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US EPA RECORDS CENTER REGION 5

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OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: Vickery Environmental, Inc.

Mailing Address: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Owner: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Operator: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Location: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

[redacted]

AUTHORIZED ACTIVITIES

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

- **Tank Treatment and Storage**
- **Miscellaneous Unit Treatment**
- **Post-Closure**
- **Corrective Action**

MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1. Effect of Permit

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

(a) The Permittee is authorized to treat hazardous waste in tanks and miscellaneous units (filtration systems including basket filters, filter press, polish filters, cartridge filters, guard filters, and bag filters) and to store hazardous waste in tanks in accordance with the terms and conditions of this permit, ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the approved hazardous waste facility installation and operation permit renewal application, as such application has been revised and supplemented and as such application may be modified pursuant to the hazardous waste rules. The renewal of the Closure Cell is included for the purpose of accomplishing post-closure activities. This unit is currently inactive and undergoing post-closure. This unit shall not be reactivated for management of hazardous waste. The approved Part B permit application as submitted to Ohio EPA on April 15, 1999 and any subsequent amendment thereto, and last updated on October 23, 2000 is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.

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

A.2. Permit Actions
OAC Rule 3745-50-58(F)

This permit may be modified or revoked for cause. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

A.3. Permit Effective/Expiration Date
OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's Journal. The permit expiration date is August 17, 2011.

A.4. Severability

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

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

The Permittee shall comply with all conditions of this permit, except that the permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency permit. Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation and is grounds for enforcement action; for permit revocation, or modification; or for denial of a permit renewal application.

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

(a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans,

specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days before the expiration date of this permit or, upon approval of the director, a later date prior to the expiration date if the Permittee can demonstrate good cause for late submittal.

(b) The Permittee may continue to operate in accordance with the terms and condition of the expired permit until a renewal permit is issued or denied if:

(i) the Permittee has submitted a timely and complete application for a renewal permit under OAC Rule 3745-50-40; and

(ii) through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.

(c) The corrective action obligations contained in this permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The Permittee must submit an application for permit reissuance at least 180 days before the expiration date of this permit pursuant to OAC Rule 3745-50-40(D) unless a) the permit has been modified to terminate the corrective action schedule of compliance and the Permittee has been released from the requirements for financial assurance for corrective action; or b) permission for a later date has been granted by the Director. The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

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

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

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

The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

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

The Permittee shall at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance include, but is not limited to, effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

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

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

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

(a) The Permittee shall allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification to:

(i) enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;

(ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

(iii) inspect and photograph at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and condition of this permit; and

(iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

(b) The Ohio EPA shall provide the Permittee with an opportunity to review photographs taken by Ohio EPA in order for Permittee to claim confidentiality pursuant to Ohio Trade Secret Law and OAC Rule 3745-50-30(B).

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

(a) Any sample and measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical /Chemical Methods: SW-846; Third Edition, May 1997; and additional supplements or latest editions thereof; Standard Methods for the Examination of Water and Wastewater: Seventeenth Edition, 1989; or an equivalent method as specified in the approved waste analysis plan, or as such term is defined and used in the Ohio hazardous waste rules.

(b) Records of monitoring information shall specify the:

(i) date(s), exact place(s), and time(s) of sampling or measurements;

(ii) individual(s) who performed the sampling or measurements;

(iii) date(s) analyses were performed;

(iv) individual(s) who performed the analyses;

(v) analytical technique(s) or method(s) used; and

(vi) results of such analyses.

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

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

A.14. Retention of Records
OAC Rules 3745-50-58(J) and 3745-50-58(M)

(a) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records, copies of all reports and records required by this permit, the certification required by paragraph B(9) of rule 3745-54-73 of the Administrative Code, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or application.

(b) The record retention period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility.

(c) The Permittee shall maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the Part B permit application and any amendments, supplements, modifications or revisions, of such application and shall retain a complete copy of the application for the life of the facility.

(d) The Permittee shall maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility, and for disposal facilities for the post-closure care period as well.

(e) Corrective Action records must be maintained at least 3 years after all Corrective Action activities have been completed.

A.15. Planned Changes
OAC Rules 3745-50-51 and 3745-50-58(L)(1)

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

A.16. Waste Shipments
OAC Rule 3745-52-12, ORC 3734.15(C)

The Permittee shall only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

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

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit pursuant to Condition A.5. and A.15.

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

(a) This permit is not transferable to any person except after notice to the director.

(b) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility, the Permittee shall notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder.

(c) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

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

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule developed in

accordance with OAC Rule 3745-50-50 of this permit shall be submitted to the Director no later than fourteen (14) days following each scheduled date.

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

(a) The Permittee shall report orally to the Ohio Environmental Protection Agency's Division of Hazardous Waste Management and Division of Emergency and Remedial Response within twenty-four hours from the time the Permittee becomes aware of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, which endangers human health or the environment, including:

(i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and

(ii) any information of a release or discharge of hazardous waste from the facility or a fire or explosion at the hazardous waste facility, which could threaten the environment or human health outside the facility.

(b) The report shall consist of the following information (if such information is available at the time of the oral report):

(i) name, address, and telephone number of the owner or operator;

(ii) name, address, and telephone number of the facility;

(iii) name and quantity of material(s) involved;

(iv) the extent of injuries, if any;

(v) an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and

(vi) estimated quantity and disposition of recovered material that resulted from the incident.

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

(a) A written report shall also be provided to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response and the Division of Hazardous Waste Management, Northwest District Office within five (5) days of the time the Permittee becomes aware of the circumstances reported in Condition A.20.

(b) The written report shall address the items in A.20 and shall contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

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

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

The Permittee shall report to the Director, all other instances of noncompliance not provided for in Condition A.20. These reports shall be submitted within ~~fifteen~~ [redacted] (~~15~~[redacted]) days of the time at which the Permittee becomes aware of such noncompliance. Such reports shall contain all information set forth within Condition A.20 of this permit.

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

Pursuant to OAC Rule 3745-50-58(L)(2) the Permittee may not commence treatment or storage of hazardous waste in the proposed replacement tanks or proposed miscellaneous units until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed, or modified in compliance with the Permit; and

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(a) the Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(b) the Director has either waived the inspection or has not within fifteen (15) days of the date of the submittal of the letter, notified the Permittee of his intent to inspect.

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

Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the director, it shall promptly submit such facts or information.

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

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

A.26. Ohio Annual Permit Fee
OAC Rule 3745-50-36

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

A.27. Compliance Schedule - Documents

(a) The Permittee shall not manage hazardous waste in the proposed units identified in Condition D.1 and F, until compliance is achieved with the Ohio hazardous waste rules and the terms and conditions of this permit, and with the following:

(i) At least thirty (30) days prior to commencing construction at the facility, the Permittee shall submit to the Ohio EPA all relevant detailed final design and construction plans as approved by the Building Official in accordance with OAC Rule 4101:2-1-23 (including ancillary equipment, blue prints, material of the construction, etc.) covering each aspect of the proposed construction. The final design and construction plans mean final design and specifications necessary for the commencement of the construction.

(ii) A schedule of construction including the estimated starting and completion dates.

(iii) If the final plans, as submitted, are inconsistent with the conceptual and/or preliminary plans contained in the approved Part B permit application and with the terms and conditions of this permit, such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a modified permit.

(iv) Upon completion of construction, the Permittee shall submit to Ohio EPA, by certified mail or hand delivery, a "certificate of use and occupancy" issued by the Building Official in accordance with OAC Rule 4101:2-1-27 and a certification stating that the facility has been constructed in compliance with applicable rules, the terms and conditions of this permit, applicable state building codes (including codes for fire, electrical service, and plumbing), and the approved application.

(v) Within sixty (60) days after completion of construction, "as built" drawings shall be submitted to Ohio EPA. If the submitted "as built" drawings appear inconsistent with the construction design plans submitted under Condition A.27(b)(i), such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a modified permit.

(vi) The certification of construction documents required by OAC Rule 3745-50-58(L) and permit condition A.23 of this permit.

(vii) Updated Closure Cost Estimate
OAC Rule 3745-55-42

The closure cost estimate found in Section I and Appendix 6 of the application must be updated to include the newly constructed portions of the facility.

(viii) Updated Financial Assurance Mechanism for Closure
OAC Rule 3745-55-43

Section I and Appendix 9 of the application, containing the financial assurance mechanism for closure, shall be updated to include the newly constructed portions of the facility.

(b) Unless specified otherwise, the Permittee shall submit the documents listed above to:

Ohio EPA, DHWM
Attn: Information Technologies and Technical Support Section
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA, Northwest District Office
Division of Hazardous Waste Management
347 North Dunbridge Road
Bowling Green, Ohio 43402

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

(a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-47, the following documents (including amendments, revisions and modifications):

(i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;

(ii) contingency plan developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;

(iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;

(iv) cost estimate for facility closure developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;

(v) personnel training plan and the training records, as developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;

(vi) operating record required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and

(vii) inspection schedules developed in accordance with OAC Rules 3745-54-15; 3745-55-74 and 3745-55-95; and the terms and conditions of this permit.

(viii) Post-Closure Plan, as required by OAC Rule 3745-55-18(A) and this Permit.

(ix) annually-adjusted cost estimate for facility closure [and post-closure], as required by OAC Rules 3745-55-42 and 3745-55-44 and this Permit.

(x) all other documents required by Module A, Permit Condition A.12.

(b) All amendments and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Director. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.

(c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

(d) Corrective Action reports and records as required by Conditions E5 and E8 of this permit. These reports and records must be maintained for at least 3 years after all Corrective Action Activities have been completed.

A.29. Waste Minimization Report
OAC Rule 3745-54-73

(a) The Permittee shall submit to the Director the current executive summary of the waste minimization and treatment plan adopted by Permittee under ORC Section 6111.045(A) within one hundred eighty (180) days of journalization of the permit.

(b) Every three years after Permittee's adoption of its waste minimization and treatment plan, on or before the anniversary date of the adoption of the plan, the Permittee shall submit to the Director a revised executive summary of the plan that meets the applicable requirements of ORC Section 6111.045.

A.30. Operating Hours

(a) The Facility's normal operating hours are 7:00 a.m. to 11:00 p.m.

(b) "Off-hours" are the hours of 11:00 p.m. to 7:00 a.m.

(c) The Permittee may receive and accept waste, but not unload waste during "off-hours", as long as such receipts are recorded in the facility's operating record.

(d) The Permittee may continue to unload waste during "off-hours" if unloading started during normal operating hours..

(e) The Permittee may begin waste unloading during "off-hours" in those instances when, through no fault of the Permittee, the generator and/or transporter experiences some unforeseen circumstance and/or emergency which would not allow the waste to be unloaded during normal operating hours. All permit requirements must be followed for waste unloading during "off-hours" and the Permittee must provide the Northwest District with prior notification. If no one is present at the district office or at the on-site inspector trailer at the time the notification is made, the notification may be made by telecopy or voicemail.

A.31. Disclosure Statement
ORC Section 3734.42

The August 29, 2000, class three permit modification approval for change in owner and operator of the Vickery facility is expressly conditioned upon the director's review and approval of the disclosure statement and investigative report submitted pursuant to sections 3734.41 through 3734.47 of the Revised Code.

Upon receipt of the attorney general's investigative report, the director shall review the disclosure statement and investigative report to determine whether the statement or report contains information that if submitted with a permit application would require a denial of the permit pursuant to section 3734.44 of the Revised Code. If the director determines that the statement or report contains such information, the director shall disapprove the change in ownership and disapprove the conditional permit modification.

If the parties to the change in ownership decide to proceed with the change prior to the action of the director on the disclosure statement and investigative report, the parties shall include in all contracts or other documents reflecting the change in ownership language expressly making the change in ownership subject to the approval of the director and expressly negating the change if it is disapproved by the director pursuant to division (F)(1) of section 3734.42 of the Revised Code and this permit condition.

MODULE B - GENERAL FACILITY CONDITIONS

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

(a) The Permittee shall design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, and ground or surface waters which could threaten human health or the environment.

(b) The Permittee shall not accept more than 630,500 tons (Basis: 126,000,000 gallons converted to tons based on a specific gravity of 1.2. This annual throughput number reflects the limitation found in the underground injection control permit.) in any one calendar year, but not to exceed 650,500 gallons per day, from any off-site sources during the life of the permit, until such time as this Condition is modified or renewed. This is a facility wide limitation and includes all units.

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

(a) Hazardous Waste from Foreign Sources

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

(b) Hazardous Waste from Off-Site Sources

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

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

The Permittee shall follow the procedures described in the approved waste analysis plan found in Appendix 1 of the approved Part B permit application and the terms and conditions of this permit.

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

B.3.1. Waste Profiles

(a) Prior to accepting a generator's waste stream, the Permittee shall obtain waste profile information about the waste stream so that the Permittee can determine if the material can be managed in accordance with the conditions of the permit and approved Part B Application. This waste profile information shall include, but not be limited to:

(i) Generator name, US EPA identification number, profile number;

(ii) Common or generic name of the hazardous waste;

(iii) Process generating the hazardous waste or the source of the hazardous waste;

(iv) Physical description of the hazardous waste;

(v) Major chemical or physical components of the hazardous waste by percent of the component per 100 percent of the hazardous waste;

B.3.3 Suspension of Permittee Approval

If Ohio EPA determines that the requirements set forth in Permit Condition B.3.1 or B.3.2 are not met, Ohio EPA may suspend the permittee's acceptance of the waste stream.

B.4. Acceptance of P Coded Waste Streams
ORC 3734.141

The Permittee must receive prior approval from Ohio EPA, Northwest District Office before accepting any P-coded waste stream, in accordance with ORC 3734.141. These waste streams shall only be streams that follow the derived from or carry through provisions or that the Permittee can treat to render them innocuous prior to deep well injection. Review of a waste stream by Ohio EPA as part of the Waste Product Review satisfies all notification requirements of ORC 3734.141.

B.5. Security
OAC Rule 3745-54-14

The Permittee shall comply with the security provisions of OAC Rule 3745-54-14(B)(2) and (C) and Section F of the Part B permit application.

B.6. General Inspection Requirements
OAC Rules 3475-54-15 and 3745-54-73

The Permittee shall follow the inspection schedule set out in Section F and Appendix 2 of the approved Part B permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by OAC Rule 3745-54-15(C). Records of inspection shall be kept for a minimum of three years from the date of inspection.

B.7. Personnel Training
OAC Rule 3745-54-16

The Permittee shall conduct personnel training, as required by OAC Rule 3745-54-16. This training program shall contain at least the elements set forth in the Section H and Appendix 4 of the approved Part B permit application. The Permittee shall maintain training documents and records as required by OAC Rule 3745-54-16(D) and (E).

B.8. General Requirements for Ignitable, Reactive, or Incompatible Waste
OAC Rule 3745-54-17

(a) The Permittee shall comply with the requirements of OAC Rule 3745-54-17 and shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Sections C, D, and F of the approved Part B permit application.

(b) The Permittee shall provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable or reactive wastes.

(c) The Permittee shall prohibit smoking and open flames in each area where ignitable, reactive or incompatible hazardous wastes are managed, and shall post appropriate signs.

(d) Where applicable, all wiring and electrical equipment at the facility shall meet the National Fire Protection Association's standards for hazardous locations (See National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp.176 through 189).

(e) The Permittee shall provide electrical grounding for all containers and tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes.

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

At a minimum, the Permittee shall maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the approved contingency plan contained in Sections F, G, and Appendix 3 of the approved Part B permit application.

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

The Permittee shall inspect, test and maintain the equipment required by Condition B.9., as necessary, to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, Section F, and Appendix 2 and 3 of the approved Part B permit application, and the terms and conditions of this permit.

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

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

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

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

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

(a) The Permittee shall comply with the requirements of OAC Rule 3745-54-37 (A) and shall attempt to:

(i) familiarize all emergency response agencies which are likely to respond in an emergency, with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section G and Appendix 3 of the approved Part B permit application;

(ii) inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility, and any further requirements related to emergency response imposed by terms and conditions of this permit; and

(iii) familiarize the local police and fire departments, hospitals and any other local emergency service, with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility.

(b) When a State or local agency declines to enter into the arrangements set forth in OAC Rule 3745-54-37(A), the Permittee shall document the refusal in the operating record as required by OAC Rule 3745-54-37(B).

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

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

With regard to spills and toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented. At a minimum, the plan must be implemented in the following situations:

(a) any fire involving hazardous waste;

(b) any explosion involving hazard waste;

(c) any uncontrolled hazardous waste reaction that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and /or explosive gases, fumes, or vapors; harmful dust; or explosive conditions;

(d) any fire or explosion that has an increased potential to threaten human health or the environment due to its proximity to a hazardous waste management unit;

(e) any hazardous waste released, outside of a secondary containment system, that causes or has the potential to cause off-site soil and/or surface water contamination;

(f) any hazardous waste release that produces or has a potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions;

(g) When NO_x emission are visually observed leaving the facility property by site personnel.

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

The Permittee shall comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section G and Appendix 3 of the approved Part B permit application.

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

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

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

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

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

(a) The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution.

(b) The Permittee shall, in accordance with OAC Rule 3745-54-53, submit a copy of the approved contingency plan, to all local police departments, fire departments, hospitals, and local emergency response teams (Ohio Environmental Protection Agency's Division of Emergency and Remedial Response) that may be called upon to provide emergency services. The Permittee shall notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments to, or modifications of the contingency plan.

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

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

B.20. Emergency Procedures
OAC Rules 3745-54-56 and 3745-51-01

The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-56, Section G and Appendix 3 of the approved Part B permit application, and the term and conditions of this permit, regarding emergency procedures.

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

The Permittee shall furnish upon Ohio EPA request, and retain, all records at the facility in accordance with OAC Rule 3745-54-74.

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

The permittee shall comply with the requirements set forth in OAC Rule 3745-54-73 regarding an operating record, including information to be recorded and the maintenance thereof.

B.23. Contingency Plan Records
OAC Rule 3745-54-73 and OAC Rule 3745-54-56-(J)

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

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

(a) In the management of waste at the facility, the Permittee shall comply with the provisions of OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.

(b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days after receiving the waste, the Permittee must submit a report, including a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-72.

(c) Unmanifested waste report. This report must be submitted to the Director within fifteen (15) days of receipt of unmanifested waste, which waste is not excluded from the manifest requirements by OAC Rule 3745-51-05, and include the information required under OAC Rule 3745-54-76.

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

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

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

During facility closure, the Permittee shall implement the provisions of the approved closure plan, Section I and Appendix 5, in such a manner as to achieve compliance with OAC Rule 3745-55-11. Permittee is encouraged to employ the most recent Division of Hazardous Waste Management's Closure Plan Review Guidance for RCRA facilities in managing its closure efforts.

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

The Permittee shall implement those procedures detailed within Section I and Appendix 5 of the approved application, in accordance with OAC Rules 3745-55-10 through 3745-55-20.

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

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

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

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

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

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

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

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

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

(a) The Permittee shall decontaminate and/or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the approved closure plan, and the terms and conditions of this permit.

(b) The Permittee shall notify the Ohio EPA Northwest District Office at least three (3) working days prior to all rinseate and soil sampling for final and partial closure.

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

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

B.34. Survey Plat
OAC Rule 3745-55-16

The Permittee shall submit a survey plat to the Director and the local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit, in accordance with OAC Rule 3745-55-16.

B.35. General Post-Closure Requirements
OAC Rule 3745-55-17, 3745-55-18, 3745-55-19, 3745-55-20

(a) Post-Closure Care Period

The Permittee shall continue post-closure care for each surface impoundment closed as a landfill after completion of closure of the unit and continue for 30 years after that date. Refer to Permit Condition M.2(a) for start date of Post-Closure Care. Post-closure care shall be in accordance with OAC Rule 3745-55-17 and the Post-Closure Plan.

(b) Post-Closure Security

The Permittee shall maintain security at the facility during the post-closure care period, in accordance with the Post-Closure Plan and OAC Rule 3745-55-17(B).

(c) Amendment to Post-Closure Plan

The Permittee shall amend the Post-Closure Plan, when necessary, in accordance with OAC Rule 3745-55-18(D).

(d) Post-Closure Notices

(i) No later than 60 days after certification of closure of each hazardous waste disposal unit, the Permittee shall submit to the director and the local zoning authority records of the type, location, and quantity of hazardous waste disposed of within each cell or disposal unit, in accordance with OAC Rule 3745-55-19(A).

(ii) Within 60 days of certification of closure of the first hazardous waste disposal unit and within 60 days of certification of closure of the last hazardous waste disposal unit, the Permittee shall do the following:

(1) Record a notation on the deed to the facility property which contains the information required by OAC Rule 3745-55-19(B)(1).

(2) Submit to the Director a certification that the Permittee has recorded the notation and submit a copy of the document in which the permittee placed the notation.

(3) The Permittee shall request and obtain a Permit modification prior to post-closure removal of hazardous wastes, hazardous waste residues, liners, or contaminated soils, in accordance with OAC Rule 3745-55-19(C).

(e) Certification of Completion of Post-Closure Care

No later than sixty days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall certify that the post-closure care period was performed in accordance with the specifications in the Post-Closure Plan, as required by OAC Rule 3745-55-20.

B.36. Cost Estimate for Facility Closure and Post-Closure
OAC Rule 3745-55-42 and 3745-55-44

(a) The Permittee's most recent closure and post-closure cost estimate, prepared in accordance with OAC Rules 3745-55-42, 3745-55-44, 3745-55-97(C)(3) & (5), 3745-56-28(C)(3) and 3745-56-58(C)(2) are specified in Section I and Appendix 5 of the Part B permit application.

(b) The Permittee must adjust the closure cost estimate and post-closure cost estimate for inflation within 30 days after the close of the Permittee's fiscal year and before submission of updated information to the Director, as specified in OAC Rule 3745-55-42(B) and OAC Rule 3745-55-44(B).

(c) The Permittee must revise the closure cost estimate and post-closure cost estimate whenever there is a change in the facility's Closure Plan that increases the cost of closure and Post-Closure Plan, as required by OAC Rule 3745-55-42(C) and 3745-55-44(C).

(d) The Permittee must submit to the Ohio EPA and keep at the facility, the latest closure cost estimate and post-closure cost estimate as required by OAC Rule 3745-55-42(D) and 3745-55-44(D).

B.37. Financial Assurance for Facility Closure and Post-Closure

The Permittee shall maintain continuous compliance with OAC Rule 3745-55-43, 55-45 and provide documentation of financial assurance which meets the requirements of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Permit Condition B.36. Changes in financial assurance mechanisms must be approved by the Director pursuant to OAC Rule 3745-55-45 or OAC Rule 3745-55-49.

B.38. Liability Requirements

The Permittee shall maintain continuous compliance with the requirement of OAC Rule 3745-55-47 to have continuous liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs.

The Permittee also shall demonstrate compliance with OAC Rule 3745-55-47(B) by maintaining liability coverage for nonsudden accidental occurrences in the amount of at least $3 million per occurrence, with an annual aggregate of at least $6 million, exclusive of legal defense costs.

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

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

B.42. New Waste Management Procedures

Prior to initiating new waste management procedures for nitric acid which vary from normal operations, the Permittee must notify the Ohio EPA, Northwest District Office. If requested by Ohio EPA, a plan must be submitted by Permittee. The plan shall describe the applicability of the proposed procedure.

B.43. Nitric Acid Waste Stream Procedures

Upon receipt of nitric acid waste streams the Permittee must follow Section 6.1.1 of the approved Waste Analysis Plan.

B.44. Nuisance Loads

The Permittee shall not create a public nuisance pursuant to Ohio Revised Code 3734.02(I).

MODULE C

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MODULE D - TANK STORAGE, TREATMENT, AND MANAGEMENT

D. Module Highlights

The Integrated Aqueous Waste Treatment System (IAWTS) consists of the following units: (1) the Truck Unloading Facility which includes ancillary, basket strainers and pumps, waste receiving tanks (V-Tanks), waste head-gas caustic scrubber and solids handling unit; (2) Waste Storage, and Treatment Tank System (T-Tanks); (3) the filters and filter buildings; (4) the pumps and pump houses; and (5) the yard piping.

The 60 foot by 124 foot steel-framed truck unloading building sits on top of concrete piers and a 4 foot high concrete block wall. The wire-mesh reinforced concrete floors of the truck unloading bays are sloped, longitudinally and transversely, a total of 11 inches, to 18-inch deep waste unloading sumps. The unloading sumps are lined with a corrosion resistant liner and contain three 6-inch truck unloading pipes and a 6-inch sump drain pipe. The below ground portions of both the truck unloading pipes and sump drain pipes are enclosed in a 10-inch PVC shield pipe. The 6-inch pipes continue through the vault and drain to one of the V-tanks. Basket strainers are installed on each of the unloading lines in the internal unloading bays. The discharge is directed to one of the six T-tanks. Tanker trucks may be unloaded by gravity drainage through the basket filters to one of the four V-tanks or unloaded directly to one of the T-tanks.

The two vaults that were used to house the sand interceptors now serve as secondary containment for pipes. The Vaults are drained by 6-inch piping enclosed in a 10-inch shield pipe to the V-tank's containment system sump. Precipitation is then automatically pumped to one of the V-tanks.

The four waste receiving V-tanks are set in a below ground vault which is approximately 13 feet deep, with only 6 inches protruding above ground. The open topped vault is sectioned in half by a 5-foot 10-inch concrete wall. Shelter is provided by a wood framed building. The vault floor is divided into two halves and slopes toward two sumps. Sump accumulation is pumped to tanks V-5 or V-7. Four horizontal centrifugal pumps are set on the floor of the vault. Each pump is dedicated to one of the four V-tanks and draws from the bottom of the tanks through a 4-inch pipe which discharges over the vault wall to the above ground pipe rack. The discharge lines follow the pipe rack to one of the six T-tanks to be stored or

treated. The head space of the four V-tanks is vented to the scrubber through 16-inch PVC vent pipes.

The six T-tanks are set upon a 143-foot by 140-foot concrete reinforced containment pad. The containment pad is lined with a protective liner. The west 13 feet of the containment pad is dedicated to the Pump House which shelters one transfer pump and one recirculating pump for each T-tank. The head space of each T-tank is blanketed with an inert gas to create an oxygen-reduced condition to reduce the potential for fire, and is vented to the caustic scrubber. The entire foundation of the containment pad is supported on 50-foot, 90-ton piles driven to refusal. The total available storage volume of the containment system is 313,423 gallons.

Yard piping which leads from the IAWTS to the deepwell injection pumps are primarily fiberglass-reinforced plastic with some use of rigid polvinylchloride. Pipes in the existing facility are situated upon above ground pipe racks. The portions of the piping which cross Myers Ditch and the high pressure lines which lead from the injection pumps to the deepwells are double walled.

Each injection well has an associated Filter Acid Tank (FAT), not all currently installed, and transfer Pump. These pumps and tanks are contained in a concrete containment wall. All currently installed FATs and V-tanks are double walled tanks. The pumps are either contained or sealess magnetic pumps.

The floor of four injection well pump houses are sloped towards sumps. Each of the four pump houses shelter an injection pump, transfer pumps, and guard filters and a polish filter.

In addition, the following tanks, filter press and pump have been approved but have not yet been installed at the facility:

- Replacement of filtered acid tanks (FAT) with double walled tanks. The tanks to be replaced include T-800(FAT-B), T-400(FAT-2), and T-600(FAT-6).
- Installation of a Filter Press Drip tank(T-94).
- Installation of a fourth unloading pump.

06-25-05

D.1. Process Capacity/Annual Limitation/Waste Identification
ORC Section 3734.02(F) and OAC Rule 3745-50-43

(a) The Permittee may store and treat a total volume of 126,000,000 gallons/year throughput (630,500 tons per year. This annual throughput volume reflects the limitation found in the UIC permit) but not to exceed 650,500 gallons per day of hazardous waste in tanks, subject to the terms of this Permit and as follows:

Tank No.	Capacity (Gallons)	Secondary Containment Required	Description of Tank	Hazardous Waste No.	Date of Installation
T-1 (T036)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-2 (T037)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-5 (T038)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-6 (T039)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-9 (T040)	100000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-10 (T041)	100000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-22 (V-4)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	2004
T-23 (V-5)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-24 (V-6)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-25 (V-7)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-94	500	Yes - when installed	Filter press drip tank	See Condition D.1.c	****
T-800 (FAT-BR)	11750	Yes - when installed	Filtered acid (Will replace FAT-B)	See Condition D.1.c	****
T-500 (FAT-5R)	11750	Yes - in place	Filtered acid	See Condition D.1.c	2005

2-7-05

Tank No.	Capacity (Gallons)	Secondary Containment Required	Description of Tank	Hazardous Waste No.	Date of Installation
T-400 (FAT-2R)	11750	Yes - when installed	Filtered acid (will replace FAT-2)	See Condition D.1.c	****
T-300 (FAT-3R)	11750	Yes - in place	Filtered acid	See Condition D.1.c	~~1995~~ 2004
T-600 (FAT-6R)	11750	Yes - when installed	Filtered acid (will replace FAT-6)	See Condition D.1.c	****
Lab Waste Tank	2500	Yes - in place	Lab Waste	See Condition D.1.c	1994

**** denotes tanks not yet installed.

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

(c) The Permittee shall store and treat in tanks only the hazardous waste codes specified in the approved Part B permit application and summarized below:

D001	D020	D039	F025	K014	K033	K052	K099	K118	K157
D002	D021	D040	F032	K015	K034	K060	K100	K123	K158
D003	D022	D041	F034	K016	K035	K061	K101	K124	K159
D004	D023	D042	F035	K017	K036	K062	K102	K125	K161
D005	D024	D043	F037	K018	K037	K069	K103	K126	K169
D006	D025	F001	F038	K019	K038	K071	K104	K131	K170
D007	D026	F002	F039	K020	K039	K073	K105	K132	K171
D008	D027	F003	K001	K021	K040	K083	K106	K136	K172
D009	D028	F004	K002	K022	K041	K084	K107	K141	K174
D010	D029	F005	K003	K023	K042	K085	K108	K142	K175
D011	D030	F006	K004	K024	K043	K086	K109	K143	K176
D012	D031	F007	K005	K025	K044	K087	K110	K144	K177
D013	D032	F008	K006	K026	K045	K088	K111	K145	K178
D014	D033	F009	K007	K027	K046	K093	K112	K147	P001
D015	D034	F010	K008	K028	K047	K094	K113	K148	P002
D016	D035	F011	K009	K029	K048	K095	K114	K149	P003
D017	D036	F012	K010	K030	K049	K096	K115	K150	P004
D018	D037	F019	K011	K031	K050	K097	K116	K151	P005
D019	D038	F024	K013	K032	K051	K098	K117	K156	P006

P007	P048	P095	P198	U032	U072	U110	U147	U184	U225
P008	P049	P096	P199	U033	U073	U111	U148	U185	U226
P009	P050	P097	P201	U034	U074	U112	U149	U186	U227
P010	P051	P098	P202	U035	U075	U113	U150	U187	U228
P011	P054	P099	P203	U036	U076	U114	U151	U188	U234
P012	P056	P101	P204	U037	U077	U115	U152	U189	U235
P013	P057	P102	P205	U038	U078	U116	U153	U190	U236
P014	P058	P103	U001	U039	U079	U117	U154	U191	U237
P015	P059	P104	U002	U041	U080	U118	U155	U192	U238
P016	P060	P105	U003	U042	U081	U119	U156	U193	U239
P017	P062	P106	U004	U043	U082	U120	U157	U194	U240
P018	P063	P108	U005	U044	U083	U121	U158	U196	U243
P020	P064	P109	U006	U045	U084	U122	U159	U197	U244
P021	P065	P110	U007	U046	U085	U123	U160	U200	U246
P022	P066	P111	U008	U047	U086	U124	U161	U201	U247
P023	P067	P112	U009	U048	U087	U125	U162	U202	U248
P024	P068	P113	U010	U049	U088	U126	U163	U203	U249
P026	P069	P114	U011	U050	U089	U127	U164	U204	U271
P027	P070	P115	U012	U051	U090	U128	U165	U205	U278
P028	P071	P116	U014	U052	U091	U129	U166	U206	U279
P029	P072	P118	U015	U053	U092	U130	U167	U207	U280
P030	P073	P119	U016	U055	U093	U131	U168	U208	U328
P031	P074	P120	U017	U056	U094	U132	U169	U209	U353
P033	P075	P121	U018	U057	U095	U133	U170	U210	U359
P034	P076	P122	U019	U058	U096	U134	U171	U211	U364
P036	P077	P123	U020	U059	U097	U135	U172	U213	U367
P037	P078	P127	U021	U060	U098	U136	U173	U214	U372
P038	P081	P128	U022	U061	U099	U137	U174	U215	U373
P039	P082	P185	U023	U062	U101	U138	U176	U216	U387
P040	P084	P188	U024	U063	U102	U140	U177	U217	U389
P041	P085	P189	U025	U064	U103	U141	U178	U218	U394
P042	P087	P190	U026	U066	U105	U142	U179	U219	U395
P043	P088	P191	U027	U067	U106	U143	U180	U220	U404
P044	P089	P192	U028	U068	U107	U144	U181	U221	U409
P045	P092	P194	U029	U069	U108	U145	U182	U222	U410
P046	P093	P196	U030	U070	U109	U146	U183	U223	U411
P047	P094	P197	U031	U071					

(d) The Permittee is prohibited from storing or treating hazardous waste that is not identified in this permit condition.

(e) All incoming waste streams must meet the acceptance criteria set forth in the approved Waste Analysis Plan which is located in Section C and Appendix 1 of the approved Part B application. Specifically, the Permittee is prohibited from storing or treating hazardous waste that does not meet the Facility Waste Acceptance Conditions which are located in Appendix WAP-C of the approved Waste Analysis Plan.

D.2. Design and Installation of New Tank Systems or Components
OAC Rule 3745-55-92

(a) The Permittee shall construct the tank system in accordance with Section D of the approved Part B application.

(b) Prior to operation of the newly constructed tank system, the Permittee shall submit the certification of installation of the tank system in accordance with 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.

D.3. Containment and Detection of Releases.
OAC Rule 3745-55-93

The Permittee shall construct and operate the secondary containment system in accordance with requirements of OAC Rule 3745-55-93(B) through (F), and Section F of the approved Part B application.

D.4. Operating Requirements
OAC Rule 3745-55-94

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

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

D.5. Inspection Schedules and Procedures.
OAC Rule 3745-55-95

(a) The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule and shall complete the items in Permit Conditions D.5(b) and D.5(c) as part of those inspections:

(b) The Permittee shall inspect the overfill controls in accordance with the procedure and schedule in the Part B permit application.

(c) The Permittee shall inspect the following components of the tank system once each operating day:

(i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(d) The Permittee shall document compliance with Permit Condition D.5 in the operating record of the facility.

D.6. Response to Leaks or Spills.
OAC Rule 3745-55-96 &3745-93(C)(4)

(a) In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

(i) Stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

(ii) Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak or at an earlier practicable time to prevent further release and to allow inspection and repair of the tank/containment system to be performed.

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

(b) Unless the requirements of Permit Conditions D.6.(b)(i) through D.6.(b)(vi) are satisfied, the Permittee shall close its tank system in accordance with OAC Rule 3745-55-97 and its approved Closure Plan if there has been a leak or spill from the tank system, from a secondary containment system, or if a system becomes unfit for continual use.

(i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs of the system before returning the tank system to service.

(ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

(iii) For a release to the environment caused by a leak from a component of the tank system that is below ground and does not have secondary containment, the Permittee must provide this component with secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(iv) For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.

(v) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee shall provide secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(vi) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.

(c) For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

D.7. Recordkeeping and Reporting
OAC Rule 3745-55-96, 3745-55-91(a), and 3745-55-92(g)

(a) The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (Releases that are contained within a secondary containment system need not be reported).

(b) Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Director: [OAC Rule 3745-55-96(D)(3)]

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

(iv) Proximity of downgradient drinking water, surface water, and populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days after returning the tank system to use.

(d) The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the tank system.

D.8. Closure and Post-Closure Care
OAC Rule 3745-55-97

(a) At closure of the tank system(s), the Permittee shall follow the procedures in the Closure Plan.

(b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall close the tank system(s) and perform post-closure care following the contingent procedures in the Closure Plan and in the Post-Closure Plan.

D.9. Special Tank Provisions for Ignitable or Reactive Wastes
OAC Rule 3745-55-98

(a) The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place it in the operating record. [OAC Rule 3745-55-98(A)]

(b) The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public

ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1991 or most recent edition) incorporated by reference in OAC Rule 3745-50-11. [OAC Rule 3745-55-98(B)]

D.10. Special Tank Provisions for Incompatible Wastes
OAC Rule 3745-55-99

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

(b) The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.10(a) are met.

ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1991 or most recent edition) incorporated by reference in OAC Rule 3745-50-11. [OAC Rule 3745-55-98(B)]

D.10. Special Tank Provisions for Incompatible Wastes
OAC Rule 3745-55-99

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

(b) The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.10(a) are met.

D.11. Injection Well No. 4 Operations

(a) The Permittee must conduct integrity testing of the entire pipeline that leads from Filter Building No. 1 to Pump House No. 2 prior to transferring waste through the pipeline if the pipeline has not been used to transfer waste liquids for 30 calendar days. The integrity testing must include pressuring the pipeline with clean water to a minimum of one and one half (1 ½) times the working pressure of the pipeline. If, during the integrity test, the pressure drops more than 10% in one hour, the integrity test is considered a failure and the Permittee must not use the pipeline for waste transfer until the leak has been repaired and the pipeline has passed the integrity test. Following completion of the integrity test, the Permittee must visually inspect the construction materials and the area around the pipeline for evidence of leaks prior to waste transfer. The pipeline must not be used for waste transfer if the Permittee observes evidence of a leak.

(b) The Permittee must conduct at least one integrity test [as described in Permit Condition D.11(a)] of the entire pipeline that leads from Filter Building No. 1 to Pump House No. 2 in any calendar year that the pipeline is used for waste transfer.

(c) The Permittee must flush with clean water or brine solution the entire pipeline that leads from Filter Building No.1 to Pump House No. 2 if the pipeline has not been used to transfer waste liquids for 30 calendar days. If the pipeline must be flushed, the Permittee must flush the pipeline within 37 calendar days of the pipeline's last use. The pipeline must be flushed with a minimum of 2100 gallons of water or brine solution.

(d) Between November 1 and April 30, the Permittee must drain the pipeline between Filter Building No. 1 and Pump House No. 2 if the pipeline has not been used for waste liquid transfer for 30 calendar days. If the pipeline must be drained, the Permittee must drain the pipeline within 45 calendar days of the pipeline's last use. The pipeline must be drained to the extent possible using normal site methods.

(e) The Permittee must maintain on-site surface water management gates A-4, A-5, A-6, A-8, A-9, A-10, B-3, C-2, C-4, E-1, E-3, E-4, and E-6 in the closed position while transferring waste through the pipeline that leads from Filter Building No.1 to Injection Well No. 4. The on-site surface water management gates are identified on Drawing 19 of Appendix 14 of the approved Part B permit application.

(f) The Permittee must document compliance with permit conditions D.11(a) through D.11(e) in the facility operating record.

MODULE E - CORRECTIVE ACTION REQUIREMENTS

Corrective Action Summary

The Permittee began corrective action under the authority of U. S. EPA. A Visual Site Inspection (VSI), part of the RCRA Facility Assessment (RFA), was conducted at the facility by Jacobs Engineering Group through Metcalf & Eddy under contract with U. S. EPA on May 8 and 9, 1990. The report identified 45 Waste Management Units (WMUs) and 5 Areas of Concern (AOC). The Report of Current Conditions (RCC) was submitted to the U. S. EPA in December 1994, and revised in April 1995. The RCC documented the current conditions at the facility and identified an additional 7 WMUs and 4 AOCs, for a total of 52 WMUs and 9 AOC. The U. S. EPA subsequently identified the TSCA closure cell as another WMU, bringing the total of WMUs to 53. In response to Ohio EPA concerns regarding the area around monitoring well L19, this area was added as an AOC, bringing the total number of AOCs to 10.

U. S. EPA issued a Federal Part B Hazardous Waste Permit which became effective, for a ten year period, on October 24, 1994. This permit included a Corrective Action Schedule of Compliance. According to the schedule, the Permittee submitted its RFI Phase I Workplan, RFI Report and Summary. The federal permit lists the requirements for the RFI Workplan. U.S. EPA determined that a total of 53 WMUs and 10 AOCs should be investigated during the RFI.

The 53 WMUs were combined into 9 WMU Groups. These 9 WMU groups and 10 AOCs are identified in permit condition E.3.

Conditional approval of the RFI workplan was provided by U. S. EPA on September 11, 1997. The Permittee submitted the final RFI Workplan on October 29, 1998. Phase I was implemented March 9, 1999 through May 12, 1999. The primary focus of Phase I was to determine if releases have occurred from WMUs and potential AOCs at the site. The results of the Phase I RFI will be used to determine areas that may require additional characterization during Phase II RFI.

On the effective date of this permit, Ohio EPA will assume corrective action authority at this facility. The Permittee shall follow the work schedule in this permit beginning with permit condition E.5 and submit all required reports to Ohio EPA.

E.1. Corrective Action at the Facility
OAC Rules 3745-50-10 & 3745-55-011

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 at which 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 that term is used in Section 3004(u) of RCRA. The terms "facility and waste management units" are defined in OAC Rule 3745-50-10. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS) and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP).

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 Rules 3745-55-011

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 WMUs
OAC Rules 3745-50-44(D) & 3745-55-011

a) U.S. EPA and the Permittee have identified the following WMUs and AOCs for investigation during the RFI:

WMU/AOC Group	WMU/AOC number and description
WMU Group A *Rationale for grouping: all are located within perimeter of WMU#16.*	WMU # 1 – Pond 1 WMU # 2 – Pond 2 WMU # 3 – Pond 3 WMU # 8 – Pond 9 and Wet Well WMU # 16 – Temporary Waste Pile Area
WMU Group B *Rationale for grouping: clean-closed status and proximity to Closure Cell*	WMU # 4 – Pond 4 WMU # 5 – Pond 5 WMU # 7 – Pond 7 WMU # 10 – Pond 11 WMU # 11 – Pond 12 WMU # 17 – Leachate Retention Pond WMU # 53 – TSCA Closure Cell
WMU Group C *Rationale for grouping: location and overlapping units*	WMU # 6 – Ponds 6E and 6W WMU # 19 – Former Drum Storage Area WMU # 9 – Pond 10
WMU Group D *Rationale for grouping: similar use during operation.*	WMU # 12 – North Landfarm WMU # 13 – East Landfarm WMU # 14 – South Landfarm
WMU Group E *Rationale for grouping: similar use during operation.*	WMU # 50 – Injection Well 1A WMU # 51 – Injection Well 1 WMU # 52 – Injection Well 3
WMU Group F *Rationale for grouping: Similar use during operation.*	WMU # 31 – Filtered Acid Tank (FAT 2) WMU # 32 – Pumphouse 2 WMU # 33 – FAT 6 WMU # 34 – Pumphouse 6 WMU # 35 – FAT 5 WMU # 36 – Pumphouse 5 WMU # 37 – FAT 4 WMU # 38 – Pumphouse 4 WMU # 39 – Old FAT 2 WMU # 40 – Former Pumphouse 2

WMU/AOC Group	WMU/AOC number and description
WMU Group G *Rationale for grouping: active status and are used to handle pickle liquors, acids, and brine.*	WMU # 21 – Truck Unloading Building WMU # 22 – Sand Interceptors WMU # 23 – V-Tanks WMU # 24 – Caustic Gas Scrubber WMU # 25 – T-Tanks WMU # 26 – T-Tank Pumphouse WMU # 27 – Leaf Filter Press WMU # 29 – Filter Press Building WMU # 30 – FAT A and B
WMU Group H *Rationale for grouping: active injection wells.*	WMU # 46 – Injection Well 2 WMU # 47 – Injection Well 4 WMU # 48 – Injection Well 5 WMU # 49 – Injection Well 6
WMU Group I *Rationale for grouping: remaining ungrouped WMUs.*	WMU # 15 – Oil Reclamation Facility WMU # 18 – Former W-Tanks WMU # 20 – Lab Waste Tank WMU # 28 – Sluice Pit WMU # 41 – PCB Storage Area WMU # 42 – Maintenance Waste Oil Tanks (Closed) WMU # 43 – Sanitary Wastewater Treatment Plant WMU # 44 – Truck Unloading Facility Sewage Holding Tank WMU # 45 – Maintenance Building Sewage Holding Tank
AOC A	Emergency Drain Tanks
AOC B	A North Parking Lot-Truck Unloading Facility
AOC C	Former Pug Mill Staging Area
AOC D	Borrow Pit #1
AOC E	Borrow Pit #2

WMU/AOC Group	WMU/AOC number and description
AOC F	Truck Sampling Area, Inspection Bay Collection Tank, and Old Truck Scale
AOC G	Roll-off Staging Pad
AOC H	Facility Aboveground Transfer Piping
AOC I	Remaining Underground Piping
AOC J	Well L-19

E.4 Reserved

E.5 RCRA Facility Investigation (RFI)
OAC Rule 3745-55-011

The Permittee shall conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous waste(s) and hazardous constituent(s) from all applicable WMUs identified in permit Conditions E.3 and E.10. WMUs identified in Condition E.3. above are currently being investigated in the on-going RFI. The permittee shall continue implementation of the on-going RFI. WMUs identified pursuant to Condition B.10 will be evaluated by Ohio EPA to determine if further investigation, including a Release Assessment and/or RFI is necessary. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in Attachment 1 (U.S. EPA's CAP).

(a) RFI Workplan

The Permittee shall submit a written RFI Workplan or Release Assessment to Ohio EPA for any newly discovered waste management unit, on a timeframe established by Ohio EPA.

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

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new RFI Workplan that incorporates Ohio EPA's comments.

3) Ohio EPA shall approve or modify and approve, in writing, the

amended or new RFI Workplan. The RFI Workplan, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Workplan must be authorized by Ohio EPA.

(b) RFI Implementation

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

(c) RFI Final Report

Within sixty (60) days after the completion of the RFI, the Permittee shall submit an RFI Final Report to Ohio EPA. The RFI Final Report shall 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.

1) If necessary, Ohio EPA shall provide written comments on the RFI Report to the Permittee.

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new RFI Report that incorporates Ohio EPA's comments.

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

E.6 Interim Measures (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 threat to human health or the environment. Alternatively, with Ohio EPA's approval, the Permittee may elect to conduct voluntary Interim Measures at any time during the life of the permit, to mitigate or eliminate a threat to human health and the environment.

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 Class 3 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, including comments received during the initial (60-day) public comment period required for Class 3 permit modifications, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose a threat to human health and the environment, Ohio EPA will approve the requested modification.

(b) Periodic Monitoring

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

(c) Further Investigations

A determination of no further action shall not preclude Ohio EPA from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or likelihood of a release from a WMU at the Facility is likely to pose a threat to human health or the environment. In such a case, Ohio EPA shall initiate a modification to the terms of the permit to rescind the determination made in accordance with Permit Condition E.7.a. Additionally, in the event Ohio EPA determines that there is insufficient information on which to base a

determination, the Permittee, upon notification, is required to 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 shall 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 by Ohio EPA.

(a) CMS Workplan

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

1) If necessary, Ohio EPA shall provide written comments on the CMS Workplan to the Permittee.

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new CMS Workplan that incorporates Ohio EPA's comments.

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

(b) CMS Workplan Implementation

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

(c) CMS Final Report

Within sixty (60) days after the completion of the CMS, the Permittee shall submit a CMS Final Report to Ohio EPA. The CMS Final Report shall summarize the results of the investigations for each remedy studied and must include and evaluation of each remedial alternative. The CMS Report should also include the owner/operator's recommended remedies or remedy and remedy performance standards, including, as applicable, proposed media cleanup levels, points of compliance, and compliance time frames.

1) If necessary, Ohio EPA shall provide written comments on the CMS Report to the Permittee.

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new CMS Report that incorporates Ohio EPA's comments.

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

E.9 CMI

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

If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and

effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

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

i) Permit Modification

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized. The Permittee shall not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

ii) Financial Assurance
OAC Rule 3745-55-011

As part of the modification of this permit to incorporate CMI, the Permittee shall provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-55-011 (b) and (c).

E.10 Newly Identified WMUs or Releases
OAC Rule 3745-55-011

(a) General Information

The Permittee shall submit to Ohio EPA, within 30 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;

iii) General dimensions and structural description (supply any available drawings);

iv) Dates when the unit was operated; and

v) Specification of all waste(s) that have been managed at the unit.

(b) Release Information

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

MODULE F - MISCELLANEOUS TREATMENT

F. Module Highlights

Filtration units at the facility have been categorized as miscellaneous units. The filtration system consists of Basket Strainers, Bag Filters, Filter Press, Primary and Secondary Cartridge Filters, and By-Pass Cartridge Filters. These individual units may either be used in series or parallel. The Thief Pole Rinsing System has also been categorized as a miscellaneous unit.

Filtration operations are housed in two existing filter buildings. Filter building 1 contains 2 bag filters. Building 2 contains a filter press. The floors of both filter buildings are coated and are sloped towards a sump. Transfer pumps are set on the floor of both filter buildings and serve to discharge wastes from the sumps to the various filters and tanks.

Each of the four pump houses shelters the Primary and Secondary Cartridge Filters and By-Pass Cartridge Filters for the injection well.

The unloading bay houses the Basket Strainers.

The Thief Pole Rinsing System is located just east of the sampling bay at truck unloading.

In addition, the following miscellaneous units have been approved but have not yet been installed at the facility:

- Construction, use and management of a new building to house the existing filter press and a new filter press.
- Installation of an additional filter press.

F.1. <u>Process Capacity/Annual Limitation/Waste Identification</u>
ORC Section 3734.02(F) and OAC Rule 3745-50-43

(a) The Permittee may filter a total volume of 126,000,000 gallons/year throughput (630,500 tons per year. This annual throughput volume reflects the limitation found in the UIC permit), but not to exceed 650,500 gallons/day

throughput of hazardous waste in miscellaneous units, subject to the terms and conditions of this Permit and as follows:

Miscellaneous Unit	Capacity	Containment Areas	Description of Hazardous Waste	Hazardous Waste No.
Basket Strainer	1000 Gallons	Yes - Unloading Bays	Aqueous Waste	See Condition F.1.c
Bag Filter	120 Gallons/minute	Yes - Filter Building	Aqueous Waste	See Condition F.1.c
Filter Press	70 cu.ft.	Yes - Filter Building	Aqueous Waste	See Condition F.1.c
Primary Cartridge Filter	400 Gallons/minute	Yes - Pumphouses	Aqueous Waste	See Condition F.1.c
Secondary Cartridge Filter	400 Gallons/minute	Yes - Pumphouses	Aqueous Waste	See Condition F.1.c
Bypass Cartridge Filter	125 Gallons/minute	Yes - Pumphouses	Aqueous Waste	See Condition F.1.c
Thief Pole Rinsing System	260 Gallons	Yes - Sampling Bay / Concrete area to east of Sampling Bay	Aqueous Waste	See Condition F.1.c

(b) During any calendar year, the Permittee shall not manage through the filter system hazardous waste in excess of the maximum annual quantity set forth in Condition F.1(a) of this permit.

(c) The Permittee shall treat in filters only the hazardous waste codes specified in the approved Part B permit application and summarized below:

D001	D008	D015	D022	D029	D036	D043	F007	F024	F039
D002	D009	D016	D023	D030	D037	F001	F008	F025	K001
D003	D010	D017	D024	D031	D038	F002	F009	F032	K002
D004	D011	D018	D025	D032	D039	F003	F010	F034	K003
D005	D012	D019	D026	D033	D040	F004	F011	F035	K004
D006	D013	D020	D027	D034	D041	F005	F012	F037	K005
D007	D014	D021	D028	D035	D042	F006	F019	F038	K006

K007	K048	K116	P007	P051	P102	U003	U045	U087	U129
K008	K049	K117	P008	P054	P103	U004	U046	U088	U130
K009	K050	K118	P009	P056	P104	U005	U047	U089	U131
K010	K051	K123	P010	P057	P105	U006	U048	U090	U132
K011	K052	K124	P011	P058	P106	U007	U049	U091	U133
K013	K060	K125	P012	P059	P108	U008	U050	U092	U134
K014	K061	K126	P013	P060	P109	U009	U051	U093	U135
K015	K062	K131	P014	P062	P110	U010	U052	U094	U136
K016	K069	K132	P015	P063	P111	U011	U053	U095	U137
K017	K071	K136	P016	P064	P112	U012	U055	U096	U138
K018	K073	K141	P017	P065	P113	U014	U056	U097	U140
K019	K083	K142	P018	P066	P114	U015	U057	U098	U141
K020	K084	K143	P020	P067	P115	U016	U058	U099	U142
K021	K085	K144	P021	P068	P116	U017	U059	U101	U143
K022	K086	K145	P022	P069	P118	U018	U060	U102	U144
K023	K087	K147	P023	P070	P119	U019	U061	U103	U145
K024	K088	K148	P024	P071	P120	U020	U062	U105	U146
K025	K093	K149	P026	P072	P121	U021	U063	U106	U147
K026	K094	K150	P027	P073	P122	U022	U064	U107	U148
K027	K095	K151	P028	P074	P123	U023	U066	U108	U149
K028	K096	K156	P029	P075	P127	U024	U067	U109	U150
K029	K097	K157	P030	P076	P128	U025	U068	U110	U151
K030	K098	K158	P031	P077	P185	U026	U069	U111	U152
K031	K099	K159	P033	P078	P188	U027	U070	U112	U153
K032	K100	K161	P034	P081	P189	U028	U071	U113	U154
K033	K101	K169	P036	P082	P190	U029	U072	U114	U155
K034	K102	K170	P037	P084	P191	U030	U073	U115	U156
K035	K103	K171	P038	P085	P192	U031	U074	U116	U157
K036	K104	K172	P039	P087	P194	U032	U075	U117	U158
K037	K105	K174	P040	P088	P196	U033	U076	U118	U159
K038	K106	K175	P041	P089	P197	U034	U077	U119	U160
K039	K107	K176	P042	P092	P198	U035	U078	U120	U161
K040	K108	K177	P043	P093	P199	U036	U079	U121	U162
K041	K109	K178	P044	P094	P201	U037	U080	U122	U163
K042	K110	P001	P045	P095	P202	U038	U081	U123	U164
K043	K111	P002	P046	P096	P203	U039	U082	U124	U165
K044	K112	P003	P047	P097	P204	U041	U083	U125	U166
K045	K113	P004	P048	P098	P205	U042	U084	U126	U167
K046	K114	P005	P049	P099	U001	U043	U085	U127	U168
K047	K115	P006	P050	P101	U002	U044	U086	U128	U169

U170	U180	U189	U201	U210	U220	U235	U246	U328	U389
U171	U181	U190	U202	U211	U221	U236	U247	U353	U394
U172	U182	U191	U203	U213	U222	U237	U248	U359	U395
U173	U183	U192	U204	U214	U223	U238	U249	U364	U404
U174	U184	U193	U205	U215	U225	U239	U271	U367	U409
U176	U185	U194	U206	U216	U226	U240	U278	U372	U410
U177	U186	U196	U207	U217	U227	U243	U279	U373	U411
U178	U187	U197	U208	U218	U228	U244	U280	U387	
U179	U188	U200	U209	U219	U234				

(d) The Permittee is prohibited from treating hazardous waste that is not identified in this permit condition.

(e) All incoming waste streams must meet the acceptance criteria set forth in the approved Waste Analysis Plan which is located in Section C and Appendix 1 of the approved Part B application. Specifically, the Permittee is prohibited from storing or treating hazardous waste that does not meet the Facility Waste Acceptance Conditions which are located in Appendix WAP-C of the approved Waste Analysis Plan.

F.2. Design and Installation of New Filter Systems or Components

(a) The Permittee shall construct the proposed filter system in accordance with Section D of the approved Part B application.

(b) Prior to operation of the newly constructed filter system, the Permittee shall submit the certification of installation of the filter system in accordance with 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.

F.3. Containment and Detection of Releases.

(a) Secondary containment must be designed, installed, and operated to prevent any migration of waste or accumulated liquid out of the system to soil, groundwater or surface water during the use of the miscellaneous unit.

(b) Secondary containment must be capable of detecting and collecting releases and accumulated liquids until the collected material is removed.

(c) The secondary containment must meet the requirements of OAC Rule 3745-55-93.

F.4. Operating Requirements

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

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

(c) The filters must be operated in accordance with manufacturer's instruction and accepted industry practice.

(d) The permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs.

F.5. Inspection Schedules and Procedures.

(a) The Permittee shall inspect the Miscellaneous Units in accordance with the Inspection Schedule and shall complete the items in Permit Conditions F.5(b) and F.5(c) as part of those inspections:

(b) The Permittee shall inspect the overfill controls, in accordance with the procedure and schedule in the Part B permit application.

(c) The Permittee shall inspect the following components once each operating day:

(i) Aboveground portions of the miscellaneous unit, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the miscellaneous unit is being operated according to its design;

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the miscellaneous unit, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(e) The Permittee shall document compliance of Permit Condition F.5 in the operating record of the facility.

F.6. Response to Leaks or Spills.

(a) In the event of a leak or a spill from the miscellaneous unit, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

(i) Stop the flow of hazardous waste into the miscellaneous unit or secondary containment system and inspect the system to determine the cause of the release.

(ii) Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak or at an earlier practicable time to prevent further release and to allow inspection and repair of the system to be performed.

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

F.7. Recordkeeping and Reporting

(a) The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (Releases that are contained within a secondary containment system need not be reported).

(b) Within 30 days of detecting a release to the environment from the filter system or secondary containment system, the Permittee shall report the following information to the Director: [OAC Rule 3745-55-96(D)(3)]

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

(iv) Proximity of downgradient drinking water, surface water, and populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee shall submit to the Director all certifications of major repairs (e.g. replacing non-routine components of the system) to correct leaks within seven days from returning the miscellaneous unit to use.

(d) The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the miscellaneous unit.

F.8. Special Miscellaneous Unit Provisions for Ignitable or Reactive Wastes

The Permittee shall not place ignitable or reactive waste in the miscellaneous unit or in the secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place it in the operating record.

F.9. Special Miscellaneous Units Provisions for Incompatible Wastes

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same miscellaneous unit or the same secondary containment system, unless the procedures specified in the Part B permit

application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

(b) The Permittee shall not place hazardous waste in a miscellaneous unit that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition F.9.(a) are met.

F.10. Closure and Post-Closure Care

(a) At closure of the miscellaneous units, the Permittee shall follow the procedures in the Closure Plan.

(b) Upon replacement of the existing admix and precoat tanks, the Permittee shall close the tanks in accordance with the approved closure plan for the filter building.

MODULE G

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MODULE H

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MODULE I

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MODULE J - GROUND WATER DETECTION MONITORING

J.1. Module Highlights

This module addresses the ground water detection monitoring program associated with the Closure Cell (formerly ponds 4, 5, and 7) at the Waste Management of Ohio facility at Vickery, Ohio. This unit is monitored under the Part B Permit regulations OAC Rule 3745-54-90 through 99. Upon approval of this permit the permittee shall continue to conduct a ground water detection monitoring program under the permitted facility rules.

The ground water detection monitoring system for the facility is comprised of two (2) separate monitoring systems. The first system is the capillary drain system which underlies the entire Closure Cell. Monitoring of this system allows the shallow overburden ground water to be sampled and analyzed. This provides an early warning detection system should the Closure Cell begin to leak. Samples taken for analysis are withdrawn from the capillary drain piping system as it enters the capillary sump.

The second of the ground water detection monitoring systems is comprised of eight (8) monitoring wells which are screened in the weathered and fractured zone of the Tymochtee Dolomite. This zone is considered to be the uppermost aquifer. The screened intervals for these wells range from 48 to 58 feet below ground surface (bgs) at well MW-24R to 51 to 61 feet bgs at well MW-14R, 30R, 36R and 37R. The monitoring wells consist of two upgradient well (MW-24R and MW-37R) and six downgradient wells near the compliance boundary (MW-14R, MW-15R, MW-16R, MW-20R, MW-30R and MW-36R).

All of the monitoring wells and sampling points listed in Permit Condition J.2 and the analytical compounds listed under Permit Condition J.3 are currently under the detection monitoring program. Compliance monitoring has not been initiated.

J.2. Well Location, Installation and Construction
OAC Rule 3745-54-97

The Permittee shall maintain a ground water monitoring system as specified below: [OAC Rule 3745-54-97]

(a) The Permittee shall maintain ground water monitoring wells and the capillary drain sampling point at the locations specified on Figure E-15 of Closure Cell Post-closure Ground Water Monitoring Plan in Volume II, Section E of the RCRA Part B Permit Application (hereafter referred to as the GWMP) and in conformance with the following list:

Background Wells (upgradient)	Downgradient Wells
MW-24	MW-14R
MW-37R	MW-15R
	MW-16R
Other Sampling Points	MW-20R
	MW-30R
Capillary Drain	MW-36R

(b) The Permittee shall maintain the monitoring wells identified in Permit Condition J.2(a), in accordance with the plans and specifications presented in Figure E-16 of GWMP.

(c) Any changes in the number, location, depth, or design of either an upgradient or downgradient well in the permitted ground water monitoring system will require a Class 2 modification according to the Appendix to OAC Rule 3745-50-51(D)(1)(a).

(d) Any replacement of an existing well that has been damaged or rendered inoperable, without change to location , design, or depth of the well will require a Class 1 Modification according to Appendix to OAC Rule 3745-50-51(D)(1)(b).

(e) Each of these types of changes must be accompanied by a revised map for Permit Condition J.2(a).

(f) All wells deleted from the monitoring program shall be plugged and abandoned in accordance with the approved specifications. The procedures used shall meet the standards outlined in the State of Ohio Technical Guidance for Sealing Unused Well (State Coordinating Committee on Ground Water, (1996)). Well plugging and abandonment methods, certification, and justification shall be submitted to the Ohio EPA within thirty (30) days after the date the well was removed from the monitoring program.

(g) Whenever any of the wells specified in Permit Condition J.2(a) are replaced for any reason, the Permittee must demonstrate to Ohio EPA within sixty (60) days of the date of replacement that the ground water chemistry at the replacement well is statistically comparable to that of the original well.

J.3. Indicator Parameters and Monitoring Constituents
OAC Rule 3745-54-98

(a) The Permittee shall monitor upgradient background wells (MW-37R and MW-24R) and downgradient wells (MW-14R, MW-15R, MW-16R, MW-20R, MW-30R and MW-36R), as described in Permit Condition J.2., for the following parameters and constituents: [OAC Rule 3745-54-98(A)]

Analyte or Constituent	Established Background Concentrations (as Prediction Limits, in micrograms/liter)
Arsenic, Dissolved	10.0
Cadmium, Dissolved	4.9
Chromium, Dissolved	10.0
Lead, Dissolved	5.0
Nickel, Dissolved	40.0
Zinc, Dissolved	20.0
Total Phenols	52.0
Benzene	4.0
Chlorobenzene	5.0
Chloroethane	10.0
Chloroform	5.0
cis-1,2-Dichloroethene	10.0
1,1-Dichloroethane	5.0
1,2-Dichloroethane	4.0
1,1-Dichloroethene	5.0
Ethanol	100.0
Ethylbenzene	5.0
Methyl Ethyl Ketone	50.0
Methylene Chloride	5.0
Toluene	5.0
trans-1,2-Dichloroethene	10.0
Trichloroethylene	4.0
1,1,1-Trichloroethane	5.0
Vinyl Chloride	2.0

J.4. Sampling and Analysis Procedures
OAC Rule 3745-54-97

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the ground water monitoring wells and the capillary drain sampling point described in Permit Condition J.2.: [OAC Rule 3745-54-97(D) and (E)]

(a) Ground water elevations shall be measured using the techniques described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(1)]

(b) Samples shall be collected and handled (including well evacuation, sample withdrawal, preservation, containerization, filtration and shipment) using the techniques and equipment described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(3)(a) and (b)]

(c) Field analysis shall be performed using instruments, procedures, and forms described in Section E.6.0 of the GWMP. Instruments shall be calibrated as described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(4)(b)]

(d) Sampling equipment shall be decontaminated using techniques described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(5)]

(e) Purge water shall be disposed in accordance with procedures described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(6)]

(f) Laboratory analytical methods, detection limits, and sample holding time shall be in accordance with Tables E-7 and E-8 of the GWMP. [OAC Rule 3745-54-97(D)(7)]

(g) Quality assurance, including field/lab/equipment blanks, duplicate samples, and identification of potential interferences, shall be in accordance with the methods described in Section E.6.0 of the GWMP [OAC Rule 3745-54-97(D)(8)]

(h) Chain of custody procedures, including standardized field tracking reporting forms, and sample labels, shall be in accordance with Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(9)]

J.5. Elevation of the Ground Water Surface
[OAC Rule 3745-54-97(F)]

(a) The Permittee shall determine the elevation of the ground water surface at each well each time the ground water is sampled, in accordance with Permit Condition J.7(b).

(b) The Permittee shall record the total depth of any newly installed wells, the surveyed elevation of the top of inner casing and the ground surface elevation in accordance with Permit Condition J.2 within sixty (60) days of the date of installation (with as-built drawings).

The Permittee shall record, on a facility map to be submitted as part of the semi-annual reports, the ground water elevations at all of the monitoring wells.

J.6. Statistical Procedures
[OAC Rule 3745-54-97(H)]

The Permittee shall conduct the statistical procedures as presented in the GWMP included in the Part B permit application.

The Permittee shall statistically evaluate the analytical results from the eight bedrock monitoring wells using prediction limits. These prediction limits were calculated using analytical results from background wells MW-24R and MW-37R.

The Permittee shall statistically evaluate the analytical results from the capillary drain using trend analysis. Data for the trend analysis was developed from analytical results of samples taken at the capillary drain.

J.7. Monitoring Program and Data Evaluation

(a) The Permittee shall collect, preserve, and analyze samples pursuant to Permit Condition J.4.

(b) The Permittee shall determine ground water quality, at each monitoring well and the capillary drain listed in Permit Condition J.2.(a), semi-annually during post-closure care period for the Closure Cell. The Permittee shall express the ground-water quality at each monitoring well in a form necessary for the determination of statistically significant increases.

(c) The Permittee shall determine the ground water flow rate and direction in the uppermost aquifer (Tymochtee Dolomite) at least annually. [OAC Rule 3745-54-98(E)]

(d) The Permittee shall determine whether there is a statistically significant increase over the background values for each parameter identified in Permit Condition J.3(a) each time ground water quality is determined at the compliance point. In determining whether such an increase has occurred, the Permittee must compare the ground water quality at each monitoring well specified in Permit Condition J.2(a) to the background value specified in Permit Condition J.3(a), in accordance with the statistical procedures specified in Permit Condition J.6. [OAC Rule 3745-54-98(F)]

(e) The Permittee shall perform the evaluations described in Permit Condition J.7.(d) within sixty (60) days after completion of sampling. [OAC Rule 3745-54-98(F)(2)]

J.8. Recordkeeping and Reporting
OAC Rule 3745-55-02

(a) Ohio EPA may request a copy of the full QA/QC report for a particular sampling event if circumstances warrant, but in general QA/QC data will not be required except as described below in this Condition.

(b) Operating Record
OAC Rule 3745-54-73(B)(5&6), OAC Rule 3745-54-98(C) & OAC Rule 3745-55-02

The Permittee shall enter all of the following information obtained in accordance with Permit Condition J.7 in the operation record as required by OAC Rule 3745-54-73(B)(5&6) and -54-98(C):

(i) Analytical results from each of the wells and their associated qualifiers including the following: method codes, detection limits, units of measurement, qualifiers on the data, definitions of any qualifiers used, any dilutions, spike, spike recovery %, and an explanation of any rejected results.

(ii) The date each well was sampled.

(iii) The date, time, and identification of all blanks and duplicates;

(iv) Any field log documentation of deviation from the procedures in the GWMP of the Part B permit application including, e.g. documentation of any problems encountered during sampling that resulted in either a change in procedures or sample collection

(v) The date the Permittee received the results from the laboratory;

(vi) Results of all blanks (trip, field, equipment, and method);

(vii) Results of the field parameters;

(viii) All chains of custody;

(ix) The date of completion of the statistical evaluation;

(x) The statistical evaluation of the data according to the statistical tests(s) that the Ohio EPA has specified (must include all computations and results of statistical tests);

(xi) Any changes in well status (i.e., going from unaffected to affected status and vice versa);

(xii) Ground water surface elevations taken at the time of sampling each well as required by OAC Rule 3745-55-02(A)(1);

(xiii) Data and results of the annual determination of the ground water flow rate and direction as required by OAC Rule 3745-55-02(A)(3); and

(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).

(c) The Permittee must submit an annual report to the Ohio EPA by March 1st. The annual reports must reference the titles and dates of any other periodic reports required by the Permit or any updates to those reports (for example, due to confirmation sampling, comments by Ohio EPA, etc), but do not need to include duplicates of hard copies previously submitted. The annual reports shall include, a reference to other periodic reports, an electronic copy

on diskette in the format supplied by Ohio EPA of all ground water and blank data for the calendar year in addition to any previous data used for background statistical comparisons. All electronic data shall be updated annually to reflect current conditions at the facility (i.e., new wells, new sampling dates).

(d) Other Reports

The Permittee shall comply with any reporting requirements that become necessary under Permit Condition J.10 in accordance with the schedule in that Condition. If any of these dates falls on a weekend, the reports will be due no later than the following business day. Resampling reports must include the same types of information as the initial reports.

The Permittee shall submit, at a minimum, the analytical results required by Permit Conditions J.7(b), the ground water elevation data required by Permit Conditions J.7(c), and the results of the initial statistical analyses required by Permit Condition J.7(d), in accordance with the following schedule:

Monitoring Well and Capillary Drain Samples Collected During the Months of:	***Results Due to the Director By:***
March - April	**July 1**
September - October	**January 1**

Should the semi-annual submittals include all the information required by the annual reporting form provided by the Ohio EPA, only the references to those semi-annual documents and the required diskette shall be submitted to meet the annual reporting requirements.

J.9. Assurance of Compliance

The Permittee shall assure the Ohio EPA that ground water monitoring and corrective action measures necessary to achieve compliance with the ground water protection standard under OAC Rule 3745-54-92 are taken during the term of the Permit. [OAC Rule 3745-54-98]

J.10 Special Requirements if Significant Increases Occur in Values for Parameters or Constituents [OAC Rule 3745-54-98(G)]

If the Permittee determines, pursuant to Permit Condition J.6., that there is statistically significant evidence of contamination by any constituent listed in Permit Condition J.3.(a) , the Permittee shall immediately implement the Verification / Validation and Response Procedures for the monitoring wells listed in Section E.7.4 and/or the Verification / Validation and Response Procedures for the capillary drain listed in Section E.7.5, of the GWMP included in the Part B Permit Application, as appropriate. If the analytical results and statistical evaluation of the resampling data confirm a significant statistical increase then the Permittee shall perform the requirements of OAC Rule 3745-54-98(G).

(a) Notify the Ohio EPA in writing within seven (7) days of that determination. The notification must indicate what parameters or constituents have shown statistically significant increases in addition to the analytical results. [OAC Rule 3745-54-98(G)(1)]

(b) Immediately sample the ground water in all wells and determine the concentration of all constituents identified in the Appendix to OAC Rule 3745-54-98. [OAC Rule 3745-54-98(G)(2)]

(c) If the Permittee desires, re-sample affected wells within one month and repeat the analysis for any compounds identified in the Appendix to OAC Rule 3745-54-98 that were detected. If the results of the second analysis confirm the initial results or if the Permittee elects not to re-sample, then the detected compounds form the basis for compliance monitoring. [OAC Rule 3745-54-98(G)(3)]

(d) Within 90 days, submit to the Ohio EPA an application for a permit modification to establish a compliance monitoring program in accordance with OAC Rule 3745-54-99. [OAC Rule 3745-54-98(G)(4)] The application must include the following information:

(i) An identification of the concentration of each Appendix to OAC Rule 3745-54-98 constituent found in the ground water at each well at the compliance point. [OAC Rule 3745-54-98(G)(4)(a)]

(ii) Any proposed changes to the ground water monitoring system at the facility necessary to meet the requirements of compliance monitoring (OAC Rule 3745-54-99). [OAC Rule 3745-54-98(G)(4)(b)]

(iii) Any proposed changes to the monitoring frequency, sampling and analysis procedures, or methods or statistical procedures used at the facility necessary to meet the requirements of compliance monitoring (OAC Rule 3745-54-99) and the Ground Water Protection Standard (OAC Rule 3745-54-92). [OAC Rule 3745-54-98 (G)(4)(c)]

(iv) For each hazardous constituent found at the compliance point, a proposed concentration limit under OAC Rule 3745-54-94(A)(1) or (A)(2), or a notice of intent to seek an alternate concentration limit for a hazardous constituent (OAC Rule 3745-54-94(B)). [OAC Rule 3745-54-98(G)(4)(d)]

(v) The Permittee shall begin sampling and analyzing for the new constituents at the next regularly scheduled sampling event following the event in which they were determined to be present.

(e) Submit to the Director a corrective action feasibility plan or all data necessary to satisfactorily justify an alternate concentration limit within 180 days of determining a statistically significant increase. [OAC Rule 3745-54-98(G)(5)]

(f) If the Permittee determines, pursuant to Permit Condition J.7., there is a statistically significant increase above the background values for the parameters specified in Permit Condition J.3(a), he may demonstrate that a source other than a regulated unit caused the increase or that the increase resulted from error in sampling, analysis, or evaluation. In such cases, the Permittee shall:

(i) Notify the Director in writing within seven (7) days of determining a statistically significant increase that he intends to make a demonstration. [OAC Rule 3745-54-98(G)(6)(a)]

(ii) Within 90 days of determining a statistically significant increase, submit a report to the Director which successfully demonstrates that a source other than a regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. [OAC Rule 3745-54-98(G)(6)(b)]

(iii) Within 90 days of determining a statistically significant increase, submit to the Director an application for a permit modification to make any appropriate changes to the detection monitoring program at the facility. [OAC Rule 3745-54-98(G)(6)(c)]

(iv) Continue to monitor in accordance with the detection monitoring program at the facility. [OAC Rule 3745-54-98(G)(6)(d)]

J.11. Request for Permit Modification

If the Permittee or the Ohio EPA determines the detection monitoring program no longer satisfies the requirements of the regulations, the Permittee must, within 90 days of the determination, submit an application for a permit modification to make any appropriate changes to the program which will satisfy the regulations. [OAC Rule 3745-54-98(H)]

MODULE K

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MODULE L

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MODULE M - POST-CLOSURE CARE

M.1. Module Highlights

At present, the Facility anticipates to clean close all waste management units which are presently in operation. Post-closure care, monitoring and maintenance of these units should not be necessary.

M.2. Unit Identification

The Permittee shall provide post-closure care for the following hazardous waste management units, subject to the terms and conditions of this permit, and as described as follows:

(a) Surface impoundments 4, 5, and 7 "closed-as-a-landfill" (Closure Cell). The Closure Cell also contains the fixed materials removed from Ponds 11 and 12 which have been clean closed.

Type of Waste Unit	*Unit No. or Other Designation*	*Maximum Waste Inventory*	*Description of Wastes Contained*	*Hazardous Waste No.*	*Start of Post Closure Period*
Landfill Cell	Closure Cell	119,747 yd^3	Fixed sludge contaminated	See Note 1	December 7, 1992
		60,638 yd^3	Fixed sludge contaminated clay Pond 5	See Note 1	
		39,239 yd^3	Fixed sludge contaminated clay Pond 7	See Note 1	
		66,707 yd^3	Fixed sludge contaminated clay Pond 11	See Note 1	
		49,808 yd^3	Fixed sludge contaminated clay Pond 12	See Note 1	

Type of Waste Unit	*Unit No. or Other Designation*	*Maximum Waste Inventory*	*Description of Wastes Contained*	*Hazardous Waste No.*	*Start of Post Closure Period*
		6,344 yd^3	Concrete debris Pond 4 & Oil Water Facility	See Note 1	
		40 yd^3	Steel Oil Water Facility	See Note 1	
		28,018 yd^3	Stone & clay stockpile & retention	See Note 1	
		1,024	Tires stockpile	See Note 1	
		59,532 yd^2	Geonetting stockpile	See Note 1	

NOTE 1: The Closure Cell at the Vickery facility serves the purpose of final disposal for the materials that have been removed, as part of the approved closure plan, from Ponds 4, 5, 7, 11, and 12. Sludge, contaminated clay and debris from Ponds 4, 5, and 7 were stabilized and stockpiled. The Closure Cell was constructed in the vicinity of where Ponds 4, 5 and 7 had existed. Upon cell construction, materials removed from Ponds 4, 5 and 7 were transferred to the Closure Cell. Materials from Ponds 11 and 12 were stabilized in place before transferring them to the Closure Cell.

The stabilized materials which are placed in the Closure Cell carry various characteristic and listed hazardous waste codes regulated under RCRA. In addition, the stabilized material is a Toxic Substances Control Act (TSCA) regulated PCB waste. Disposal of TSCA regulated PCB waste in the closure cell was approved by U. S. EPA via letter dated July 22, 1988.

M.3. <u>Post-Closure Procedures and Use of Property</u>

(a) The Permittee shall conduct post-closure care for each hazardous waste management unit listed in Permit Condition M.2. above, to begin after completion of closure of the unit and continue for 30 years after that date, except that the 30-year post-closure care period may be shortened upon application and demonstration approved by EPA that the facility is secure,

or it may be extended by EPA if the Director finds this is necessary to protect human health and the environment. [OAC Rule 3745-55-17(A)]

(b) The Permittee shall maintain and monitor the ground-water monitoring system and comply with all other applicable requirements of OAC Rule 3745-54-90 thru 99 and OAC Rule 3745-55-01 & 02 during the post-closure period. [OAC Rule 3745-55-17(A)(1)]

(c) The Permittee shall comply with the requirements for landfills, as follows: [OAC Rule 3745-57-10(B)]

(i) Maintain the integrity and effectiveness of the final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, or other events;

(ii) Continue to operate the leachate collection and removal system until leachate is no longer detected;

(iii) Maintain and monitor the ground-water monitoring system and comply with all other applicable requirements of OAC Rule 3745-54-90 thru 99 and OAC Rule 3745-55-01 & 02;

(iv) Prevent run-on and run-off from eroding or otherwise damaging the final cover; and

(v) Protect and maintain surveyed benchmarks used in complying with the surveying and recordkeeping requirements of OAC Rule 3745-57-09.

(d) The Permittee shall comply with all security requirements, as specified in the Part B permit application. [OAC Rule 3745-55-17(B)]

(e) The Permittee shall not allow any use of the units designated in Permit Condition M.2. which will disturb the integrity of the final cover, liners, any components of the containment system, or the function of the facility's monitoring systems during the post-closure care period. [OAC Rule 3745-55-17(C)]

(f) The Permittee shall implement the Post-Closure Plan contained in Section I of the approved Part B application. All post-closure care activities must be

conducted in accordance with the provisions of the Post-Closure Plan. [OAC Rule 3745-55-17(D) and OAC Rule 3745-55-18(B)]

M.4. Inspections

The Permittee shall inspect the components, structures, and equipment at the site in accordance with the Inspection Schedule in the Part B application. [OAC Rule 3745-55-17(A)(1)(b)]

M.5. Notices and Certification

(a) If the Permittee, or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous wastes and hazardous waste residues, the liner, if any; or contaminated soils, then he shall request a modification to this post-closure permit in accordance with the applicable requirements in Chapter OAC Rule 3745-50. The Permittee or any subsequent owner or operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of OAC Rule 3745-55-17(C). [OAC Rule 3745-55-19(C)]

(b) No later than 60 days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall submit to the Director, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan. The certification must be signed by the Permittee and an independent, registered professional engineer. Documentation supporting the independent, registered professional engineer's certification must be furnished to the Director upon request until the Director releases the Permittee from the financial assurance requirements for post-closure care under OAC Rule 3745-55-45. [OAC Rule 3745-55-20]

M.6. Financial Assurance

(a) The Permittee shall maintain financial assurance during the post-closure period and comply with all applicable requirements of OAC Rule 3745-55-40 thru 51. [OAC Rule 3745-55-45]

(b) The Permittee shall demonstrate to the Director that the value the of the financial assurance mechanism exceeds the remaining cost of post-closure,

in order for the Director to approve a release of funds. [OAC Rule 3745-55-45(A)(10)]

(c) The Permittee shall submit itemized bills to the Director when requesting reimbursement for post-closure care. [OAC Rule 3745-55-45(A)(11)]

M.7. Post-Closure Permit Modifications

The Permittee must request a permit modification to authorize a change in the approved Post-Closure Plan. This request must be in accordance with applicable requirements of Chapter OAC 3745-50, and must include a copy of the proposed amended Post-Closure Plan for approval by the Director. The Permittee shall request a permit modification whenever changes in operating plans or facility design affect the approved Post-Closure Plan, there is a change in the expected year of final closure, or other events occur during the active life of the facility that affect the approved Post-Closure Plan. The Permittee must submit a written request for a permit modification at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the Post-Closure Plan. [OAC 3745-55-18(D)]

M.8. Secondary Leachate Collection System Monitoring

The Permittee shall maintain and monitor the Secondary Leachate Collection System as described in Section E of the approved permit application.

END OF PERMIT CONDITIONS

OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

August 29, 2000

Re: Vickery Environmental, Inc.
US EPA ID No.: OHD 020 273 819
Ohio Permit No.: 03-72-0191
Class 3 Permit Modification

RECEIVED
SEP 05 2000
CERTIFIED MAIL
MNOHWI PERMIT SECTION - WMB
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Mr. Stephen C. Lonneman
Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Dear Mr. Lonneman:

On June 14, 2000, you were issued a modification of your Ohio Hazardous Waste Facility Installation and Operation Permit, in draft form, in accordance with the requirements of Rule 3745-50-51 of the Ohio Administrative Code. One public comment was received which is addressed in the responsiveness summary.

Therefore, the enclosed modified hazardous waste permit is being issued to you today in final form. Please note that the modified permit remains in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit 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 (ERAC) 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. It must be filed with the ERAC within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address: Environmental Review Appeals Commission, 236 E. Town Street, Room 300, Columbus, Ohio 43215.

Sincerely yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

cc: Jeremy Carroll, Supervisor, EU, ERAS, DHWM
Harriet Croke, US EPA, Region V
Raymond Roe, Hazardous Waste Facility Board
Chuck Hull, DHWM, NWDO
Dave Schilt, DHWM, NWDO
Ohio EPA, Public Interest Center

OHIO E.P.A.
AUG 29 2000
ENTERED DIRECTOR'S JOURNAL

OHIO ENVIRONMENTAL PROTECTION AGENCY

MODIFIED OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT

Date of Issuance: August 29, 2000
Effective Date: August 29, 2000

U.S. EPA ID No.: OHD 020 273 819
Ohio Permit No.: 03-72-0191

Name of Permittee: Waste Management of Ohio, Inc.

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

Person to Contact: Stephen C. Lonneman

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(D) 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 October 24, 1994, is hereby incorporated by reference in its entirety except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on January 5, 2000. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.
By: [illegible] Date 8-29-00

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the October 24, 1994, renewal permit.

Christopher Jones
Director

directorsmodpage/TK.so

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT

SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE INSTALLATION AND OPERATION PERMIT

Waste Management of Ohio, Inc.
U.S. EPA ID #: OHD 020 273 819
Ohio ID #: 03-72-0191

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

Class 3 Modification:

Change in facility owner and operator from Waste Management of Ohio, Inc. to Vickery Environmental, Inc.

modsummary/TK ao

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: **Vickery Environmental, Inc.**

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Owner: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Operator: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Location: 3956 State Route 412
Vickery, Ohio 43464
Sandusky County

Ohio ID: 03-72-0191

US EPA ID: OHD 020 273 819

Issue Date:	10/ 24 / 1994
Effective Date:	10/ 24 / 1994
Expiration Date:	10/ 24 / 1999

AUTHORIZED ACTIVITIES

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

- Tank Storage
- Miscellaneous Treatment (Filtration)
- Tank Treatment
- Surface Impoundment Closure

permitcover/TK.ao

OHIO EPA, DHWM

AUG 29 2000

(x) all other documents required by Permit Condition A.13, B.35, D.11, F.4, F.5, F.7 and F.8.

(b) All amendments, revisions and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Ohio Environmental Protection Agency. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.

(c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.31. Waste Minimization Report

(a) The Permittee shall submit to the Director the current executive summary of the waste minimization and treatment plan adopted by Permittee under ORC Section 6111.045(A) within one hundred eighty (180) days of journalization of the permit.

(b) Every three years after Permittee's adoption of its waste minimization and treatment plan, on or before the anniversary date of the adoption of the plan, the Permittee shall submit to the Director a revised executive summary of the plan that meets the applicable requirements of ORC Section 6111.045.

A.32. Compliance Schedule

(a) The Permittee shall submit to Ohio EPA within 60 days after permit journalization, in accordance Ohio's hazardous waste Rules, the following documentation:

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

Appendix 6 and Appendix 8 of the application containing the financial assurance mechanism for closure shall be updated to include a copy of the current closure/post-closure cost estimate as set forth in OAC Rules 3745-55-42 and 3745-55-44.

(2) Updated Financial Assurance Mechanism for Closure
OAC Rules 3745-55-43 and 3745-55-45

Appendix 9 of the application containing the financial assurance mechanism for closure shall be updated to include a copy of the current financial assurance mechanism, as set forth in OAC Rules 3745-55-43 and 3745-55-45 and as specified

OHIO EPA. DHWM

AUG 2 9 2000

by the wording requirements of OAC Rules 3745-55-51. The value of the financial assurance mechanism must reflect at least the current amount of the closure/post-closure cost estimate.

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

Appendix 11 of the application containing the financial assurance mechanism for closure shall be updated to include a copy of the current financial assurance mechanism as set forth in OAC Rule 3745-55-47 and as specified by the wording requirements of OAC Rule 3745-55-51.

(b) Unless otherwise specified, the above submittals shall be made to the Division of Hazardous Waste Management, Compliance Assurance Section (CAS) and the Engineering and Risk Assessment Section (ERAS).

A.33. Disclosure Statement
ORC Section 3734.42

This permit modification is expressly conditioned upon the director's review and approval of the disclosure statement and investigative report submitted pursuant to sections 3734.41 through 3734.47 of the Revised Code.

Upon receipt of the attorney general's investigative report, the director shall review the disclosure statement and investigative report to determine whether the statement or report contains information that if submitted with a permit application would require a denial of the permit pursuant to section 3734.44 of the Revised Code. If the director determines that the statement or report contains such information, the director shall disapprove the change in ownership and disapprove the conditional permit modification.

If the parties to a the change in ownership decide to proceed with the change prior to the action of the director on the disclosure statement and investigative report, the parties shall include in all contracts or other documents reflecting the change in ownership language expressly making the change in ownership subject to the approval of the director and expressly negating the change if it is disapproved by the director pursuant to division (F)(1) of section 3734.42 of the Revised Code and this permit condition.

OHIO EPA. DHWM

AUG 29 2000

Responsiveness Summary For Comments Received
Waste Management of Ohio, Inc. Class 3 Permit Modification Request

1) **Comment Received:**

The permittee commented that the closure/post-closure cost estimates to be updated are located in the Appendices to the permit application, not section I of the permit application as indicated in the draft modified permit.

Ohio EPA Response:

Ohio agrees with this comment and has changed the language of permit condition A.32(a)(1) accordingly.

2) **Comment Received:**

The permittee commented that the financial assurance mechanism for closure to be updated is located in the Appendices to the permit application, not section I of the permit application as indicated in the draft modified permit.

Ohio EPA Response:

Ohio agrees with this comment and has changed the language of permit condition A.32(a)(2) accordingly.

3) **Comment Received:**

The Permittee commented that the liability requirements to be updated are located in the Appendices to the permit application, not section I of the permit application as indicated in the draft modified permit.

Ohio EPA Response:

Ohio agrees with this comment and has changed the language of permit condition A.32(a)(3) accordingly.

4) **Comment Received:**

The Permittee requested clarification on how the facility will be informed that the disclosure statements required by the April 6, 2000 ORC §3734.02(G) Director's Final Findings and Orders have been approved.

Ohio EPA Response:

Typically, the owner/operator of the facility is contacted regarding the disclosure statement and investigative report only if more information is needed or if there is some issue raised concerning the information gathered. If so desired, the agency will notify the permittee, in writing, of the outcome of the review.

END OF COMMENTS

RECEIVED
SEP 14 2001
RCRA RECORDS CENTER
WASTE, PESTICIDES & TOXICS DIVISION
U.S. EPA – REGION 5

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: Vickery Environmental, Inc.

Mailing Address: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Owner: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Operator: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Location: Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Ohio Permit No.:	03-72-0191
US EPA ID:	OHD 020 273 819
Issue Date:	August 17, 2001
Effective Date:	August 17, 2001
Expiration Date:	August 17, 2006

AUTHORIZED ACTIVITIES

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

- **Tank Treatment and Storage**
- **Miscellaneous Unit Treatment**
- **Post-Closure**
- **Corrective Action**

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency
By Sonya Jackson Date 8-17-01

ENTERED DIRECTOR'S JOURNAL
AUG 17 2001
OHIO E.P.A.

PERMIT APPROVAL

Christopher Jones, Director
Ohio Environmental Protection Agency

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

Entered into the Journal of the Director this 17 day of August, 2001.

By Sonya Jackson of the Ohio Environmental Protection Agency.

MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1. Effect of Permit
ORC Sections 3734.02 (E) and (F) and 3734.05
OAC Rule 3745-50-58(G)

(a) The Permittee is authorized to treat hazardous waste in tanks and miscellaneous units (filtration systems including basket filters, filter press, polish filters, cartridge filters, guard filters, and bag filters) and to store hazardous waste in tanks in accordance with the terms and conditions of this permit, ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the approved hazardous waste facility installation and operation permit renewal application, as such application has been revised and supplemented and as such application may be modified pursuant to the hazardous waste rules. The renewal of the Closure Cell is included for the purpose of accomplishing post-closure activities. This unit is currently inactive and undergoing post-closure. This unit shall not be reactivated for management of hazardous waste. The approved Part B permit application as submitted to Ohio EPA on April 15, 1999 and any subsequent amendment thereto, and last updated on October 23, 2000 is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.

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

A.2. Permit Actions
OAC Rule 3745-50-58(F)

This permit may be modified or revoked for cause. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

A.3. Permit Effective/Expiration Date
OAC Rule 3745-50-54

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

A.4. Severability

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

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

The Permittee shall comply with all conditions of this permit, except that the permittee need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency permit. Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation and is grounds for enforcement action; for permit revocation, or modification; or for denial of a permit renewal application.

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

(a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans,

specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days before the expiration date of this permit or, upon approval of the director, a later date prior to the expiration date if the Permittee can demonstrate good cause for late submittal.

(b) The Permittee may continue to operate in accordance with the terms and condition of the expired permit until a renewal permit is issued or denied if:

(i) the Permittee has submitted a timely and complete application for a renewal permit under OAC Rule 3745-50-40; and

(ii) through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.

(c) The corrective action obligations contained in this permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The Permittee must submit an application for permit reissuance at least 180 days before the expiration date of this permit pursuant to OAC Rule 3745-50-40(D) unless a) the permit has been modified to terminate the corrective action schedule of compliance and the Permittee has been released from the requirements for financial assurance for corrective action; or b) permission for a later date has been granted by the Director. The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

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

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

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

The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

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

The Permittee shall at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance include, but is not limited to, effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

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

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

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

(a) The Permittee shall allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification to:

(i) enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;

(ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

(iii) inspect and photograph at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and condition of this permit; and

(iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

(b) The Ohio EPA shall provide the Permittee with an opportunity to review photographs taken by Ohio EPA in order for Permittee to claim confidentiality pursuant to Ohio Trade Secret Law and OAC Rule 3745-50-30(B).

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

(a) Any sample and measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical /Chemical Methods; SW-846: Third Edition, May 1997; and additional supplements or latest editions thereof; Standard Methods for the Examination of Water and Wastewater: Seventeenth Edition, 1989; or an equivalent method as specified in the approved waste analysis plan, or as such term is defined and used in the Ohio hazardous waste rules.

(b) Records of monitoring information shall specify the:

(i) date(s), exact place(s), and time(s) of sampling or measurements;

(ii) individual(s) who performed the sampling or measurements;

(iii) date(s) analyses were performed;

(iv) individual(s) who performed the analyses;

(v) analytical technique(s) or method(s) used; and

(vi) results of such analyses.

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

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

A.14. Retention of Records
OAC Rules 3745-50-58(J) and 3745-50-58(M)

(a) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records, copies of all reports and records required by this permit, the certification required by paragraph B(9) of rule 3745-54-73 of the Administrative Code, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or application.

(b) The record retention period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility.

(c) The Permittee shall maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the Part B permit application and any amendments, supplements, modifications or revisions, of such application and shall retain a complete copy of the application for the life of the facility.

(d) The Permittee shall maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility, and for disposal facilities for the post-closure care period as well.

(e) Corrective Action records must be maintained at least 3 years after all Corrective Action activities have been completed.

A.15. Planned Changes
OAC Rules 3745-50-51 and 3745-50-58(L)(1)

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

A.16. Waste Shipments
OAC Rule 3745-52-12, ORC 3734.15(C)

The Permittee shall only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

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

The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit pursuant to Condition A.5. and A.15.

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

(a) This permit is not transferable to any person except after notice to the director.

(b) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility, the Permittee shall notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder.

(c) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

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

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule developed in

accordance with OAC Rule 3745-50-50 of this permit shall be submitted to the Director no later than fourteen (14) days following each scheduled date.

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

(a) The Permittee shall report orally to the Ohio Environmental Protection Agency's Division of Hazardous Waste Management and Division of Emergency and Remedial Response within twenty-four hours from the time the Permittee becomes aware of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, which endangers human health or the environment, including:

(i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and

(ii) any information of a release or discharge of hazardous waste from the facility or a fire or explosion at the hazardous waste facility, which could threaten the environment or human health outside the facility.

(b) The report shall consist of the following information (if such information is available at the time of the oral report):

(i) name, address, and telephone number of the owner or operator;

(ii) name, address, and telephone number of the facility;

(iii) name and quantity of material(s) involved;

(iv) the extent of injuries, if any;

(v) an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and

(vi) estimated quantity and disposition of recovered material that resulted from the incident.

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

(a) A written report shall also be provided to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response and the Division of Hazardous Waste Management, Northwest District Office within five (5) days of the time the Permittee becomes aware of the circumstances reported in Condition A.20.

(b) The written report shall address the items in A.20 and shall contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

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

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

The Permittee shall report to the Director, all other instances of noncompliance not provided for in Condition A.20. These reports shall be submitted within fifteen (15) days of the time at which the Permittee becomes aware of such noncompliance. Such reports shall contain all information set forth within Condition A.20 of this permit.

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

Pursuant to OAC Rule 3745-50-58(L)(2) the Permittee may not commence treatment or storage of hazardous waste in the proposed replacement tanks or proposed miscellaneous units until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed, or modified in compliance with the Permit; and

(a) the Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(b) the Director has either waived the inspection or has not within fifteen (15) days of the date of the submittal of the letter, notified the Permittee of his intent to inspect.

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

Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the director, it shall promptly submit such facts or information.

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

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

A.26. Ohio Annual Permit Fee
OAC Rule 3745-50-36

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

A.27. Compliance Schedule - Documents

(a) The Permittee shall not manage hazardous waste in the proposed units identified in Condition D.1 and F, until compliance is achieved with the Ohio hazardous waste rules and the terms and conditions of this permit, and with the following:

(i) At least thirty (30) days prior to commencing construction at the facility, the Permittee shall submit to the Ohio EPA all relevant detailed final design and construction plans as approved by the Building Official in accordance with OAC Rule 4101:2-1-23 (including ancillary equipment, blue prints, material of the construction, etc.) covering each aspect of the proposed construction. The final design and construction plans mean final design and specifications necessary for the commencement of the construction.

(ii) A schedule of construction including the estimated starting and completion dates.

(iii) If the final plans, as submitted, are inconsistent with the conceptual and/or preliminary plans contained in the approved Part B permit application and with the terms and conditions of this permit, such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a modified permit.

(iv) Upon completion of construction, the Permittee shall submit to Ohio EPA, by certified mail or hand delivery, a "certificate of use and occupancy" issued by the Building Official in accordance with OAC Rule 4101:2-1-27 and a certification stating that the facility has been constructed in compliance with applicable rules, the terms and conditions of this permit, applicable state building codes (including codes for fire, electrical service, and plumbing), and the approved application.

(v) Within sixty (60) days after completion of construction, "as built" drawings shall be submitted to Ohio EPA. If the submitted "as built" drawings appear inconsistent with the construction design plans submitted under Condition A.27(b)(i), such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a modified permit.

(vi) The certification of construction documents required by OAC Rule 3745-50-58(L) and permit condition A.23 of this permit.

(vii) Updated Closure Cost Estimate
OAC Rule 3745-55-42

The closure cost estimate found in Section I and Appendix 6 of the application must be updated to include the newly constructed portions of the facility.

(viii) Updated Financial Assurance Mechanism for Closure
OAC Rule 3745-55-43

Section I and Appendix 9 of the application, containing the financial assurance mechanism for closure, shall be updated to include the newly constructed portions of the facility.

(b) Unless specified otherwise, the Permittee shall submit the documents listed above to:

Ohio EPA, DHWM
Attn: Information Technologies and Technical Support Section
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA, Northwest District Office
Division of Hazardous Waste Management
347 North Dunbridge Road
Bowling Green, Ohio 43402

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

(a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from financial assurance requirements pursuant to OAC Rule 3745-55-47, the following documents (including amendments, revisions and modifications):

(i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;

(ii) contingency plan developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;

(iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;

(iv) cost estimate for facility closure developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;

(v) personnel training plan and the training records, as developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;

(vi) operating record required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and

(vii) inspection schedules developed in accordance with OAC Rules 3745-54-15; 3745-55-74 and 3745-55-95; and the terms and conditions of this permit.

(viii) Post-Closure Plan, as required by OAC Rule 3745-55-18(A) and this Permit.

(ix) annually-adjusted cost estimate for facility closure [and post-closure], as required by OAC Rules 3745-55-42 and 3745-55-44 and this Permit.

(x) all other documents required by Module A, Permit Condition A.12.

(b) All amendments and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Director. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.

(c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

(d) Corrective Action reports and records as required by Conditions E5 and E8 of this permit. These reports and records must be maintained for at least 3 years after all Corrective Action Activities have been completed.

A.29. Waste Minimization Report
OAC Rule 3745-54-73

(a) The Permittee shall submit to the Director the current executive summary of the waste minimization and treatment plan adopted by Permittee under ORC Section 6111.045(A) within one hundred eighty (180) days of journalization of the permit.

(b) Every three years after Permittee's adoption of its waste minimization and treatment plan, on or before the anniversary date of the adoption of the plan, the Permittee shall submit to the Director a revised executive summary of the plan that meets the applicable requirements of ORC Section 6111.045.

A.30. Operating Hours

(a) The Facility's normal operating hours are 7:00 a.m. to 11:00 p.m.

(b) "Off-hours" are the hours of 11:00 p.m. to 7:00 a.m.

(c) The Permittee may receive and accept waste, but not unload waste during "off-hours", as long as such receipts are recorded in the facility's operating record.

(d) The Permittee may continue to unload waste during "off-hours" if unloading started during normal operating hours.

(e) The Permittee may begin waste unloading during "off-hours" in those instances when, through no fault of the Permittee, the generator and/or transporter experiences some unforeseen circumstance and/or emergency which would not allow the waste to be unloaded during normal operating hours. All permit requirements must be followed for waste unloading during "off-hours" and the Permittee must provide the Northwest District with prior notification. If no one is present at the district office or at the on-site inspector trailer at the time the notification is made, the notification may be made by telecopy or voicemail.

A.31. Disclosure Statement
ORC Section 3734.42

The August 29, 2000, class three permit modification approval for change in owner and operator of the Vickery facility is expressly conditioned upon the director's review and approval of the disclosure statement and investigative report submitted pursuant to sections 3734.41 through 3734.47 of the Revised Code.

Upon receipt of the attorney general's investigative report, the director shall review the disclosure statement and investigative report to determine whether the statement or report contains information that if submitted with a permit application would require a denial of the permit pursuant to section 3734.44 of the Revised Code. If the director determines that the statement or report contains such information, the director shall disapprove the change in ownership and disapprove the conditional permit modification.

If the parties to the change in ownership decide to proceed with the change prior to the action of the director on the disclosure statement and investigative report, the parties shall include in all contracts or other documents reflecting the change in ownership language expressly making the change in ownership subject to the approval of the director and expressly negating the change if it is disapproved by the director pursuant to division (F)(1) of section 3734.42 of the Revised Code and this permit condition.

MODULE B - GENERAL FACILITY CONDITIONS

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

(a) The Permittee shall design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, and ground or surface waters which could threaten human health or the environment.

(b) The Permittee shall not accept more than 630,500 tons (Basis: 126,000,000 gallons converted to tons based on a specific gravity of 1.2. This annual throughput number reflects the limitation found in the underground injection control permit.) in any one calendar year, but not to exceed 650,500 gallons per day, from any off-site sources during the life of the permit, until such time as this Condition is modified or renewed. This is a facility wide limitation and includes all units.

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

(a) Hazardous Waste from Foreign Sources

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

(b) Hazardous Waste from Off-Site Sources

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

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

The Permittee shall follow the procedures described in the approved waste analysis plan found in Appendix 1 of the approved Part B permit application and the terms and conditions of this permit.

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

B.3.1. Waste Profiles

(a) Prior to accepting a generator's waste stream, the Permittee shall obtain waste profile information about the waste stream so that the Permittee can determine if the material can be managed in accordance with the conditions of the permit and approved Part B Application. This waste profile information shall include, but not be limited to:

(i) Generator name, US EPA identification number, profile number;

(ii) Common or generic name of the hazardous waste;

(iii) Process generating the hazardous waste or the source of the hazardous waste;

(iv) Physical description of the hazardous waste;

(v) Major chemical or physical components of the hazardous waste by percent of the component per 100 percent of the hazardous waste;

(vi) Documentation supporting the generator's knowledge of the waste, analytical data, or a combination of the two which adequately characterizes the waste such that it may be treated, stored, or disposed of in accordance with this permit, Chapters 3745-54 to 57, 3745-218 and 3745-270 of the Ohio Administrative Code.;

(vii) RCRA hazardous waste description and US EPA waste codes;

(viii) Specific handling instructions needed to manage the waste in accordance with the permittee's permit.

(ix) Date and signature of the generator certifying that the information is correct.

(b) The Permittee shall not accept a waste stream if determined that:

(i) The waste is not among those which the Permittee is authorized to accept by this permit;

(ii) Acceptance of the waste is contrary to specific regulation promulgated by Ohio EPA;

(iii) Acceptance of the waste would cause harm to the environment or to operations of the facility;

(iv) The waste contains Toxic Substances Control Act (TSCA) regulated levels of PCBs;

(v) Permit Conditions in B.3.1(a) are not met.

(c) The Permittee shall meet with Ohio EPA periodically, as agreed upon by Ohio EPA and the Permittee, to review new, recertifications of, and amendments to, waste profiles. Review will be performed by the on-site inspector or his/her designee. In the event the inspector is not available, the review will be done at the next meeting.

B.3.2. <u>Waste Profile Expiration</u>

(a) All Waste Profiles shall expire on the last day of the thirteenth month from the date of generator's signature.

B.3.3 Suspension of Permittee Approval

If Ohio EPA determines that the requirements set forth in Permit Condition B.3.1 or B.3.2 are not met, Ohio EPA may suspend the permittee's acceptance of the waste stream.

B.4. Acceptance of P Coded Waste Streams
ORC 3734.141

The Permittee must receive prior approval from Ohio EPA, Northwest District Office before accepting any P-coded waste stream, in accordance with ORC 3734.141. These waste streams shall only be streams that follow the derived from or carry through provisions or that the Permittee can treat to render them innocuous prior to deep well injection. Review of a waste stream by Ohio EPA as part of the Waste Product Review satisfies all notification requirements of ORC 3734.141.

B.5. Security
OAC Rule 3745-54-14

The Permittee shall comply with the security provisions of OAC Rule 3745-54-14(B)(2) and (C) and Section F of the Part B permit application.

B.6. General Inspection Requirements
OAC Rules 3475-54-15 and 3745-54-73

The Permittee shall follow the inspection schedule set out in Section F and Appendix 2 of the approved Part B permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by OAC Rule 3745-54-15(C). Records of inspection shall be kept for a minimum of three years from the date of inspection.

B.7. Personnel Training
OAC Rule 3745-54-16

The Permittee shall conduct personnel training, as required by OAC Rule 3745-54-16. This training program shall contain at least the elements set forth in the Section H and Appendix 4 of the approved Part B permit application. The Permittee shall maintain training documents and records as required by OAC Rule 3745-54-16(D) and (E).

B.8. General Requirements for Ignitable, Reactive, or Incompatible Waste
OAC Rule 3745-54-17

(a) The Permittee shall comply with the requirements of OAC Rule 3745-54-17 and shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Sections C, D, and F of the approved Part B permit application.

(b) The Permittee shall provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable or reactive wastes.

(c) The Permittee shall prohibit smoking and open flames in each area where ignitable, reactive or incompatible hazardous wastes are managed, and shall post appropriate signs.

(d) Where applicable, all wiring and electrical equipment at the facility shall meet the National Fire Protection Association's standards for hazardous locations (See National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp.176 through 189).

(e) The Permittee shall provide electrical grounding for all containers and tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes.

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

At a minimum, the Permittee shall maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the approved contingency plan contained in Sections F, G, and Appendix 3 of the approved Part B permit application.

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

The Permittee shall inspect, test and maintain the equipment required by Condition B.9., as necessary, to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, Section F, and Appendix 2 and 3 of the approved Part B permit application, and the terms and conditions of this permit.

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

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

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

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

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

(a) The Permittee shall comply with the requirements of OAC Rule 3745-54-37 (A) and shall attempt to:

(i) familiarize all emergency response agencies which are likely to respond in an emergency, with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section G and Appendix 3 of the approved Part B permit application;

(ii) inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility, and any further requirements related to emergency response imposed by terms and conditions of this permit; and

(iii) familiarize the local police and fire departments, hospitals and any other local emergency service, with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility.

(b) When a State or local agency declines to enter into the arrangements set forth in OAC Rule 3745-54-37(A), the Permittee shall document the refusal in the operating record as required by OAC Rule 3745-54-37(B).

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

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

With regard to spills and toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented. At a minimum, the plan must be implemented in the following situations:

(a) any fire involving hazardous waste;

(b) any explosion involving hazard waste;

(c) any uncontrolled hazardous waste reaction that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and /or explosive gases, fumes, or vapors; harmful dust; or explosive conditions;

(d) any fire or explosion that has an increased potential to threaten human health or the environment due to its proximity to a hazardous waste management unit;

(e) any hazardous waste released, outside of a secondary containment system, that causes or has the potential to cause off-site soil and/or surface water contamination;

(f) any hazardous waste release that produces or has a potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions.

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

The Permittee shall comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section G and Appendix 3 of the approved Part B permit application.

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

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

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

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

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

(a) The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution.

(b) The Permittee shall, in accordance with OAC Rule 3745-54-53, submit a copy of the approved contingency plan, to all local police departments, fire departments, hospitals, and local emergency response teams (Ohio Environmental Protection Agency's Division of Emergency and Remedial Response) that may be called upon to provide emergency services. The Permittee shall notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments to, or modifications of the contingency plan.

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

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

B.20. Emergency Procedures
OAC Rules 3745-54-56 and 3745-51-01

The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-56, Section G and Appendix 3 of the approved Part B permit application, and the term and conditions of this permit, regarding emergency procedures.

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

The Permittee shall furnish upon Ohio EPA request, and retain, all records at the facility in accordance with OAC Rule 3745-54-74.

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

The permittee shall comply with the requirements set forth in OAC Rule 3745-54-73 regarding an operating record, including information to be recorded and the maintenance thereof.

B.23. Contingency Plan Records
OAC Rule 3745-54-73 and OAC Rule 3745-54-56-(J)

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

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

(a) In the management of waste at the facility, the Permittee shall comply with the provisions of OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.

(b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days after receiving the waste, the Permittee must submit a report, including a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-72.

(c) Unmanifested waste report. This report must be submitted to the Director within fifteen (15) days of receipt of unmanifested waste, which waste is not excluded from the manifest requirements by OAC Rule 3745-51-05, and include the information required under OAC Rule 3745-54-76.

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

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

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

During facility closure, the Permittee shall implement the provisions of the approved closure plan, Section I and Appendix 5, in such a manner as to achieve compliance with OAC Rule 3745-55-11. Permittee is encouraged to employ the most recent Division of Hazardous Waste Management's Closure Plan Review Guidance for RCRA facilities in managing its closure efforts.

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

The Permittee shall implement those procedures detailed within Section I and Appendix 5 of the approved application, in accordance with OAC Rules 3745-55-10 through 3745-55-20.

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

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

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

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

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

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

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

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

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

(a) The Permittee shall decontaminate and/or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the approved closure plan, and the terms and conditions of this permit.

(b) The Permittee shall notify the Ohio EPA Northwest District Office at least three (3) working days prior to all rinseate and soil sampling for final and partial closure.

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

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

B.34. Survey Plat
OAC Rule 3745-55-16

The Permittee shall submit a survey plat to the Director and the local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit, in accordance with OAC Rule 3745-55-16.

B.35. General Post-Closure Requirements
OAC Rule 3745-55-17, 3745-55-18, 3745-55-19, 3745-55-20

(a) Post-Closure Care Period

The Permittee shall continue post-closure care for each surface impoundment closed as a landfill after completion of closure of the unit and continue for 30 years after that date. Refer to Permit Condition M.2(a) for start date of Post-Closure Care. Post-closure care shall be in accordance with OAC Rule 3745-55-17 and the Post-Closure Plan.

(b) Post-Closure Security

The Permittee shall maintain security at the facility during the post-closure care period, in accordance with the Post-Closure Plan and OAC Rule 3745-55-17(B).

(c) Amendment to Post-Closure Plan

The Permittee shall amend the Post-Closure Plan, when necessary, in accordance with OAC Rule 3745-55-18(D).

(d) Post-Closure Notices

(i) No later than 60 days after certification of closure of each hazardous waste disposal unit, the Permittee shall submit to the director and the local zoning authority records of the type, location, and quantity of hazardous waste disposed of within each cell or disposal unit, in accordance with OAC Rule 3745-55-19(A).

(ii) Within 60 days of certification of closure of the first hazardous waste disposal unit and within 60 days of certification of closure of the last hazardous waste disposal unit, the Permittee shall do the following:

(1) Record a notation on the deed to the facility property which contains the information required by OAC Rule 3745-55-19(B)(1).

(2) Submit to the Director a certification that the Permittee has recorded the notation and submit a copy of the document in which the permittee placed the notation.

(3) The Permittee shall request and obtain a Permit modification prior to post-closure removal of hazardous wastes, hazardous waste residues, liners, or contaminated soils, in accordance with OAC Rule 3745-55-19(C).

(e) Certification of Completion of Post-Closure Care

No later than sixty days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall certify that the post-closure care period was performed in accordance with the specifications in the Post-Closure Plan, as required by OAC Rule 3745-55-20.

B.36. Cost Estimate for Facility Closure and Post-Closure
OAC Rule 3745-55-42 and 3745-55-44

(a) The Permittee's most recent closure and post-closure cost estimate, prepared in accordance with OAC Rules 3745-55-42, 3745-55-44, 3745-55-97(C)(3) & (5), 3745-56-28(C)(3) and 3745-56-58(C)(2) are specified in Section I and Appendix 5 of the Part B permit application.

(b) The Permittee must adjust the closure cost estimate and post-closure cost estimate for inflation within 30 days after the close of the Permittee's fiscal year and before submission of updated information to the Director, as specified in OAC Rule 3745-55-42(B) and OAC Rule 3745-55-44(B).

(c) The Permittee must revise the closure cost estimate and post-closure cost estimate whenever there is a change in the facility's Closure Plan that increases the cost of closure and Post-Closure Plan, as required by OAC Rule 3745-55-42(C) and 3745-55-44(C).

(d) The Permittee must submit to the Ohio EPA and keep at the facility, the latest closure cost estimate and post-closure cost estimate as required by OAC Rule 3745-55-42(D) and 3745-55-44(D).

B.37. Financial Assurance for Facility Closure and Post-Closure

The Permittee shall maintain continuous compliance with OAC Rule 3745-55-43, 55-45 and provide documentation of financial assurance which meets the requirements of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Permit Condition B.36. Changes in financial assurance mechanisms must be approved by the Director pursuant to OAC Rule 3745-55-45 or OAC Rule 3745-55-49.

B.38. Liability Requirements

The Permittee shall maintain continuous compliance with the requirement of OAC Rule 3745-55-47 to have continuous liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs.

The Permittee also shall demonstrate compliance with OAC Rule 3745-55-47(B) by maintaining liability coverage for nonsudden accidental occurrences in the amount of at least $3 million per occurrence, with an annual aggregate of at least $6 million, exclusive of legal defense costs.

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

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

B.40. General Requirements for Land Disposal Restrictions
OAC Chapter 3745-59

(a) The Permittee shall comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-59. Waste restricted from land disposal by OAC Rules 3745-59-30, 3745-59-31, and 3745-59-33 or prohibited from land disposal by OAC Rule 3645-59-32 or Section 3004(d) of RCRA, shall not be shipped to an off-site land disposal facility unless the appropriate notification is given to a designated land disposal facility which is permitted to treat the waste or the waste meets the treatment standards given in OAC Rules 3745-59-40 to 3745-59-44 and the applicable prohibition levels set forth in OAC Rule 3745-59-32 and Section 3004(d) of RCRA.

(b) A mixture of any restricted waste with nonrestricted waste(s) is a restricted waste under OAC Chapter 3745-59. [OAC Rule 3745-51-03(B)(2)]

(c) The Permittee shall not in any way dilute a restricted waste or the residue from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with OAC 3745-59-40 through 3745-59-44, to circumvent the effective date of a prohibition in OAC Rules 3745-59-30 through 3745-59-35, or to otherwise avoid a prohibition in OAC Rules 3745-59-30 through 3745-35, or to circumvent a land disposal prohibition imposed by Section 3004(d) of RCRA.

(d) The Permittee shall prepare and maintain a current list of the hazardous waste codes handled by the facility that are identified in OAC Rules 3745-59-30 through 3745-59-35. The list shall include all waste codes handled by the facility and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, in accordance with OAC Rule 3745-50-51.

(e) The Permittee must test, in accordance with OAC Rule 3745-59-07, any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.

(f) The Permittee shall comply with all the applicable notification, certification, and record keeping requirements described in OAC Rule 3745-59-07.

(g) The Permittee shall comply with all the applicable prohibitions on storage of restricted waste specified in OAC Rule 3745-59-50.

(h) Except as otherwise provided in OAC Rule 3745-59-50, the Permittee may store restricted wastes in tanks solely for the purpose of the accumulation of such quantities of hazardous wastes as necessary to facilitate proper recovery, treatment, or disposal provided that each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at the facility.

(i) The Permittee may store restricted wastes for up to one (1) year unless the Ohio EPA can demonstrate that such storage was not solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recover, treatment or disposal. [OAC Rule 3745-59-50]

(j) The Permittee may store restricted wastes beyond one (1) year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal. [OAC Rule 3745-59-50]

(k) The Permittee shall not store any liquid hazardous waste containing polychlorinated biphenyl (PCBs) at concentrations greater than or equal to 50 ppm unless the waste is stored in storage facility that meets the requirements of 40 CFR 761.65(b). This waste must be removed from storage and treated or disposed as required by OAC Rule 3745-59-50 within one (1) year of the date when such wastes are first put into storage. Condition B.49(j) above, that allows storage for over one (1) year with specified demonstration, does not apply to PCB waste prohibited under OAC Rule 3745-59-32.

B.41. Surface Water Management Plan

The Permittee shall follow the Surface Water Management Plan as outlined in Section F of the approved application.

B.42. New Waste Management Procedures

Prior to initiating new waste management procedures for nitric acid which vary from normal operations, the Permittee must notify the Ohio EPA, Northwest District Office. If requested by Ohio EPA, a plan must be submitted by Permittee. The plan shall describe the applicability of the proposed procedure.

B.43. Nitric Acid Waste Stream Procedures

Upon receipt of nitric acid waste streams the Permittee must follow Section 6.1.1 of the approved Waste Analysis Plan.

B.44. Nuisance Loads

The Permittee shall not create a public nuisance pursuant to Ohio Revised Code 3734.02(I).

MODULE C

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MODULE D - TANK STORAGE, TREATMENT, AND MANAGEMENT

D. Module Highlights

The Integrated Aqueous Waste Treatment System (IAWTS) consists of the following units: (1) the Truck Unloading Facility which includes ancillary, basket strainers and pumps, waste receiving tanks (V-Tanks), waste head-gas caustic scrubber and solids handling unit; (2) Waste Storage, and Treatment Tank System (T-Tanks); (3) the filters and filter buildings; (4) the pumps and pump houses; and (5) the yard piping.

The 60 foot by 124 foot steel-framed truck unloading building sits on top of concrete piers and a 4 foot high concrete block wall. The wire-mesh reinforced concrete floors of the truck unloading bays are sloped, longitudinally and transversely, a total of 11 inches, to 18-inch deep waste unloading sumps. The unloading sumps are lined with a corrosion resistant liner and contain three 6-inch truck unloading pipes and a 6-inch sump drain pipe. The below ground portions of both the truck unloading pipes and sump drain pipes are enclosed in a 10-inch PVC shield pipe. The 6-inch pipes continue through the vault and drain to one of the V-tanks. Basket strainers are installed on each of the unloading lines in the internal unloading bays. The discharge is directed to one of the six T-tanks. Tanker trucks may be unloaded by gravity drainage through the basket filters to one of the four V-tanks or unloaded directly to one of the T-tanks.

The two vaults that were used to house the sand interceptors now serve as secondary containment for pipes. The Vaults are drained by 6-inch piping enclosed in a 10-inch shield pipe to the V-tank's containment system sump. Precipitation is then automatically pumped to one of the V-tanks.

The four waste receiving V-tanks are set in a below ground vault which is approximately 13 feet deep, with only 6 inches protruding above ground. The open topped vault is sectioned in half by a 5-foot 10-inch concrete wall. Shelter is provided by a wood framed building. The vault floor is divided into two halves and slopes toward two sumps. Sump accumulation is pumped to tanks V-5 or V-7. Four horizontal centrifugal pumps are set on the floor of the vault. Each pump is dedicated to one of the four V-tanks and draws from the bottom of the tanks through a 4-inch pipe which discharges over the vault wall to the above ground pipe rack. The discharge lines follow the pipe rack to one of the six T-tanks to be stored or

treated. The head space of the four V-tanks is vented to the scrubber through 16-inch PVC vent pipes.

The six T-tanks are set upon a 143-foot by 140-foot concrete reinforced containment pad. The containment pad is lined with a protective liner. The west 13 feet of the containment pad is dedicated to the Pump House which shelters one transfer pump and one recirculating pump for each T-tank. The head space of each T-tank is blanketed with an inert gas to create an oxygen-reduced condition to reduce the potential for fire, and is vented to the caustic scrubber. The entire foundation of the containment pad is supported on 50-foot, 90-ton piles driven to refusal. The total available storage volume of the containment system is 313,423 gallons.

Yard piping which leads from the IAWTS to the deepwell injection pumps are primarily fiberglass-reinforced plastic with some use of rigid polvinylchloride. Pipes in the existing facility are situated upon above ground pipe racks. The portions of the piping which cross Myers Ditch and the high pressure lines which lead from the injection pumps to the deepwells are double walled.

Each injection well has an associated Filter Acid Tank (FAT), not all currently installed, and transfer Pump. These pumps and tanks are contained in a concrete containment wall. All currently installed FATs and V-tanks are double walled tanks. The pumps are either contained or sealess magnetic pumps.

The floor of four injection well pump houses are sloped towards sumps. Each of the four pump houses shelter an injection pump, transfer pumps, and guard filters and a polish filter.

In addition, the following tanks, filter press and pump have been approved but have not yet been installed at the facility:

- Replacement of filtered acid tanks (FAT) with double walled tanks. The tanks to be replaced include T-800(FAT-B), T-400(FAT-2), and T-600(FAT-6).
- Installation of a Filter Press Drip tank(T-94).
- Installation of a fourth unloading pump.

D.1. Process Capacity/Annual Limitation/Waste Identification
ORC Section 3734.02(F) and OAC Rule 3745-50-43

(a) The Permittee may store and treat a total volume of 126,000,000 gallons/year throughput (630,500 tons per year. This annual throughput volume reflects the limitation found in the UIC permit) but not to exceed 650,500 gallons per day of hazardous waste in tanks, subject to the terms of this Permit and as follows:

Tank No.	Capacity (Gallons)	Secondary Containment Required	Description of Tank	Hazardous Waste No.	Date of Installation
T-1 (T036)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-2 (T037)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-5 (T038)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-6 (T039)	200000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-9 (T040)	100000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-10 (T041)	100000	Yes - in place	Treatment/Storage	See Condition D.1.c	1989
T-22 (V-4)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-23 (V-5)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-24 (V-6)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-25 (V-7)	6000	Yes - in place	Truck Unloading	See Condition D.1.c	1998
T-94	500	Yes - when installed	Filter press drip tank	See Condition D.1.c	****
T-700 (FAT-AR)	11750	Yes - in place	Filtered Acid	See Condition D.1.c	1995
T-800 (FAT-BR)	11750	Yes - when installed	Filtered acid (Will replace FAT-B)	See Condition D.1.c	****
T-500 (FAT-5R)	11750	Yes - in place	Filtered acid	See Condition D.1.c	1998

Tank No.	Capacity (Gallons)	Secondary Containment Required	Description of Tank	Hazardous Waste No.	Date of Installation
T-400 (FAT-2R)	11750	Yes - when installed	Filtered acid (will replace FAT-2)	See Condition D.1.c	****
T-300 (FAT-3R)	11750	Yes - in place	Filtered acid	See Condition D.1.c	1995
T-600 (FAT-6R)	11750	Yes - when installed	Filtered acid (will replace FAT-6)	See Condition D.1.c	****
Lab Waste Tank	2500	Yes - in place	Lab Waste	See Condition D.1.c	1994

**** denotes tanks not yet installed.

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

(c) The Permittee shall store and treat in tanks only the hazardous waste codes specified in the approved Part B permit application and summarized below:

D001	D020	D039	F025	K014	K033	K052	K094	K113	K148
D002	D021	D040	F032	K015	K034	K060	K095	K114	K149
D003	D022	D041	F034	K016	K035	K061	K096	K115	K150
D004	D023	D042	F035	K017	K036	K062	K097	K116	K151
D005	D024	D043	F037	K018	K037	K064	K098	K117	K156
D006	D025	F001	F038	K019	K038	K065	K099	K118	K157
D007	D026	F002	F039	K020	K039	K066	K100	K123	K158
D008	D027	F003	K001	K021	K040	K069	K101	K124	K159
D009	D028	F004	K002	K022	K041	K071	K102	K125	K160
D010	D029	F005	K003	K023	K042	K073	K103	K126	K161
D011	D030	F006	K004	K024	K043	K083	K104	K131	P001
D012	D031	F007	K005	K025	K044	K084	K105	K132	P002
D013	D032	F008	K006	K026	K045	K085	K106	K136	P003
D014	D033	F009	K007	K027	K046	K086	K107	K141	P004
D015	D034	F010	K008	K028	K047	K087	K108	K142	P005
D016	D035	F011	K009	K029	K048	K088	K109	K143	P006
D017	D036	F012	K010	K030	K049	K090	K110	K144	P007
D018	D037	F019	K011	K031	K050	K091	K111	K145	P008
D019	D038	F024	K013	K032	K051	K093	K112	K147	P009

P010	P056	P103	U003	U044	U085	U126	U166	U208	U353
P011	P057	P104	U004	U045	U086	U127	U167	U209	U359
P012	P058	P105	U005	U046	U087	U128	U168	U210	U364
P013	P059	P106	U006	U047	U088	U129	U169	U211	U365
P014	P060	P108	U007	U048	U089	U130	U170	U213	U366
P015	P062	P109	U008	U049	U090	U131	U171	U214	U367
P016	P063	P110	U009	U050	U091	U132	U172	U215	U372
P017	P064	P111	U010	U051	U092	U133	U173	U216	U373
P018	P065	P112	U011	U052	U093	U134	U174	U217	U375
P020	P066	P113	U012	U053	U094	U135	U176	U218	U376
P021	P067	P114	U014	U055	U095	U136	U177	U219	U377
P022	P068	P115	U015	U056	U096	U137	U178	U220	U378
P023	P069	P116	U016	U057	U097	U138	U179	U221	U379
P024	P070	P118	U017	U058	U098	U140	U180	U222	U381
P026	P071	P119	U018	U059	U099	U141	U181	U223	U382
P027	P072	P120	U019	U060	U101	U142	U182	U225	U383
P028	P073	P121	U020	U061	U102	U143	U183	U226	U384
P029	P074	P122	U021	U062	U103	U144	U184	U227	U385
P030	P075	P123	U022	U063	U105	U145	U185	U228	U386
P031	P076	P127	U023	U064	U106	U146	U186	U234	U387
P033	P077	P128	U024	U066	U107	U147	U187	U235	U389
P034	P078	P185	U025	U067	U108	U148	U188	U236	U390
P036	P081	P188	U026	U068	U109	U149	U189	U237	U391
P037	P082	P189	U027	U069	U110	U150	U190	U238	U392
P038	P084	P190	U028	U070	U111	U151	U191	U239	U393
P039	P085	P191	U029	U071	U112	U152	U192	U240	U394
P040	P087	P192	U030	U072	U113	U153	U193	U243	U395
P041	P088	P194	U031	U073	U114	U154	U194	U244	U396
P042	P089	P196	U032	U074	U115	U155	U196	U246	U400
P043	P092	P197	U033	U075	U116	U156	U197	U247	U401
P044	P093	P198	U034	U076	U117	U157	U200	U248	U402
P045	P094	P199	U035	U077	U118	U158	U201	U249	U403
P046	P095	P201	U036	U078	U119	U159	U202	U271	U404
P047	P096	P202	U037	U079	U120	U160	U203	U277	U407
P048	P097	P203	U038	U080	U121	U161	U204	U278	U409
P049	P098	P204	U039	U081	U122	U162	U205	U279	U410
P050	P099	P205	U041	U082	U123	U163	U206	U280	U411
P051	P101	U001	U042	U083	U124	U164	U207	U328	
P054	P102	U002	U043	U084	U125	U165			

(d) The Permittee is prohibited from storing or treating hazardous waste that is not identified in this permit condition.

(e) All incoming waste streams must meet the acceptance criteria set forth in the approved Waste Analysis Plan which is located in Section C and Appendix 1 of the approved Part B application. Specifically, the Permittee is prohibited from storing or treating hazardous waste that does not meet the Facility Waste Acceptance Conditions which are located in Appendix WAP-C of the approved Waste Analysis Plan.

D.2. Design and Installation of New Tank Systems or Components
OAC Rule 3745-55-92

(a) The Permittee shall construct the tank system in accordance with Section D of the approved Part B application.

(b) Prior to operation of the newly constructed tank system, the Permittee shall submit the certification of installation of the tank system in accordance with 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.

D.3. Containment and Detection of Releases.
OAC Rule 3745-55-93

The Permittee shall construct and operate the secondary containment system in accordance with requirements of OAC Rule 3745-55-93(B) through (F), and Section F of the approved Part B application.

D.4. Operating Requirements
OAC Rule 3745-55-94

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

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

D.5. Inspection Schedules and Procedures.
OAC Rule 3745-55-95

(a) The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule and shall complete the items in Permit Conditions D.5(b) and D.5(c) as part of those inspections:

(b) The Permittee shall inspect the overfill controls in accordance with the procedure and schedule in the Part B permit application.

(c) The Permittee shall inspect the following components of the tank system once each operating day:

(i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(d) The Permittee shall document compliance with Permit Condition D.5 in the operating record of the facility.

D.6. Response to Leaks or Spills.
OAC Rule 3745-55-96 &3745-93(C)(4)

(a) In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

(i) Stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

(ii) Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak or at an earlier practicable time to prevent further release and to allow inspection and repair of the tank/containment system to be performed.

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

(b) Unless the requirements of Permit Conditions D.6.(b)(i) through D.6.(b)(vi) are satisfied, the Permittee shall close its tank system in accordance with OAC Rule 3745-55-97 and its approved Closure Plan if there has been a leak or spill from the tank system, from a secondary containment system, or if a system becomes unfit for continual use.

(i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs of the system before returning the tank system to service.

(ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

(iii) For a release to the environment caused by a leak from a component of the tank system that is below ground and does not have secondary containment, the Permittee must provide this component with secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(iv) For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.

(v) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee shall provide secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(vi) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.

(c) For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

D.7. Recordkeeping and Reporting
OAC Rule 3745-55-96, 3745-55-91(a), and 3745-55-92(g)

(a) The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (Releases that are contained within a secondary containment system need not be reported).

(b) Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Director: [OAC Rule 3745-55-96(D)(3)]

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

(iv) Proximity of downgradient drinking water, surface water, and populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days after returning the tank system to use.

(d) The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the tank system.

D.8. Closure and Post-Closure Care
OAC Rule 3745-55-97

(a) At closure of the tank system(s), the Permittee shall follow the procedures in the Closure Plan.

(b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall close the tank system(s) and perform post-closure care following the contingent procedures in the Closure Plan and in the Post-Closure Plan.

D.9. Special Tank Provisions for Ignitable or Reactive Wastes
OAC Rule 3745-55-98

(a) The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place it in the operating record. [OAC Rule 3745-55-98(A)]

(b) The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public

ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1991 or most recent edition) incorporated by reference in OAC Rule 3745-50-11. [OAC Rule 3745-55-98(B)]

D.10. Special Tank Provisions for Incompatible Wastes
OAC Rule 3745-55-99

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

(b) The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.10(a) are met.

MODULE E - CORRECTIVE ACTION REQUIREMENTS

Corrective Action Summary

The Permittee began corrective action under the authority of U. S. EPA. A Visual Site Inspection (VSI), part of the RCRA Facility Assessment (RFA), was conducted at the facility by Jacobs Engineering Group through Metcalf & Eddy under contract with U. S. EPA on May 8 and 9, 1990. The report identified 45 Waste Management Units (WMUs) and 5 Areas of Concern (AOC). The Report of Current Conditions (RCC) was submitted to the U. S. EPA in December 1994, and revised in April 1995. The RCC documented the current conditions at the facility and identified an additional 7 WMUs and 4 AOCs, for a total of 52 WMUs and 9 AOC. The U. S. EPA subsequently identified the TSCA closure cell as another WMU, bringing the total of WMUs to 53. In response to Ohio EPA concerns regarding the area around monitoring well L19, this area was added as an AOC, bringing the total number of AOCs to 10.

U. S. EPA issued a Federal Part B Hazardous Waste Permit which became effective, for a ten year period, on October 24, 1994. This permit included a Corrective Action Schedule of Compliance. According to the schedule, the Permittee submitted its RFI Phase I Workplan, RFI Report and Summary. The federal permit lists the requirements for the RFI Workplan. U.S. EPA determined that a total of 53 WMUs and 10 AOCs should be investigated during the RFI.

The 53 WMUs were combined into 9 WMU Groups. These 9 WMU groups and 10 AOCs are identified in permit condition E.3.

Conditional approval of the RFI workplan was provided by U. S. EPA on September 11, 1997. The Permittee submitted the final RFI Workplan on October 29, 1998. Phase I was implemented March 9, 1999 through May 12, 1999. The primary focus of Phase I was to determine if releases have occurred from WMUs and potential AOCs at the site. The results of the Phase I RFI will be used to determine areas that may require additional characterization during Phase II RFI.

On the effective date of this permit, Ohio EPA will assume corrective action authority at this facility. The Permittee shall follow the work schedule in this permit beginning with permit condition E.5 and submit all required reports to Ohio EPA.

E.1. Corrective Action at the Facility
OAC Rules 3745-50-10 & 3745-55-011

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 at which 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 that term is used in Section 3004(u) of RCRA. The terms "facility and waste management units" are defined in OAC Rule 3745-50-10. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS) and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP).

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 Rules 3745-55-011

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 WMUs
OAC Rules 3745-50-44(D) & 3745-55-011

a) U.S. EPA and the Permittee have identified the following WMUs and AOCs for investigation during the RFI:

WMU/AOC Group	WMU/AOC number and description
WMU Group A *Rationale for grouping: all are located within perimeter of WMU#16.*	WMU # 1 – Pond 1 WMU # 2 – Pond 2 WMU # 3 – Pond 3 WMU # 8 – Pond 9 and Wet Well WMU # 16 – Temporary Waste Pile Area
WMU Group B *Rationale for grouping: clean-closed status and proximity to Closure Cell*	WMU # 4 – Pond 4 WMU # 5 – Pond 5 WMU # 7 – Pond 7 WMU # 10 – Pond 11 WMU # 11 – Pond 12 WMU # 17 – Leachate Retention Pond WMU # 53 – TSCA Closure Cell
WMU Group C *Rationale for grouping: location and overlapping units*	WMU # 6 – Ponds 6E and 6W WMU # 19 – Former Drum Storage Area WMU # 9 – Pond 10
WMU Group D *Rationale for grouping: similar use during operation.*	WMU # 12 – North Landfarm WMU # 13 – East Landfarm WMU # 14 – South Landfarm
WMU Group E *Rationale for grouping: similar use during operation.*	WMU # 50 – Injection Well 1A WMU # 51 – Injection Well 1 WMU # 52 – Injection Well 3
WMU Group F *Rationale for grouping: Similar use during operation.*	WMU # 31 – Filtered Acid Tank (FAT 2) WMU # 32 – Pumphouse 2 WMU # 33 – FAT 6 WMU # 34 – Pumphouse 6 WMU # 35 – FAT 5 WMU # 36 – Pumphouse 5 WMU # 37 – FAT 4 WMU # 38 – Pumphouse 4 WMU # 39 – Old FAT 2 WMU # 40 – Former Pumphouse 2

WMU/AOC Group	WMU/AOC number and description
WMU Group G *Rationale for grouping: active status and are used to handle pickle liquors, acids, and brine.*	WMU # 21 – Truck Unloading Building WMU # 22 – Sand Interceptors WMU # 23 – V-Tanks WMU # 24 – Caustic Gas Scrubber WMU # 25 – T-Tanks WMU # 26 – T-Tank Pumphouse WMU # 27 – Leaf Filter Press WMU # 29 – Filter Press Building WMU # 30 – FAT A and B
WMU Group H *Rationale for grouping: active injection wells.*	WMU # 46 – Injection Well 2 WMU # 47 – Injection Well 4 WMU # 48 – Injection Well 5 WMU # 49 – Injection Well 6
WMU Group I *Rationale for grouping: remaining ungrouped WMUs.*	WMU # 15 – Oil Reclamation Facility WMU # 18 – Former W-Tanks WMU # 20 – Lab Waste Tank WMU # 28 – Sluice Pit WMU # 41 – PCB Storage Area WMU # 42 – Maintenance Waste Oil Tanks (Closed) WMU # 43 – Sanitary Wastewater Treatment Plant WMU # 44 – Truck Unloading Facility Sewage Holding Tank WMU # 45 – Maintenance Building Sewage Holding Tank
AOC A	Emergency Drain Tanks
AOC B	A North Parking Lot-Truck Unloading Facility
AOC C	Former Pug Mill Staging Area
AOC D	Borrow Pit #1
AOC E	Borrow Pit #2

WMU/AOC Group	WMU/AOC number and description
AOC F	Truck Sampling Area, Inspection Bay Collection Tank, and Old Truck Scale
AOC G	Roll-off Staging Pad
AOC H	Facility Aboveground Transfer Piping
AOC I	Remaining Underground Piping
AOC J	Well L-19

E.4 Reserved

E.5 RCRA Facility Investigation (RFI)
OAC Rule 3745-55-011

The Permittee shall conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous waste(s) and hazardous constituent(s) from all applicable WMUs identified in permit Conditions E.3 and E.10. WMUs identified in Condition E.3. above are currently being investigated in the on-going RFI. The permittee shall continue implementation of the on-going RFI. WMUs identified pursuant to Condition B.10 will be evaluated by Ohio EPA to determine if further investigation, including a Release Assessment and/or RFI is necessary. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in Attachment 1 (U.S. EPA's CAP).

(a) RFI Workplan

The Permittee shall submit a written RFI Workplan or Release Assessment to Ohio EPA for any newly discovered waste management unit, on a timeframe established by Ohio EPA.

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

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new RFI Workplan that incorporates Ohio EPA's comments.

3) Ohio EPA shall approve or modify and approve, in writing, the

amended or new RFI Workplan. The RFI Workplan, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Workplan must be authorized by Ohio EPA.

(b) RFI Implementation

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

(c) RFI Final Report

Within sixty (60) days after the completion of the RFI, the Permittee shall submit an RFI Final Report to Ohio EPA. The RFI Final Report shall 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.

1) If necessary, Ohio EPA shall provide written comments on the RFI Report to the Permittee.

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new RFI Report that incorporates Ohio EPA's comments.

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

E.6 Interim Measures (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 threat to human health or the environment. Alternatively, with Ohio EPA's approval, the Permittee may elect to conduct voluntary Interim Measures at any time during the life of the permit, to mitigate or eliminate a threat to human health and the environment.

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 Class 3 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, including comments received during the initial (60-day) public comment period required for Class 3 permit modifications, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose a threat to human health and the environment, Ohio EPA will approve the requested modification.

(b) Periodic Monitoring

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

(c) Further Investigations

A determination of no further action shall not preclude Ohio EPA from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or likelihood of a release from a WMU at the Facility is likely to pose a threat to human health or the environment. In such a case, Ohio EPA shall initiate a modification to the terms of the permit to rescind the determination made in accordance with Permit Condition E.7.a. Additionally, in the event Ohio EPA determines that there is insufficient information on which to base a

determination, the Permittee, upon notification, is required to 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 shall 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 by Ohio EPA.

(a) CMS Workplan

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

1) If necessary, Ohio EPA shall provide written comments on the CMS Workplan to the Permittee.

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new CMS Workplan that incorporates Ohio EPA's comments.

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

(b) CMS Workplan Implementation

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

(c) CMS Final Report

Within sixty (60) days after the completion of the CMS, the Permittee shall submit a CMS Final Report to Ohio EPA. The CMS Final Report shall summarize the results of the investigations for each remedy studied and must include and evaluation of each remedial alternative. The CMS Report should also include the owner/operator's recommended remedies or remedy and remedy performance standards, including, as applicable, proposed media cleanup levels, points of compliance, and compliance time frames.

1) If necessary, Ohio EPA shall provide written comments on the CMS Report to the Permittee.

2) Within forty-five (45) days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new CMS Report that incorporates Ohio EPA's comments.

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

E.9 CMI

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

If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and

effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

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

i) Permit Modification

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized. The Permittee shall not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

ii) Financial Assurance
OAC Rule 3745-55-011

As part of the modification of this permit to incorporate CMI, the Permittee shall provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-55-011 (b) and (c).

E.10 Newly Identified WMUs or Releases
OAC Rule 3745-55-011

(a) General Information

The Permittee shall submit to Ohio EPA, within 30 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;

iii) General dimensions and structural description (supply any available drawings);

iv) Dates when the unit was operated; and

v) Specification of all waste(s) that have been managed at the unit.

(b) Release Information

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

MODULE F - MISCELLANEOUS TREATMENT

F. Module Highlights

Filtration units at the facility have been categorized as miscellaneous units. The filtration system consists of Basket Strainers, Bag Filters, Filter Press, Primary and Secondary Cartridge Filters, and By-Pass Cartridge Filters. These individual units may either be used in series or parallel. The Thief Pole Rinsing System has also been categorized as a miscellaneous unit.

Filtration operations are housed in two existing filter buildings. Filter building 1 contains 2 bag filters. Building 2 contains a filter press. The floors of both filter buildings are coated and are sloped towards a sump. Transfer pumps are set on the floor of both filter buildings and serve to discharge wastes from the sumps to the various filters and tanks.

Each of the four pump houses shelters the Primary and Secondary Cartridge Filters and By-Pass Cartridge Filters for the injection well.

The unloading bay houses the Basket Strainers.

The Thief Pole Rinsing System is located just east of the sampling bay at truck unloading.

In addition, the following miscellaneous units have been approved but have not yet been installed at the facility:

- Construction, use and management of a new building to house the existing filter press and a new filter press.
- Installation of an additional filter press.

F.1. <u>Process Capacity/Annual Limitation/Waste Identification</u>
ORC Section 3734.02(F) and OAC Rule 3745-50-43

(a) The Permittee may filter a total volume of 126,000,000 gallons/year throughput (630,500 tons per year. This annual throughput volume reflects the limitation found in the UIC permit), but not to exceed 650,500 gallons/day

throughput of hazardous waste in miscellaneous units, subject to the terms and conditions of this Permit and as follows:

Miscellaneous Unit	Capacity	Containment Areas	Description of Hazardous Waste	Hazardous Waste No.
Basket Strainer	1000 Gallons	Yes - Unloading Bays	Aqueous Waste	See Condition F.1.c
Bag Filter	120 Gallons/minute	Yes - Filter Building	Aqueous Waste	See Condition F.1.c
Filter Press	70 cu.ft.	Yes - Filter Building	Aqueous Waste	See Condition F.1.c
Primary Cartridge Filter	400 Gallons/minute	Yes - Pumphouses	Aqueous Waste	See Condition F.1.c
Secondary Cartridge Filter	400 Gallons/minute	Yes - Pumphouses	Aqueous Waste	See Condition F.1.c
Bypass Cartridge Filter	125 Gallons/minute	Yes - Pumphouses	Aqueous Waste	See Condition F.1.c
Thief Pole Rinsing System	260 Gallons	Yes - Sampling Bay / Concrete area to east of Sampling Bay	Aqueous Waste	See Condition F.1.c

(b) During any calendar year, the Permittee shall not manage through the filter system hazardous waste in excess of the maximum annual quantity set forth in Condition F.1(a) of this permit.

(c) The Permittee shall treat in filters only the hazardous waste codes specified in the approved Part B permit application and summarized below:

D001	D008	D015	D022	D029	D036	D043	F007	F024	F039
D002	D009	D016	D023	D030	D037	F001	F008	F025	K001
D003	D010	D017	D024	D031	D038	F002	F009	F032	K002
D004	D011	D018	D025	D032	D039	F003	F010	F034	K003
D005	D012	D019	D026	D033	D040	F004	F011	F035	K004
D006	D013	D020	D027	D034	D041	F005	F012	F037	K005
D007	D014	D021	D028	D035	D042	F006	F019	F038	K006

K007	K048	K111	P010	P057	P105	U006	U048	U090	U132
K008	K049	K112	P011	P058	P106	U007	U049	U091	U133
K009	K050	K113	P012	P059	P108	U008	U050	U092	U134
K010	K051	K114	P013	P060	P109	U009	U051	U093	U135
K011	K052	K115	P014	P062	P110	U010	U052	U094	U136
K013	K060	K116	P015	P063	P111	U011	U053	U095	U137
K014	K061	K117	P016	P064	P112	U012	U055	U096	U138
K015	K062	K118	P017	P065	P113	U014	U056	U097	U140
K016	K064	K123	P018	P066	P114	U015	U057	U098	U141
K017	K065	K124	P020	P067	P115	U016	U058	U099	U142
K018	K066	K125	P021	P068	P116	U017	U059	U101	U143
K019	K069	K126	P022	P069	P118	U018	U060	U102	U144
K020	K071	K131	P023	P070	P119	U019	U061	U103	U145
K021	K073	K132	P024	P071	P120	U020	U062	U105	U146
K022	K083	K136	P026	P072	P121	U021	U063	U106	U147
K023	K084	K141	P027	P073	P122	U022	U064	U107	U148
K024	K085	K142	P028	P074	P123	U023	U066	U108	U149
K025	K086	K143	P029	P075	P127	U024	U067	U109	U150
K026	K087	K144	P030	P076	P128	U025	U068	U110	U151
K027	K088	K145	P031	P077	P185	U026	U069	U111	U152
K028	K090	K147	P033	P078	P188	U027	U070	U112	U153
K029	K091	K148	P034	P081	P189	U028	U071	U113	U154
K030	K093	K149	P036	P082	P190	U029	U072	U114	U155
K031	K094	K150	P037	P084	P191	U030	U073	U115	U156
K032	K095	K151	P038	P085	P192	U031	U074	U116	U157
K033	K096	K156	P039	P087	P194	U032	U075	U117	U158
K034	K097	K157	P040	P088	P196	U033	U076	U118	U159
K035	K098	K158	P041	P089	P197	U034	U077	U119	U160
K036	K099	K159	P042	P092	P198	U035	U078	U120	U161
K037	K100	K160	P043	P093	P199	U036	U079	U121	U162
K038	K101	K161	P044	P094	P201	U037	U080	U122	U163
K039	K102	P001	P045	P095	P202	U038	U081	U123	U164
K040	K103	P002	P046	P096	P203	U039	U082	U124	U165
K041	K104	P003	P047	P097	P204	U041	U083	U125	U166
K042	K105	P004	P048	P098	P205	U042	U084	U126	U167
K043	K106	P005	P049	P099	U001	U043	U085	U127	U168
K044	K107	P006	P050	P101	U002	U044	U086	U128	U169
K045	K108	P007	P051	P102	U003	U045	U087	U129	U170
K046	K109	P008	P054	P103	U004	U046	U088	U130	U171
K047	K110	P009	P056	P104	U005	U047	U089	U131	U172

U173	U185	U197	U210	U222	U239	U279	U375	U386	U400
U174	U186	U200	U211	U223	U240	U280	U376	U387	U401
U176	U187	U201	U213	U225	U243	U328	U377	U389	U402
U177	U188	U202	U214	U226	U244	U353	U378	U390	U403
U178	U189	U203	U215	U227	U246	U359	U379	U391	U404
U179	U190	U204	U216	U228	U247	U364	U381	U392	U407
U180	U191	U205	U217	U234	U248	U365	U382	U393	U409
U181	U192	U206	U218	U235	U249	U366	U383	U394	U410
U182	U193	U207	U219	U236	U271	U367	U384	U395	U411
U183	U194	U208	U220	U237	U277	U372	U385	U396	
U184	U196	U209	U221	U238	U278	U373			

(d) The Permittee is prohibited from treating hazardous waste that is not identified in this permit condition.

(e) All incoming waste streams must meet the acceptance criteria set forth in the approved Waste Analysis Plan which is located in Section C and Appendix 1 of the approved Part B application. Specifically, the Permittee is prohibited from storing or treating hazardous waste that does not meet the Facility Waste Acceptance Conditions which are located in Appendix WAP-C of the approved Waste Analysis Plan.

F.2. <u>Design and Installation of New Filter Systems or Components</u>

(a) The Permittee shall construct the proposed filter system in accordance with Section D of the approved Part B application.

(b) Prior to operation of the newly constructed filter system, the Permittee shall submit the certification of installation of the filter system in accordance with 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.

F.3. <u>Containment and Detection of Releases.</u>

(a) Secondary containment must be designed, installed, and operated to prevent any migration of waste or accumulated liquid out of the system to soil, groundwater or surface water during the use of the miscellaneous unit.

(b) Secondary containment must be capable of detecting and collecting releases and accumulated liquids until the collected material is removed.

(c) The secondary containment must meet the requirements of OAC Rule 3745-55-93.

F.4. Operating Requirements

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

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

(c) The filters must be operated in accordance with manufacturer's instruction and accepted industry practice.

(d) The permittee must comply with the requirements of OAC Rule 3745-55-96 if a leak or spill occurs.

F.5. Inspection Schedules and Procedures.

(a) The Permittee shall inspect the Miscellaneous Units in accordance with the Inspection Schedule and shall complete the items in Permit Conditions F.5(b) and F.5(c) as part of those inspections:

(b) The Permittee shall inspect the overfill controls, in accordance with the procedure and schedule in the Part B permit application.

(c) The Permittee shall inspect the following components once each operating day:

(i) Aboveground portions of the miscellaneous unit, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the miscellaneous unit is being operated according to its design;

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the miscellaneous unit, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(e) The Permittee shall document compliance of Permit Condition F.5 in the operating record of the facility.

F.6. Response to Leaks or Spills.

(a) In the event of a leak or a spill from the miscellaneous unit, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

(i) Stop the flow of hazardous waste into the miscellaneous unit or secondary containment system and inspect the system to determine the cause of the release.

(ii) Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak or at an earlier practicable time to prevent further release and to allow inspection and repair of the system to be performed.

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

F.7. Recordkeeping and Reporting

(a) The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the secondary containment system to the environment. (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) (Releases that are contained within a secondary containment system need not be reported).

(b) Within 30 days of detecting a release to the environment from the filter system or secondary containment system, the Permittee shall report the following information to the Director: [OAC Rule 3745-55-96(D)(3)]

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

(iv) Proximity of downgradient drinking water, surface water, and populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee shall submit to the Director all certifications of major repairs (e.g. replacing non-routine components of the system) to correct leaks within seven days from returning the miscellaneous unit to use.

(d) The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the miscellaneous unit.

F.8. Special Miscellaneous Unit Provisions for Ignitable or Reactive Wastes

The Permittee shall not place ignitable or reactive waste in the miscellaneous unit or in the secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place it in the operating record.

F.9. Special Miscellaneous Units Provisions for Incompatible Wastes

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same miscellaneous unit or the same secondary containment system, unless the procedures specified in the Part B permit

application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record.

(b) The Permittee shall not place hazardous waste in a miscellaneous unit that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition F.9.(a) are met.

F.10. Closure and Post-Closure Care

(a) At closure of the miscellaneous units, the Permittee shall follow the procedures in the Closure Plan.

(b) Upon replacement of the existing admix and precoat tanks, the Permittee shall close the tanks in accordance with the approved closure plan for the filter building.

MODULE G

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MODULE H

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MODULE I

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MODULE J - GROUND WATER DETECTION MONITORING

J.1. Module Highlights

This module addresses the ground water detection monitoring program associated with the Closure Cell (formerly ponds 4, 5, and 7) at the Waste Management of Ohio facility at Vickery, Ohio. This unit is monitored under the Part B Permit regulations OAC Rule 3745-54-90 through 99. Upon approval of this permit the permittee shall continue to conduct a ground water detection monitoring program under the permitted facility rules.

The ground water detection monitoring system for the facility is comprised of two (2) separate monitoring systems. The first system is the capillary drain system which underlies the entire Closure Cell. Monitoring of this system allows the shallow overburden ground water to be sampled and analyzed. This provides an early warning detection system should the Closure Cell begin to leak. Samples taken for analysis are withdrawn from the capillary drain piping system as it enters the capillary sump.

The second of the ground water detection monitoring systems is comprised of eight (8) monitoring wells which are screened in the weathered and fractured zone of the Tymochtee Dolomite. This zone is considered to be the uppermost aquifer. The screened intervals for these wells range from 48 to 58 feet below ground surface (bgs) at well MW-24R to 51 to 61 feet bgs at well MW-14R, 30R, 36R and 37R. The monitoring wells consist of two upgradient well (MW-24R and MW-37R) and six downgradient wells near the compliance boundary (MW-14R, MW-15R, MW-16R, MW-20R, MW-30R and MW-36R).

All of the monitoring wells and sampling points listed in Permit Condition J.2 and the analytical compounds listed under Permit Condition J.3 are currently under the detection monitoring program. Compliance monitoring has not been initiated.

J.2. Well Location, Installation and Construction
OAC Rule 3745-54-97

The Permittee shall maintain a ground water monitoring system as specified below: [OAC Rule 3745-54-97]

(a) The Permittee shall maintain ground water monitoring wells and the capillary drain sampling point at the locations specified on Figure E-15 of Closure Cell Post-closure Ground Water Monitoring Plan in Volume II, Section E of the RCRA Part B Permit Application (hereafter referred to as the GWMP) and in conformance with the following list:

Background Wells (upgradient)	Downgradient Wells
MW-24	MW-14R
MW-37R	MW-15R
	MW-16R
Other Sampling Points	MW-20R
	MW-30R
Capillary Drain	MW-36R

(b) The Permittee shall maintain the monitoring wells identified in Permit Condition J.2(a), in accordance with the plans and specifications presented in Figure E-16 of GWMP.

(c) Any changes in the number, location, depth, or design of either an upgradient or downgradient well in the permitted ground water monitoring system will require a Class 2 modification according to the Appendix to OAC Rule 3745-50-51(D)(1)(a).

(d) Any replacement of an existing well that has been damaged or rendered inoperable, without change to location , design, or depth of the well will require a Class 1 Modification according to Appendix to OAC Rule 3745-50-51(D)(1)(b).

(e) Each of these types of changes must be accompanied by a revised map for Permit Condition J.2(a).

(f) All wells deleted from the monitoring program shall be plugged and abandoned in accordance with the approved specifications. The procedures used shall meet the standards outlined in the State of Ohio Technical Guidance for Sealing Unused Well (State Coordinating Committee on Ground Water, (1996)). Well plugging and abandonment methods, certification, and justification shall be submitted to the Ohio EPA within thirty (30) days after the date the well was removed from the monitoring program.

(g) Whenever any of the wells specified in Permit Condition J.2(a) are replaced for any reason, the Permittee must demonstrate to Ohio EPA within sixty (60) days of the date of replacement that the ground water chemistry at the replacement well is statistically comparable to that of the original well.

J.3. Indicator Parameters and Monitoring Constituents
OAC Rule 3745-54-98

(a) The Permittee shall monitor upgradient background wells (MW-37R and MW-24R) and downgradient wells (MW-14R, MW-15R, MW-16R, MW-20R, MW-30R and MW-36R), as described in Permit Condition J.2., for the following parameters and constituents: [OAC Rule 3745-54-98(A)]

Analyte or Constituent	Established Background Concentrations (as Prediction Limits, in micrograms/liter)
Arsenic, Dissolved	10.0
Cadmium, Dissolved	4.9
Chromium, Dissolved	10.0
Lead, Dissolved	5.0
Nickel, Dissolved	40.0
Zinc, Dissolved	20.0
Total Phenols	52.0
Benzene	4.0
Chlorobenzene	5.0
Chloroethane	10.0
Chloroform	5.0
cis-1,2-Dichloroethene	10.0
1,1-Dichloroethane	5.0
1,2-Dichloroethane	4.0
1,1-Dichloroethene	5.0
Ethanol	100.0
Ethylbenzene	5.0
Methyl Ethyl Ketone	50.0
Methylene Chloride	5.0
Toluene	5.0
trans-1,2-Dichloroethene	10.0
Trichloroethylene	4.0
1,1,1-Trichloroethane	5.0
Vinyl Chloride	2.0

J.4. Sampling and Analysis Procedures
OAC Rule 3745-54-97

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the ground water monitoring wells and the capillary drain sampling point described in Permit Condition J.2.: [OAC Rule 3745-54-97(D) and (E)]

(a) Ground water elevations shall be measured using the techniques described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(1)]

(b) Samples shall be collected and handled (including well evacuation, sample withdrawal, preservation, containerization, filtration and shipment) using the techniques and equipment described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(3)(a) and (b)]

(c) Field analysis shall be performed using instruments, procedures, and forms described in Section E.6.0 of the GWMP. Instruments shall be calibrated as described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(4)(b)]

(d) Sampling equipment shall be decontaminated using techniques described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(5)]

(e) Purge water shall be disposed in accordance with procedures described in Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(6)]

(f) Laboratory analytical methods, detection limits, and sample holding time shall be in accordance with Tables E-7 and E-8 of the GWMP. [OAC Rule 3745-54-97(D)(7)]

(g) Quality assurance, including field/lab/equipment blanks, duplicate samples, and identification of potential interferences, shall be in accordance with the methods described in Section E.6.0 of the GWMP [OAC Rule 3745-54-97(D)(8)]

(h) Chain of custody procedures, including standardized field tracking reporting forms, and sample labels, shall be in accordance with Section E.6.0 of the GWMP. [OAC Rule 3745-54-97(D)(9)]

J.5. Elevation of the Ground Water Surface
[OAC Rule 3745-54-97(F)]

(a) The Permittee shall determine the elevation of the ground water surface at each well each time the ground water is sampled, in accordance with Permit Condition J.7(b).

(b) The Permittee shall record the total depth of any newly installed wells, the surveyed elevation of the top of inner casing and the ground surface elevation in accordance with Permit Condition J.2 within sixty (60) days of the date of installation (with as-built drawings).

The Permittee shall record, on a facility map to be submitted as part of the semi-annual reports, the ground water elevations at all of the monitoring wells.

J.6. Statistical Procedures
[OAC Rule 3745-54-97(H)]

The Permittee shall conduct the statistical procedures as presented in the GWMP included in the Part B permit application.

The Permittee shall statistically evaluate the analytical results from the eight bedrock monitoring wells using prediction limits. These prediction limits were calculated using analytical results from background wells MW-24R and MW-37R.

The Permittee shall statistically evaluate the analytical results from the capillary drain using trend analysis. Data for the trend analysis was developed from analytical results of samples taken at the capillary drain.

J.7. Monitoring Program and Data Evaluation

(a) The Permittee shall collect, preserve, and analyze samples pursuant to Permit Condition J.4.

(b) The Permittee shall determine ground water quality, at each monitoring well and the capillary drain listed in Permit Condition J.2.(a), semi-annually during post-closure care period for the Closure Cell. The Permittee shall express the ground-water quality at each monitoring well in a form necessary for the determination of statistically significant increases.

(c) The Permittee shall determine the ground water flow rate and direction in the uppermost aquifer (Tymochtee Dolomite) at least annually. [OAC Rule 3745-54-98(E)]

(d) The Permittee shall determine whether there is a statistically significant increase over the background values for each parameter identified in Permit Condition J.3(a) each time ground water quality is determined at the compliance point. In determining whether such an increase has occurred, the Permittee must compare the ground water quality at each monitoring well specified in Permit Condition J.2(a) to the background value specified in Permit Condition J.3(a), in accordance with the statistical procedures specified in Permit Condition J.6. [OAC Rule 3745-54-98(F)]

(e) The Permittee shall perform the evaluations described in Permit Condition J.7.(d) within sixty (60) days after completion of sampling. [OAC Rule 3745-54-98(F)(2)]

J.8. Recordkeeping and Reporting
OAC Rule 3745-55-02

(a) Ohio EPA may request a copy of the full QA/QC report for a particular sampling event if circumstances warrant, but in general QA/QC data will not be required except as described below in this Condition.

(b) Operating Record
OAC Rule 3745-54-73(B)(5&6), OAC Rule 3745-54-98(C) & OAC Rule 3745-55-02

The Permittee shall enter all of the following information obtained in accordance with Permit Condition J.7 in the operation record as required by OAC Rule 3745-54-73(B)(5&6) and -54-98(C):

(i) Analytical results from each of the wells and their associated qualifiers including the following: method codes, detection limits, units of measurement, qualifiers on the data, definitions of any qualifiers used, any dilutions, spike, spike recovery %, and an explanation of any rejected results.

(ii) The date each well was sampled.

(iii) The date, time, and identification of all blanks and duplicates;

(iv) Any field log documentation of deviation from the procedures in the GWMP of the Part B permit application including, e.g. documentation of any problems encountered during sampling that resulted in either a change in procedures or sample collection

(v) The date the Permittee received the results from the laboratory;

(vi) Results of all blanks (trip, field, equipment, and method);

(vii) Results of the field parameters;

(viii) All chains of custody;

(ix) The date of completion of the statistical evaluation;

(x) The statistical evaluation of the data according to the statistical tests(s) that the Ohio EPA has specified (must include all computations and results of statistical tests);

(xi) Any changes in well status (i.e., going from unaffected to affected status and vice versa);

(xii) Ground water surface elevations taken at the time of sampling each well as required by OAC Rule 3745-55-02(A)(1);

(xiii) Data and results of the annual determination of the ground water flow rate and direction as required by OAC Rule 3745-55-02(A)(3); and

(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).

(c) The Permittee must submit an annual report to the Ohio EPA by March 1st. The annual reports must reference the titles and dates of any other periodic reports required by the Permit or any updates to those reports (for example, due to confirmation sampling, comments by Ohio EPA, etc), but do not need to include duplicates of hard copies previously submitted. The annual reports shall include, a reference to other periodic reports, an electronic copy

on diskette in the format supplied by Ohio EPA of all ground water and blank data for the calendar year in addition to any previous data used for background statistical comparisons. All electronic data shall be updated annually to reflect current conditions at the facility (i.e., new wells, new sampling dates).

(d) Other Reports

The Permittee shall comply with any reporting requirements that become necessary under Permit Condition J.10 in accordance with the schedule in that Condition. If any of these dates falls on a weekend, the reports will be due no later than the following business day. Resampling reports must include the same types of information as the initial reports.

The Permittee shall submit, at a minimum, the analytical results required by Permit Conditions J.7(b), the ground water elevation data required by Permit Conditions J.7(c), and the results of the initial statistical analyses required by Permit Condition J.7(d), in accordance with the following schedule:

Monitoring Well and Capillary Drain Samples Collected During the Months of:	***Results Due to the Director By:***
March - April	**July 1**
September - October	**January 1**

Should the semi-annual submittals include all the information required by the annual reporting form provided by the Ohio EPA, only the references to those semi-annual documents and the required diskette shall be submitted to meet the annual reporting requirements.

J.9. <u>Assurance of Compliance</u>

The Permittee shall assure the Ohio EPA that ground water monitoring and corrective action measures necessary to achieve compliance with the ground water protection standard under OAC Rule 3745-54-92 are taken during the term of the Permit. [OAC Rule 3745-54-98]

J.10 Special Requirements if Significant Increases Occur in Values for Parameters or Constituents [OAC Rule 3745-54-98(G)]

If the Permittee determines, pursuant to Permit Condition J.6., that there is statistically significant evidence of contamination by any constituent listed in Permit Condition J.3.(a) , the Permittee shall immediately implement the Verification / Validation and Response Procedures for the monitoring wells listed in Section E.7.4 and/or the Verification / Validation and Response Procedures for the capillary drain listed in Section E.7.5, of the GWMP included in the Part B Permit Application, as appropriate. If the analytical results and statistical evaluation of the resampling data confirm a significant statistical increase then the Permittee shall perform the requirements of OAC Rule 3745-54-98(G).

(a) Notify the Ohio EPA in writing within seven (7) days of that determination. The notification must indicate what parameters or constituents have shown statistically significant increases in addition to the analytical results. [OAC Rule 3745-54-98(G)(1)]

(b) Immediately sample the ground water in all wells and determine the concentration of all constituents identified in the Appendix to OAC Rule 3745-54-98. [OAC Rule 3745-54-98(G)(2)]

(c) If the Permittee desires, re-sample affected wells within one month and repeat the analysis for any compounds identified in the Appendix to OAC Rule 3745-54-98 that were detected. If the results of the second analysis confirm the initial results or if the Permittee elects not to re-sample, then the detected compounds form the basis for compliance monitoring. [OAC Rule 3745-54-98(G)(3)]

(d) Within 90 days, submit to the Ohio EPA an application for a permit modification to establish a compliance monitoring program in accordance with OAC Rule 3745-54-99. [OAC Rule 3745-54-98(G)(4)] The application must include the following information:

(i) An identification of the concentration of each Appendix to OAC Rule 3745-54-98 constituent found in the ground water at each well at the compliance point. [OAC Rule 3745-54-98(G)(4)(a)]

(ii) Any proposed changes to the ground water monitoring system at the facility necessary to meet the requirements of compliance monitoring (OAC Rule 3745-54-99). [OAC Rule 3745-54-98(G)(4)(b)]

(iii) Any proposed changes to the monitoring frequency, sampling and analysis procedures, or methods or statistical procedures used at the facility necessary to meet the requirements of compliance monitoring (OAC Rule 3745-54-99) and the Ground Water Protection Standard (OAC Rule 3745-54-92). [OAC Rule 3745-54-98 (G)(4)(c)]

(iv) For each hazardous constituent found at the compliance point, a proposed concentration limit under OAC Rule 3745-54-94(A)(1) or (A)(2), or a notice of intent to seek an alternate concentration limit for a hazardous constituent (OAC Rule 3745-54-94(B)). [OAC Rule 3745-54-98(G)(4)(d)]

(v) The Permittee shall begin sampling and analyzing for the new constituents at the next regularly scheduled sampling event following the event in which they were determined to be present.

(e) Submit to the Director a corrective action feasibility plan or all data necessary to satisfactorily justify an alternate concentration limit within 180 days of determining a statistically significant increase. [OAC Rule 3745-54-98(G)(5)]

(f) If the Permittee determines, pursuant to Permit Condition J.7., there is a statistically significant increase above the background values for the parameters specified in Permit Condition J.3(a), he may demonstrate that a source other than a regulated unit caused the increase or that the increase resulted from error in sampling, analysis, or evaluation. In such cases, the Permittee shall:

(i) Notify the Director in writing within seven (7) days of determining a statistically significant increase that he intends to make a demonstration. [OAC Rule 3745-54-98(G)(6)(a)]

(ii) Within 90 days of determining a statistically significant increase, submit a report to the Director which successfully demonstrates that a source other than a regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. [OAC Rule 3745-54-98(G)(6)(b)]

(iii) Within 90 days of determining a statistically significant increase, submit to the Director an application for a permit modification to make any appropriate changes to the detection monitoring program at the facility. [OAC Rule 3745-54-98(G)(6)(c)]

(iv) Continue to monitor in accordance with the detection monitoring program at the facility. [OAC Rule 3745-54-98(G)(6)(d)]

J.11. Request for Permit Modification

If the Permittee or the Ohio EPA determines the detection monitoring program no longer satisfies the requirements of the regulations, the Permittee must, within 90 days of the determination, submit an application for a permit modification to make any appropriate changes to the program which will satisfy the regulations. [OAC Rule 3745-54-98(H)]

MODULE K

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MODULE L

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MODULE M - POST-CLOSURE CARE

M.1. Module Highlights

At present, the Facility anticipates to clean close all waste management units which are presently in operation. Post-closure care, monitoring and maintenance of these units should not be necessary.

M.2. Unit Identification

The Permittee shall provide post-closure care for the following hazardous waste management units, subject to the terms and conditions of this permit, and as described as follows:

(a) Surface impoundments 4, 5, and 7 "closed-as-a-landfill" (Closure Cell). The Closure Cell also contains the fixed materials removed from Ponds 11 and 12 which have been clean closed.

Type of Waste Unit	*Unit No. or Other Designation*	*Maximum Waste Inventory*	*Description of Wastes Contained*	*Hazardous Waste No.*	*Start of Post Closure Period*
Landfill Cell	Closure Cell	119,747 yd^3	Fixed sludge contaminated	See Note 1	December 7, 1992
		60,638 yd^3	Fixed sludge contaminated clay Pond 5	See Note 1	
		39,239 yd^3	Fixed sludge contaminated clay Pond 7	See Note 1	
		66,707 yd^3	Fixed sludge contaminated clay Pond 11	See Note 1	
		49,808 yd^3	Fixed sludge contaminated clay Pond 12	See Note 1	

Type of Waste Unit	*Unit No. or Other Designation*	*Maximum Waste Inventory*	*Description of Wastes Contained*	*Hazardous Waste No.*	*Start of Post Closure Period*
		6,344 yd^3	Concrete debris Pond 4 & Oil Water Facility	See Note 1	
		40 yd^3	Steel Oil Water Facility	See Note 1	
		28,018 yd^3	Stone & clay stockpile & retention	See Note 1	
		1,024	Tires stockpile	See Note 1	
		59,532 yd^2	Geonetting stockpile	See Note 1	

NOTE 1: The Closure Cell at the Vickery facility serves the purpose of final disposal for the materials that have been removed, as part of the approved closure plan, from Ponds 4, 5, 7, 11, and 12. Sludge, contaminated clay and debris from Ponds 4, 5, and 7 were stabilized and stockpiled. The Closure Cell was constructed in the vicinity of where Ponds 4, 5 and 7 had existed. Upon cell construction, materials removed from Ponds 4, 5 and 7 were transferred to the Closure Cell. Materials from Ponds 11 and 12 were stabilized in place before transferring them to the Closure Cell.

The stabilized materials which are placed in the Closure Cell carry various characteristic and listed hazardous waste codes regulated under RCRA. In addition, the stabilized material is a Toxic Substances Control Act (TSCA) regulated PCB waste. Disposal of TSCA regulated PCB waste in the closure cell was approved by U. S. EPA via letter dated July 22, 1988.

M.3. <u>Post-Closure Procedures and Use of Property</u>

(a) The Permittee shall conduct post-closure care for each hazardous waste management unit listed in Permit Condition M.2. above, to begin after completion of closure of the unit and continue for 30 years after that date, except that the 30-year post-closure care period may be shortened upon application and demonstration approved by EPA that the facility is secure,

or it may be extended by EPA if the Director finds this is necessary to protect human health and the environment. [OAC Rule 3745-55-17(A)]

(b) The Permittee shall maintain and monitor the ground-water monitoring system and comply with all other applicable requirements of OAC Rule 3745-54-90 thru 99 and OAC Rule 3745-55-01 & 02 during the post-closure period. [OAC Rule 3745-55-17(A)(1)]

(c) The Permittee shall comply with the requirements for landfills, as follows: [OAC Rule 3745-57-10(B)]

(i) Maintain the integrity and effectiveness of the final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, or other events;

(ii) Continue to operate the leachate collection and removal system until leachate is no longer detected;

(iii) Maintain and monitor the ground-water monitoring system and comply with all other applicable requirements of OAC Rule 3745-54-90 thru 99 and OAC Rule 3745-55-01 & 02;

(iv) Prevent run-on and run-off from eroding or otherwise damaging the final cover; and

(v) Protect and maintain surveyed benchmarks used in complying with the surveying and recordkeeping requirements of OAC Rule 3745-57-09.

(d) The Permittee shall comply with all security requirements, as specified in the Part B permit application. [OAC Rule 3745-55-17(B)]

(e) The Permittee shall not allow any use of the units designated in Permit Condition M.2. which will disturb the integrity of the final cover, liners, any components of the containment system, or the function of the facility's monitoring systems during the post-closure care period. [OAC Rule 3745-55-17(C)]

(f) The Permittee shall implement the Post-Closure Plan contained in Section I of the approved Part B application. All post-closure care activities must be

conducted in accordance with the provisions of the Post-Closure Plan. [OAC Rule 3745-55-17(D) and OAC Rule 3745-55-18(B)]

M.4. Inspections

The Permittee shall inspect the components, structures, and equipment at the site in accordance with the Inspection Schedule in the Part B application. [OAC Rule 3745-55-17(A)(1)(b)]

M.5. Notices and Certification

(a) If the Permittee, or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous wastes and hazardous waste residues, the liner, if any; or contaminated soils, then he shall request a modification to this post-closure permit in accordance with the applicable requirements in Chapter OAC Rule 3745-50. The Permittee or any subsequent owner or operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of OAC Rule 3745-55-17(C). [OAC Rule 3745-55-19(C)]

(b) No later than 60 days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall submit to the Director, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan. The certification must be signed by the Permittee and an independent, registered professional engineer. Documentation supporting the independent, registered professional engineer's certification must be furnished to the Director upon request until the Director releases the Permittee from the financial assurance requirements for post-closure care under OAC Rule 3745-55-45. [OAC Rule 3745-55-20]

M.6. Financial Assurance

(a) The Permittee shall maintain financial assurance during the post-closure period and comply with all applicable requirements of OAC Rule 3745-55-40 thru 51. [OAC Rule 3745-55-45]

(b) The Permittee shall demonstrate to the Director that the value the of the financial assurance mechanism exceeds the remaining cost of post-closure,

in order for the Director to approve a release of funds. [OAC Rule 3745-55-45(A)(10)]

(c) The Permittee shall submit itemized bills to the Director when requesting reimbursement for post-closure care. [OAC Rule 3745-55-45(A)(11)]

M.7. Post-Closure Permit Modifications

The Permittee must request a permit modification to authorize a change in the approved Post-Closure Plan. This request must be in accordance with applicable requirements of Chapter OAC 3745-50, and must include a copy of the proposed amended Post-Closure Plan for approval by the Director. The Permittee shall request a permit modification whenever changes in operating plans or facility design affect the approved Post-Closure Plan, there is a change in the expected year of final closure, or other events occur during the active life of the facility that affect the approved Post-Closure Plan. The Permittee must submit a written request for a permit modification at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the Post-Closure Plan. [OAC 3745-55-18(D)]

M.8. Secondary Leachate Collection System Monitoring

The Permittee shall maintain and monitor the Secondary Leachate Collection System as described in Section E of the approved permit application.

END OF PERMIT CONDITIONS

Chemical Waste Management, Inc.

3956 State Route 412
Vickery, Ohio 43464
419/547-7791

B.1.8

FEDERAL EXPRESS &
CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 228 284 956

November 21, 1994

Mr. Donald Schregardus, Director
Ohio Environmental Protection Agency
1800 WaterMark Drive
P.O. Box 163669
Columbus, OH 43266-3669

Re: Ohio Hazardous Waste Permit Renewal
Chemical Waste Management, Inc.
U.S. EPA ID #: OHD020273819
Ohio ID #: 03-72-0191

Dear Mr. Schregardus:

Chemical Waste Management, Inc. (CWMI) appeals the above captioned Ohio Hazardous Waste Facility Installation and Operation Permit (the "Permit") in accordance with O.R.C. 3745.04 and serves notice pursuant to instructions contained in an Ohio EPA letter dated October 24, 1994, transmitting said permit to CWMI.

Attached is a tabulation of provisions of the Permit with which CWMI has issue. The majority of the provisions noted, CWMI believes, go beyond the requirements of Ohio environmental regulations. Accordingly, CWMI requests Ohio EPA to review comments on the draft Permit CWMI filed on November 11, 1993, for greater specificity. CWMI would like to communicate the balance of its issues in a face-to-face meeting or by subsequent correspondence, whatever Ohio EPA deems appropriate.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

CWMI looks forward to a resolution of the outstanding issues. Please direct any questions to the undersigned.

Very truly yours,

CHEMICAL WASTE MANAGEMENT, INC.

F.G. Nicar

F.G. Nicar
General Manager

FGN/tr

Attachment

Printed on recycled paper

cc w/att: Environmental Board of Review (Federal Express)
236 East Town Street
Room 300
Columbus, OH 43215

Charles Hull, OEPA-NWDO
Edwin Lim, OEPA-DHWM-CO
Vinayak Croke, USEPA-Region V

Ohio EPA Permit Conditions Appealed

CONDITION	CURRENT DESCRIPTION	REQUIRED CHANGE
A.1(b)	RESTRICTS MANAGEMENT OF HAZARDOUS WASTE TO THOSE ACTIVITIES AUTHORIZED IN THE PERMIT	INCORPORATE LANGUAGE THAT RECOGNIZES OTHER PERMITTED ACTIVITIES SUCH AS UIC PERMIT ACTIVITIES AND USEPA RCRA HSWA PERMIT.
A.11	RESTRICT OPERATING HOURS TO 7 AM TO 11 PM UNLESS NOTIFY NWDO FIRST	REMOVE FROM ; UNNECESSARILY RESTRICTIVE.
A.12.(c)	ADDS USE OF PHOTOGRAPHY	WHILE SITE HAS NOT PREVENTED AGENCY USE OF PHOTOGRAPHY, THE SITE DOES WISH TO ASSURE THAT TRADE SECRET INFORMATION IS PROTECTED. NEITHER RULE NOR THE LAW QUOTED ALLOW PHOTOGRAPHY; THEREFORE, THE LANGUAGE OF THE CONDITION SHOULD BE MADE TO MATCH THE QUOTED RULE.
A.12(d)	ALLOWS AGENCY TO SAMPLE	THE LANGUAGE MATCHES THE RULES. HOWEVER, THE FACILITY HAS EXPERIENCE WITH AGENCY PERSONNEL CAUSING DAMAGE TO THE SITE GROUNDWATER MONITORING SYSTEM BECAUSE THE SITE'S PLANS, WHICH HAD BEEN REVIEWED AND APPROVED BY THE AGENCY TO ENSURE THE INTEGRITY OF THE WELL SYSTEM, WERE NOT FOLLOWED BY THE AGENCY. THE GROUNDWATER MONITORING INTEGRITY NEEDS TO BE PROTECTED BY BOTH SITE PERSONNEL AND AGENCY PERSONNEL. LANGUAGE SHOULD BE ADDED TO REQUIRE THE AGENCY PERSONNEL TO FOLLOW ALL QUALITY CONTROL PROCEDURES IN THE SITE PLAN AND TO SAMPLE UNDER THE DIRECTION OF A QUALIFIED SITE SAMPLING TECHNICIAN.

A.21	REPORTING OF NON COMPLIANCE THAT THREATEN HUMAN HEALTH OR THE ENVIRONMENT.	THE LANGUAGE SHOULD BE CHANGED TO MATCH THE QUOTED RULE.
A.21(a)	REFERENCES A.20(b)(i) AND (ii)	THERE ARE NO SUCH SECTIONS.
A.22(a)	REFERENCES A.20	APPEARS TO BE INCORRECT REFERENCE.
A.23	REQUIRES OTHER NON-COMPLIANCES TO BE REPORTED WITHIN 15 DAYS OF DISCOVERY	QUOTED RULE REQUIRES REPORTING OF OTHER NON-COMPLIANCES AT THE TIME MONITORING REPORTS ARE SUBMITTED. THE FACILITY SUBMITS MONITORING REPORTS FOR GROUNDWATER TO THE AGENCY. REPORTS OF OTHER NON-COMPLIANCE SHOULD BE SUBMITTED WITH THESE REPORTS. WE ASSUME THIS CONDITION MEANT TO SUBMIT REPORT WITHIN 15 DAYS OF THE END OF THE MONITORING PERIOD.
A.29	LIST AGENCY MAILING ADDRESS	THE MAILING ADDRESS FOR BOWLING GREEN IS A P.O. BOX THAT WE HAVE BEEN NOTIFIED DOESN'T EXIST BUT TO WHICH WE MUST SEND INFORMATION. NEED TO EITHER REMOVE ADDRESSES OR ALLOW FOR POTENTIAL OF AGENCY CHANGING ADDRESS.
A.29(b)(iv)	REFERENCES A.28(a)(i)	THERE IS NO SUCH SECTION.
A.29(f)	IN 60 DAYS, REVISE AND SUBMIT SECTION E.6.0 BY UPDATING TABLES E-8, E-9, AND E-10 AND PQL's PER CONDITION F.3.(a)	A REVISED TABLE WILL BE SUBMITTED; HOWEVER, THE PQL's OF THE SUBMISSION ARE BEING APPEALED IN CONDITION F.3.(a). SUBMISSION OF THIS TABLE DOES NOT IMPLY AGREEMENT WITH THE PQL's.

A.31	GENERATOR WASTE MINIMIZATION REPORT	THIS CONDITION SHOULD BE REMOVED. THE QUOTED RULES ARE NOT APPLICABLE TO THE SITE. RULE OAC 3745-54-75((H), (I) & (J) ARE FOR GENERATORS WHO TREAT, STORE OR DISPOSE OF HAZARDOUS WASTE ON-SITE. OAC 7345-54-73(B)(9) REQUIRES ANNUAL CERTIFICATION THAT SITE REDUCES THE QUANTITY AND TOXICITY OF HAZARDOUS WASTE IT GENERATES TO THE EXTENT ECONOMICALLY PRACTICABLE. OAC 3745-54-20(B) REFERS TO FILLING OUT THE MANIFEST WHICH HAS A STATEMENT SIMILAR TO OAC 3745-54-73(B)(9)
B.3.	LEFT BLANK	THE PERMIT SHOULD BE A STAND ALONE DOCUMENT AND SHOULD COVER THE WPR PROCESS.
B.5.	WASTE MINIMIZATION ALTERNATIVES	THIS CONDITION SHOULD BE REMOVED FROM THE PERMIT. THE ENFORCEMENT OF THIS ACTIVITY ON GENERATORS IS RESERVED TO OHIO EPA BY STATUTE. NOTE THAT IT IS ONLY FOR HAZARDOUS WASTES.
B.8.(a)	REQUIRES PERFORMING NITRIC COMPATIBILITY TEST AT 120 F.	THIS CONDITION SHOULD BE REMOVED. THIS TESTING IS NO LONGER APPLICABLE AND HAS BEEN SUPERSEDED BY ANALYSIS OF SOLUTION MILLIVOLT AND CONTROL OF THE OXIDATION/REDUCTION POTENTIAL OF THE BLENDED STREAMS. THE SITE WASTE HANDLING PROCEDURES DETAILS THIS TESTING.
B.9.	REQUIRES FOLLOWING WAP IN APPENDIX 2 OF APPROVED PART B PERMIT APPLICATION	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.

B.10.	REQUIRES FOLLOWING SECTION F FOR SECURITY	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.11.	FOLLOW INSPECTION PLAN IN APPLICATION.	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.12.	FOLLOW TRAINING PLAN IN APPLICATION	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.14.	MAINTAIN ALL EQUIPMENT IN THE CONTINGENCY PLAN IN THE APPLICATION	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.15.	TEST AND MAINTAIN EQUIPMENT IN B.14.	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.

B.16.	MAINTAIN ACCESS TO COMMUNICATIONS AND ALARM SYSTEM AS SHOWN IN SECTION F OF PERMIT APP.	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.18.	REFERS TO EVACUATION ROUTES DEPICTED IN SECTION G AND APPENDIX 4 OF APPL.	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.18(a)	ARRANGEMENT WITH LOCAL AUTHORITIES	MAKE LANGUAGE MATCH RULE. SPECIFICALLY CHANGE THE WORDS 'BY MAKING A DILIGENT EFFORT TO' TO 'AND SHALL ATTEMPT TO'.
B.18.(c)	REQUIRES SUBMISSION OF CONTINGENCY PLAN WITHIN 10 DAYS OF CHANGES	MAKE LANGUAGE MATCH RULE.
B.19.	FOLLOW SURFACE WATER MANAGEMENT PLAN IN PERMIT APPLICATION	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.20	CONTINGENCY PLAN IMPLEMENTATION	REVISE LANGUAGE TO MATCH RULES. IF NOT, NEED TO HAVE ALLOWANCE TO CHANGE CONTINGENCY PLAN TO ALLOW FOR TIERED IMPLEMENTATION.
B.20.(f)	REMOVE ALL WASTE RESIDUES FROM LEAKS OR SPILLS IN ALL PUMP HOUSES WITHIN 24 HOURS	CHANGE LANGUAGE TO 'REMOVE ALL UNCONTAINED WASTE RESIDUES FROM LEAKS AND SPILLS OF HAZARDOUS WASTE IN ALL PUMP HOUSES WITHIN 24 HOURS OF DISCOVERY OF SUCH INCIDENT.'

B.21.	COMPLY WITH CONTINGENCY PLAN AS SET FORTH IN SECTION G AND APPENDIX 4	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.23.	ANNUAL REVIEW OF CONTINGENCY PLAN	REMOVE FROM PERMIT. THE RULES DO NOT REQUIRE ANNUAL REVIEW OF CONTINGENCY PLAN.
B.26.	NOTIFY OEPA NWDO OF NEW WASTE MANAGEMENT PROCEDURES WHICH VARY FROM NORMAL OPERATIONS	REMOVE FROM PERMIT. THIS CONDITION IS NOT DEFINED IN RULES OR IN THE PERMIT AND IS VAGUE AND AMBIGUOUS.
B.27.	COMPLY WITH EMERGENCY PROCEDURES IN SECTION G AND APPENDIX 4 OF THE APP.	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.33.	CLOSURE PERFORMANCE	REMOVE 'IN ACCORDANCE WITH' AND REPLACE WITH 'IN REFERENCE TO'. GUIDANCE DOCUMENTS DO NOT HAVE THE FORCE AND EFFECT OF LAW.
B.34.	CLOSURE PLAN	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
B.38.	TIME ALLOWED FOR CLOSURE	RULE ALLOWS OPTION OF AN ADDITIONAL 180 DAYS CLOSURE EXTENSION. MAKE LANGUAGE MATCH RULE AND ALLOW SAME OPTIONS.

B.39.(b)	CLOSURE NOTICE 5 DAYS PRIOR TO RINSEATE SAMPLING AND SOIL SAMPLING MUST GIVE NOTICE	REMOVE FROM PERMIT. THE AGENCY WILL HAVE BEEN PREVIOUSLY NOTIFIED OF CLOSURE ACTIVITIES. TO HAVE ADDITIONAL NOTICE REQUIREMENTS IS UNNEEDED AND NOT CONSISTENT WITH REGULATIONS. IN ADDITION, THE AGENCY HAS A FULL TIME ON-SITE INSPECTOR WHO CAN OBSERVE ALL SUCH ACTIVITIES ON A DAILY BASIS.
B.41.	FINANCIAL ASSURANCE OF FACILITY CLOSURE	REMOVE FROM PERMIT. AUTHORITY FOR APPROVAL OF DIRECTOR TO CHANGE FINANCIAL MECHANISM NOT IN RULE.
B.42.	LIABILITY REQUIREMENTS	ADD WORDS ' AS APPLICABLE' AFTER 'OAC RULE 3745-55-51'.
B.49(d)	SUBMIT LDR LIST TO OEPA PER OAC 3745-50-51	REMOVE REQUIREMENT TO SUBMIT LIST TO OEPA AS IT IS NOT REQUIRED BY OAC 3745-50-51.
B.49(f) & (g) & (i)	MUST TEST RESIDUES FOR LAND DISPOSAL RESTRICTIONS	INCLUDE LANGUAGE AS IN THE RULE WHICH ALLOWS THE PERMITTEE TO USE KNOWLEDGE OF HIS WASTE OR TESTING. IN ADDITION, THE OPTION OF KNOWING THE WASTE DOES NOT MEET THE TREATMENT STANDARD AND SENDING IT OFFSITE FOR TREATMENT PRIOR TO DISPOSAL MUST BE ALLOWED AS IN THE REGULATIONS. EVERY RESTRICTED WASTE DOES NOT HAVE TO BE TESTED BY THE PERMITTEE TO ASSURE IT MEETS TREATMENT STANDARDS PRIOR TO SENDING IT OFFSITE FOR TREATMENT .
B.49.(o)	REFERS TO SECTION B.42.(n)	THERE IS NO SUCH SECTION B.42(n), SHOULD BE B.49.(n)
D.1.	HIGHLIGHTS	PAGE 34, PARAGRAPH 1, (3) SHOULD HAVE FILTER PLURAL. SO SHOULD READ 'THE FILTERS AND FILTER BUILDINGS'. PAGE 35, PARAGRAPH 2, THE FLOORS OF THE EXISTING FILTER BUILDINGS DO NOT HAVE A LINER.

D.2.(a)	ALLOWS WASTE IN LISTED TANKS	THE PERMIT APPLICATION REQUESTED THE ABILITY TO REPLACE CERTAIN TANKS. THIS CONDITION LISTS THE TANKS THE FACILITY IS ALLOWED TO USE. IT DOES NOT LIST THE EXISTING TANKS WHICH WERE IN SERVICE THE DAY THE PERMIT WAS ISSUED AND WHICH CONTINUE TO BE IN SERVICE. THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW THE EXISTING TANKS TO BE USED UNTIL REPLACEMENT TANKS ARE INSTALLED. IN ADDITION, THE TANK LIST SHOWS 'T-18' NOT' T-400'. T-18 IS THE EXISTING FAT-B TANK AND T-400 IS THE REPLACEMENT TANK. ALSO SEVERAL TANKS HAVE "SEE T&C" IN DESCRIPTION. PLEASE DEFINE THIS.
D.2.(c)	WASTE CODE LIST	ADD THE WASTE CODE K045 TO THE SCRUBBER WATER LIST WHICH APPEARS TO BE MISSING DUE TO A TYPOGRAPHICAL ERROR.
D.2.(d)	WASTE ACCEPTANCE CONDITIONS	REMOVE FROM PERMIT. THESE TYPE OF REQUIREMENTS ARE PART OF THE AGENCY APPROVED WAP. THE WAP IS A DYNAMIC DOCUMENT AND AS IT CHANGES THE AGENCY WILL REVIEW AND APPROVE THE CHANGES. HAVING THESE REQUIREMENTS LISTED AGAIN IS REDUNDANT AND CREATES AN ADDITIONAL CUMBERSOME STEP IN REVISING THE SITE MANAGEMENT PRACTICES. IN ADDITION, THE LIMITATION OF PHENOL AT 30,000 PPM IS NO LONGER APPROPRIATE AND WAS REMOVED FROM OUR WASTE ANALYSIS PLAN SINCE THE SITE HAS THE CAPABILITY OF HANDLING SUCH WASTE.
D.2.(e)	WASTE ANALYSIS PLAN	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.

D.3.(c)(ii)	NOTIFY THE DIRECTOR, IN ACCORDANCE WITH PERMIT CONDITION D.7. OF THIS PERMIT	THE REFERENCED PERMIT CONDITION DOES NOT ADDRESS NOTIFICATION OF THE DIRECTOR.
D.6.	RESPONSE TO LEAKS OR SPILLS	CHANGE LANGUAGE TO MATCH RULE.
D.7.(a)	PERFORM TANK INSPECTIONS AND COMPLETE THE ITEMS IN PERMIT CONDITION D.6(b) AND D.6(c) AS PART OF THOSE INSPECTIONS	REVISE LANGUAGE TO READ 'THE PERMITTEE SHALL INSPECT THE TANK SYSTEMS, IN ACCORDANCE WITH THE INSPECTION SCHEDULE.'
D.8.(b)(iii)	TANK RELEASE REPORTING	CHANGE LANGUAGE TO MATCH RULE.

F.3.(a)	ESTABLISHES BACKGROUND PREDICTION LIMITS.	NEED TO CHANGE SOME PREDICTION LIMITS. SPECIFICALLY: 1. PCB's SHOULD BE REMOVED AS IT PART OF THE TSCA REQUIREMENTS. IN ADDITION, THE FEDERAL AND STATE REGULATIONS LIST THE PQL FOR TOTAL AROCHLORS AS 50 PPB. 2. 1,2-DICHLOROETHANE; THE MCL IN 3745-81-12(B) IS 5 PPB. THE PERMIT APPEARS TO HAVE A TYPO AND LISTS 0.5 PPB. 3. CADMIUM; THE AGENCY LISTS THE LIMIT AS 40 PPB. IN OUR COMMENTS, WE INDICATED THE PQL WAS 5 PPB. PER 3745-81-11(A) THE MCL FOR CADMIUM IS 5 PPB. IN THE ISSUED PERMIT, THE AGENCY HAS 1 PPB. WE BELIEVE THIS IS A TYPO. 4. BENZENE, THE MCL IN 3745-81-12(B), IS 5 PPB. THE PERMIT APPEARS TO HAVE A TYPO AND LISTS 2 PPB. 5. METHANOL SHOULD BE REMOVED FROM THE LIST BECAUSE IT IS NOT A HAZARDOUS CONSTITUENT. 6. TRICHLOROETHYLENE , THE MCL IN 3745-81-12(B), IS 5 PPB. THE PERMIT APPEARS TO HAVE A TYPO AND LISTS 1 PPB. 7. ZINC SHOULD HAVE THE WORD 'DISSOLVED' AFTER IT.
F.3.(b)	ESTABLISH BACKGROUND FOR WELLS MW-24R AND MW-37R IN FIRST YEAR AFTER PERMIT	THE SITE HAS ALREADY ESTABLISHED BACKGROUND FOR THESE WELLS. AT THE END OF THE LAST PARAGRAPH REMOVE THE WORDS 'WITHIN THE FIRST YEAR AFTER PERMIT APPROVAL'.

F.4.	CONDUCT SAMPLING AND ANALYSIS PER QA/QC PROCEDURES IN APPENDIX 14-B	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
F.5.(b)	RECORD THE SURVEYED ELEVATION OF THE MONITORING WELLS AND CAPILLARY DRAIN SUMP ON THE FACILITY MAP	REMOVE THE CAPILLARY DRAIN ELEVATION FROM INCLUSION ON THE CONTOUR MAPS. THERE IS NO CORRELATION BETWEEN GROUNDWATER ELEVATIONS AND THE CAPILLARY DRAIN SUMP.
F.6.	USED STATISTICAL PROCEDURES IN SECTION E.7 OF APPLICATION	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
F.9.(a)(i)	IMPLEMENT VERIFICATION / VALIDATION PROCEDURES PER APPLICATION	THE PERMIT LANGUAGE NEEDS TO BE MODIFIED TO ALLOW FOR CHANGES IN THE REFERENCE PLAN. THESE PLANS ARE NOT STATIC AND CHANGE THROUGH TIME. IN FACT, THE PLANS IN THE APPLICATION HAVE CHANGED SINCE SUBMISSION OF THE APPLICATION DUE TO AGENCY ACTIONS REQUIRING THEM TO CHANGE.
H.6.(b)(ii)	REFERS TO PERMIT CONDITION M.3(b)(i)	THERE IS NO SUCH PERMIT CONDITION.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Revised Ohio Hazardous Waste Facility Installation and Operation Permit

Date of Issuance: October 8, 1997
Effective Date: October 8, 1997

US EPA ID No: OHD 020 273 819
Ohio ID No: 03-72-0191

Name of Facility: Chemical Waste Management, Inc.

Mailing Address: 3956 State Route 412
Vickery, OH 43464

Facility Location: 3956 State Route 412
Vickery, OH 43464

Person to Contact: Mr. F. G. Nicar, General Manager

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This Revised 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(L) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above referenced permit number as renewed on October 24, 1994, is hereby incorporated by reference in its entirety except as it may be revised herein.

This revision of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.

The Permittee shall comply with all requirements of the revised Part B permit application as amended or supplemented on July 15, 1997. The information contained in the revised Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations, or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the revised permit application are hereby incorporated as express, binding terms and conditions of this revised permit.

The revised terms and conditions of this permit are attached hereto and are incorporated herein by reference. The revised terms and conditions supersede and replace the corresponding pages found in the October 24, 1994 renewal permit.

Donald R. Schregardus
Director

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.
revper.st
By: Janice Ou Date 10/8/97

SUMMARY OF REVISIONS TO THE HAZARDOUS WASTE INSTALLATION AND OPERATION PERMIT

Chemical Waste Management, Inc.
U.S. EPA ID No: OHD 020 273 819
Ohio Permit No: 03-72-0191

On October 24, 1994, Ohio EPA issued an Ohio Hazardous Waste Renewal Permit to CWM. The permit allowed CWM to store and/or treat a total of 126,000,000 gallons/year throughput (630,500 tons per year), but not to exceed 650,500 gallons/day throughput at its facility in Vickery, Ohio. On November 22, 1994, CWM appealed conditions of the renewal permit to the Environmental Review Appeals Commission (formerly the Environment Board of Review) pursuant to Section 3745.04 of the Ohio Revised Code (Case No. EBR 723242.) As a part of the resolution of this appeal, Ohio EPA agreed in the Environmental Review Appeals Commission Stipulation and Settlement Agreement (Settlement Agreement) dated January 23, 1997 to reissue the permit with the revised portions that were a result of the settlement.

The changes in the revised Permit as a result of the Settlement Agreement dated January 23, 1997 have been classified by the Ohio EPA as a revision and accordingly Permit Conditions A.1, A.11, A.12, A.13, A.21, A.22, A.29, A.31, B.3, B.5, B.8, B.18, B.20, B.26, B.33, B.38, B.39, B.41, B.42, B.49, D.1, D.2, D.3, D.4, D.6, D.7, F.3, F.4, F.5 and H.6 have been revised.

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MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1. Effect of Permit.
ORC Sections 3734.02(F) and 3745.05

(a) The Permittee is authorized to treat hazardous waste in tanks and filtration systems (grit filters, filterpress/leaf filters, polish filters, and guard filters), and to store hazardous waste in tanks, in accordance with the terms and conditions of this permit, ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the approved hazardous waste facility installation and operation permit renewal application, as such application has been revised and supplemented and as such application may be revised or modified pursuant to the hazardous waste rules. The renewal of the "surface impoundment, closed-as-a-landfill" reflects the storage, treatment, and disposal volumes of Ponds # 4, # 5, # 7, # 11 and # 12, and other miscellaneous on and off-site construction debris, and is included for the purpose of accomplishing post closure activities. These units have been certified by an independent engineer [Appendix I-(A)] as being closed in accordance with the approved closure plan. The approved Part B permit application as submitted to Ohio EPA on October 25, 1988 and last updated on August 31, 1993, and any subsequent approved amendments thereto, is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.

(b) Any management of hazardous waste not authorized by this permit is prohibited, unless (1) some other management of hazardous waste is authorized under a permit by rule under rules adopted by the Director or some other management is not subject to permit requirements under rules adopted by the Director, and (2) applicable law independently and validly authorizes some other management of hazardous waste without regard to the requirements of this permit, and the appropriate authorizations are obtained under that law, or (3) some other management is exempted from the requirements of this permit by order of the Director issued pursuant to O.R.C. 3734.02(G). Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights.

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

The Permittee shall furnish the Ohio Environmental Protection Agency, within a reasonable time established by the Agency, any relevant information which the Agency may request to determine whether cause exists for modifying, revising, revoking or suspending this permit or to determine compliance with this permit. The Permittee shall also furnish the Agency, upon request, copies of records required to be kept by this permit.

A.11 OPERATING HOURS

The Permittee may receive waste from the hours of 11:00 PM to 7:00 AM in those instances when, through no fault of the Permittee, a generator and/or transporter experiences some unforeseen circumstance and/or emergency which would not allow the waste to be received during normal operating hours (7:00 AM to 11:00 PM). Such "off-hours" receipt of waste may be conducted under the above described circumstances. All permit requirements must be followed for waste received during these "off-hours" and the Permittee must provide the Northwest District Office with prior notification. If no one is present at the District Office or at the on-site inspector trailer at the time the notification is made, the notification may be made by telecopy or voice mail.

A.12. Inspection and Entry.
OAC Rule 3745-50-58(I) and ORC Section 3734.07

(a) The Permittee shall allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification to:

(i) enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;

(ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

(iii) inspect and photograph at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and condition of this permit; and

(iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

(b) The Ohio EPA shall provide the Permittee with an opportunity to review photographs taken by Ohio EPA in order for Permittee to claim confidentiality pursuant to Ohio Trade Secret Law and OAC Rule 3745-50-30(B).

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A.13. Monitoring and Records.
OAC Rules 3745-50-48 and 3745-50-58(J)

(a) Any sample and measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical /Chemical Methods; SW-846:Third Edition, November 1986; and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater: Seventeenth Edition, 1989; and additional supplements or editions thereof; or an equivalent method as specified in the approved waste analysis plan, or as such term is defined and used in the Ohio hazardous waste rules.

(b) Records of monitoring information shall specify the:

(i) date(s), exact place(s), and time(s) of sampling or measurements;

(ii) individual(s) who performed the sampling or measurements;

(iii) date(s) analyses were performed;

(iv) individual(s) who performed the analyses;

(v) analytical technique(s) or method(s) used; and

(vi) results of such analyses.

A.14. Certification of Records
OAC Rule 3745-50-58

All applications, reports or information submitted to the Director shall be properly certified in accordance with OAC Rules 3745-50-58(K) and 3745-50-42.

A.15. Retention of Records.
OAC Rules 3745-50-58(J) and 3745-50-58(M)

(a) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports and records.

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A.19. Transfer of Permits.
OAC Rules 3745-50-52; 3745-50-58(L)(3) and 3745-54-12

(a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified or revised under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility the Permittee shall notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder.

(b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

A.20. Compliance Schedules.
OAC Rule 3745-50-58(L)(5)

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Ohio Environmental Protection Agency no later than fourteen (14) days following each scheduled date, unless otherwise specified in the compliance schedule.

A.21. Immediate Reporting of Noncompliance.
OAC Rule 3745-50-58(L)(6)

(a) The Permittee shall report orally to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response within two hours from the time the Permittee becomes aware of the circumstances of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment, including:

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(i) information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies;

(ii) any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management facility which could threaten the environment or human health inside or outside the facility.

(b) The report shall consist of the following information:

(i) name, address, and telephone number of the owner or operator;

(ii) name, address, and telephone number of the facility;

(iii) date, time, and type of incident;

(iv) name and quantity of materials involved;

(v) the extent of injuries, if any;

(vi) an assessment of actual or potential hazards to the environment and human health inside and outside the facility, where this is applicable;

(vii) estimated quantity and disposition of recovered material that resulted from the release, discharge or incident.

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A.22. Follow-Up Written Report of Noncompliance.
OAC Rule 3745-50-58(L)(6)(c)

(a) A written report shall also be provided to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response and the Division of Hazardous Waste Management, Northwest District Office, within five (5) days of the time the Permittee becomes aware of the circumstances reported in Condition A. 21.

(b) The written report shall contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

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

A.23. Other Noncompliance.
OAC Rule 3745-50-58(L)(10)

The Permittee shall report to the Ohio Environmental Protection Agency Division of Hazardous Waste Management's Central Office, all other instances of noncompliance not provided for in Condition A.21. These reports shall be submitted within fifteen (15) days of the time at which the Permittee is aware of such noncompliance. Such reports shall contain all information set forth within Condition A.21 of this permit.

A.24. Certification of Construction.
OAC Rule 3745-50-58(L)(2)

Pursuant to OAC 3745-50-58(L)(2) the Permittee may not commence treatment or storage of hazardous waste in the revised portion of the facility until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or revised in compliance with the Permit; and

(a) the Director has inspected the newly constructed or revised portion of the facility and finds it to be in compliance with the conditions of the permit; or

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A.29. Compliance Schedule - Documents.

Unless specified otherwise, the Permittee shall submit the documents listed below to:

Ohio EPA, DHWM
1800 WaterMark Dr.
Columbus, Ohio 43215
Attn: Data Management Section

Ohio EPA, NWDO
347 North Dunbridge Road
Bowling Green, Ohio 43402
Attn: DHWM Unit Supervisor

(a) The Permittee shall submit to the Ohio EPA within thirty (30) days after permit journalization, in accordance with the Ohio hazardous waste rules, the following:

Updated financial requirements for closure of the facility and liability requirements. This includes the cost estimate for closure as required by OAC rule 3745-55-42, financial assurance for facility as required by OAC Rule 3745-55-43, and liability insurance as required by OAC 3745-55-47.

(b) The Permittee shall not manage hazardous waste in the revised portions of the facility until compliance is achieved with the Ohio hazardous waste rules and the terms and conditions of this permit, and with the following:

(i) Documents required by this condition shall be submitted as follows:

(aa) At least thirty (30) days prior to commencing construction at the facility, the Permittee shall submit to the Ohio EPA all relevant detailed final design and construction plans as approved by the Building Official in accordance with OAC Rule 4101:2-1-23 (including ancillary equipment, blue prints, material of the construction, etc.) covering each aspect of the proposed construction. The final design and construction plans mean final design and specifications necessary for the commencement of the construction.

(bb) A schedule of construction including the estimated starting and completion dates.

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(ii) If the final plans, as submitted, are inconsistent with the conceptual and/or preliminary plans contained in the approved Part B permit application and with the terms and conditions of this permit, such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a revised/modified permit.

(iii) Upon completion of construction, the Permittee shall submit to Ohio EPA, by certified mail or hand delivery, a "certificate of use and occupancy" issued by the Building Official in accordance with OAC rule 4101:2-1-27 and a certification stating that the facility has been constructed/revised in compliance with applicable rules, the terms and conditions of this permit, applicable state building codes (including codes for fire, electrical service, and plumbing), and the approved application.

(iv) Within sixty (60) days after completion of construction, "as built" drawings shall be submitted to Ohio EPA. If the submitted "as built" drawings appear inconsistent with the construction design plans submitted under Condition A.29(b)(i)(aa), such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a revised/modified permit.

(v) The Certification of Construction documents required in Condition A.24. of this Permit.

(c) The Permittee shall submit to the Ohio EPA the following:

	Item	Date Due to the Director
(i)	Tank data sheets for the following: T-94, T-95, T-96, T-98, T-700, T-800, T-500, T-300, T-400 and T-600	60 days prior to Installation
(ii)	Demonstration of secondary containment which meets the requirements of OAC Rule 3745-55-93 (B) through (F) for the following tanks: T94, T-95, T-96, T-98, T-700, T-800, T-500, T-300, T-400 and T-600	60 days prior to installation

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(iii)	Documentation of the age of the following tanks: T-7, T-8, T-19, T-17, T-18, T-20 and Lab Waste Tank.	60 days after the effective date of this permit
(iv)	Contingent Post-Closure Plan which meets the requirements of OAC Rule 3745-55-97 (B)(C) for tanks effected by this permit.	60 days after the effective date of this permit.

(d) The Permittee shall, within 60 days of permit journalization, revise and submit page E-63 by striking out references to WMI procedures (WMI Manual for Groundwater Sampling).

(e) The Permittee shall, within 60 days of permit journalization, revise and submit Section E.6.0 to include procedures and techniques for measurement of water levels, field measurements, sample collection, sample documentation chain of custody, and any other pertinent aspects of sampling of the capillary drain.

(f) The Permittee shall, within 60 days of permit journalization, revise and submit section E.6.0 by updating Tables E-8, E-9 and E-10 and providing any other changes necessary to reflect changes made in the PQL's by permit condition F.3.(a).

(g) The Permittee shall submit to the Ohio EPA within thirty (30) days after permit journalization, Section E of the application containing the revised pages reflecting changes in the established background concentrations prediction limit for ground water detection monitoring as per settlement of case no. EBR 723242.

A.30. Documents to be Maintained at the Facility.

(a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from

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(c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.31. Waste Minimization Report.
OAC Rule 3745-54-73

(a) The Permittee shall submit to the Director the current executive summary of the waste minimization and treatment plan adopted by Permittee under ORC Section 6111.045(A) within one hundred eighty (180) days of journalization of the permit.

(b) Every three years after Permittee's adoption of its waste minimization and treatment plan, on or before the anniversary date of the adoption of the plan, the Permittee shall submit to the Director a revised executive summary of the plan that meets the applicable requirements of ORC Section 6111.045.

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MODULE B - GENERAL FACILITY CONDITIONS

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

(a) The Permittee shall design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, and ground or surface waters which could threaten human health or the environment as required by OAC Rule 3745-54-31.

(b) The Permittee shall not accept more than 630,500 tons (Basis: 126,000,000 gallons converted to tons based on a specific gravity of 1.2. This annual throughput number reflects the limitation found in the underground injection control permit.) in any one calendar year from any sources during the life of the permit. This is a facility wide limitation and includes all units.

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

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

(b) Hazardous Waste from Off-Site Sources

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

B.3. Waste Product Review (WPR)

(a) Prior to accepting a generator's waste stream, the Permittee shall submit to the Ohio Environmental Protection Agency, information about the waste stream so that Ohio EPA may approve, conditionally approve or deny the acceptance of the waste stream by the Permittee. This information shall include, but not be limited to, a completed and signed waste profile, a completed waste analysis report containing analytical data

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to adequately characterize the waste for characteristic or listed hazardous waste constituents, and a site decision to manage the waste. The Permittee shall not accept a waste stream if the OhioEPA has determined that:

(i) The waste is not among those which the Permittee is authorized to accept by this permit;

(ii) Acceptance of the waste is contrary to specific regulation promulgated by Ohio EPA;

(iii) The waste is incompatible with the inventory of wastes at the facility or acceptance of the waste would cause harm to the environment or to operations of the facility;

(iv) The waste differs in a material respect from other wastes accepted at the facility in a manner that will cause harm to the environment even if properly disposed of at the facility; or

(v) The waste contains TSCA regulated levels of PCB's.

(b) The Permittee shall meet with Ohio EPA no more than weekly to present waste streams for approval. Ohio EPA shall timely review all requests for new waste streams but shall respond in all cases within five (5) days after receiving the Permittee's information for requests made in the ordinary course of business and shall respond within twenty-four (24) hours after receiving Permittee's submission of information for emergency approval. Emergency requests shall include but not be limited to waste streams from spills, boiler cleanouts, and lagoon cleanouts. In the event that Ohio EPA does not respond within ten (10) days after receiving the Permittee's submission, the Permittee may accept the waste stream without Ohio EPA approval, subject to the applicable requirements of this permit and hazardous waste laws and rules.

B.4. Waste Product Review (WPR) Expiration

All WPR approvals shall expire on the last day of the thirteenth month from the date of Ohio EPA approval.

B.5. "This section left blank intentionally"

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B.6. New Protocols for Waste Analysis Plan

The Permittee must notify the Ohio EPA, Northwest District Office prior to administering any new protocol in the Waste Analysis Plan.

B.7. Acceptance of P Coded Waste Streams
ORC 3734.141

The Permittee must receive prior approval from the Ohio EPA, Northwest District Office before accepting any P-coded waste stream, in accordance with ORC 3734-141. These waste streams shall only be streams that follow the derived from or carry through provisions or that the Permittee can treat to render them innocuous prior to deep well injection. Approval of a waste stream by Ohio EPA as part of the Waste Product Review satisfies all notification requirements of ORC 3734.141.

B.8. Nitric Acid Waste Stream Procedures

Upon receipt of nitric acid waste streams the Permittee must follow Section 6.1.1 of the approved Waste Analysis Plan.

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B.16. Access to Communications or Alarm System.
OAC Rule 3745-54-34

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

B.17. Required Aisle Space.
OAC Rule 3745-54-35

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

B.18. Arrangements with Local Authorities.
OAC Rule 3745-54-37

(a) The Permittee shall comply with the requirements of OAC Rule 3745-54-37 (A) and shall attempt to:

(i) familiarize all emergency response agencies which are likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section G and Appendix 4 of the approved Part B permit application;

(ii) inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility, and any further requirements related to emergency response imposed by terms and conditions of this permit; and

(iii) familiarize the local ambulance services, fire department, hospitals and any other local emergency service, with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility.

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(c) any spill or release of material that exhibits the characteristics of reactivity as defined by OAC Rule 3745-51-23 and which results in the release of gases that may threaten human health or the environment;

(d) any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits.

B.21. Content of the Contingency Plan.
OAC Rule 3745-54-52

The Permittee shall comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section G and Appendix 4 of the approved Part B permit application.

B.22. Contingency Plan - Released Material and Emergency Response Material and By-products.
OAC Rule 3745-54-56

All liquid or solid material resulting from fire, explosion, released material or emergency response material and by-products that the Permittee is required to evaluate to determine whether such material is hazardous waste in accordance with OAC Rule 3745-52-11, shall be collected and managed as a hazardous waste until such time as the Permittee can demonstrate that such waste is not hazardous in accordance with OAC Rules 3745-51-03(C) and (D) as required by OAC Rule 3745-54-56(G).

B.23. Amendments to Plan.
OAC Rule 3745-54-54

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

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B.24. Copies of Plan.
OAC Rule 3745-54-53

The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution.

B.25. Emergency Coordinator.
OAC Rule 3745-54-55

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

B.26. New Waste Management Procedures

Prior to initiating new waste management procedures for nitric acid which vary from normal operations the Permittee must notify the Ohio EPA, Northwest District Office. If requested by the Ohio EPA, a plan must be submitted by Permittee. The plan shall describe the applicability of the proposed procedure.

B.27. Emergency Procedures.
OAC Rules 3745-54-56 and 3745-51-01

The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-56, Section G and Appendix 4 of the approved Part B permit application, and the conditions of this permit, regarding emergency procedures.

B.28. Availability, Retention and Disposition of Records.
OAC Rule 3745-54-74

The Permittee shall maintain all records at the facility in accordance with OAC Rule 3745-54-74.

B.29. Operating Record.
OAC Rule 3745-54-73

The Permittee shall comply with the requirements set forth, in OAC Rule 3745-54-73 regarding maintenance of an operating record for the facility.

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B.30. Contingency Plan Records.
OAC Rule 3745-54-73

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

B.31. Manifest System.
OAC Rules 3745-54-70, 3745-54-71 and 3745-54-76

(a) In the management of waste at the facility the Permittee shall comply with the provisions of OAC Chapter 3745-52 and OAC Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.

(b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days, the Permittee must submit a report, including a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-71.

(c) Unmanifested waste report. This report must be submitted to the Director within fifteen (15) days of receipt of unmanifested waste and include the information required under OAC Rule 3745-54-76.

B.32. Annual Reports and Additional Reports.
OAC Rule 3745-54-77

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

B.33. Closure Performance Standard
OAC Rule 3745-55-11

During facility closure, the Permittee shall implement the provisions of the approved closure plan, Section I of the Part B application in such a manner as to achieve compliance with OAC Rule 3745-55-11. Permittee is encouraged to employ the most recent Division of Hazardous Waste Management Closure Plan Review guidance for RCRA facilities in managing *its* closure efforts.

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B.34. Closure Plan.
OAC Rule 3745-55-10

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

B.35. Amendment of Closure Plan.
OAC Rule 3745-55-12

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

B.36. Content of Closure Plan.
OAC Rule 3745-55-12

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

B.37. Notification of Closure.
OAC Rule 3745-55-12

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

(b) 120-days prior to closure of any RCRA management unit the Permittee must submit to Ohio EPA Northwest District Office a Sampling and Analysis Plan (SAP) to be followed to obtain 12 background samples or equivalent data from past sampling events. This background sampling data is required in order to establish clean levels for soils as described in Section 3.11 of the Ohio EPA, Closure Plan Review Guidance document.

B.38. Time Allowed for Closure.
OAC Rule 3745-55-13

The Permittee shall commence and complete closure activities in accordance with the time limits set forth in OAC Rule 3745-55-13, or such longer time periods as the Director may approve pursuant to authority granted to the Director by paragraphs (A) and (B) of OAC Rule 3745-55-13.

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B.39. Disposal or Decontamination of Equipment, Structures, and Soils.
OAC Rule 3745-55-14

(a) The Permittee shall decontaminate and/or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the approved closure plan and the terms and conditions of this permit.

(b) The Permittee shall verbally notify a representative at Ohio EPA NWDO/DHWM at least one (1) working day prior to all rinseate and soil sampling.

B.40. Certification of Closure.
OAC Rule 3745-55-15

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

B.41. Financial Assurance for Facility Closure.
OAC Rule 3745-55-43

The Permittee shall maintain continuous compliance with OAC Rule 3745-55-43 and provide documentation of financial assurance which meets the wording of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Condition B.45.

B.42. Liability Requirements.
OAC Rule 3745-55-47

The Permittee shall maintain continuous compliance with the requirement of OAC Rule 3745-55-47 and the documentation of liability by providing liability coverage which meets the requirements of OAC Rule 3745-55-51 for sudden accidental occurrences in the amount required by the applicable rules, exclusive of the legal defense costs.

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(c) The Permittee shall not in any way dilute a restricted waste or the residual from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with OAC Rules 3745-59-40 through 3745-59-44, to circumvent the effective date of a prohibition in OAC Rules 3745-59-30 through 3745-59-35, to otherwise avoid a prohibition in OAC Rules 3745-59-30 through 3745-59-35, or to circumvent a land disposal prohibition imposed by Section 3004(d) of RCRA. [OAC Rule 3745-59-03]

(d) The Permittee shall prepare and maintain a current list of the hazardous waste codes handled by the facility that are identified in OAC Rules 3745-59-30 through 3745-59-35. The list shall include all waste codes handled by the facility, and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, as promulgated or amended.

(e) The Permittee must test, in accordance with OAC Rule 3745-59-07, any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.

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(f) The Permittee shall comply with all the applicable notification, certification, and record keeping requirements described in OAC Rule 3745-59-07.

(g) The Permittee shall comply with all the applicable prohibitions on storage of restricted waste specified in OAC Rule 3745-59-50.

(h) Except as otherwise provided in OAC Rule 3745-59-50, the Permittee may store restricted wastes in tanks solely for the purpose of the accumulation of such quantities of hazardous wastes as necessary to facilitate proper recovery, treatment or disposal provided that each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at the facility.

(i) The Permittee may store restricted wastes for up to one (1) year unless the Ohio EPA can demonstrate that such storage was not solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recover, treatment or disposal. [OAC Rule 3745-59-50]

(j) The Permittee may store restricted wastes beyond one (1) year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal. [OAC Rule 3745-59-50]

(k) The Permittee shall not store any liquid hazardous waste containing polychlorinated biphenyl (PCBs) at concentrations greater than or equal to 50 ppm unless the waste is stored in storage facility that meets the requirements of 40 CFR 761.65(b). This waste must be removed from storage and treated or disposed as required by OAC Rule 3745-59-50 within one (1) year of the date when such wastes are first put into storage. Condition B.42(j) above, which allows storage for more than one (1) year with specified demonstration, does not apply to PCB waste prohibited under OAC Rule 3745-59-32.

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MODULE D - TANK STORAGE, TREATMENT AND MANAGEMENT

D.1. MODULE HIGHLIGHTS

The Integrated Aqueous Waste Treatment System (IAWTS) consists of the following units: (1) the Truck Unloading Facility which includes ancillary, basket and grit filters, waste receiving tanks (V-Tanks), waste head-gas caustic scrubber and solids handling unit; (2) Waste Storage and Treatment Tank System (T-Tanks); (3) the filters and filter buildings; (4) the pumps and pump houses; and (5) the yard piping.

The 60 foot by 124 foot truck unloading building sets on top of a 4-foot high concrete block wall. The wire-mesh reinforced concrete floors of the truck unloading bays are sloped, longitudinally and transversely, a total of 11 inches, to 18-inch deep waste unloading sumps. The unloading sumps are lined with a corrosion resistant liner and contain 6 inch truck unloading pipes and a 6-inch sump drain pipe. The below ground portions of both the truck unloading pipes and sump drain pipes are enclosed in a 10-inch PVC shield pipe. The 6-inch pipes drain to one of the four grit filters or through alternative filtering devices. The discharge is directed to one of the six T-tanks. The 10 inch shield pipes drain to the grit filter's vault system. Tanker trucks may be unloaded by gravity drainage through the grit filters to one of the four V-tanks or unloaded directly to one of the T-tanks.

The 3 foot 9 inch by 7 foot solid handling grit filters are constructed of 1/3-inch stainless steel which is lined with a corrosion resistant liner. The four grit filters, are set below grade in two concrete vaults. The head gases from these vault systems are vented though 16-inch piping to the scrubber. The two grit filter vaults are drained by 6-inch piping enclosed in a 10-inch shield pipe to the V-tank's containment system sump. Waste is then automatically pumped to one of the V-tanks.

The four waste receiving V-tanks are set in a below ground vault which is approximately 11 feet deep. The open topped vault is sectioned in half by a 5-foot 10-inch concrete wall. Shelter is provided by a wooden framed building. The vault floor is divided into two halves and slopes toward two sumps. Sump accumulation is pumped to tanks V-5 or V-7. Four horizontal centrifugal pumps are set on the floor of the vault. Each pump is dedicated to one of the four V-tanks and draws from the bottom of the tanks through a 4-inch pipe which discharges over the vault wall to the above ground pipe rack. The discharge lines follow the pipe rack to one of the six T-tanks to be stored or treated. The head space of the four V-tanks is vented to the scrubber through 16-inch PVC vent pipes.

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The six T-tanks are set upon a 143 foot by 140 foot concrete reinforced containment pad. The containment pad is lined with a protective liner. The West 13 feet of the containment pad is dedicated to the Pump House which shelters one transfer pump and one recirculating pump for each T-tank. The head space of each T-tank is blanketed with an inert gas, to create an oxygen reduced condition to reduce the potential for fire, and is vented to the caustic scrubber. The entire foundation of the containment pad is supported on 50 foot, 90 tons piles driven to refusal. The total available storage volume of the containment system is 313,423 gallons.

Filtration operations are housed in two existing filter buildings. Filter building 1 includes 2 leaf filters, an add mix tank, and a precoat tank. Building 2 includes a filter press and the polish filters. The floors of both filter buildings are coated and are sloped toward a local sump. Transfer pumps are set on the floor of both filter buildings and serve to discharge wastes from the sumps to and from the various filters and tanks.

Yard piping which leads from the IAWTS to the deepwell injection pumps is situated upon above ground pipe racks. As part of the yard piping, above ground surge tanks (FAT) are set adjacent to each of the 4 injection well pump houses. The portions of the piping which cross Myers Ditch and the high pressure lines which lead from the injection pumps to the deepwells are double walled. The floor of four injection well pump houses are sloped toward local sumps. Each of the four pump houses shelter an injection pump, transfer pumps and guard filters and, upon approval, a polish filter.

Proposed changes approved under this renewal/revision are as follows: (These changes have been authorized by the Director of Ohio EPA under Findings and Orders issued to the Permittee on September 10, 1993 (Appendix II)).

(a) Construction, use and management of a new building to house the existing filter press and a filter press which will replace the two existing leaf filters.

Replacement of the existing Add Mix tank, the Precoat tank, an additional Filter Press Dip tank. Associated piping would be ancillary to the filter presses.

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(b) Augmenting of the gravity unloading/sand interceptor system with basket strainers and pumps.

(c) Replacement of six existing Filtered Acid Tanks (FAT) with double walled tanks. The tanks to be replaced include T-7, T-8, T-17, T-18, T-19, and T-20 which will result in a net decrease in the facility's overall storage capacity of 26,977 gallons.

(d) Relocation of the four guard filters from the current filter building to each of the four injection well pump houses.

(e) Installation of contained piping for all waste transfer lines to all well houses and pump houses.

D.2. Process Capacity/Annual Limitation/Waste Identification.

(a) The Permittee may store and/or treat a total volume of 126,000,000 gallons/year throughput (630,500 tons per year), but not to exceed 650,500 gallons/day throughput (This annual throughput volume reflects the limitation found in the UIC permit) of hazardous waste in the below listed tanks, subject to the terms and conditions of this Permit and as follows:

Tank No. Waste No.	Capacity (Gallons)	Dimensions	Secondary Containment of Tank	Description of of Hazardous Waste Required	Hazardous Waste
T-1 (T036)	200,000	31 ft.(ID) x 39 ft	Yes-in place	Aqueous waste	See Condition D.1.c
T-2 (T037)	200,000	31 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-5 (T038)	200,000	31 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-6 (T039)	200,000	31 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-9 (T040)	100,000	22 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-10 (T041)	100,000	22 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-22 (V-4)	6,608	12 ft.(dia) x 8 ft.	N/A	Waste receiving	" "

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Tank No. Waste No.	Capacity (Gallons)	Dimensions	Secondary Containment of Tank	Description of of Hazardous Waste Required	Hazardous Waste	
T-23 (V-5)	6,000	12 ft.(dia) x 8 ft.	N/A	Waste receiving	"	"
T-24 (V-6)	6,000	12 ft.(dia) x 8 ft.	N/A	Waste receiving	"	"
T-25 (V-7)	6,000	12 ft.(dia) x 8 ft.	N/A	Waste receiving	"	"
T-19 (FAT-5)	10,575	10 ft.(dia) x 20 ft.	N/A	Filtered Acid	"	"
T-94	500	See note	Yes-when installed	Filter press drip tank	"	"
T-95	3,000	See note	Yes-when installed	Add mix replacement	"	"
T-96	1,600	See note	Yes-when installed	Precoat replacement	"	"
T-98	500	See note	Yes-when installed	Caustic feed to filter press	"	"
T-700 (FAT-AR)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-800 (FAT-BR)	11,750	11 ft.11in. (dia) x 21ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-500 (FAT-5R)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-400 (FAT-2R)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-300 (FAT-3R)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"

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T-600 (FAT-6R)	11,750	11 ft.11in. (dia) xi 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"

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Tank No. Waste No.	Capacity (Gallons)	Dimensions	Secondary Containment of Tank	Description of of Hazardous Waste Required	Hazardous Waste
Lab Waste Tank	2,500	See note	See note	Lab waste	" "

Note: Information required to be submitted through Condition A.29 of this permit.

(b) During any calendar year, the Permittee shall not manage through tank storage hazardous waste in excess of the maximum daily and annual quantity set forth in Condition B.1(b) of this permit.

(c) The Permittee shall store and treat in tanks only the hazardous waste codes and types specified in the approved Part B permit application and summarized below:

D001 and D003 shall only be stored and treated in tanks;
D002, D004, D005, D006, D007, D008, D009, D010, D011, D013, D014, D015, D016, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005, F006, F007, F008, F009, F010, F012, F019, F037, F038, F039, K017, K049, K052, K060, K062, K107, K108, K109, K110, K131, K132, P001, P005, P010, P012, P018, P022, P030, P044, P050, P064, P078, P098, P105, P106, P119, P120, U001, U002, U003, U007, U008, U009, U012, U016, U019, U031, U034, U036, U043, U044, U051, U052, U053, U055, U056, U057, U068, U070, U072, U075, U077, U078, U080, U081, U088, U092, U102, U103, U105, U108, U112, U113, U115, U117, U121, U122, U123, U124, U125, U131, U133, U134, U135, U140, U144, U147, U148, U151, U154, U159, U161, U162, U165, U167, U169, U182, U188, U190, U196, U201, U207, U208, U210, U211, U213, U219, U220, U221, U222, U223, U226, U227, U228, U238, U239

The following waste codes are only permitted for the scrubber water waste types, which are generated by air pollution control devices and are classified as hazardous waste through the application of the "derived from" or mixture rule:

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D012, D017, F011, K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K046, K047, K048, K050, K051, K061, K064, K065, K066, K069, K071, K073, K083, K084, K085, K086, K087, K088, K090, K091, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K111, K112, K113, K114, K115, K116, K117, K118, K123, K124, K125, K126, K136, P002, P003, P004, P006, P007, P008, P009, P011, P013, P014, P015, P016, P017, P020, P021, P023, P024, P026, P027, P028, P029, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P045, P046, P047, P048, P049, P051, P054, P056, P057, P058, P059, P060, P062, P063, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P099, P101, P102, P103, P104, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P121, P122, P123, U004, U005, U006, U010, U011, U014, U015, U017, U018, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U032, U033, U035, U037, U038, U039, U041, U042, U045, U046, U047, U048, U049, U050, U058, U059, U060, U061, U062, U063, U064, U066, U067, U069, U071, U073, U074, U076, U079, U082, U083, U084, U085, U086, U087, U089, U090, U091, U093, U094, U095, U096, U097, U098, U099, U101, U106, U107, U109, U110, U111, U114, U116, U118, U119, U120, U126, U127, U128, U129, U130, U132, U136, U137, U138, U141, U142, U143, U145, U146, U149, U150, U152, U153, U155, U156, U157, U158, U160, U163, U164, U166, U168, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U183, U184, U185, U186, U187, U189, U191, U192, U193, U194, U197, U200, U202, U203, U204, U205, U206, U209, U214, U215, U216, U217, U218, U224, U225, U234, U235, U236, U237, U240, U243, U244, U246, U247, U248, U249, U328, U353, U359

(d) All incoming waste streams must meet the acceptance criteria set forth in the approved Waste Analysis Plan which is located in section C and appendix 2 of the approved Part B application. Specifically, the Permittee is prohibited from storing or treating hazardous waste that does not meet the Facility Waste Acceptance Conditions which are located in Appendix WAP-B of the approved Waste Analysis Plan.

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(e) Until the WAP is approved, the Permittee is prohibited from storing or treating hazardous waste with a radiation level which exceeds background.

D.3. Secondary Containment and Integrity Assessments.
OAC Rules 3745-55-90 through 3745-55-93

(a) Existing Tank Systems Without Secondary Containment. For tank systems used to store or treat materials that are defined as hazardous waste in the future, the Permittee must obtain a written assessment of the existing tank system integrity within 12 months from the date the waste is defined as hazardous. [OAC Rule 3745-55-91(C)] The assessment shall be certified by an independent, qualified, and registered professional engineer. [OAC Rules 3745-55-91(A) & (B)]

(b) Existing Tank Systems with Secondary Containment. The Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in the Part B permit application. [OAC Rules 3745-55-93(B) through (F)]

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(c) The Permittee shall comply with the following conditions until such time as secondary containment that meets the requirements of OAC Rule 3745-55-93 is provided:

(i) For ancillary equipment, a leak test (or other integrity method as approved by the Director) must be conducted annually using the procedures in the Part B permit application. [OAC Rule 3745-55-93(I)(3)]

(ii) If a tank system or component is found to be leaking or unfit for use as a result of the leak test or assessment, the Permittee shall comply with Permit Condition D.6. of this Permit and notify the Director, in accordance with Permit Condition D.8. of this Permit. [OAC Rule 3745-55-93(I)(4)]

D.4. Certification of Tank Systems.
OAC Rules 3745-55-92, 3745-55-93 and 3745-50-42

(a) Existing Tank Systems.

The Permittee shall keep on file at the facility a written assessment that is reviewed and certified by an independent, qualified professional engineer, in accordance with OAC Rule 3745-50-42(D), that attests to the structural integrity and suitability of each existing tank system for handling hazardous waste, as required under OAC Rule 3745-55-91.

Existing tanks at the facility are T-1, T-2, T-5, T-6, T-9, T-10, T-22, T-23, T-24 and T-25. The age of the following tanks have not been identified within the Part B application: T-7 (FAT A), T-8 (FAT-B), T-19 (FAT-5), T-18 (FAT-3), T-17 (FAT-2), T-20 (FAT-6) and Lab Waste Tank (See condition D.11).

(b) New Tank Systems.

The Permittee shall keep on file at the facility a written statement(s) by those persons required to certify the design of the tank systems and supervise the installation of the tank systems in accordance with the requirements of OAC Rule 3745-55-92, that attest that the tank systems were properly designed and installed. These written statements must also include the certification as required by OAC Rule 3745-50-42(D). New tanks at the facility are T-94, T-95, T-96, T-98. Proposed replacements tanks are T-700, T-800, T-500, T-300, T-400 and T-600.

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(b) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

(i) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

(ii) For a release to the environment caused by a leak from a component of the tank system that is below ground and does not have secondary containment, the Permittee must provide this component with secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(iii) For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.

(iv) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee shall provide secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(v) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.

(c) For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

(d) The Permittee must remove all waste residues from leaks and spills of hazardous waste in all pump houses within 24 hours of discovery of such incidents.

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D.7. Inspection Schedules and Procedures.
OAC Rule 3745-55-95

(a) The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule and shall complete the items in Permit Conditions D.7(b) and D.7(c) as part of those inspections:

(b) [OAC Rule 3745-55-95(A)] The Permittee shall inspect the overfill controls, in accordance with the procedure and schedule in the Part B permit application.

(c) [OAC Rule 3745-55-95(B)] The Permittee shall inspect the following components of the tank system once each operating day:

(i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(d) The Permittee shall document compliance of permit Condition D.6 in the operating record of the facility.

D.8. Recordkeeping and Reporting.
OAC Rule 3745-55-96

(a) The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment.

[OAC Rule 3745-55-96(D)(1)] (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) [OAC Rule 3745-55-96(D)(2)] (Releases that are contained within a secondary containment system need not be reported).

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Point of Compliance Wells (downgradient)

MW-14R
MW-15R
MW-16R
MW-20R
MW-30R
MW-36R

(b) The Permittee shall maintain and use the capillary drain that underlies the Closure Cell as a second detection monitoring system.

(c) The Permittee shall maintain the monitoring wells identified in Permit Condition F.2(a) and the capillary drain identified in Permit Condition F.2(b), in accordance with the detailed plans and specifications presented in the Part B permit application.

(d) Should any well need to be deleted from the closure cell monitoring program, notification shall be provided in accordance with the Part B permit application (Section E.5.4). Proposed well plugging and abandonment methods shall be submitted at that time. Well plugging and abandonment certification, including actual methods used, shall be submitted to the Director within 30 days from the date the well is removed from the monitoring program.

F.3. Monitoring Parameters and Hazardous Constituents.
OAC 3745-54-98

(a) The Permittee shall monitor compliance wells MW-14R, MW-15R, MW-16R, MW-20R, MW-30R, MW-36R, and background wells MW-24R and MW-37R, and the capillary drain as described in Permit Condition F.2., for the following parameters and hazardous constituents: [OAC 3745-54-98(A)]

Parameter or Constituent	Established Background Concentrations (ug/l) Prediction Limits
Benzene	4
Chlorobenzene	5
Chloroform	5
1,2-Dichloroethane	4
Ethyl Benzene	5

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Parameter or Constituent	Established Background Concentrations (ug/l) Prediction Limits
Methyl Ethyl Ketone	50
Methylene Chloride	5
Toluene	5
Trichloroethylene	4
1,1,1-Trichloroethane	5
Vinyl Chloride	2
1,1-Dichloroethane	5
Chloroethane	10
Ethanol	100
1,1-Dichloroethene	5
Cis-1,2-Dichloroethene	10
Trans 1,2-Dichloroethene	10
Arsenic, Dissolved	30
Cadmium, Dissolved	4.9
Chromium, Dissolved	10
Lead, Dissolved	25
Nickel, Dissolved	40(b)
Zinc, dissolved	20
Total Phenol	62

(b) For the parameters and constituents in Permit Condition F.3(a) for which five of the eight background values have been established as of October, 1993 (Nickel), the Permittee shall establish background values in accordance with the following procedures:

Background wells MW-24R and MW-37R shall be sampled at least quarterly for dissolved nickel and in a manner to provide the additional three (3) independent background samples needed for statistical analysis.

F.4. Sampling and Analysis Procedures.
OAC 3745-54-97

The Permittee shall conduct all sampling and analysis in accordance with the procedures specified in section E.6.0 and condition A.29(d), (e), and (f), and the general quality assurance/quality control (QA/QC) procedures outlined in Appendix 14-B.

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F.5. Elevation of the Ground-Water Surface.

(a) The Permittee shall determine the elevation of the ground-water surface at each well each time the ground water is sampled at that well in accordance with Permit Condition F.7(b). [OAC 3745-54-97(F)]

(b) The Permittee shall record the elevation of the ground-water surface of the monitoring wells on the facility map.

F.6. Statistical Procedures.

When evaluating the monitoring results for parameters or hazardous constituents specified under permit condition F.3. in accordance with Permit Condition F.7., the Permittee shall use the procedures described in the permit application, section E.7 to identify statistically significant evidence of contamination.

F.7. Monitoring Program and Data Evaluation.

(a) The Permittee shall collect, preserve, and analyze samples pursuant to Permit Condition F.4.

(b) The Permittee shall determine ground-water quality at each monitoring well at the compliance point. The ground water quality in the capillary drain shall be determined at the piping system as it enters the sump. This shall be determined at least semi-annually during detection monitoring and in accordance with the permit. The Permittee shall maintain a record of ground water quality analytical data as measured and in a form necessary for the determination of statistical significance under OAC 3745-54-97(H). [OAC 3745-54-98(C)].

(c) The Permittee shall determine the ground-water flow rate and direction in the uppermost aquifer (bedrock zone) at least annually. [OAC 3745-54-98(E)]

(d) The Permittee shall determine whether there is a statistically significant evidence of contamination for chemical parameters or hazardous constituents identified in Permit Condition F.3(a) each time ground water quality is determined at the compliance point.

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H.6. Notices and Certification.

(a) No later than 60 days after certification of closure of each permitted hazardous waste disposal unit, the Permittee shall submit to the local zoning authority, or the authority with jurisdiction over local land use, and to the Director a record of the type, location, and quantity of hazardous wastes disposed of within each cell or other disposal unit of the facility. For hazardous wastes disposed of before January 12, 1981, the Permittee shall identify the type, location, and quantity of the hazardous wastes to the best of his knowledge and in accordance with any records he has kept. [OAC 3745-55-19(A)]

(b) Within 60 days of certification of closure of the first and the last hazardous waste disposal unit, the Permittee shall:

(i) Record, in accordance with Ohio law, a notation on the deed to the facility property -- or on some other instrument that is normally examined during the title search -- that will in perpetuity notify any potential purchaser of the property that:

(aa) The land has been used to manage hazardous wastes;

(bb) Its use is restricted under OAC 3745-55-10 thru 20; and

(cc) The survey plat and record of the type, location, and quantity of hazardous wastes disposed of within each cell or other hazardous waste disposal unit of the facility have been filed with the Director and the Sandusky County Recorder.

(ii) Submit a certification to the Director, signed by the Permittee, that he has recorded the notation specified in Permit Condition H.6(b)(i), including a copy of the document in which the notation has been placed. [OAC 3745-55-19(B)]

(c) If the Permittee or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous wastes and hazardous waste residues, the liner, if any; or contaminated soils, then he shall request a change to this post closure permit in accordance with the applicable requirements in Chapter OAC 3745-50. The Permittee or any subsequent owner or operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of OAC 3745-55-17(C). [OAC 3745-55-19(C)]

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OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT

RENEWAL

Name of Permittee: Chemical Waste Management, Inc.

Facility Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3856 State Route 412
Sandusky County, Vickery, Ohio 43464

Ohio Permit Number: 03-72-0191

U.S. EPA ID Number: OHD 020 273 819

Permit Issue Date: _____

Permit Effective Date: _____

Permit Expiration Date: _____

AUTHORIZED ACTIVITIES

In reference to the application of Chemical Waste Management, Inc., for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under R.C. Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

STORAGE	TREATMENT	DISPOSAL
_ Container	X Tank	X Injection Well
X Tank	_ Surface Impoundment	X Landfill
_ Waste Pile	_ Incinerator	_ Land Impoundment
_ Surface Impoundment	X Other	_ Surface Impoundment

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PERMIT APPROVAL

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

_____
Donald R. Schregardus, Director
Ohio Environmental Protection Agency

Entered into the Journal of the Director this _____ day of _____, 1991

By _____
Ohio Environmental Protection Agency

A. GENERAL PERMIT CONDITIONS

A.1 Effect of Permit

(a) Chemical Waste Management, Inc. (Permittee) is authorized to store hazardous waste in tanks and treat it in tanks and filtration devices in accordance with the terms and conditions of this permit, all applicable Ohio hazardous waste rules, and the approved hazardous waste facility installation and operation permit application, as such application has been revised and supplemented in the permit issuance proceedings and as such application may be revised or modified pursuant to the hazardous waste rules. The approved permit application is hereby incorporated into this permit. In the instance of discrepancies or inconsistent language between the above, the language of the more stringent provision shall govern.

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

(c) The Permittee shall not accept from off-site bulk shipments of any hazardous waste exhibiting the characteristics of flammability and/or reactivity (EPA waste codes D001 and D003). Cyanide and Sulfide bearing waste will be considered reactive if amenable Cyanide and Sulfide concentrations exceed 250 PPM and 500 PPM respectively.

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A.2 Permit Actions

This Permit may be modified, revised, revoked, suspended, or renewed as specified by Ohio law. The filing of a request for a permit modification, revision, revocation, suspension, or renewal or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit term or condition.

A.3 Permit Effective/Expiration Date

This permit effective date is the date the permit is entered into the Journal of the Director of the Ohio Environmental Protection Agency (Director). The permit expiration date is five (5) years after the date of journalization of this permit.

A.4 Severability

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

A.5 Duty to Comply

The Permittee shall comply with all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of R.C. Chapter 3734 and the rules adopted thereunder and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.

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A.6 Duty to Reapply and Permit Expiration

(a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this Permit, the Permittee must submit a completed application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days prior to the expiration date of this permit or upon a later date prior to the expiration date if the Permittee can demonstrate good cause for late submittal.

(b) The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:

(i) The Permittee has submitted a timely and complete application for a renewal permit under O.A.C. Rule 3745-50-40; and

(ii) Through no fault of the Permittee, a new permit has not been issued pursuant to O.A.C. Rule 3745-50-40 on or before the expiration date of this permit.

A.7 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce an activity with regard to the management (storage or treatment) of the hazardous waste in order to maintain compliance with the conditions of this permit.

A.8 Duty to Mitigate

The Permittee shall expeditiously take all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with this permit.

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A.9 Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes, but is not limited to, effective management practices, adequate funding, adequate operator staffing, and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

A.10 Duty to Provide Information

The Permittee shall furnish the Ohio Environmental Protection Agency (Ohio EPA), within a reasonable time, any relevant information which the Ohio EPA may request to determine whether cause exists for modifying, revising, revoking or suspending this permit or to determine compliance with this permit. The Permittee shall also furnish the Ohio EPA, upon request, copies of records required to be kept by this Permit.

A.11 Inspection and Entry

The Permittee shall allow the Director, or an authorized representative, upon proper identification as may be required by law to:

(a) Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this Permit;

(b) Have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this Permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and condition of this permit; and

(d) Sample, document (including but not limited to the use of video tape and camera equipment) or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by R.C. Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

A.12 Monitoring and Records

(a) Any sample and measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of O.A.C. Chapter 3745-51, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods SW-846, June 1982 and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater, Fifteenth Edition, 1980 and 1981 supplement; or an equivalent method as specified in the approved waste analysis plan, or as such term is defined and used in the Ohio hazardous waste rules.

(b) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individuals who performed the analyses;

(v) The analytical techniques or methods used; and

(vi) The results of such analyses.

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A.13 Retention of Records

(a) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and copies of all reports and records required by this Permit, for a period of at least three (3) years from the date of the sample, measurement, report, and record.

(b) The periods of record retention may be extended by request of the Ohio EPA at any time and are automatically extended during the course of any unresolved enforcement action regarding the facility. Once any enforcement action is resolved, the Permittee shall maintain relevant document for a period of one year beyond the date of final resolution or three years from the original date of sample, measurement, report of record, whichever is greater.

(c) The Permittee shall maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the permit application and any amendments, supplements, revisions, or modifications of such application and shall retain a complete copy of the application for the life of the facility.

A.14 Planned Changes

The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility.

A.15 Waste Shipments

The Permittee shall only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws, rules, and standards.

A.16 Anticipated Noncompliance

The Permittee shall give advance notice to the Ohio EPA of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not constitute a waiver of the Permittee's duty to comply with permit requirements.

A.17 Transfer of Permits

(a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with R.C. Chapter 3734 and the rules adopted thereunder. Before transferring ownership or operation of the facility the Permittee shall notify the new owner or operator in writing of the requirements of R.C. Chapter 3734 and the rules adopted thereunder.

(b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

A.18 Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Ohio EPA no later than fourteen (14) days following each scheduled date, unless otherwise specified in the compliance schedule.

A.19 Immediate Reporting of Noncompliance

The Permittee shall immediately report to the Ohio EPA Emergency Response Section any noncompliance with this permit, R.C. Chapter 3734 or the rules adopted thereunder which noncompliance may endanger human health or the environment. Such report shall consist of the information set forth in this Condition that is available at such time. After initial notification, the Permittee shall immediately report to the Ohio EPA Emergency Response Section any subsequent changes in the situation as conditions warrant until the Permittee has provided the Ohio EPA Emergency Response Section with all the informational requirements of this condition and in no event shall this information be reported to the Ohio EPA Emergency Response Section later than twenty-four (24) hours after the initial report. The report shall include the following:

(i) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.

(ii) Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management facility which could threaten the environment or human health inside or outside the facility. The description of the occurrence and its cause shall include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident;

(4) Local weather conditions;

(5) Name and quantity of materials involved;

(6) The extent of injuries, if any;

(7) An assessment of actual or potential hazards to the environment and human health inside and outside the facility, where this is applicable;

(8) The response the Permittee has taken to contain and monitor the release, discharge or incident;

(9) Who has been notified;

(10) Any monitoring results; and

(11) Estimated quantity and disposition of recovered material that resulted from the release, discharge or incident.

A.20 <u>Follow-Up Written Report of Noncompliance</u>

(a) A written report shall also be provided to the Ohio EPA Emergency Response Section within five (5) days of the time the Permittee becomes aware of the circumstances reported in Condition A.19.

(b) The written report shall contain a description of the noncompliance and its cause (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

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

A.21 Other Noncompliance

The Permittee shall report to the Ohio EPA Division of Hazardous Waste Management all other instances of noncompliance not provided for in Condition A.19 at the time monitoring reports are submitted. The reports shall contain the information set forth in Condition A.19.

A.22 Other Information

If at any time the Permittee becomes aware that it failed to submit any relevant facts in the permit issuance proceedings, or submitted incorrect, misleading, or incomplete information in the permit issuance proceedings or in any other submission

or report to the Ohio EPA or the Ohio Hazardous Waste Facility Board, the Permittee shall promptly submit such facts, information or corrected information to the appropriate entity.

A.23 Signatory Requirement

All reports or information required by the terms and conditions of this permit or required by the Ohio EPA shall be signed and certified in accordance with O.A.C. Rule 3745-50-42.

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A.24 Confidential Information

In accordance with R.C. Chapter 3734 and the rules adopted thereunder, the Permittee may request confidentiality of any information required to be submitted by the terms and conditions of this permit.

A.25 Ohio Annual Permit Fee

The annual permit fee, payable to the Treasurer of the State, shall be submitted to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit. For the purpose of the payment of the Ohio Annual Permit Fee, the date of issuance is the date the permit was entered into the Journal of the Director.

A.26 Compliance Schedule - Documents

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

Ohio EPA, DHWM
Attn: Thomas E. Crepeau
P.O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

The Permittee shall submit the following to the Ohio EPA within sixty (60) days after permit journalization, for its approval in accordance with the Ohio hazardous waste rules:

(i) Financial Test and Corporate Guarantee for Closure, Post-Closure.

(1) The March 22, 1991 Chief Financial Officer's letter does not contain the required wording of O.A.C. Rule 3745-55-51(F);

(2) The March 22, 1991 Corporate Guarantee does not contain the required wording of O.A.C. Rule 3745-55-51(H);

(3) The accountant's report required by O.A.C. Rules 3745-55-43(F)(3)(b) and 3745-55-45(F)(3)(b) was not submitted; and

(4) The Chief Financial Officer's letter and Corporate Guarantee do not contain the current, 1991 post-closure cost estimate, as provided in the application.

The Permittee must maintain a copy of the mechanism in the application which meets the requirements of O.A.C. Rules 3745-55-43 and 3745-55-45, including the wording requirements of O.A.C. Rule 3745-55-51.

(b) Certificates of Liability Insurance for Sudden and Nonsudden Accidental Occurrences.

The April 25, 1991 mechanisms contained in the application do not contain the required wording of O.A.C. Rule 3745-55-51(J). The Permittee must maintain a copy of the mechanism in the application which meets the requirements of O.A.C. Rule 3745-55-47, including the wording requirements of O.A.C. Rule 3745-55-51.

A.27 <u>Documents to be Maintained at the Facility</u>

(a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to O.A.C. Rule 3745-55-15, the following documents and amendments, revisions and modifications to these documents:

(i) Waste analysis plan, submitted in accordance with O.A.C. Rule 3745-54-13 and the terms and conditions of this permit;

(ii) Contingency plan submitted in accordance with O.A.C. Rule 3745-54-53 and the terms and conditions of this permit;

(iii) Closure plan, submitted in accordance with O.A.C. Rule 3745-55-12 and the terms and conditions of this permit;

(iv) Cost estimate for facility closure submitted in accordance with O.A.C. Rule 3745-55-42 and the terms and conditions of this permit;

(v) Personnel training plan and the training records, as submitted in accordance with O.A.C. Rule 3745-54-16 and the terms and conditions of this permit;

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(vi) Operating record required by O.A.C. Rule 3745-54-73 and the terms and conditions of this permit;

(vii) Inspection schedules developed in accordance with O.A.C. Rule 3745-54-15, O.A.C. Rule 3745-55-74, O.A.C. Rule 3745-55-95, and the terms and Conditions of this permit;

(b) All amendments, revisions and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Ohio EPA. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.

(c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three years from the date of inspection.

A.28 <u>Waste Minimization and Waste Alternatives</u>

(a) The permittee shall submit a report pursuant to O.A.C. Rule 3745-54-75(H), (I) and (J) at least once every two years that the Permittee has a program in place to reduce volume and toxicity of hazardous waste it generates to the degree determined by the Permittee to be economically practicable,

and the proposed method of treatment, storage disposal is that practicable method currently available to the Permittee which minimizes present and future threat to human health and environment.

(b) The Permittee shall submit copies of the waste generator's current Waste Minimization Report and the Waste Management Alternatives Report as required by the generator's certification on the uniform national manifest to the Director of the Ohio EPA within one hundred eighty (180) days of journalization of this permit.

B. GENERAL FACILITY CONDITIONS

B.1 Maintenance and Operation of Facility

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or nonsudden release of hazardous waste constituents to air, soil, and groundwater or surface water which could threaten human health or the environment.

B.2 Required Notices

(a) The owner or operator of a facility that has arranged to receive hazardous waste from a foreign source, shall notify the Director in writing at least four weeks in advance of the date the waste is expected to arrive at the facility. Notice of subsequent shipments of the same waste from the same foreign source is not required.

(b) If the Permittee transfers ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of the applicable Ohio hazardous waste rules.

(c) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio hazardous waste rules does not relieve the new owner or operator of his obligation to comply with all applicable requirements.

B.3 Waste Analysis

(a) The Permittee shall follow the procedures described in the approved waste analysis plan (Approved Permit Application at volume 2, appendix 2) and waste analysis and recordkeeping for land disposal restricted wastes as required in O.A.C. Rule 3745-59-07.

(b) Permittee must revise their Waste Analysis Plan to accommodate their new Nitric Acid receipt procedures(Attachment 5).

(c) The Permittee shall follow the Waste Product Review (WPR) process and shall not accept any waste from off-site prior to obtaining an written approval from Ohio EPA. The WPR package must at a minimum contain the following in order to be deemed a complete WPR application process.

(i) A complete description of the process generating the waste.

(ii) Completed lab results verifying the classification of the waste, which includes all analysis necessary to properly characterize the waste.

(iii) Certification for representative samples, Generator certification as to the accuracy of the waste profile and Permittee's certification regarding its evaluation.

(d) Ohio EPA may approve, approve with any necessary conditions or deny the application for acceptance of off-site waste.

(e) All WPR approvals shall expire on the last day of the thirteenth month from the date of approval by Ohio EPA.

(f) A Waste Management Alternative Plan maybe required as part of a conditional Waste Product Review (WPR) approval and shall be submitted to Ohio EPA within six months of the WPR approval date for review.

B.4 Security

The Permittee shall comply with the security provisions of O.A.C. Rule 3745-54-14 and of the approved permit application.

B.5 General Inspection Requirements

The Permittee shall inspect the facility in accordance with section F and appendix 3 of the approved permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by O.A.C. Rule 3745-54-15(C). Records of inspections shall be kept as required by O.A.C. Rule 3745-54-73(D).

B.6 Personnel Training

The Permittee shall conduct personnel training, as required by O.A.C. Rule 3745-54-16. This training program shall contain the elements set forth in section H and appendix 5 of the approved permit application. The Permittee shall maintain training documents and records, as required by O.A.C. Rule 3745-54-16(D) and (E).

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B.7 General Requirements for Ignitable, Reactive or Incompatible Waste

(a) The Permittee shall comply with the requirements of O.A.C. Rule 3745-54-17. The Permittee shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in the approved permit application.

(b) Where applicable, all wiring and electrical equipment at the proposed facility shall meet the National Fire Protection Association's standards for hazardous locations. (See National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp.176 through 189.)

(c) The Permittee shall provide electrical grounding for all containers during all operations involving the handling of flammable or combustible wastes.

(d) The Permittee shall provide, and require the use of, spark proof tools during all operations involving the handling of flammable or combustible wastes.

(e) The Permittee shall prohibit smoking and open flames in each area where hazardous waste are managed, and shall post appropriate signs.

B.8 Required Equipment

At a minimum, the Permittee shall maintain at the facility all the equipment required by O.A.C. Rule 3745-54-32 and the equipment set forth in the approved permit application.

B.9 Testing and Maintenance of Equipment

The Permittee shall inspect, test and maintain the equipment required by Condition B.8 as necessary to assure its proper operation in time of emergency, as specified in O.A.C. Rule 3745-54-33, the approved permit application, and the permit terms and conditions.

B.10 Access to Communications or Alarm System

The Permittee shall maintain access to the communications and alarm systems, as required by O.A.C. Rule 3745-54-34, the approved permit application, and the terms and conditions of this permit.

B.11 Required Aisle Space

The Permittee shall not obstruct access to hazardous waste management units and shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above mentioned purposes, as required by O.A.C. Rule 3745-54-35.

B.12 Arrangements with Local Authorities

(a) The Permittee shall make a diligent effort to:

(i) Familiarize all emergency response agencies which are likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes;

(ii) Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility, and any further requirements related to emergency response imposed by terms and conditions of this permit; and

(iii) Familiarize the hospitals listed in the approved permit application with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility.

(b) When State or local agency decline to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A), the Permittee shall document the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)

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(c) The Permittee shall, in accordance with O.A.C. Rule 3745-65-53, submit a copy of the approved contingency plan, including all amendments, revisions or modifications, to the agencies and local authorities designated in such plan. The Permittee shall notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments of, revisions to, or modifications to the contingency plan.

(d) The Permittee shall, in accordance with O.A.C. Rule 3745-54-53, submit a copy of the approved contingency plan, and all revisions amendments and modifications to the Ohio EPA Emergency Response Section.

B.13 Contingency Plan Implementation

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

In regard to spills and related toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented. At a minimum, the plan must be implemented in the following situations:

(i) Any spill greater than or equal to 55 gallons.

(ii) Any spill less than 55 gallons that may result in a fire or explosion hazard, as determined by the Emergency Coordinator.

(iii) Any spill that results in the release of material that exhibits the characteristics of reactivity as defined by O.A.C. Rule 3745-51-23 or results in the release of gases that may threaten human health or the environment.

(iv) Any spill on-site that may potentially cause on or off-site soil and /or ground or surface water contamination.

B.14 Content of the Contingency Plan

The Permittee shall maintain at the facility a contingency plan which contains the elements described in O.A.C. Rule 3745-54-52.

B.15 Contingency Plan - Released Material and Emergency Response Material and By-Products

All fire, explosion, or released material and emergency response material and by-products shall be collected and managed as a hazardous waste until such time as the Permittee can demonstrate to the Ohio EPA that such a waste is not hazardous in accordance with O.A.C. Rule 3745-51-03(C) and (D).

B.16 Amendments to Plan

The Permittee shall review its approved contingency plan at least annually and upon the occurrence of any event listed in O.A.C. Rule 3745-54-54. If necessary or appropriate, the Permittee shall amend the contingency plan as required by O.A.C. Rule 3745-54-54.

B.17 Emergency Coordinator

The Permittee shall comply with the requirements set forth in O.A.C. Rule 3745-54-55 regarding the emergency coordinator.

B.18 Emergency Procedures

The Permittee shall comply with the requirements set forth in O.A.C. Rule 3745-54-56, section G and appendix 4 of the approved permit application, and the conditions of this permit, regarding emergency procedures.

B.19 Recordkeeping and Reporting

(a) Operating Record.

The Permittee shall maintain a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74.

(b) Contingency Plan Records.

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

(c) Annual Reports and Additional Reports.

The Permittee shall comply with the annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77.

B.20 Manifest System

In the management of waste at the facility the Permittee shall comply with the provisions of O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.

B.21 Closure Performance Standard

(a) During facility closure, the Permittee shall implement the provisions of the approved closure plan in such a manner as to achieve compliance with O.A.C. Rule 3745-55-11. More specifically, the following rinseate standards must be met before the surface of a hazardous waste management unit and its appurtenances or decontamination equipment can be considered clean:

(i) 15 times public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and O.A.C. Rule 3745-81-11 for inorganics and 40 CFR 141.12 and O.A.C. Rule 3745-81-12 for organics;

(ii) If an MCL is not available for a particular contaminant, then 15 times maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 shall be used as the clean standard; or

(iii) If neither an MCL nor an MCLG is available for a particular contaminant, 1 mg/l shall be used as the clean standard.

(b) If the MCL or MCLG is less than the contaminant's analytical detection limit using methods found in U.S. EPA Publication SW-846, "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", the SW-846 analytical detection limit shall be used as the clean standard.

(c) The final rinseate shall be analyzed for all chemicals listed in the Part A application.

B.22 Closure Plan

The Permittee shall carry out the approved closure plan in accordance with O.A.C. Chapter 3745-55 and the terms and conditions of this permit.

B.23 Amendment of Closure Plan

The Permittee shall amend the approved closure plan, in accordance with O.A.C. Rule 3745-55-12(B).

B.24 Content of Closure Plan

The Permittee shall maintain at the facility a closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12.

B.25 Time Allowed For Closure

After receiving the final volume of hazardous waste, the Permittee shall remove from the facility all hazardous waste within ninety (90) days and shall complete all closure activities within one hundred eighty (180) days in accordance with O.A.C. Rule 3745-55-13.

B.26 Disposal or Decontamination of Equipment, Structures and Soils

The Permittee shall decontaminate and/or dispose of all contaminated facility equipment, structures, and soils, as required by O.A.C. Rule 3745-55-14 and the approved closure plan.

B.27 Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the approved closure plan and the terms and conditions of this permit, as required by O.A.C. Rule 3745-55-15.

B.28 Cost Estimate for Facility Closure

The Permittee's original closure cost estimate, prepared in accordance with O.A.C. Rule 3745-55-42(A), is specified in the approved closure plan. The Permittee shall:

(i) Adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared as required by O.A.C. Rule 3745-55-42(B);

(ii) Revise the closure cost estimate whenever there is a change in the facility's closure plan as required by O.A.C. Rule 3745-55-42(C); and

(iii) Submit annually to Ohio EPA the latest closure cost estimate as required by O.A.C. Rule 3745-55-42(D).

B.29 Financial Assurance for Facility Closure

The Permittee shall demonstrate continuous compliance with O.A.C. Rule 3745-55-43 by providing documentation of financial assurance, in at least the amount of the cost estimates required by Condition B.28. Changes in financial assurance mechanisms must be approved by the Director pursuant to O.A.C. Rule 3745-55-43.

B.30 Liability Requirements

The Permittee shall demonstrate continuous compliance with the requirement of O.A.C. Rule 3745-55-47(A) to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs.

B.31 General Requirements for Land Disposal Restrictions

(a) Land Disposal Restrictions and Prohibitions.

The Permittee shall comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by O.A.C. Chapter 3745-59. Wastes restricted from land disposal by O.A.C. Rules 3745-59-30, 3745-59-31 and 3745-59-33 or prohibited from land disposal by O.A.C. Rule 3745-59-32 or by section 3004(d) of RCRA shall not be shipped to an off-site land disposal facility unless the waste meets the treatment standards given in O.A.C. Rule 3745-59-40 to 3745-59-44 and the applicable prohibition levels set forth in O.A.C. Rule 3745-59-32 and section 3004(d) of RCRA.

(b) Notification Requirements for Restricted or Prohibited Wastes.

The Permittee shall comply with the notification and certification requirements set forth in O.A.C. Rule 3745-59-07(A) regarding wastes restricted from land disposal by O.A.C. Rules 3745-59-30, 3745-59-31 and 3745-59-33 or prohibited from land disposal by O.A.C. Rule 3745-59-32 or by section 3004(d) of RCRA.

(c) Prohibition of Dilution.

The Permittee shall comply with the requirements of O.A.C. Rule 3745-59-03, and shall not in any way dilute a restricted waste or the residue from the treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with O.A.C. Rules 3745-59-40 to 3745-59-44, to otherwise avoid a prohibition set in O.A.C. Rules 3745-59-30 to 3745-59-33, or to circumvent a land disposal prohibition imposed by section 3004(d) of RCRA.

(d) Waste Analysis Requirements for Restricted and Prohibited Wastes.

The Permittee shall comply with the waste analysis requirements found in O.A.C. Rule 3745-54-13(A)(1) and shall maintain elements within the facility waste analysis plan to document compliance with O.A.C. Rule 3745-54-15(B)(6) with regard to wastes managed at the facility which are restricted from land disposal by O.A.C. Rules 3745-59-30, 3745-59-31 and 3745-59-33 or prohibited from land disposal by O.A.C. Rule 3745-59-32 or by section 3004(d) of RCRA.

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(e) Retention of Records.

The Permittee shall retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by O.A.C. Rule 3745-59-07(A)(5). Copies of all notices, certifications, demonstrations, waste analysis data and other documentation produced pursuant to the requirements of O.A.C. Chapter 3745-59 shall be retained for a period of five (5) years as required by O.A.C. Rule 3745-59-07(A)(6).

(f) Storage Time for Restricted and Prohibited Wastes.

The Permittee shall comply with the requirements regarding the storage of wastes restricted from land disposal by O.A.C. Rules 3745-59-30, 3745-59-31 and 3745-59-33 or prohibited from land disposal by O.A.C. Rule 3745-59-32 or by section 3004(d) of RCRA as set forth in O.A.C. Rule 3745-59-50.

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C. TANK STORAGE AND MANAGEMENT

C.1 Process Capacity/Annual Limitation

(a) The Permittee shall not store more than 1,139,000 gallons of hazardous waste at any given time in the permitted tank storage system. The Permittee shall not treat more than 237,250,000 gallons per year in the permitted tank treatment system. The Permittee shall not treat more than 237,250,000 gallons per year by filtration. See attachment 3 for restrictions on annual quantities. The Permittee shall not exceed the following working volumes for individual tanks:

FACILITY TANKS

Tank #	Description	Maximum Volume	Working Volume
T-22	receiving tank	6,770	5,920
T-23	receiving tank	6,770	5,920
T-24	receiving tank	6,770	5,920
T-25	receiving tank	6,770	5,920
T7	filtered acid	21,005	19,313
T8	filtered acid	21,005	19,313
T-17	filtered acid	15,440	13,736
T-19	filtered acid	12,357	10,575
T-1	storage/treatment	206,000	200,000
T-2	storage/treatment	206,000	200,000
T-5	storage/treatment	206,000	200,000
T-6	storage/treatment	206,000	200,000
T-9	storage/treatment	102,000	100,000
T-10	storage/treatment	102,000	100,000

Tank #	Description	Maximum Volume	Working Volume
T-13	storage/treatment	152,000	150,000
T-14	storage/treatment	77,000	75,000
T-15	storage/treatment	206,000	200,000

(b) During any calendar year, Permittee shall not manage through tank storage any individual hazardous waste in quantities in excess of the annual quantities set forth in Condition C.2 of this permit.

C.2 Waste Identification

(a) The Permittee shall store in the permitted tanks only the waste in the attachment VI of this permit and treatment shall not exceed the annual quantity of 237,250,000 gallons. Each individual waste stream shall be restricted to an annual maximum of 89,000 tons.

C.3 Assessment/Certification of Tank Systems

(a) Existing Tank Systems

The Permittee shall keep on file at the facility a written assessment for all existing tanks systems that is reviewed and certified by an independent, qualified professional engineer, in accordance with O.A.C. Rule 3745-50-42(D), to the structural integrity and suitability of each existing tank system for handling hazardous waste, as required under O.A.C. Rule 3745-55-91. The existing tanks are T-22, T-23, T-24, T-25, T7,T8, T-17 and T-19.

(b) New Tank Systems

The Permittee shall keep on file at the facility all written assessments by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirement of O.A.C. Rule 3745-55-92, that attest that tanks systems were properly designed and installed. These written statements must also included the certification as required by O.A.C. Rule 3745-50-42(D). The new tanks are T-1, T-2, T-5, T-6, T-9 and T-10.

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C.4 Containment System

(a) Secondary containment must be designed, installed and operated to prevent any migration of waste or accumulated liquid out of the system to soil, groundwater or surface water during the use of the tank system.

(b) Secondary containment must be capable of detecting and collecting releases and accumulated liquids until the collected material is removed.

(c) The secondary containment must meet the requirements of O.A.C. Rule 3745-55-93.

C.5 General Operating Requirements

(a) Hazardous waste or treatment reagents shall not be placed in a tank system if they could cause the tank, its ancillary equipment or the secondary containment system to rupture, leak, corrode or otherwise fail, as required by O.A.C. Rule 3745-55-94.

(b) The Permittee must use appropriate controls and practices to prevent spills or overflows from tank or containment systems.

(c) The Permittee must comply with the requirements of O.A.C. Rule 3745-55-96 if a leak or spill occurs in the tank systems.

(d) All tank secondary containment systems shall be washed monthly to remove any visible discoloration or contamination.

C.6 Inspections

(a) The Permittee shall inspect the hazardous waste tank systems daily in accordance with O.A.C. Rule 3745-55-95 and the approved inspection plan.

(b) The Permittee shall document compliance with Condition D.6.(a).

C.7 Response to Leaks or Spills and Disposition of Leaking or Unfit for Use Tank Systems

A tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, must be

removed from service immediately and the Permittee must satisfy the following requirements, in accordance with O.A.C. Rule 3745-55-96:

(i) Cessation of Use.

The Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

(ii) Removal of Waste From Tank System or Secondary Containment System.

(1) If the release was from the tank system, the Permittee must within twenty-four hours after detection of the leak or at the earliest practicable time, remove as much waste as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be preformed.

(2) If the material released was to a secondary containment system, all released materials must be removed within twenty-four hours or in as timely a manner as is possible to prevent harm to human health and the environment.

(3) Containment of Visible Releases to the Environment.

The Permittee shall immediately conduct a visual inspection of the release and based upon that inspection, prevent further migration of the leak or spill to soil or surface water and remove, and properly dispose of, any visible contamination of the soil or surface water.

(4) Notifications.

Any release to the environment, except as provided in O.A.C. Rule 3745-55-96(D)(2), must be reported to the Director within twenty-four hours of detection.

(5) The Permittee shall close or repair the tank system or provide secondary containment in compliance with O.A.C. Rule 3745-55-96(E) and 3745-55-97.

(6) The Permittee shall obtain a certification by an independent, qualified professional engineer that major repair has been satisfactorily preformed, capable of handling hazardous waste without release for the intended life of the system. The certification must be submitted to the Director within seven days after returning the tank to use.

C.8 Special Requirements

(a) Ignitable or Reactive Waste.

(i) The Permittee must not place ignitable or reactive waste in a tank unless the procedures in O.A.C. Rule 3745-55-98 are followed.

(ii) The Permittee shall document compliance with Condition C.8(a)(i) of this permit, as required by O.A.C. Rule 3745- 55-98 and place this documentation in the operating record.

(iii) The Permittee must comply with the requirements for maintenance of protective distances between the waste management areas and any public ways, streets, alleys or adjoining property lines that can be built upon.

(b) Incompatible Waste.

(i) The Permittee must not place incompatible waste in the same tank system or place hazardous waste in a tank system that previously held an incompatible waste or material unless in accordance with O.A.C. Rule 3745-55-99(B).

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(ii) The Permittee shall document compliance with Condition C.8.(b) of this permit, as required by O.A.C. Rule 3745-55-99 and place this documentation in the operating record.

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D. ADDITIONAL TERMS AND CONDITIONS

D.1 Closure Plans

Within 120 days of the effective date of this permit the Permittee shall submit to the Ohio EPA, a detailed closure plan which reorganizes the materials contained in the approved Part B application, for the permitted hazardous waste management units. Separate units must each be addressed in the closure plan for the container handling facility, roll-off/bulk storage area, aqueous waste and concentrated acids process building, HF acid process building, storage and treatment tank farm, pumps and pump houses with yard piping, truck unloading facility, and filtration system. At a minimum the plans must include the following information and data:

(a) Description of Facility.

The plan shall include the type of industry, products, location, size and other general summarized information. Processes or activities that generate or manage hazardous waste must be described.

(b) Description of Waste Management Units to be Closed.

Describe each hazardous waste storage area, tank, and treatment area and include waste types for each unit (standard chemical name and EPA hazardous waste code), period of use, dimensions, construction details, and any other relevant matters.

(c) Map of Facility.

Location on a legible topographical map shall be provided, plus a more detailed drawing of the facility with each hazardous waste management unit clearly located and identified. Map scale must be specified and North arrows provided.

(d) Detailed Drawings of Unit(s) to be Closed.

A sketch, diagram or blueprint of the unit(s), showing dimensions and other construction details, appurtenant structures and relationship to other points or structures on the facility property. Scale of drawing and North arrows must be provided.

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(e) List of Hazardous Waste.

The facility must provide a complete, detailed list of hazardous waste (chemical name and EPA hazardous waste code) treated, stored or disposed of at the unit. The list of hazardous waste must identify all hazardous constituents listed in the Appendix to O.A.C. Rule 3745-54-93 associated with the waste managed in the unit(s) undergoing closure. An estimate of the maximum inventory of waste in storage or treatment for each unit (broken down by EPA waste code) must be provided.

(f) Removal of Waste.

The closure plan must specify methods for removal of waste and contaminated media (including type of equipment and removal protocol) from areas to be closed, transportation of waste, and storage and treatment and disposal. For off-site management the plan must specify the type of facility each waste is expected to be sent to.

(g) Schedule for Closure.

The facility must remove or dispose of all inventoried hazardous waste in accordance with the closure plan within 90 days after receiving the final volume of hazardous waste. The Permittee must also complete closure in accordance with the closure plan within 180 days receiving the final volume of hazardous waste.

The plan must contain a schedule which shows all critical dates for closure, including but not limited to waste removal, sampling, soil removal, critical points when the independent engineer will be present, independent engineers certification, backfilling, and other relevant activities. This schedule shall start at the point upon notification of intent to close and not rely on calendar dates.

(h) Air Emission and Wastewater.

The plan must specify how the facility will minimize or eliminate air emissions related to closure, including nuisance problems such as fugitive dust or odors. The plan shall also address rinseate management in accordance with Ohio water pollution control rules.

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(i) Personnel Safety and Fire Prevention.

The facility must clearly show the measures that will be taken to protect all personnel (including contractors and visitors) involved in the closure or those possibly exposed to hazardous waste by closure activities. The closure plan shall include:

(i) A demonstration that the health and safety plan to be implemented during closure is consistent with or exceeds the guidelines provided in OSHA's 29 CFR 1910.120, 1910.132, 1910.133(a), 1910.134, 1910.135, 1910.136, 1910.1200, and 1926, USEPA's Occupational Health and Safety Manual and Chapter 9 of USEPA's Standard Operating Safety Guides;

(ii) Personnel levels of protection, such as determined through use of the U.S. Department of Health and Human Services, National Institute for Occupational Safety and Health, "NIOSH Respirator Decision Logic", of May 1987 (or as updated). The independent engineer and the facility monitoring the cleanup for worker exposure must monitor and make a determination as to what level of personal protective equipment must be used;

(iii) Environmental monitoring to ensure proper protective equipment for the conditions at hand, including monitoring methods to be used to detect hazardous gases, dust or other air emissions during closure activities;

(iv) Contingency plans to deal with emergencies and accidental exposures;

(v) The name and telephone number of emergency coordinator(s) and local emergency officials to be notified in case of emergency during closure;

(vi) A delineation of the work zones to be used in the closure and decontamination areas (i.e., exclusion, contamination reduction and support zones); and

(vii) Personnel decontamination procedures and methods, and proper disposal or decontamination of equipment used during closure activities.

(j) Decontamination Efforts.

The facility must describe all efforts to clean or decontaminate hazardous waste and its residues and constituents from equipment, vehicles, tanks, paved areas, concrete, pipes, pumps, sumps and any other appurtenances to the hazardous waste management unit.

(i) The facility should specify use of any reasonable means to clean or decontaminate, including solvent washing, pressure washing, scraping, scarification or other means. The independent engineer should certify the methods used and that the minimum amount of residue remains in accordance with Ohio EPA's rinseate standards.

The rinseate standards in permit Condition B.21 must be met before the surface of a storage pad or other structure could be considered "clean".

(ii) Reusable equipment (e.g., earth moving equipment and stainless steel soil samplers) may be decontaminated by brushing or scraping debris from the exposed surfaces followed by at least three separate rinses. Although no chemical or physical analysis of the rinseate is required, rinseate must be managed as hazardous waste unless sampling results demonstrate that the rinseate is "non-hazardous". The solid debris should be managed as solid or hazardous waste depending on the wastes in the hazardous waste management unit and the sampling results. The equipment decontamination operation should be managed so that vehicles do not distribute contaminated debris outside of the waste management area.

(iii) A description of how waste material (i.e., rinseate, debris, disposable equipment, etc.) from decontamination will be managed and an estimate of the volume of waste material which will be generated by decontamination efforts shall also be provided. Please note that contaminated debris containing hazardous constituents derived from listed hazardous waste or exhibiting a characteristic of hazardous waste must be managed as a hazardous waste.

(iv) The facility must provide design details for the equipment decontamination area. Information required shall include, but not limited to, a scaled map showing location of the decontamination area, materials of construction, liner specifications and method of rinseate collection.

(k) Clean Levels for Soils.

The facility shall determine the clean level for the environmental media. This shall be determined by either comparison to background conditions or through risk assessment. Either may be conducted first.

(l) Sampling Plan and Analytical Procedures.

The facility must determine the full extent of vertical and horizontal soil contamination and contaminant concentrations.

(i) Closures of units where there is any evidence of potential for leaks or spills or potential for waste constituent migration must include sampling of soil to determine the nature and full extent of contamination of soil. Such evidence includes units in contact with soil, storage units with underlying pavements or concrete that appears to be cracked or broken, areas receiving runoff or discharge, visual or olfactory evidence of contamination, knowledge, such as by employees, inspectors, or others, that releases had or may have occurred, length of time the unit has been in existence, and other situations which may lead to soil contamination.

(ii) An adequate soil sampling and analysis plan should include the following information and rational for each selection:

(1) Parameters to be analyzed;

(2) Number of samples and locations, including both surface points and depths;

(3) Background samples;

(4) Sample type;

(5) Sampling methods and equipment;

(6) Analytical methods;

(7) Evidence of quality assurance/quality control plan for laboratory analysis;

(8) A clear statement of the "clean" level for soil and rinseate; and

(9) Quality assurance/quality control protocols for field methods, including chain of custody procedures.

(iii) Locations of soil samples must be selected to determine the full horizontal and vertical extent of all contaminants specified previously, and sampling should proceed until this extent is determined. To determine horizontal extent a grid system shall be used.

For grid sampling, the following equations may be used to determine grid intervals and the number of samples in a given area:

(1) GI = (3.14A/GL)1/2; or

(2) GI = [(A/3.14)1/2]/2

The above equations establish grid point representation, proportioned to the size of the area for equal weighing, where GL is the length of the area to be gridded (units), A is the area to be gridded (square units), and GI is the grid interval (units). Equation 1 is most appropriate for sites over 3 acres, while Equation 2 is best for smaller sites.

(iv) The interval for sampling soil at various depths may be dependent on several factors, including:

(1) soil type and permeability;

(2) suspected magnitude of surface contamination;

(3) physical state of the waste and its mobility;

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(4) height of liquid head at the ground surface;

(5) length of time that waste was present at the site; and

(6) relative toxicity of the waste.

The depth intervals typically selected vary from 4-6 inches to 3 feet. However, in the upper 3- 4 feet of soil, the sampling interval should not exceed one foot. When sampling for organics, sampling and analysis should be conducted for both the top layer and the next underlying layer, at a minimum.

(v) Background samples are needed when the hazardous waste constituent of interest naturally occurs in soil, such as heavy metals.

vi) Sampling methods and equipment, as well as laboratory analytical methods, should follow guidance in USEPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition".

(m) Description of Removal Efforts.

The facility must fully describe each step in removing waste and contaminated soil from the property. This includes description of solidification/stabilization, staging and containerization of waste or reagents, equipment, removal pattern and depth increments, loading areas or any other step critical to removal. The plan must clearly define how soil will be removed, stored, loaded and managed once it leaves the property.

(n) Certification.

(i) All closures of hazardous waste management units must be certified by both the facility and a qualified independent registered professional engineer licensed in Ohio. The closure plan must include a statement acknowledging this requirement.

(ii) Certification must be submitted within 60 days of completion of closure.

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(iii) The facility's and independent registered professional engineer's certification must follow the signature requirements found in O.A.C. Rule 3745-50-42.

The facility's certification statement must include the exact wording found in O.A.C. Rule 3745-50-42(D).

(iv) At a minimum the certification document must include the following information:

(1) certification statement;

(2) reference to the approved closure plan;

(3) volume of waste removed;

(4) all correspondence;

(5) details of sampling and analysis methods;

(6) laboratory records;

(7) description of all activities of closure; and

(8) signature of facility representative and qualified independent registered professional engineer.

(v) The qualified independent registered professional engineer shall be present at all critical activities during closure.

(o) Cost Estimates for Closure.

The facility must prepare detailed written estimates of the current cost of closing. The cost must be based on activities described in the closure plan.

D.2 <u>Preparedness and Prevention</u>

(a) Permittee may receive waste from the hours of 11:00 PM to 7:00 AM in those instances when, through no fault of Permittee, a generator and/or transporter experiences some unforeseen circumstance and/or emergency which would not allow the waste to be received during normal operating hours (7:00 AM to 11:00 PM). Such "off-hours" receipt of waste may be conducted under

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the above described circumstances, and Permittee must notify Northwest District Office as soon as possible (within one business day). Prior notification shall be made when such a information ia available.

(b) Permittee must spray down and remove all residues from leaks and spills in all pump houses within 24 hours of discovering such spills and leak.

(c) Permittee must clean and remove all residues from leaks and spills in the filter buildings immediately after removing roll-off boxes. There must not be filter cake accumulating on the floors.

(d) Permittee must follow their Surface Water Management Plan with the corrections outlined in their Notice of Deficiency (NOD) response of June 21, 1991 (Attachment 4).

(e) The surface impoundments 4, 5, 7, 11 and 12 are renewed by this permit for the purpose of completing closure activities and in no event shall these surface impoundments be re-activated to manage hazardous waste.

(e) Permittee must continue to close all surface impoundments.

D.3 Ground Water Monitoring

(a) Until Permittee is notified by the Director that he is no longer required to maintain financial assurance for closure pursuant to O.A.C. Rules 3745-66-42 and 3745-66-43 for units 4, 5, 6 West, 7, 9, 10, 11 and 12 at the facility, Permittee shall:

(i) comply with the ground water monitoring requirements pursuant to O.A.C. Rules 3745-65-90(A), 3745-65-92(E), 3745-65-93(C) through 3745-65-94;

(ii) obtain and analyze samples collected from the ground water monitoring system for all parameters on the continued monitoring list of parameters (attached hereto) as developed pursuant to work required by the April 2, 1985 U.S. EPA Consent Agreement and Final Order, at least semi-annually; and

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(iii) implement a ground water monitoring program at the facility that incorporates a ground water data evaluation program that includes, at a minimum the following:

(1) Data summary tables (yearly and historic) and a trend analysis of each constituent for each well;

(2) An upgradient (background) to downgradient statistical analysis for each detection monitoring constituent (as specified in the company's current continued monitoring parameter list) for each discretely monitored zone (i.e.,lacustrine, till, and bedrock) must be performed regardless of the type of statistical method selected This analysis should be determine whether there has been statistically significant change in the downgradient ground water quality when compared to the upgradient (background) ground water quality;

(3) If statistical method other than that specified in OAC rule 3745-65-93(B) is selected, then an appropriate method that incorporates an upgradient to downgradient statistical comparison must be selected, and meet the performance standards as specified in US EPA's interim final guidance document "Statistical Analysis of Ground Water Monitoring Data at RCRA Facilities, April, 1989".

(b) Within ninety (90) days from the issuance of this permit, Permittee shall submit a ground water monitoring program plan for the landfill unit at the facility (hereinafter "Landfill"), consistent with OAC rule 3745-50-44(B). In the event that Ohio EPA provides the Permittee with written notification of deficiencies in the plan, The Permittee shall submit a new plan or modified plan to address the deficiencies within thirty (30) days of receipt of such notification.

(c) The Permittee shall comply with the approved ground waster monitoring program plan for the Landfill at the facility upon notification by the Director that he is no longer required to maintain financial assurance for closure pursuant to OAC Rules 3745-66-42 and 3745-66-43 for the Landfill at the Facility.

END OF PERMIT CONDITIONS

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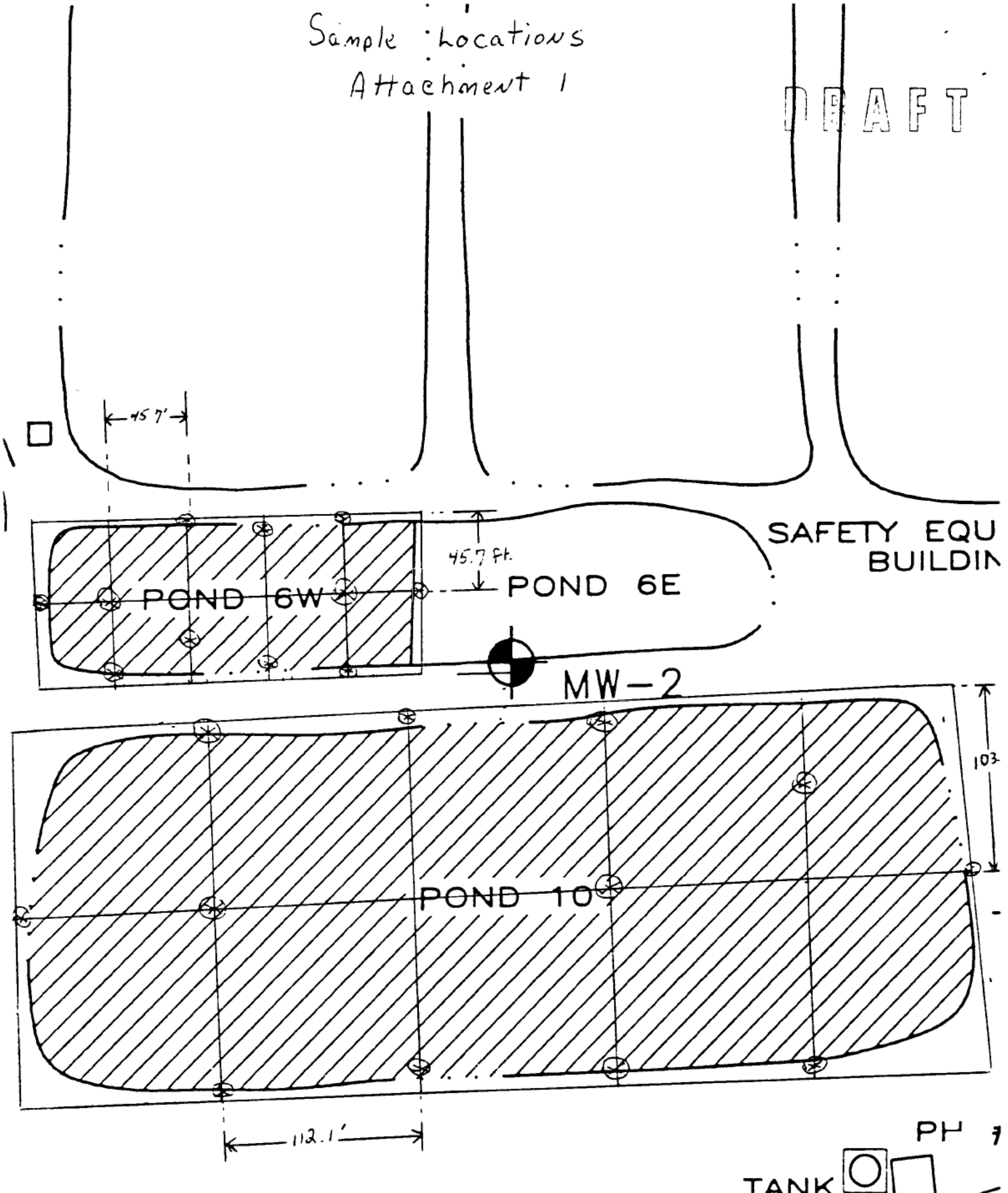
ATTACHMENT I

Sample Locations
Attachment 1



⊗ = Samples[E]

[E] Sample Distances Referenced from "Closure Plan Review Guidance" May 1, 1991 OERR, DS4001

1" = 66.4 ft.

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ATTACHMENT II

Sample Locations
Attachment 2

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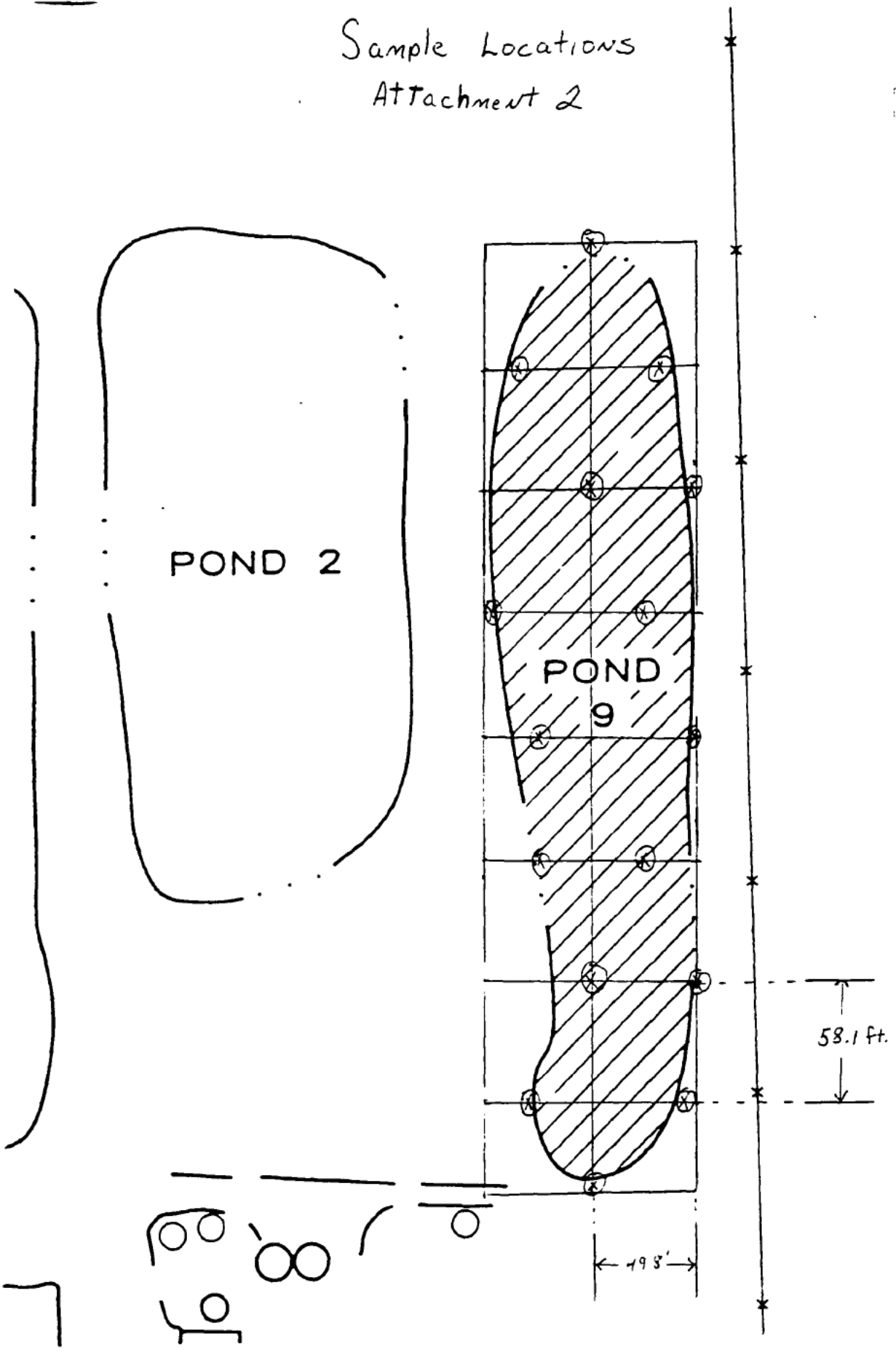

⊗ . Samples*

* Sample distances Recommended from "Closure Plan Review Guidance" May 1, 1991 CERA, DSHWM

1" = 66.4 ft

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ATTACHMENT III

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ATTACHMENT 3

ANNUAL QUANTITY DETERMINATIONS

1. Annual quantity for roll-off/bulk tanker storage pad:

-The limiting factor is time assumed for storage.

-This storage pad is mainly for short term storage. This pad will accommodate facilities which need to store waste temporarily due to unforeseen incidents. To determine annual quantities 10 days was used for an average storage time.

Phase 1 - 25 tankers X 8,000 gallons per tank
=200,000 gallons
- turn around rate every 10 days
- storage pad could be turned over 36 times in one year
-36 X 200,000 = 7,200,000 gallons/year

Phase 1 - 25 30-cubic yard roll-off boxes

- 25 roll-off boxes X 30 cubic yards
=750 cubic yards/storage period

750 cubic yards X 36 storage period/year
=27,000 cubic yards/year

Phase 2, 3, and 4

- 25 roll-off boxes X Phase 2, 3, and 4
=75 roll-off boxes

- 75 roll-off boxes X 20 cubic yards/roll-off
=1500 cubic yards

1500 cubic yards/storage period X 36 storage periods/year
=54,000 cubic yards/year

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2. Tank storage annual quantity.

- The limiting factor is amount the permittee is capable of treating per year. The facility is capable of treating 650,000 gallons per day.

  650,000 gallons/day X 365 days/year
  =237,250,000 gallons/year

3. Tank treatment annual quantity.

- The Permittee is capable of treating 650,000 gallons per day.
  650,000 gallons/day X 365 days/year
  =237,250,000 gallons/year

4. Annual quantity of treatment by filtration.

- The permittee is capable of treating 650,000 gallons per day by filtration.

- 650,000 gallons/day X 365 days/year
  =237,250,000 gallons/year

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ATTACHMENT V

Chemical Waste Management, Inc.

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HAND DELIVERED

RECEIVED

AUG 29 1991

OHIO E.P.A.
N.W.D.O.

August 26, 1991

Mr. Charles Hull
Ohio Environmental Protection Agency
Northwest District Office
347 N. Dunbridge Road
P.O. Box 466
Bowling Green, OH 43402

Subject: Resolution of NOx Releases

Dear Mr. Hull:

Chemical Waste Management, Inc. - Vickery is in receipt of the Ohio Environmental Protection Agency's letter of August 16, 1991 regarding releases of NOx from the facility's waste handling operations.

Please note that although your letter references two NOx releases, CWM actually reported a total of five releases to the Ohio EPA on-site representatives. One release was August 6, 1991, another was August 7, 1991, two separate releases occurred on August 9, 1991, and one on August 10, 1991. Descriptions of the steps taken to prevent future releases are attached.

On August 6, 1991, Vickery experienced a NOx release near the end of unloading a tanker. It was small (less than 10 lbs) and did not occur upon resuming unloading.

On August 8, 1991, a release occurred that was assumed to be a reportable quantity and was reported accordingly. The source of this release occurred in the nitric storage tank (T-9) as evidenced by storage vent releasing fumes as well as the scrubber. The T-9 recirculating pump was down for repair during this period. Lack of circulation in the tank is a possible contributing cause.

On August 9, 1991, another release occurred, but to a lessor degree. At this time, the unloading was monitored very closely. This release occurred in the sand interceptor/V-Tank area before the V-Tank had started pumping to T-9. The usual nitric stream V-Tank was out for repair to the pump and another V-Tank was used following a rinse with process water, and being pumped to as near empty as possible. It is possible that some residue may have remained in the tank from material processed through it at an earlier date. This procedure has been used in the past without causing a release. After a brief hold, unloading was resumed without incident, except for a light emission due to displacement of NOx in T-9. Another load received in the evening was pump unloaded directly to T-9 and caused an emission from the scrubber, probably due to gas displacement.

After review of the incidents, a hold was placed on nitric acid receipts until a complete review, and revisions, give a more reliable operation.

On August 10, 1991, after reviewing lab results and new streams, it was decided to reduce the nitric concentration of T-9 with several loads of leachate from Adams Center landfill. Upon addition to T-9, a slight emission resulted and this addition was immediately stopped.

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Although to our knowledge no public complaint was received (probably due to the small nature of the releases), the site elected not to receive any more nitric loads over 1% or with an oxidation reduction meter potential over 600 until a complete investigation was complete.

Upon review of new streams, lab records, and operations, the following action plan has been initiated to minimize the potential of NOx releases in the future.

The new, replumbed system, as stated above, designates SI 2, V-5 and T-9 as the nitric system. Streams containing nitric acid/nitrates will be the only materials unloaded through this system. The line from V-5 to T-9 is now completely dedicated.

CWM believes that these process changes will eliminate the potential of similar releases of NOx, and, therefore, additional changes to site operations such as air pollution control equipment and waste analysis is not warranted. CWM has reviewed this approach with Ohio EPA representatives, and preliminary concurrence has been obtained regarding this solution. CWM will meet with the Ohio EPA for a final review prior to resuming nitric acid receipts. CWM intends to test the system by unloading nitric acid on Tuesday, August 27, 1991. Ohio EPA has expressed interest, and is requested by CWM to observe the first few unloading events. These will be scheduled verbally with the Ohio EPA on-site representative.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.

F. G. Nicar
General Manager

Attachments

cc: Randy Puckett, OEPA Onsite
Ed Kitchen, OEPA, DSHWM, CO
Ken Kerik, SCHD
Donald Waltermeyer, OEPA, NWDO, Air

DRAFT

August 12, 1991

(Updated - 8/22/91)

NITRIC ACID ACTION STEPS

NOTE: We will not accept nitric acid > 1% and millivolts greater than 600 until all items are completed; except for item #8. This may take more than two weeks.

Status			
Done	Nicar by 8/13/91	1.	Dedicate SI-2, V-5, and T-9 for nitric acid.
Done	Nicar by 8/13/91	2.	Clean out SI-2 and V-5. Paul will check out the safety concerns if any for clean out plus the safety involved in using the sand interceptor, V-tank configuration.
Done	Nicar by 8/16/91	3.	Also clean out SI-3, V-7 which will now be used for sulfide streams such as Envirosafe. Again, Paul will check out the safety.
Done	Friday 8/19/91 Confined Space	4.	Blend off the nitric that is in T-9 into T-6, add well water and/or land fill leachate to T-9 and empty for inspection. Inspect by removing one of the bottom manways after the liquid level is below the bottom of the manway. Use the vac truck to empty the tank as far as possible.
Done	Phil by 8/19/91	5.	Tie in all sump pumps in the V-tank sump area into V-4.
Done	Rudy/Phil Done	6.	Check out the pump curves on all V-tank pumps and check for proper operation.
Done	Phil by 8/19/91	7.	Make sure we have spare parts for all V-tank pumps and T-tanks. Especially the recycle pump on T-9.

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NITRIC ACID ACTION STEPS - Continued

Status			
In Progress	Rudy by 8/23/91	8.	Isolate the V-5 line so it unloads directly into T-9 without mixing with T-10 and T-1 streams. Make sure it is properly engineered and a process change form issued.
Done	Moneghan	9.	Immediately start adding more nitrogen to T-10 and T-9.
Done	Jay Immediately	10.	Make sure the Air Group of OEPA is communicated to.
In Progress	By 8/20/91	11.	Paul to put together an SDP for Nitric Acid unloading. Rudy will help.
	As a result of meeting with OEPA 8/22/91.	12.	Have a designated unloading spigot going to sand interceptor #2. Label the spigots.
	As a result of meeting with OEPA 8/22/91.	13.	Segregate the sump/grate on SI #2 so that it doesn't come in contact with nitric incompatible waste.

RJM/mp/tlt

DRAFT

NITRIC ACID

Other Changes:

1. The lab must heat the load sample and the T-tank sample to 120°F before the compatibility is run.

2. Two trial loads of Armco on Tuesday August 27, 1991. Carolyn will check with John Wunderle.

3. Unload the Avesta loads with H20 to begin with.

4. No VisionMark loads until the week of September 1, 1991.
   Note: VisionMark may be put on hold for even a longer period of time.

RJM/tlt

DRAFT

NITRIC ACID UPDATE

1. Tuesday, August 20, 1991 - Make new header tie-in.

2. Wednesday, August 21, 1991 - Clean V-5.

3. Wednesday, August 21, 1991 - Make new line tie-in to T-9. Start the T-10 tie-in.

4. Wednesday, August 21, 1991 - Empty T-9 by pumping to T-5; Compatibility is O.K. This may have to be done in the evening. Transfer from T-9 to T-5 will shut down the Fat A or Fat B transfer. Go FAT A→B.

5. Thursday, August 22, 1991 - Meet with Randy Puckett and layout game plan (Rudy & Jay).

6. Thursday, August 22, 1991 - Blind the header system V-5 (both ways), V-6, V-7.

7. Thursday, August 22, 1991 - Pressure test the new line and the T-10 line.

8. Thursday, August 22, 1991 - Inspect T-9, sparge, downcomer, liner, etc. Use vac truck to get completely empty.

9. Thursday, August 22, 1991 - Start training people to unload water through the new nitric acid system.

10. Friday, August 23, 1991 - Continue training and unloading a few more H_2O loads into T-9. Kenny - Schedule.

NITRIC ACID CUSTOMERS

1. Will not receive nitric acid until Tuesday, August 27, 1991. Kirk has been communicated to. Only 2 and 3 loads of Armco Tuesday. Prioritize nitric acid customers; first - Armco, second - Avesta. Third, fourth, etc. will be based on volume and need.

2. Vision Mark - We may put a hold on them.

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AUGUST 22, 1991 - MEETING WITH RANDY PUCKETT (OEPA)

Present: Randy Puckett, Jay Skabo, Rudy Maes

1) All O.K. for Tuesday, August 27, 1991, except for the conditions listed below to be added to the nitric action steps.

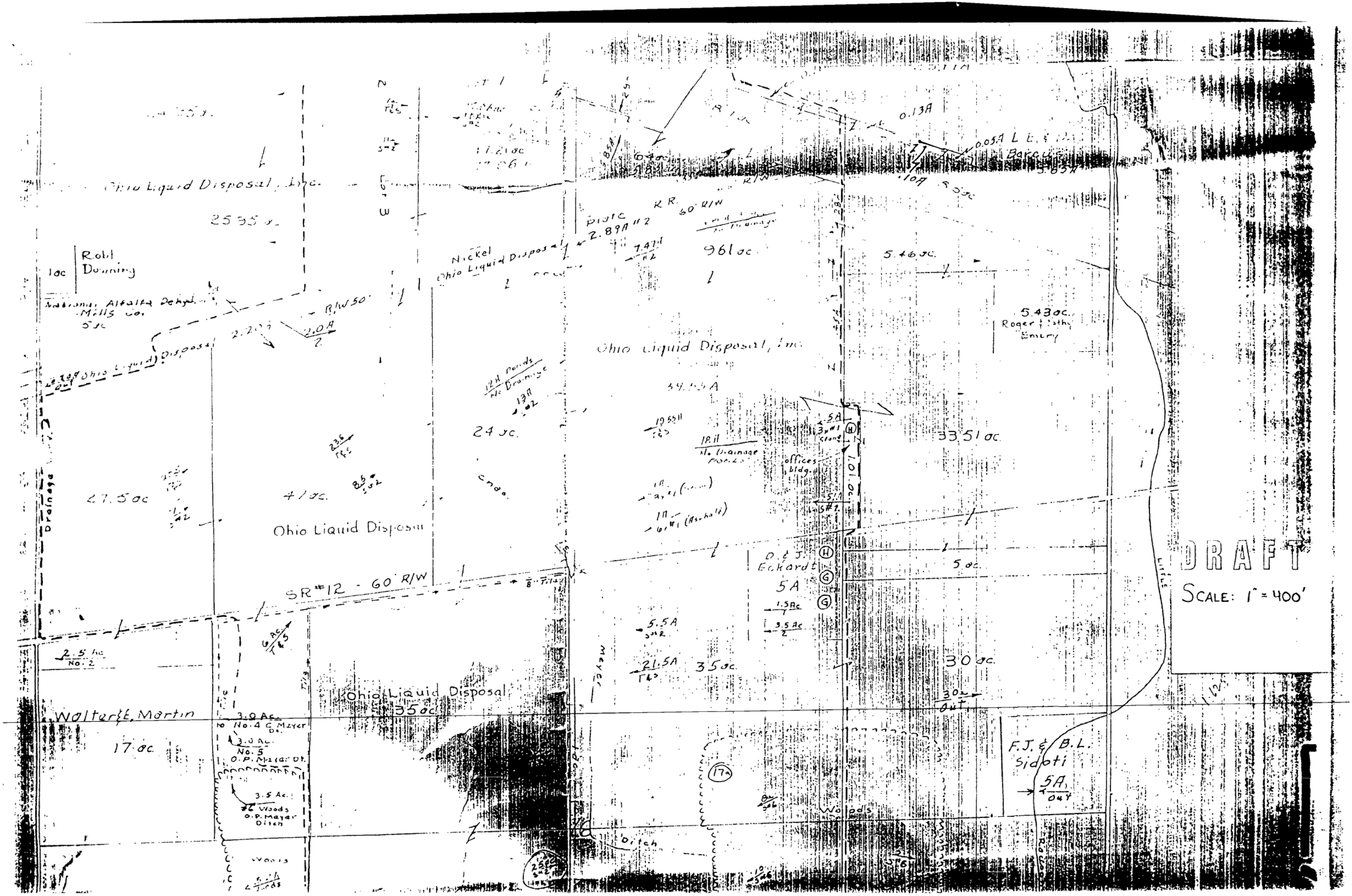
   a) New action step #12 - label spigots on the unloading spigots, also label the sand interceptors. Identify and label where the unloading spigot drain sumps flow to.

   b) Make sure all the other action items are completed.

   c) Pressure test date to Randy Puckett for T-9 line.

   d) Lab Manager must o.k. blending.

RJM/mp



DRAFT
SCALE: 1" = 400'
Ohio Liquid Disposal, Inc.
25.95 ac.
Robt Downing
1 ac
National Alfalfa Dehyd. Mills Co.
5 ac
R/W 50'
2.0 A
Ohio Liquid Disposal
Nickel
Ohio Liquid Disposal
Plate
2.89 A #2
R.R.
60' R/W
9.61 ac.
5.46 ac.
5.43 ac.
Roger & Cathy Emery
Ohio Liquid Disposal, Inc.
12 A ponds No Drainage
13 A
24 ac.
19.55 A
18 A No Drainage ponds
offices bldg.
33.51 ac.
27.5 ac
41 ac.
Ohio Liquid Disposal
SR #12 - 60' R/W
D. & J. Eckardt
5 A
1.5 Ac
3.5 Ac
5 ac.
5.5 A
21.5 A
35 ac.
30 ac.
30 ac Out
2.5 Ac No. 2
Ohio Liquid Disposal
35 ac
Walter & E. Martin
17 ac.
3.0 Ac. No. 4 C. Mayer Dt.
3.0 Ac. No. 5 O.P. Mayer Dt.
3.5 Ac. #6 Woods O.P. Mayer Ditch
Woods
Ditch
Mayer
F.J. & B.L. Sidoti
5 A Out
Woods
Little
Drainage

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ATTACHMENT IV

Golder Associates	SUBJECT Peak Flow In Meyer's Ditch		
	Job No. 913-3237	Made by CB	Date 5/20/91
	Ref. CWM/Meyer's Ditch/Vickery	Checked	Sheet 1 of 20
		Reviewed	

DRAFT

Objective: Estimate the peak flow in Meyer's Ditch at the point where it enters the site (South of SR412). Use the 25 year - 24 hour storm as the design storm.

Approach: Use the Soil Conservation Service's (SCS) curve Number Method to estimate the run-off hydrograph (the Curve Number Method is presented in Reference 1). Use Manning's equation (Reference 2) to estimate the capacity of Meyer's Ditch and the velocity of flow in the ditch.

Assumptions/Data:

Size of watershed for Meyer's Ditch* = 303.2 acres (From PLAT dwg of area surrounding Meyer's Ditch, December 1960, Reference 3)

* This is the area South of SR 412

Golder Associates	SUBJECT Peak Flow in Meyer's Ditch		
	Job No. 913-3237 Ref. CWM/Meyer's Ditch/Rich	Made by CB Checked Reviewed	Date 5/20/91 Sheet 2 of 20

Assumptions / Data Continued ...

DRAFT

Average slope of land surface ≅ .003 ft/ft

Average slope of ditch ≅ .0033 ft/ft

(Slopes derived from Reference 4, original base contour map from November 1982 aerial photography)

Most of watershed is crop land - corn straight row, <20% residue.

(Curve numbers are presented in computer printouts, after the references.)

Hydrologic Soil Group:

The soils in the area of the site are generally silty clays with low permeability.

The hydrologic soil group assumed for the watershed soils is Group D

Group D soils have a high run-off potential and therefore, assuming group D for all the watershed soils is probably conservative. (Reference 1)

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Assumptions / Data continued...

SCS TYPE II Rainfall Distribution (Ref 1)

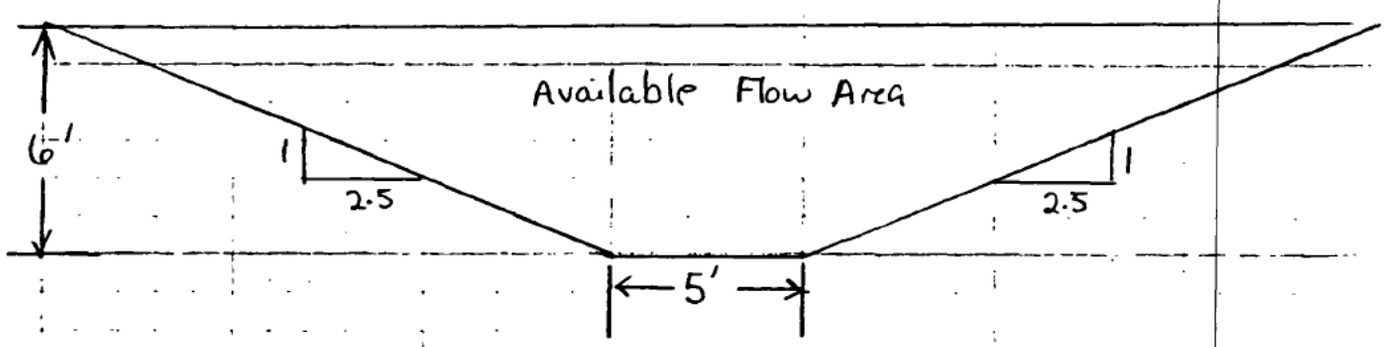
2 yr - 24 hr storm = 2.5 in (Ref 1)

25 yr - 24 hr storm = 4.0 in (Ref 1)

Meyer's ditch was assumed to be winding and sluggish with dense weeds in relatively deep channels.

n = Manning's coefficient = .04 (Ref 2)

Assumed cross-section of ditch NTS



Golder Associates	SUBJECT Peak Flow In Meyer's Ditch		
	Job No. 913-3237	Made by CB	Date 5/20/91
	Ref. CWM/Meyer's Ditch/Vic	Checked	Sheet 4 of 20
		Reviewed	

DRAFT

Discussion:

The watershed for Meyer's Ditch south of SR 412 was broken into three subwatersheds. This was done to provide a better model for the long thin watershed than a single subwatershed would have done. The assumptions and data for the three watersheds were inputed into the TR-55 computer program which uses the SCS's Curve Number Method to estimate run-off hydrographs. The resulting computer printouts are shown after the references. In the first iteration, the velocity of the flow in Meyer's Ditch was assumed to be 4 ft/s. Analysis of the ditch using Mannings equation showed the actual (estimated) velocity to be 4.26 ft/s. This value was close enough to 4 ft/s to deem

DRAFT

Discussion continued...

further iterations unnecessary.

Conclusions :

The peak flow in Meyer's Ditch after the 25 year - 24 hour storm is 396 cfs. The capacity of Meyers Ditch is approximately 558 cfs. Therefore Meyer's Ditch should not overflow in the 25 year - 24 hour storm.

References :

(1) Soil Conservation Service, "Urban Hydrology For Small Watersheds", Technical Release 55, June 1986.

(2) Chow, Open Channel Hydraulics, McGraw-Hill Book Company, 1959.

Golder Associates	SUBJECT Peak Flow In Meyer's Ditch		
	Job No. 913-3237 Ref. cwm/Meyer's Ditch/vcke	Made by CB Checked Reviewed	Date 5/20/91 Sheet 6 of 20

DRAFT

References, continued...

(3) PLAT Map, Riley TWP, Sandusky Co, December 1960.

(4) Golder Associates, Dwg of Existing Boring, Piezometer, and Monitoring Well Locations, 1984. Base contour map from November 1982 aerial photography.

DRAFT 7/20

TR-55 CURVE NUMBER COMPUTATION VERSION 1.11

Project : VICKERY MEYERS DITCH User: CB Date: 05-17-91
County : SANDUSKY State: OH Checked: ____ Date: _____
Subtitle: SOUTH OF SR 412
Subarea : 1

COVER DESCRIPTION		Hydrologic Soil Group A	B	C	D
		Acres (CN)			
OTHER AGRICULTURAL LANDS					
Woods	fair	-	-	-	29.6(79)
Total Area (by Hydrologic Soil Group)					29.6

SUBAREA: 1 TOTAL DRAINAGE AREA: 29.6 Acres WEIGHTED CURVE NUMBER:79

DRAFT 8/20

TR-55 CURVE NUMBER COMPUTATION VERSION 1.11

Project : VICKERY MEYERS DITCH User: CB Date: 05-17-91
County : SANDUSKY State: OH Checked: ____ Date: _____
Subtitle: SOUTH OF SR 412
Subarea : 2

COVER DESCRIPTION			Hydrologic Soil Group A	B	C	D
			Acres (CN)			
CULTIVATED AGRICULTURAL LANDS						
Row crops	SR + Crop residue	poor	-	-	-	87.6(90)
Total Area (by Hydrologic Soil Group)						87.6

SUBAREA: 2 TOTAL DRAINAGE AREA: 87.6 Acres WEIGHTED CURVE NUMBER:90

DRAFT 9/20

TR-55 CURVE NUMBER COMPUTATION VERSION 1.11

Project : VICKERY MEYERS DITCH User: CB Date: 05-17-91
County : SANDUSKY State: OH Checked: ____ Date: _____
Subtitle: SOUTH OF SR 412
Subarea : 3

COVER DESCRIPTION			Hydrologic Soil Group A	B	C	D
			Acres (CN)			
CULTIVATED AGRICULTURAL LANDS						
Row crops	SR + Crop residue	poor	-	-	-	186(90)
Total Area (by Hydrologic Soil Group)						186

SUBAREA: 3 TOTAL DRAINAGE AREA: 186 Acres WEIGHTED CURVE NUMBER:90

DRAFT 10/20

TR-55 Tc and Tt THRU SUBAREA COMPUTATION VERSION 1.11

Project : VICKERY MEYERS DITCH User: CB Date: 05-17-91
County : SANDUSKY State: OH Checked: ____ Date: _____
Subtitle: SOUTH OF SR 412

Subarea #1 - 1

Flow Type	2 year rain	Length (ft)	Slope (ft/ft)	Surface code	n	Area (sq/ft)	Wp (ft)	Velocity (ft/sec)	Time (hr)
Sheet	2.5	300	.003	H					2.083
Shallow Concent'd		1700	.003	U					0.534
Open Channel		7600						4	0.528
								Time of Concentration =	3.14*

Subarea #2 - 2

Flow Type	2 year rain	Length (ft)	Slope (ft/ft)	Surface code	n	Area (sq/ft)	Wp (ft)	Velocity (ft/sec)	Time (hr)
Sheet	2.5	300	.003	C					0.457
Shallow Concent'd		500	.003	U					0.157
Open Channel		7600						4	0.528
								Time of Concentration =	1.14*

Subarea #3 - 3

Flow Type	2 year rain	Length (ft)	Slope (ft/ft)	Surface code	n	Area (sq/ft)	Wp (ft)	Velocity (ft/sec)	Time (hr)
Sheet	2.5	300	.003	C					0.457
Shallow Concent'd		1400	.003	U					0.440
Open Channel		4600						4	0.319
								Time of Concentration =	1.22*

--- Sheet Flow Surface Codes ---

A Smooth Surface
B Fallow (No Res.)
C Cultivated < 20 % Res.
D Cultivated > 20 % Res.
E Grass-Range, Short
F Grass, Dense
G Grass, Burmuda
H Woods, Light
I Woods, Dense

--- Shallow Concentrated --- Surface Codes ---

P Paved
U Unpaved

* - Generated for use by TABULAR method

DRAFT 11/20

TR-55 TABULAR DISCHARGE METHOD VERSION 1.11

Project : VICKERY MEYERS DITCH User: CB Date: 05-17-91
County : SANDUSKY State: OH Checked: ____ Date: _____
Subtitle: SOUTH OF SR 412

Total watershed area: 0.474 sq mi Rainfall type: II Frequency: 25 years

	Subareas 1	2	3
Area(sq mi)	0.05*	0.14*	0.29*
Rainfall(in)	4.0	4.0	4.0
Curve number	79*	90*	90*
Runoff(in)	1.96	2.92	2.92
Tc (hrs)	3.14*	1.14*	1.22*
(Used)	0.20	1.25	1.25
TimeToOutlet	0.00	0.00	0.00
(Used)	0.10	0.00	0.00
Ia/P	0.13	0.06	0.06
(Used)	0.13	0.10	0.10

Time (hr)	Total Flow	Subarea Contribution to Total Flow (cfs) 1	2	3
11.0	13	1	4	8
11.3	18	2	5	11
11.6	25	3	7	15
11.9	38	7	10	21
12.0	50	13	12	25
[illegible]	74	27	15	32
12.[illegible]	120	52	22	46
12.3	166	65P	32	69
12.4	198	51	47	100
12.5	235	32	65	138
12.6	287	21	85	181
12.7	334	15	102	217
12.8	366	12	113	241
13.0	396P	8	124P	264P
13.2	339	7	106	226
13.4	271	6	85	180
13.6	208	5	65	138
13.8	166	5	52	109
14.0	134	4	42	88
14.3	101	4	31	66
14.6	79	3	24	52
15.0	62	3	19	40
15.5	49	3	15	31
16.0	40	2	12	26
16.5	36	2	11	23
17.0	32	2	10	20
17.5	30	2	9	19
18	27	2	8	17
19	24	2	7	15
20.0	21	1	6	14
22.0	16	1	5	10
26.0	1	0	0	1

* - Peak Flow

* - value(s) provided from TR-55 system routines

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DRAFT

OPEN CHANNEL FLOW
CHANNEL DESIGN USING MANNING'S EQUATION
TRAPEZOIDAL, TRIANGULAR OR CIRCULAR CHANNELS

Golder Associates has set up this Lotus spreadsheet to efficiently perform repetative calculations required for channel design. This spreadsheet uses Manning's equation for flow in an open channel:

Manning's equation

$$Q = \frac{1.486}{n} * A * R^{2/3} * s^{1/2}$$

where:
- Q = Flow capacity of channel (cfs)
- n = Manning's coefficient for channel lining
- A = Cross sectional area of flow (ft^2)
- P = Wetted perimeter (ft)
- R = Hydraulic radius = A/P (ft)
- s = Longitudinal ditch slope (ft/ft)

This spreadsheet performs the following two calculations:

1. Given values for the following parameters for a trapezoidal or triangular channel:

   - n = Manning's coefficient
   - b = Bottom width of channel(ft) (b=0 for triangular)
   - d = Depth of channel (ft)
   - s = Longitudinal slope (ft/ft)
   - LSS = Left sideslope of channel (LSS:1)
   - RSS = Right sideslope of channel (RSS:1)

   or for a circular channel:

   - n = Manning's coefficient
   - D = Diameter of circular channel (ft)
   - s = Longitudinal slope (ft/ft)

   the spreadsheet calculates the maximum flow (Qmax) in the channel using Manning's equation. The channels are assumed to flow full with no freeboard.

2. The user inputs the peak flow in the channel (Qactual, calculated from TR-55 or by another method). The user then inputs trial values for depth (d), and the spreadsheet calculates the value of AR^(2/3). This value is compared to the AR^(2/3) calculated from Qactual. The user manually adjusts the trial depths until the two values are close. Given this depth of flow (dmax) the spreadsheet calculates velocity (vmax) in the channel at peak flow.

Version 1.0, 3-11-91, EGM

Reference: "Open Channel Hydraulics, Ven Te Chow, McGraw-Hill Book Company, 1959.

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CHANNEL DESIGN USING MANNING'S EQUATION VERSION 1.0
TRAPEZOIDAL OR TRIANGULAR CHANNEL

PROJECT NUMBER: 913-3237
PROJECT NAME: VICKERY
DITCH SECTION: #1

Manning's equation $Q = \frac{1.486}{n} * A * R^{2/3} * s^{1/2}$ (See summary sheet for explanation of terms.)

1. INPUT VALUES FOR THE FOLLOWING VARIABLES:

SKETCH OF CHANNEL GEOMETRY: (optional)

Manning's coefficient	n =	0.04
Bottom width of channel(ft)	b =	5.0
Depth of channel (ft)	d =	6.0
Longitudinal slope	s =	0.0033
Left sideslope (LSS:1)	LSS =	2.5
Right sideslope (RSS:1)	RSS =	2.5

SPREADSHEET CALCULATES Qmax USING THE ABOVE DIMENSIONS:

d	A	P	R
6.0	120.0	37.3	3.2

Qmax = 558.0 cfs

2. INPUT PEAK FLOW EXPECTED IN CHANNEL (Qactual) AS CALCULATED FROM TR-55 PROGRAM OR OTHER METHOD:

Qactual = 396 cfs

SPREADSHEET CALCULATES ACTUAL DEPTH (d) AND VELOCITY (v) FOR Qactual AS FOLLOWS:

Using Qactual, spreadsheet solves for required A*R^(2/3) = 185.56

Input trial value for d and spreadsheet calculates AR^(2/3), shown below. This number is compared to the AR^(2/3) for Qactual. If the difference is

negative - then d is too small. Try a larger d.
positive - then d is too large. Try a smaller d.

d	A	P	R	AR^(2/3)	difference
5.25	95.16	33.27	2.86	191.72	6.17
5.10	90.52	32.46	2.79	179.34	-6.22
5.18	92.98	32.90	2.83	185.88	0.32
5.17	92.67	32.84	2.82	185.06	-0.50
NA	NA	NA	NA	NA	NA

RESULTS: Depth of channel required to carry Qactual, dmax = 5.18 ft

Velocity in channel at depth of dmax, vmax = 4.26 fps

REFERENCE 1

Appendix A: Hydrologic soil groups

Soils are classified into hydrologic soil groups (HSG's) to indicate the minimum rate of infiltration obtained for bare soil after prolonged wetting. The HSG's, which are A, B, C, and D, are one element used in determining runoff curve numbers (see chapter 2). For the convenience of TR-55 users, exhibit A-1 lists the HSG classification of United States soils.

The infiltration rate is the rate at which water enters the soil at the soil surface. It is controlled by surface conditions. HSG also indicates the transmission rate—the rate at which the water moves within the soil. This rate is controlled by the soil profile. Approximate numerical ranges for transmission rates shown in the HSG definitions were first published by Musgrave (USDA 1955). The four groups are defined by SCS soil scientists as follows:

Group A soils have low runoff potential and high infiltration rates even when thoroughly wetted. They consist chiefly of deep, well to excessively drained sands or gravels and have a high rate of water transmission (greater than 0.30 in/hr).

Group B soils have moderate infiltration rates when thoroughly wetted and consist chiefly of moderately deep to deep, moderately well to well drained soils with moderately fine to moderately coarse textures. These soils have a moderate rate of water transmission (0.15-0.30 in/hr).

Group C soils have low infiltration rates when thoroughly wetted and consist chiefly of soils with a layer that impedes downward movement of water and soils with moderately fine to fine texture. These soils have a low rate of water transmission (0.05-0.15 in/hr).

Group D soils have high runoff potential. They have very low infiltration rates when thoroughly wetted and consist chiefly of clay soils with a high swelling potential, soils with a permanent high water table, soils with a claypan or clay layer at or near the surface, and shallow soils over nearly impervious material. These soils have a very low rate of water transmission (0-0.05 in/hr).

In exhibit A-1, some of the listed soils have an adc modifier; for example, "Abrazo, gravelly." This refers to a gravelly phase of the Abrazo series tha is found in SCS soil map legends.

Disturbed soil profiles

As a result of urbanization, the soil profile may be considerably altered and the listed group classification may no longer apply. In these circumstances, use the following to determine HSG according to the texture of the new surface soil, provided that significant compaction has not occurr (Brakensiek and Rawls 1983):

HSG	*Soil textures*
A	Sand, loamy sand, or sandy loam
B	Silt loam or loam
C	Sandy clay loam
D	Clay loam, silty clay loam, sandy clay, silty clay, or clay

Drainage and group D soils

Some soils in the list are in group D because of a high water table that creates a drainage problem. Once these soils are effectively drained, they are placed in a different group. For example, Ackerma: soil is classified as A/D. This indicates that the drained Ackerman soil is in group A and the undrained soil is in group D.

Reference 1

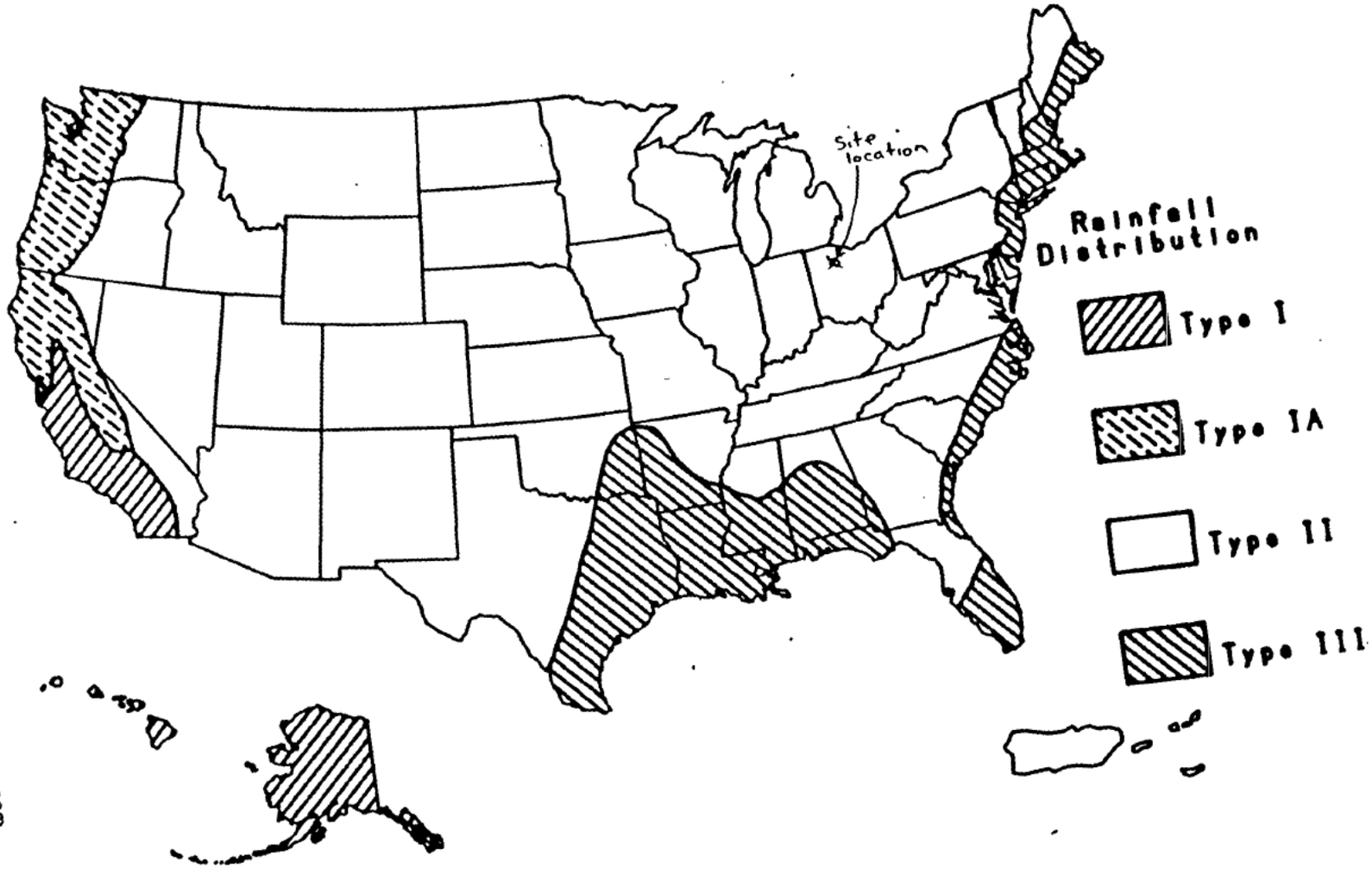

Figure II-2.—Approximate geographic boundaries for SCS rainfall distributions.

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16/20

Reference 1

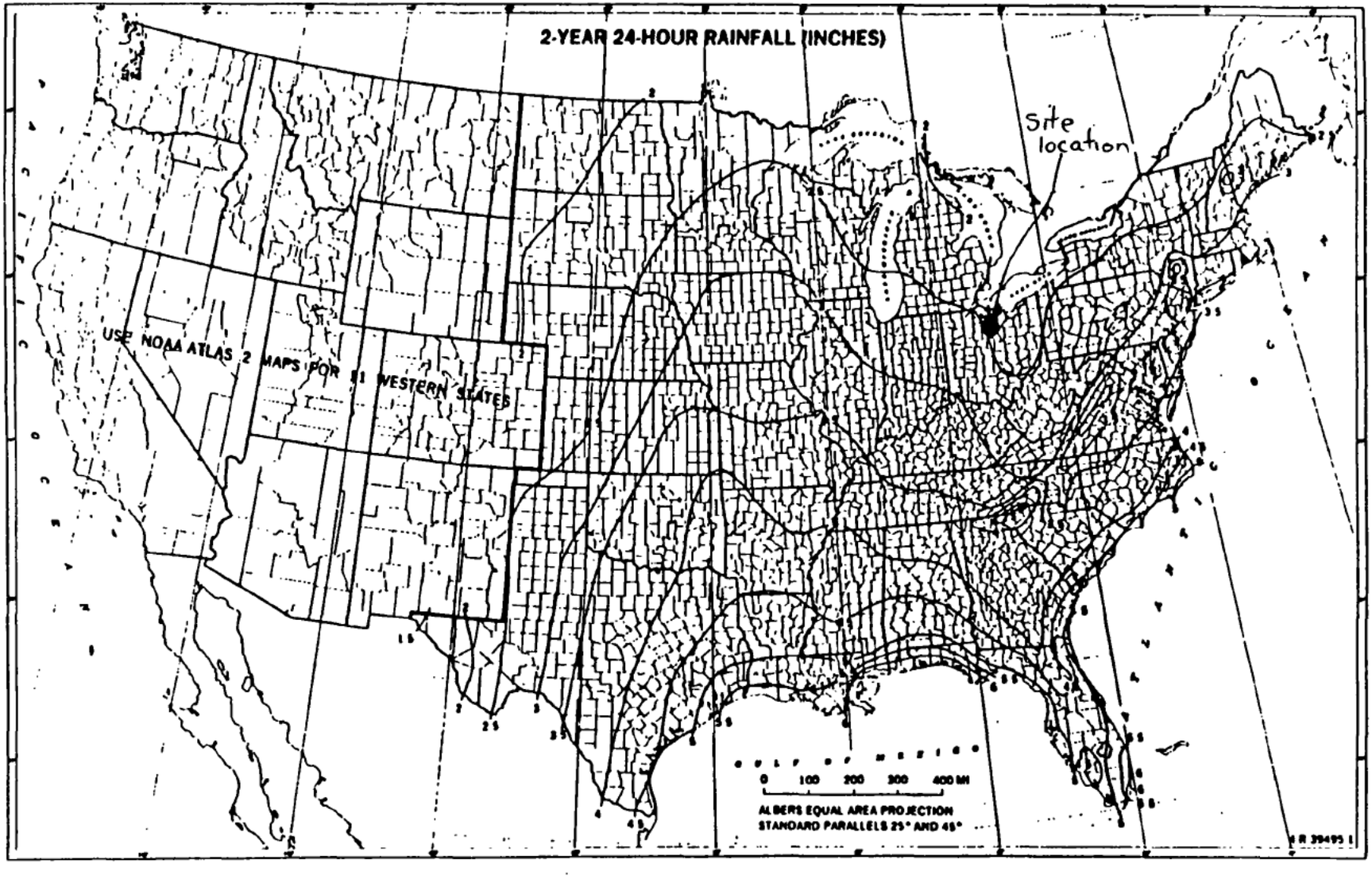


Figure B-3.—Two-year, 24-hour rainfall.

DRAFT

17/20

Reference 1

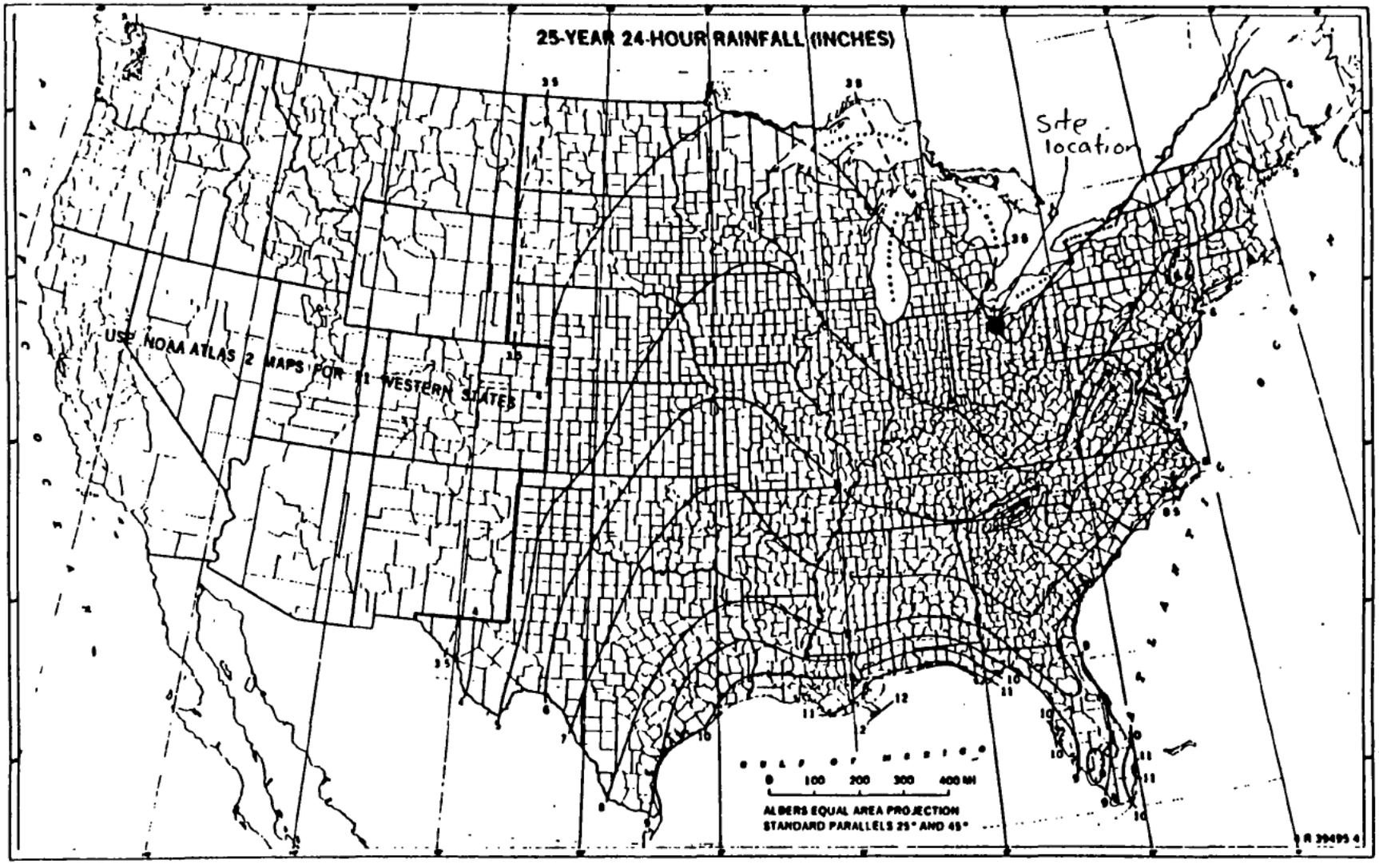


Figure B-6.—Twenty-five-year, 24-hour rainfall.

18/20

19/20

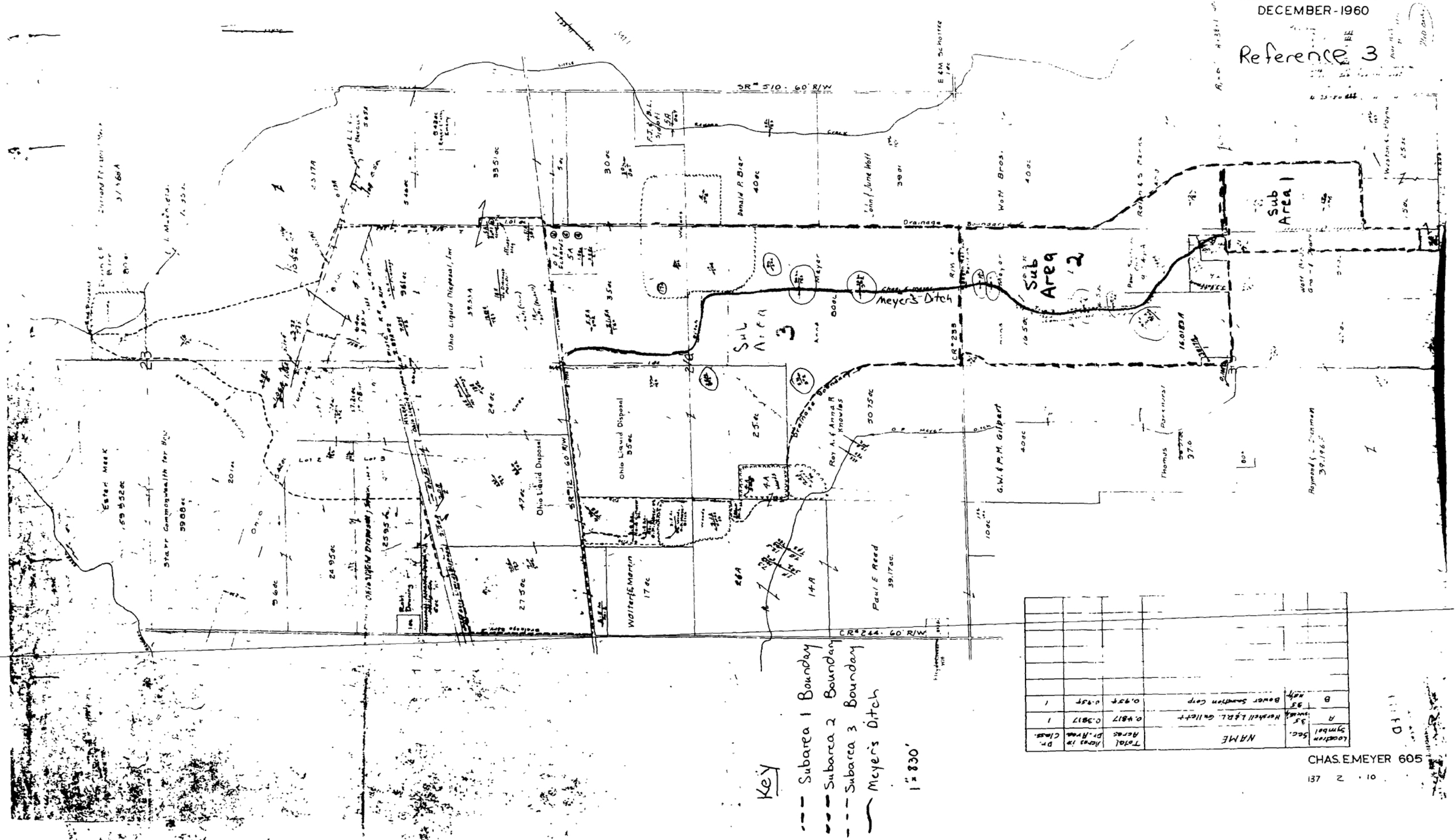
PLAT

CHAS. E. MEYER DITCH
DITCH NO. 605
SEC. 23, 26 & 35
RILEY TWP, SANDUSKY CO.

1/10

MILES C. NEWTON-CO ENG'R.
DECEMBER-1960

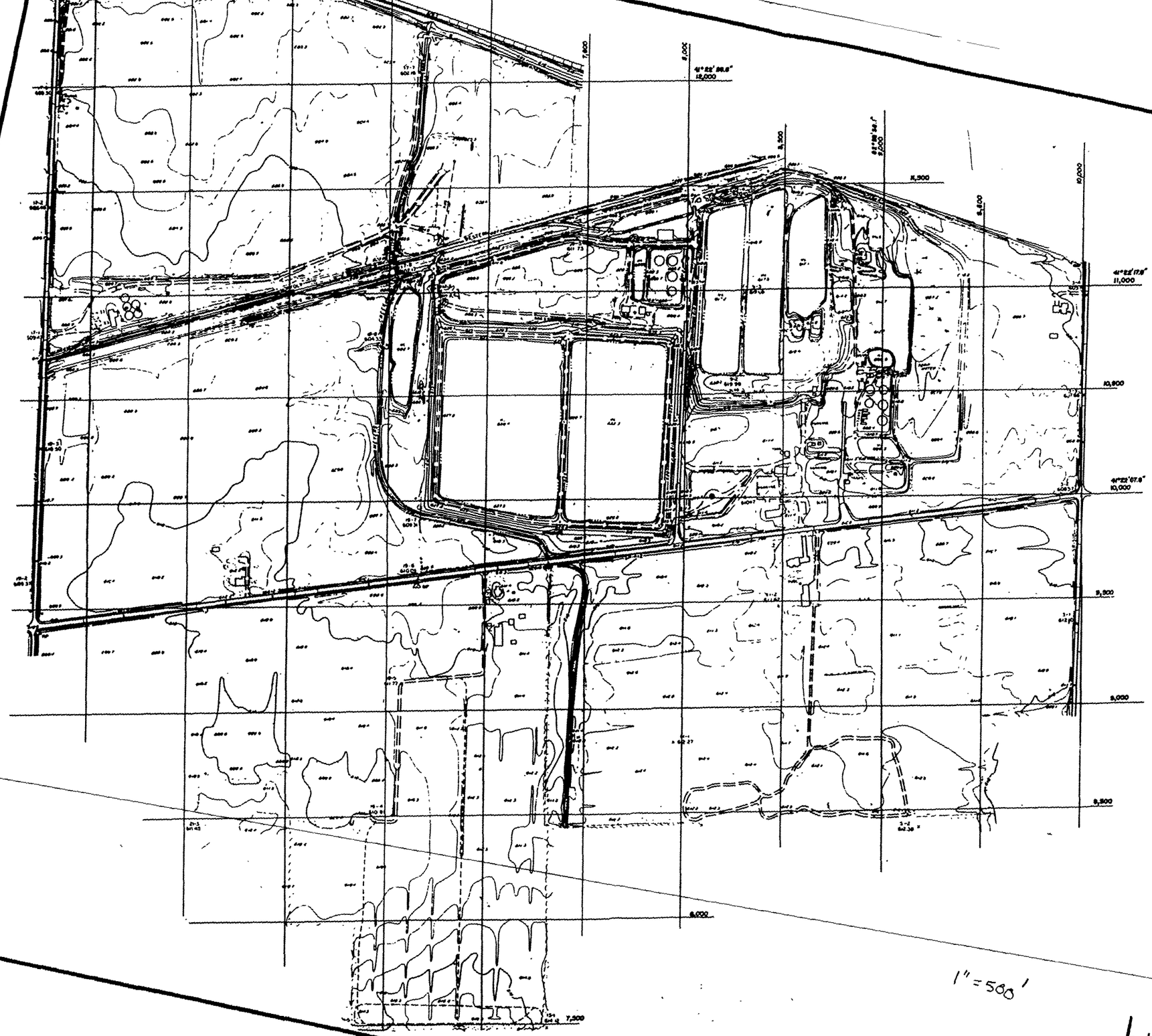
Reference 3



Location Symbol	Sec.	NAME	Total Acres	Acres in Dr. Area	Dr. Class.
A	35	Hershell L. & R.L. Gullett	0.4817	0.3817	1
B	35	Bower Sanation Corp	0.954	0.954	1

CHAS. E. MEYER 605

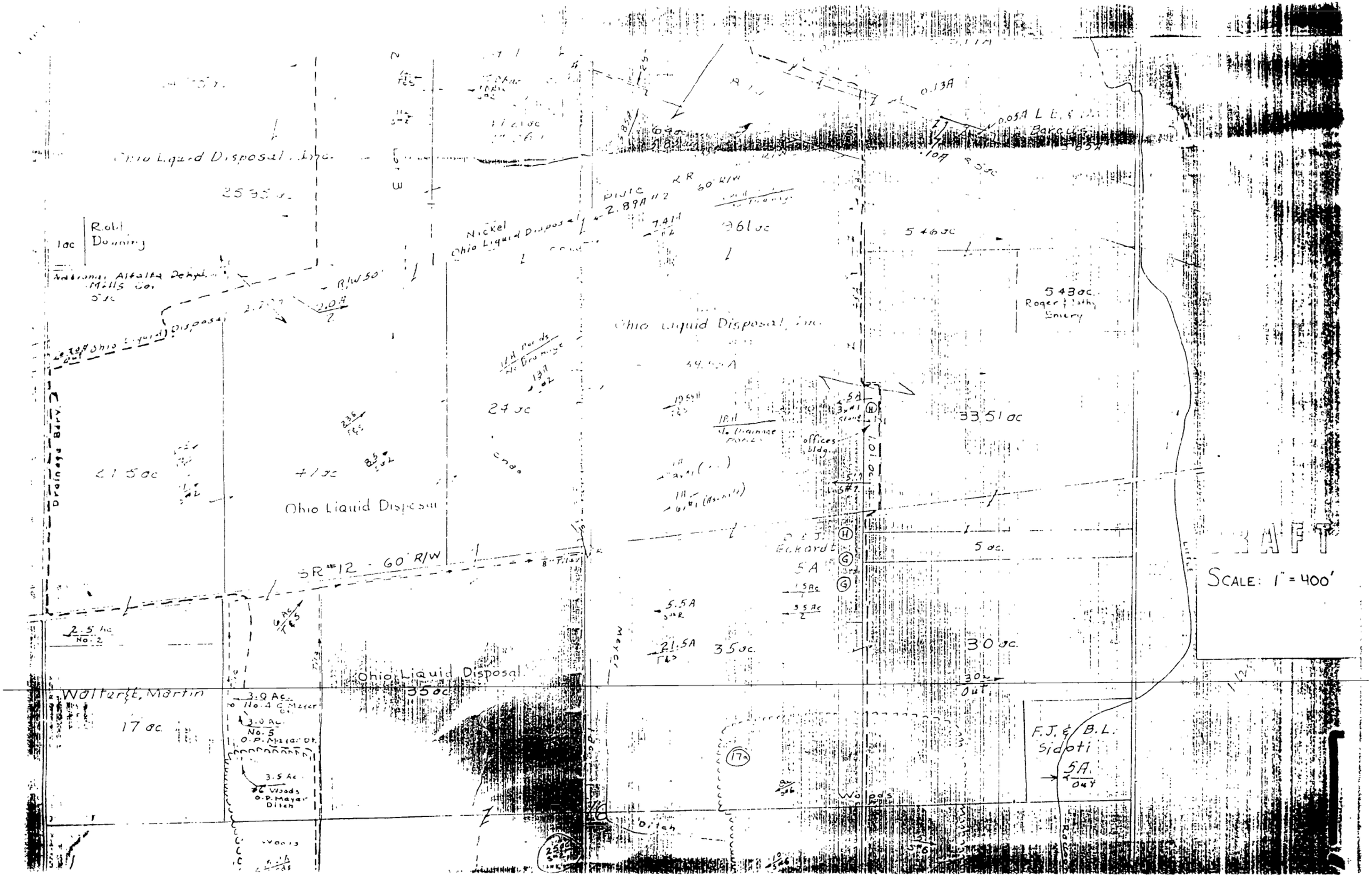
137 2 10



Reference 4

1" = 500'

GAF DRAFTING MEDIA



Ohio Liquid Disposal, Inc.
25.95 ac
Robt Downing
1 ac
National Alfalfa Dehyd. Mills Co.
Ohio Liquid Disposal
Drainage Bar
21.5 ac
41 ac
Ohio Liquid Disposal
SR #12 - 60' R/W
Nickel
Ohio Liquid Disposal
2.89A #2
60' R/W
9.61 ac
5.46 ac
5.43 ac
Roger & Cathy Emery
Ohio Liquid Disposal, Inc.
24 ac
33.51 ac
offices bldg.
D. & J. Eckardt
5A
5 ac.
5.5A
21.5A
35 ac.
30 ac.
Ohio Liquid Disposal
35 ac
Walter E. Martin
17 ac
3.0 Ac.
No. 4 C. Mayer Dr.
3.0 Ac.
No. 5
O.P. Mayer Dr.
3.5 Ac.
#6 Woods
O.P. Mayer Ditch
Woods
Ditch
Woods
F.J. & B.L. Sidoti
5A
Out
Mayer
Lot 3
Scale: 1" = 400'

ATTACHMENT VI

CTS: Photocopy this page before completing if you have more than 25 wastes to list. Form Approved OMB No. [illegible]

EPA I.D. NUMBER (enter from page 1): VOHD020273819 | FOR OFFICIAL USE ONLY: DUP | DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

Line	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D001	89,000	T	D79 S01	D80, T04
2	D001	"	T	S02 T01 D79 S01	D80, T04
3	D002	"	T	S04 T02 D79 S01	D80, T04
4	D002	"	T	S02 T01 D79 S01	D80, T04
5	D003	"	T	D79 S01	D80, T04
6	D003	"	T	S02 T01 D79 S01	D80, T04
7	D004	"	T	S04 T02 D79 S01	D80, T04
8	D004	"	T	S02 T01 D79 S01	D80, T04
9	D005	"	T	S04 T02 D79 S01	D80, T04
10	D005	"	T	S02 T01 D79 S01	D80, T04
11	D006	"	T	S04 T02 D79 S01	D80, T04
	D006	"	T	S02 T01 D79 S01	D80, T04
13	D007	"	T	S04 T02 D79 S01	D80, T04
14	D007	"	T	S02 T01 D79 S01	D80, T04
15	D008	"	T	S04 T02 D79 S01	D80, T04
16	D008	"	T	S02 T01 D79 S01	D80, T04
17	D009	"	T	S04 T02 D79 S01	D80, T04
18	D009	"	T	S02 T01 D79 S01	D80, T04
19	D010	"	T	S04 T02 D79 S01	D80, T04
20	D010	"	T	S02 T01 D79 S01	D80, T04
21	D011	"	T	S04 T02 D79 S01	D80, T04
22	D011	"	T	S02 T01 D79 S01	D80, T04
23	D013	"	T	S04 T02 D79 S01	D80, T04
24	D013	"	T	S02 T01 D79 S01	D80, T04
	D014	"	T	S04 T02 D79 S01	D80, T04
25	D014	"	T	S02 T01 D79 S01	D80, T04

EPA Form 3510-3 (6-80) CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

NOTE: Photocopy this page before completing ...

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W O H D 0 2 0 2 7 3 8 1 9 11	W DUP 12 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D015	89,000	T	S04 T02 D79 S01	D80, T04
2	D015	"	T	S02 T01 D79 S01	D80, T04
3	D016	"	T	S04 T02 D79 S01	D80, T04
4	D016	"	T	S02 T01 D79 S01	D80, T04
5	F001	"	T	S04 T02 D79 S01	D80, T04
6	F001	"	T	S02 T01 D79 S01	D80, T04
7	F002	"	T	S04 T02 D79 S01	D80, T04
8	F002	"	T	S02 T01 D79 S01	D80, T04
9	F003	"	T	S04 T02 D79 S01	D80, T04
10	F003	"	T	S02 T01 D79 S01	D80, T04
11	F004	"	T	S04 T02 D79 S01	D80, T04
12	F004	"	T	S02 T01 D79 S01	D80, T04
13	F005	"	T	S04 T02 D79 S01	D80, T04
14	F005	"	T	S02 T01 D79 S01	D80, T04
15	F006	"	T	S04 T02 D79 S01	D80, T04
16	F006	"	T	S02 T01 D79 S01	D80, T04
17	F007	"	T	S04 T02 D79 S01	D80, T04
18	F007	"	T	S02 T01 D79 S01	D80, T04
19	F008	"	T	S04 T02 D79 S01	D80, T04
20	F008	"	T	S02 T01 D79 S01	D80, T04
21	F009	"	T	S04 T02 D79 S01	D80, T04
22	F009	"	T	S02 T01 D79 S01	D80, T04
23	F010	"	T	S04 T02 D79 S01	D80, T04
	F010	"	T	S02 T01 D79 S01	D80, T04
25	F012	"	T	S04 T02 D79 S01	D80, T04
26	F012	"	T	S02 T01 D79 S01	D80, T04

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EPA Form 2510-3 (6-80)

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(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

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EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W O H D 0 2 0 2 7 3 8 1 9 11	W DUP 12 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F019	89,000	T	S04 T02 D79 S01	D80, T04
2	F019	"	T	S02 T01 D79 S01	D80, T04
3	K017	"	T	S04 T02 D79 S01	D80, T04
4	K017	"	T	S02 T01 D79 S01	D80, T04
9	K049	"	T	S04 T02 D79 S01	D80, T04
10	K049	"	T	S02 T01 D79 S01	D80, T04
13	K052	"	T	S04 T02 D79 S01	D80, T04
14	K052	"	T	S02 T01 D79 S01	D80, T04
15	K060	"	T	S04 T02 D79 S01	D80, T04
16	K060	"	T	S02 T01 D79 S01	D80, T04
17	K062	"	T	S04 T02 D79 S01	D80, T04
18	K062	"	T	S02 T01 D79 S01	D80, T04

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EPA Form 3510-3 (6-80)

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Form Approved OMB No. 158-S20004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
WIHD020273819	WI DUP	2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1					
2		89,000			
3	U001	"	T	S04 T02 D79 S01	D80, T04
4	U001	"	T	S02 T01 D79 S01	D80, T04
5	U002	"	T	S04 T02 D79 S01	D80, T04
6	U002	"	T	S02 T01 D79 S01	D80 T04
7	U003	"	T	S04 T02 D79 S01	D80, T04
8	U003	"	T	S02 T01 D79 S01	D80, T04
9	U007	"	T	S04 T02 D79 S01	D80, T04
10	U007	"	T	S02 T01 D79 S01	D80, T04
11	U008	"	T	S04 T02 D79 S01	D80, T04
	U008	"	T	S02 T01 D79 S01	D80, T04
13	U009	"	T	S04 T02 D79 S01	D80, T04
14	U009	"	T	S02 T01 D79 S01	D80, T04
15	U012	"	T	S04 T02 D79 S01	D80, T04
16	U012	"	T	S02 T01 D79 S01	D80, T04
17	U016	"	T	S04 T02 D79 S01	D80, T04
18	U016	"	T	S02 T01 D79 S01	D80, T04
19	U019	"	T	S04 T02 D79 S01	D80, T04
20	U019	"	T	S02 T01 D79 S01	D80, T04
21	U031	"	T	S04 T02 D79 S01	D80, T04
22	U031	"	T	S02 T01 D79 S01	D80, T04
23	U034	"	T	S04 T02 D79 S01	D80, T04
24	U034	"	T	S02 T01 D79 S01	D80, T04
	U036	"	T	S04 T02 D79 S01	D80, T04
26	U036	"	T	S02 T01 D79 S01	D80, T04

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W O H D 0 2 0 2 7 3 8 1 9	W DUP 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))
3	U043	89,000	T	S04	T02	D79	S01	D80, T04
4	U043	"	T	S02	T01	D79	S01	D80, T04
5	U044	"	T	S04	T02	D79	S01	D80, T04
6	U044	"	T	S02	T01	D79	S01	D80, T04
9	U051	"	T	S04	T02	D79	S01	D80, T04
10	U051	"	T	S02	T01	D79	S01	D80, T04
11	U052	"	T	S04	T02	D79	S01	D80, T04
12	U052	"	T	S02	T01	D79	S01	D80, T04
13	U053	"	T	S04	T02	D79	S01	D80, T04
14	U053	"	T	S02	T01	D79	S01	D80, T04
15	U055	"	T	S04	T02	D79	S01	D80, T04
16	U055	"	T	S02	T01	D79	S01	D80, T04
17	U056	"	T	S04	T02	D79	S01	D80, T04
18	U056	"	T	S02	T01	D79	S01	D80, T04
19	U057	"	T	S04	T02	D79	S01	D80, T04
20	U057	"	T	S02	T01	D79	S01	D80, T04
21	U068	"	T	S04	T02	D79	S01	D80, T04
22	U068	"	T	S02	T01	D79	S01	D80, T04
23	U070	"	T	S04	T02	D79	S01	D80, T04
24	U070	"	T	S02	T01	D79	S01	D80, T04
25	U072	"	T	S04	T02	D79	S01	D80, T04
26	U072	"	T	S02	T01	D79	S01	D80, T04

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Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
H D 0 2 0 2 7 3 8 1 9 1 1	WI DUP 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U075	89,000	T	S04 T02 D79 S01	D80, T04
2	U075	"	T	S02 T01 D79 S01	D80, T04
3	U077	"	T	S04 T02 D79 S01	D80, T04
4	U077	"	T	S02 T01 D79 S01	D80, T04
5	U078	"	T	S04 T02 D79 S01	D80, T04
6	U078	"	T	S02 T01 D79 S01	D80, T04
7	U080	"	T	S04 T02 D79 S01	D80, T04
8	U080	"	T	S02 T01 D79 S01	D80, T04
9	U081	"	T	S04 T02 D79 S01	D80, T04
10	U081	"	T	S02 T01 D79 S01	D80, T04
11	U088	"	T	S04 T02 D79 S01	D80, T04
12	U088	"	T	S02 T01 D79 S01	D80, T04
13	U092	"	T	S04 T02 D79 S01	D80, T04
14	U092	"	T	S02 T01 D79 S01	D80, T04
15	U102	"	T	S04 T02 D79 S01	D80, T04
16	U102	"	T	S02 T01 D79 S01	D80, T04
17	U103	"	T	S04 T02 D79 S01	D80, T04
18	U103	"	T	S02 T01 D79 S01	D80, T04
19	U105	"	T	S04 T02 D79 S01	D80, T04
20	U105	"	T	S02 T01 D79 S01	D80, T04
21	U108	"	T	S04 T02 D79 S01	D80, T04
22	U108	"	T	S02 T01 D79 S01	D80, T04
23	U112	"	T	S04 T02 D79 S01	D80, T04
24	U112	"	T	S02 T01 D79 S01	D80, T04
25	U113	"	T	S04 T02 D79 S01	D80, T04
26	U113	"	T	S02 T01 D79 S01	D80, T04

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Form Approved OMB No. 158-S20004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
WOHD020273819 11	W DUP 12 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U115	89,000	T	S04 T02 D79 S01	D80, T04
2	U115	"	T	S02 T01 D79 S01	D80, T04
3	U117	"	T	S04 T02 D79 S01	D80, T04
4	U117	"	T	S02 T01 D79 S01	D80, T04
5	U121	"	T	S04 T02 D79 S01	D80, T04
6	U121	"	T	S02 T01 D79 S01	D80, T04
7	U122	"	T	S04 T02 D79 S01	D80, T04
8	U122	"	T	S02 T01 D79 S01	D80, T04
9	U123	"	T	S04 T02 D79 S01	D80, T04
10	U123	"	T	S02 T01 D79 S01	D80, T04
11	U124	"	T	S04 T02 D79 S01	D80, T04
12	U124	"	T	S02 T01 D79 S01	D80, T04
13	U125	"	T	S04 T02 D79 S01	D80, T04
14	U125	"	T	S02 T01 D79 S01	D80, T04
17	U131	"	T	S04 T02 D79 S01	D80, T04
18	U131	"	T	S02 T01 D79 S01	D80, T04
19	U133	"	T	S04 T02 D79 S01	D80, T04
20	U133	"	T	S02 T01 D79 S01	D80, T04
21	U134	"	T	S04 T02 D79 S01	D80, T04
22	U134	"	T	S02 T01 D79 S01	D80, T04
23	U135	"	T	S04 T02 D79 S01	D80, T04
24	U135	"	T	S02 T01 D79 S01	D80, T04
25	U140	"	T	S04 T02 D79 S01	D80, T04
26	U140	"	T	S02 T01 D79 S01	D80, T04

CONTINUE ON REVERSE

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

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EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
VOHD020273819	W DUP	2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U144	89,000	T	S04 T02 D79 S01	D80, T04
2	U144	"	T	S02 T01 D79 S01	D80, T04
5	U147	"	T	S04 T02 D79 S01	D80, T04
6	U147	"	T	S02 T01 D79 S01	D80, T04
7	U148	"	T	S04 T02 D79 S01	D80, T04
8	U148	"	T	S02 T01 D79 S01	D80, T04
9	U151	"	T	S04 T02 D79 S01	D80, T04
10	U151	"	T	S02 T01 D79 S01	D80, T04
11	U154	"	T	S04 T02 D79 S01	D80, T04
[illegible]	U154	"	T	S02 T01 D79 S01	D80, T04
13	U159	"	T	S04 T02 D79 S01	D80, T04
14	U159	"	T	S02 T01 D79 S01	D80, T04
15	U161	"	T	S04 T02 D79 S01	D80, T04
16	U161	"	T	S02 T01 D79 S01	D80, T04
17	U162	"	T	S04 T02 D79 S01	D80, T04
18	U162	"	T	S02 T01 D79 S01	D80, T04
19	U165	"	T	S04 T02 D79 S01	D80, T04
20	U165	"	T	S02 T01 D79 S01	D80, T04
21	U167	"	T	S04 T02 D79 S01	D80, T04
22	U167	"	T	S02 T01 D79 S01	D80, T04
3	U169	"	T	S04 T02 D79 S01	D80, T04
24	U169	"	T	S02 T01 D79 S01	D80, T04
	U182	"	T	S04 T02 D79 S01	D80, T04
26	U182	"	T	S02 T01 D79 S01	D80, T04

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EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W O H D 0 2 0 2 7 3 8 1 9 — 11	W DUP — 12 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U188	89,000	T	S04 T02 D79 S01	D80, T04
2	U188	"	T	S02 T01 D79 S01	D80, T04
3	U190	"	T	S04 T02 D79 S01	D80, T04
4	U190	"	T	S02 T01 D79 S01	D80, T04
5	U196	"	T	S04 T02 D79 S01	D80, T04
6	U196	"	T	S02 T01 D79 S01	D80, T04
7	U201	"	T	S04 T02 D79 S01	D80, T04
8	U201	"	T	S02 T01 D79 S01	D80, T04
9	U207	"	T	S04 T02 D79 S01	D80, T04
10	U207	"	T	S02 T01 D79 S01	D80, T04
11	U208	"	T	S04 T02 D79 S01	D80, T04
12	U208	"	T	S02 T01 D79 S01	D80, T04
13	U210	"	T	S04 T02 D79 S01	D80, T04
14	U210	"	T	S02 T01 D79 S01	D80, T04
15	U211	"	T	S04 T02 D79 S01	D80, T04
16	U211	"	T	S02 T01 D79 S01	D80, T04
17	U213	"	T	S04 T02 D79 S01	D80, T04
18	U213	"	T	S02 T01 D79 S01	D80, T04
19	U219	"	T	S04 T02 D79 S01	D80, T04
20	U219	"	T	S02 T01 D79 S01	D80, T04
21	U220	"	T	S04 T02 D79 S01	D80, T04
22	U220	"	T	S02 T01 D79 S01	D80, T04
23	U221	"	T	S04 T02 D79 S01	D80, T04
24	U221	"	T	S02 T01 D79 S01	D80, T04
25	U222	"	T	S04 T02 D79 S01	D80, T04
26	U222	"	T	S02 T01 D79 S01	D80, T04

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EPA Form 2510-3 (6-80)

CONTINUE ON REVERSE

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
10HD020273819	W1 DUP	12 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U223	89,000	T	S04 T02 D79 S01	D80, T04
2	U223	"	T	S02 T01 D79 S01	D80, T04
3	U226	"	T	S04 T02 D79 S01	D80, T04
4	U226	"	T	S02 T01 D79 S01	D80, T04
5	U227	"	T	S04 T02 D79 S01	D80, T04
6	U227	"	T	S02 T01 D79 S01	D80, T04
7	U228	"	T	S04 T02 D79 S01	D80, T04
8	U228	"	T	S02 T01 D79 S01	D80, T04
9	U238	"	T	S04 T02 D79 S01	D80, T04
10	U238	"	T	S02 T01 D79 S01	D80, T04
11	U239	"	T	S04 T02 D79 S01	D80, T04
12	U239	"	T	S02 T01 D79 S01	D80, T04

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OHIO ENVIRONMENTAL PROTECTION AGENCY

Revised Ohio Hazardous Waste Facility Installation and Operation Permit

Date of Issuance:
Effective Date:

US EPA ID No: OHD 020 273 819
Ohio ID No: 03-72-0191

Name of Facility:	Chemical Waste Management, Inc.
Mailing Address:	3956 State Route 412 Vickery, OH 43464
Facility Location:	3956 State Route 412 Vickery, OH 43464
Person to Contact:	Mr. F. G. Nicar, General Manager

This Revised 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(L) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above referenced permit number as renewed on October 24, 1994, is hereby incorporated by reference in its entirety except as it may be revised herein.

This revision of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended, or revoked.

The Permittee shall comply with all requirements of the revised Part B permit application as amended or supplemented on August 31, 1993. The information contained in the revised Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations, or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the revised permit application are hereby incorporated as express, binding terms and conditions of this revised permit.

The revised terms and conditions of this permit are attached hereto and are incorporated herein by reference. The revised terms and conditions supersede and replace the corresponding pages found in the October 24, 1994 renewal permit.

Donald R. Schregardus
Director

revper.ss/ao

DRAFT

SUMMARY OF REVISIONS TO THE HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT

Chemical Waste Management, Inc.
U.S. EPA ID No: OHD 020 273 819
Ohio Permit No: 03-72-0191

On October 24, 1994, Ohio EPA issued an Ohio Hazardous Waste Renewal Permit to Chemical Waste Management, Inc. (CWM). The permit allowed CWM to store and/or treat a total of 126,000,000 gallons/year throughput (630,500 tons per year), but not to exceed 650,500 gallons/day throughput at its facility in Vickery, Ohio. On November 22, 1994, CWM appealed conditions of the renewal permit to the Environmental Review Appeals Commission (formerly the Environment Board of Review) pursuant to Section 3745.04 of the Ohio Revised Code (Case No. EBR 723242). As a part of the resolution of this appeal, Ohio EPA agreed in the Environmental Review Appeals Commission Stipulation and Settlement Agreement (Settlement Agreement) dated January 23, 1997, to reissue the permit with the revised portions that were a result of the settlement.

The changes in the revised Permit as a result of the Settlement Agreement dated January 23, 1997, have been classified by the Ohio EPA as a revision and accordingly Permit Conditions A.1, A.11, A.12, A.13, A.21, A.22, A.29, A.31, B.3, B.5, B.8, B.18, B.20, B.26, B.33, B.38, B.39, B.41, B.42, B.49, D.1, D.2, D.3, D.4, D.6, D.7, F.3, F.4, F.5 and H.6 have been revised.

sumofrev.ss/ao

MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1. Effect of Permit.
ORC Sections 3734.02(F) and 3745.05

(a) The Permittee is authorized, to treat hazardous waste in tanks and filtration systems (grit filters, filterpress/leaf filters, polish filters, and guard filters), and to store hazardous waste in tanks, in accordance with the terms and conditions of this permit, ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the approved hazardous waste facility installation and operation permit renewal application, as such application has been revised and supplemented and as such application may be revised or modified pursuant to the hazardous waste rules. The renewal of the "surface impoundment, closed-as-a-landfill" reflects the storage, treatment, and disposal volumes of Ponds #4, #5, #7, #11 and #12, and other miscellaneous on and off-site construction debris, and is included for the purpose of accomplishing post closure activities. These units have been certified by an independent engineer (Appendix I-(A)) as being closed in accordance with the approved closure plan. The approved Part B permit application as submitted to Ohio EPA on October 25, 1988 and last updated on August 31, 1993, ~~and any subsequent approved amendments thereto,~~ is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.

(b) Any management of hazardous waste not authorized by this permit is prohibited, unless otherwise ~~expressly or specifically exempted by law (1) some other management of hazardous waste is authorized under a permit by rule under rules adopted by the Director or some other management is not subject to permit requirements under rules adopted by the Director, (2) and applicable law independently and validly authorizes some other management of hazardous waste without regard to the requirements of this permit, and the appropriate authorizations are obtained under that law, or (3) some other management is exempted from the requirements of this permit by order of the Director issued pursuant to O.R.C. 3734.02(G).~~ Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights.

DRAFT

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

The Permittee shall furnish the Ohio Environmental Protection Agency, within a reasonable time established by the Agency, any relevant information which the Agency may request to determine whether cause exists for modifying, revising, revoking or suspending this permit or to determine compliance with this permit. The Permittee shall also furnish the Agency, upon request, copies of records required to be kept by this permit.

A.11 OPERATING HOURS

The Permittee may receive waste from the hours of 11:00 PM to 7:00 AM in those instances when, through no fault of the Permittee, a generator and/or transporter experiences some unforeseen circumstance and/or emergency which would not allow the waste to be received during normal operating hours (7:00 AM to 11:00 PM). Such "off-hours" receipt of waste may be conducted under the above described circumstances, and the Permittee must provide ~~personnel of~~ the Northwest District Office with prior notification**, by telecopy or voice mail, if no one is present at the District Office or at the on-site inspector trailer at the time the notification is made.**

A.12. Inspection and Entry.
OAC Rule 3745-50-58(I) and ORC Section 3734.07

(a) The Permittee shall allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification to:

~~(a)~~(i) enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;

~~(b)~~(ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

~~(c)~~(iii) inspect and photograph at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and condition of this permit; and

~~(d)~~(iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

~~(b)~~ The Ohio EPA shall provide the Permittee with an opportunity to review photographs taken by Ohio EPA in order for Permittee to claim confidentiality pursuant to Ohio Trade Secret Law and OAC Rule 3745-50-30(B).

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: **CHEMICAL WASTE MANAGEMENT, INC.**

Facility: Chemical Waste Management, Inc.
3956 State Route 412
Vickery, Ohio 43464

Owner: Chemical Waste Management Holdings
3003 Butterfield Road
Oak Brook, Il. 60621

Operator: Chemical Waste Management, Inc.
3001 Butterfield Road
Oak Brook, Il. 60521

Location: 3956 State Route 412
Vickery, Ohio
Sandusky County

Ohio Permit No.: 03-72-0191

US EPA ID: OHD 020 273 819

Issue Date: 10 /24/94

Effective Date: 10/24/94

Expiration Date: 10 /24/99

AUTHORIZED ACTIVITIES

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

Tank Storage, **Miscellaneous Treatment (Filtration)**
Tank Treatment, **Surface Impoundment Closure**

PERMIT APPROVAL

Donald R. Schregardus, Director
Ohio Environmental Protection Agency

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

Entered in to the Journal of the Director this 24 day of October, 1994.

By Mary Cavin of the Ohio Environmental Protection Agency.

OHIO E.P.A.
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ENTERED DIRECTOR'S JOURNAL

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

By: Mary Cavin Date 10-24-94

MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1. Effect of Permit.
ORC Sections 3734.02(F) and 3745.05

(a) The Permittee is authorized, to treat hazardous waste in tanks and filtration systems (grit filters, filterpress/leaf filters, polish filters, and guard filters), and to store hazardous waste in tanks, in accordance with the terms and conditions of this permit, ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the approved hazardous waste facility installation and operation permit renewal application, as such application has been revised and supplemented and as such application may be revised or modified pursuant to the hazardous waste rules. The renewal of the "surface impoundment, closed-as-a-landfill" reflects the storage, treatment, and disposal volumes of Ponds #4, #5, #7, #11 and #12, and other miscellaneous on and off-site construction debris, and is included for the purpose of accomplishing post closure activities. These units have been certified by an independent engineer (Appendix I-(A)) as being closed in accordance with the approved closure plan. The approved Part B permit application as submitted to Ohio EPA on October 25, 1988 and last updated on August 31, 1993 is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.

(b) Any management of hazardous waste not authorized by this permit is prohibited, unless otherwise expressly or specifically exempted by law. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights.

Compliance with the terms and conditions of this permit does not obviate Permittee's obligation to comply with other applicable provisions of law governing protection of public health or the environment including but not limited to the Community Right to Know law under ORC Chapter 3750.

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A.2. Permit Actions.
OAC Rule 3745-50-58(F)

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

A.3. Permit Effective/Expiration Date.
OAC Rule 3745-50-54

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

A.4. Severability.

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

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

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

A.6. Duty to Reapply and Permit Expiration.
OAC Rules 3745-50-40(E); 3745-50-58(B); 3745-50-56 and ORC Section 3734-05(H)

(a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such

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information as the Director may require, to the Director no later than one hundred eighty (180) days prior to the expiration date of this permit or upon approval of the director a later date prior to the expiration date if the Permittee can demonstrate good cause for late submittal.

(b) The Permittee may continue to operate in accordance with the terms and condition of the expired permit until a renewal permit is issued or denied if:

(i) the Permittee has submitted a timely and complete application for a renewal permit under OAC Rule 3745-50-40; and

(ii) through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.

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

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

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

The Permittee shall expeditiously take all steps necessary to minimize or correct any adverse impact on the environment or the public health resulting from noncompliance with this permit.

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

The Permittee shall at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes, but is not limited to, effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

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

The Permittee shall furnish the Ohio Environmental Protection Agency, within a reasonable time established by the Agency, any relevant information which the Agency may request to determine whether cause exists for modifying, revising, revoking or suspending this permit or to determine compliance with this permit. The Permittee shall also furnish the Agency, upon request, copies of records required to be kept by this permit.

A.11 OPERATING HOURS

The Permittee may receive waste from the hours of 11:00 PM to 7:00 AM in those instances when, through no fault of the Permittee, a generator and/or transporter experiences some unforeseen circumstance and/or emergency which would not allow the waste to be received during normal operating hours (7:00 AM to 11:00 PM). Such "off-hours" receipt of waste may be conducted under the above described circumstances, and the Permittee must provide personnel of the Northwest District Office with prior notification.

A.12. Inspection and Entry.
OAC Rule 3745-50-58(I) and ORC Section 3734.07

The Permittee shall allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification to:

(a) enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;

(b) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

(c) inspect and photograph at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and condition of this permit; and

(d) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.

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A.13. Monitoring and Records.
OAC Rules 3745-50-48 and 3745-50-58(J)

(a) Any sample and measurement taken for the purpose of monitoring shall be a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste: Physical /Chemical Methods: SW-846:Second Edition, November 1986; and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater: Seventeenth Edition, 1989; and additional supplements or editions thereof; or an equivalent method as specified in the approved waste analysis plan, or as such term is defined and used in the Ohio hazardous waste rules.

(b) Records of monitoring information shall specify the:

(i) date(s), exact place(s), and time(s) of sampling or measurements;

(ii) individual(s) who performed the sampling or measurements;

(iii) date(s) analyses were performed;

(iv) individual(s) who performed the analyses;

(v) analytical technique(s) or method(s) used; and

(vi) results of such analyses.

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A.14. Certification of Records
OAC Rule 3745-50-58

All applications, reports or information submitted to the Director shall be properly certified in accordance with OAC Rules 3745-50-58(K) and 3745-50-42.

A.15. Retention of Records.
OAC Rules 3745-50-58(J) and 3745-50-58(M)

(a) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports and records

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required by this permit, the certification required by paragraph B(9) of rule 3745-54-73 of the administrative code, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, Certification, or application. The period may be extended by request of the Director at any time.

(b) The periods of record retention may be extended by request of the Ohio Environmental Protection Agency at any time and are automatically extended during the course of any unresolved enforcement action regarding the facility.

(c) The Permittee shall maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the Part B permit application and any amendments, supplements, modifications or revisions, of such application and shall retain a complete copy of the application for the life of the facility.

(d) The permittee shall maintain records from all groundwater monitoring wells and associated ground water surface elevations for the active life of the facility and for disposal facilities for the post closure care period as well.

A.16. Planned Changes.
OAC Rules 3745-50-51 and 3745-50-58(L)(1)

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

A.17. Waste Shipments.
OAC Rule 3745-53-11, ORC 3734.15(C)

The Permittee shall only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

A.18. Anticipated Noncompliance.
OAC Rule 3745-50-58(L)(2)

The Permittee shall give advance notice to the Ohio Environmental Protection Agency of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit, pursuant to Condition A.5. and A.16.

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A.19. Transfer of Permits.
OAC Rules 3745-50-52; 3745-50-58(L)(3) and 3745-54-12

(a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified or revised under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility the Permittee shall notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder.

(b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

A.20. Compliance Schedules.
OAC Rule 3745-50-58(L)(5)

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Ohio Environmental Protection Agency no later than fourteen (14) days following each scheduled date, unless otherwise specified in the compliance schedule.

A.21. Immediate Reporting of Noncompliance.
OAC Rule 3745-50-58(L)(6)

(a) The Permittee shall report to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response within two hours from the time the Permittee becomes aware of the circumstances of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, of which noncompliance may endanger human health or the environment. Such report shall consist of the information listed in Condition A.20(b)(i) and (ii) that is available at such time.

(b) After initial notification, the Permittee shall immediately report to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response any subsequent changes in the situation as conditions warrant until the Permittee has provided the Agency's Division of Emergency and Remedial Response with all informational requirements of this condition and in no event shall this information be reported to the Agency's Division of Emergency and Remedial Response no later than twenty-four (24) hours after the initial report.

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The report of any non-compliance shall include the following:

(i) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies;

(ii) Any information of a release or discharge of hazardous waste, or of a fire or explosion from the hazardous waste management facility which could threaten the environment or human health inside or outside the facility; and

(iii) A description of the occurrence and its cause shall include:

(1) name, address, and telephone number of the owner or operator;

(2) name, address, and telephone number of the facility;

(3) date, time, and type of incident;

(4) local weather conditions;

(5) name and quantity of materials involved;

(6) the extent of injuries, if any;

(7) an assessment of actual or potential hazards to the environment and human health inside and outside the facility, where this is applicable;

(8) the response the Permittee has taken to contain and monitor the release, discharge or incident;

(9) who has been notified;

(10) any monitoring results; and

(11) estimated quantity and disposition of recovered material that resulted from the release, discharge or incident.

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A.22. Follow-Up Written Report of Noncompliance.
OAC Rule 3745-50-58(L)(6)(c)

(a) A written report shall also be provided to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response and the Division of Hazardous Waste Management, Northwest District Office, within five (5) days of the time the Permittee becomes aware of the circumstances reported in Condition A.20.

(b) The written report shall contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

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

A.23. Other Noncompliance.
OAC Rule 3745-50-58(L)(10)

The Permittee shall report to the Ohio Environmental Protection Agency Division of Hazardous Waste Management's Central Office, all other instances of noncompliance not provided for in Condition A.21. These reports shall be submitted within fifteen (15) days of the time at which the Permittee is aware of such noncompliance. Such reports shall contain all information set forth within Condition A.21 of this permit.

A.24. Certification of Construction.
OAC Rule 3745-50-58(L)(2)

Pursuant to OAC 3745-50-58(L)(2) the Permittee may not commence treatment or storage of hazardous waste in the revised portion of the facility until the Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or revised in compliance with the Permit; and

(a) the Director has inspected the newly constructed or revised portion of the facility and finds it to be in compliance with the conditions of the permit ;or

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(b) the Director has either waived the inspection or has not within 15 days notified the Permittee of his intent to inspect.

A.25. Other Information.
OAC Rule 3745-50-58(L)(11)

If at any time the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect, misleading, or incomplete information to the Ohio Environmental Protection Agency and/or the Ohio Hazardous Waste Facility Board, the Permittee shall promptly submit such facts, information or corrected information to the appropriate entity.

A.26. Signatory Requirement.
OAC Rules 3745-50-42(B) and 3745-50-58(K)

All reports or information required by the terms and conditions of this permit or required or requested by the Director shall be signed and certified in accordance with OAC Rule 3745-50-42.

A.27. Confidential Information.
OAC Rule 3745-50-30

In accordance with ORC Chapter 3734 and the rules adopted thereunder, the Permittee may request confidentiality of any information required to be submitted by the terms and conditions of this permit.

A.28. Ohio Annual Permit Fee.
OAC Rule 3745-50-36

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

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By: Mary Cavin Date 10-24-94

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A.29. Compliance Schedule - Documents.

Unless specified otherwise, the Permittee shall submit the documents listed below to:

Ohio EPA, DHWM
Attn: Data Management Section
P.O. Box 163669
1800 WaterMark Drive
Columbus, Ohio 43266-3669

Ohio EPA, NWDO
Attn: DHWM Unit Supervisor
P.O. Box 466
Bowling Green, Ohio 43402

(a) The Permittee shall submit to the Ohio EPA within thirty (30) days after permit journalization, in accordance with the Ohio hazardous waste rules, the following:

Updated financial requirements for closure of the facility and liability requirements. This includes the cost estimate for closure as required by OAC rule 3745-55-42, financial assurance for facility as required by OAC Rule 3745-55-43, and liability insurance as required by OAC Rule 3745-55-47.

(b) The Permittee shall not manage hazardous waste in the revised portions of the facility until compliance is achieved with the Ohio hazardous waste rules and the terms and conditions of this permit, and with the following:

(i) Documents required by this condition shall be submitted as follows:

(aa) At least thirty (30) days prior to commencing construction at the facility, the Permittee shall submit to the Ohio EPA all relevant detailed final design and construction plans as approved by the Building Official in accordance with OAC Rule 4101:2-1-23 (including ancillary equipment, blue prints, material of the construction, etc.) covering each aspect of the proposed construction. The final design and construction plans mean final design and specifications necessary for the commencement of the construction.

(bb) A schedule of construction including the estimated starting and completion dates.

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By: Mary Cavin Date 10-24-94

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(ii) If the final plans, as submitted, are inconsistent with the conceptual and/or preliminary plans contained in the approved Part B permit application and with the terms and conditions of this permit, such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a revised/modified permit.

(iii) Upon completion of construction, the Permittee shall submit to Ohio EPA, by certified mail or hand delivery, a "certificate of use and occupancy" issued by the Building Official in accordance with OAC rule 4101:2-1-27 and a certification stating that the facility has been constructed/revised in compliance with applicable rules, the terms and conditions of this permit, applicable state building codes (including codes for fire, electrical service, and plumbing), and the approved application.

(iv) Within sixty (60) days after completion of construction, "as built" drawings shall be submitted to Ohio EPA. If the submitted "as built" drawings appear inconsistent with the construction design plans submitted under Condition A.28(a)(i), such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility and thus requiring issuance of a revised/modified permit.

(v) The Certification of Construction documents required in Condition A.24. of this Permit.

(c) The Permittee shall submit to the Ohio EPA the following:

	Item	Date Due to the Director
(i)	Tank data sheets for the following: T-94, T-95, T-96, T-98, T-7, T-8, T-19, T-300 T-400 and T-600	60 days prior to Installation

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(ii)	Demonstration of secondary containment which meets the requirements of OAC Rule 3745-55-93 (B) through (F) for the following tanks: T94, T-95, T-96, T-98, T-7, T-8, T-19, T-300, T-400 and T-600	60 days prior to installation
(iii)	Documentation of the age of the following tanks: T-7, T-8, T-19, T-300, T-400, T-600 and Lab Waste Tank.	60 days after the effective date of this permit
(iv)	Contingent Post-Closure Plan which meets the requirements of OAC Rule 3745-55-97 (B)(C) for tanks effected by this permit.	60 days after the effective date of this permit.

(d) The Permittee shall, within 60 days of permit journalization, revise and submit page E-63 by striking out references to WMI procedures (WMI Manual for Groundwater Sampling).

(e) The Permittee shall, within 60 days of permit journalization, revise and submit Section E.6.0 to include procedures and techniques for measurement of water levels, field measurements, sample collection, sample documentation chain of custody, and any other pertinent aspects of sampling of the capillary drain.

(f) The Permittee shall, within 60 days of permit journalization, revise and submit section E.6.0 by updating Tables E-8, E-9 and E-10 and providing any other changes necessary to reflect changes made in the PQL's by permit condition F.3.(a).

A.30. <u>Documents to be Maintained at the Facility.</u>

(a) The Permittee shall maintain at the facility, until closure is completed and certified by an independent, registered professional engineer, pursuant to OAC Rule 3745-55-15, and until the Director releases the Permittee from

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financial assurance requirements pursuant to OAC Rule 3745-55-47, the following documents (including amendments, revisions and modifications):

(i) waste analysis plan, developed and maintained in accordance with OAC Rule 3745-54-13 and the terms and conditions of this permit;

(ii) contingency plan developed and maintained in accordance with OAC Rule 3745-54-53 and the terms and conditions of this permit;

(iii) closure plan, developed and maintained in accordance with OAC Rule 3745-55-12 and the terms and conditions of this permit;

(iv) cost estimate for facility closure developed and maintained in accordance with OAC Rule 3745-55-42 and the terms and conditions of this permit;

(v) personnel training plan and the training records, as developed and maintained in accordance with OAC Rule 3745-54-16 and the terms and conditions of this permit;

(vi) operating record required by OAC Rule 3745-54-73 and the terms and conditions of this permit; and

(vii) inspection schedules developed in accordance with OAC Rules 3745-54-15; 3745-55-74 and 3745-55-95; and the terms and conditions of this permit.

(viii) Post-Closure Plan, as required by OAC Rule 3745-55 18(A)and this Permit.

(ix) annually-adjusted cost estimate for facility closure and post-closure, as required by OAC Rules 3745-55-42 and 3745-55-44 and this Permit.

(x) all other documents required by Permit Condition A.13, B.35, D.11, F.4, F.5, F.7 and F.8.

(b) All amendments, revisions and modifications to any plan required by the terms and conditions of this permit or the Ohio hazardous waste rules shall be submitted to the Ohio Environmental Protection Agency. No such change shall be made unless the Permittee has received approval in accordance with the Ohio hazardous waste rules.

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(c) The Permittee shall maintain copies of all inspection logs at the facility for a period not less than three (3) years from the date of inspection.

A.31. Waste Minimization Report.
OAC Rule 3745-54-73

(a) The Permittee shall submit a Waste Minimization Report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(B) at least once every two years. The provision of OAC Rules 3745-54-75(H), (I) and (J); and 3745-54-73(B)(9) must be satisfied annually.

(b) In completing this report, the Permittee shall refer to the following information: instructions prepared by the Ohio EPA for completing the Waste Minimization Annual Report required by OAC Rules 3745-54-75(H), (I), and (J); the Federal Register notice of June 12, 1989, vol. 54, no. 111, p. 25056, "Draft Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program"; and U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088) May, 1992, and any subsequent updates. The Waste Minimization Report prepared by the Permittee shall incorporate the phases outlined in the "Facility Pollution Prevention Guide" including planning and organization, assessment, feasibility analysis, implementation, measuring progress and maintaining the program. Similar content and additional discussion are found in Ohio EPA's "Ohio Pollution Prevention and Waste Minimization Planning Guidance Manual".

(c) The Permittee shall submit the Waste Minimization Report to the Director within one hundred eighty (180) days of journalization of this permit, and shall submit updates to this report biennially thereafter.

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MODULE B - GENERAL FACILITY CONDITIONS

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

(a) The Permittee shall design, construct, maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, and ground or surface waters which could threaten human health or the environment as required by OAC Rule 3745-54-31.

(b) The Permittee shall not accept more than 630,500 tons (Basis: 126,000,000 gallons converted to tons based on a specific gravity of 1.2. This annual throughput number reflects the limitation found in the underground injection control permit.) in any one calendar year from any sources during the life of the permit. This is a facility wide limitation and includes all units.

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

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

(b) Hazardous Waste from Off-Site Sources

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

B.3. ***"This section left blank intentionally"***

B.4. Waste Product Review (WPR) Expiration

All WPR approvals shall expire on the last day of the thirteenth month from the date of Ohio EPA approval.

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B.5. Waste Minimization Alternatives

(a) A Waste Minimization Alternative (WMA) Plan prepared by the generator after Ohio EPA's approval of new waste streams consisting of annual volumes with a mass greater than 200 tons must be submitted to the Agency by the Permittee within six months of the Agency approval.

(b) The Permittee shall submit to Ohio EPA copies of the waste generator's current Waste Minimization Report and the Waste Management Alternatives Report as required by the generator's certification on the uniform national manifest.

B.6. New Protocols for Waste Analysis Plan

The Permittee must notify the Ohio EPA, Northwest District Office prior to administering any new protocol in the Waste Analysis Plan.

B.7. Acceptance of P Coded Waste Streams
ORC 3734.141

The Permittee must receive prior approval from the Ohio EPA, Northwest District Office before accepting any P-coded waste stream, in accordance with ORC 3734-141. These waste streams shall only be streams that follow the derived from or carry through provisions or that the Permittee can treat to render them innocuous prior to deep well injection. Approval of a waste stream by Ohio EPA as part of the Waste Product Review satisfies all notification requirements of ORC 3734.141.

B.8. Nitric Acid Waste Stream Procedures

Upon receipt of nitric acid waste streams the Permittee must follow the following procedures:

(a) The lab must heat the load sample and the designated receiving tank sample to 120°F before the compatibility test is conducted.

(b) Prior to blending nitric acid streams approval must be obtained from the Lab Manager or his/her qualified designee. If an approval signature can not be obtained prior to blending, then verbal approval of the Lab Manager or his/her qualified designee must be obtained and the Waste Compatibility Sheet must be signed the next working day.

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B.9. General Waste Analysis Plan.
OAC Rule 3745-54-13

The Permittee shall follow the procedures described in the approved waste analysis plan found in Appendix 2 of the approved Part B permit application and the terms and conditions of this permit.

The Permittee shall verify the analysis of each waste stream annually as part of its quality assurance program, in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, and additional supplements or editions thereafter, or equivalent methods approved by the Director. At a minimum, the Permittee or contract laboratory shall maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations.

B.10. Security.
OAC Rule 3745-54-14

The Permittee shall comply with the security provisions of OAC Rule 3745-54-14(B)(2) and (c) and Section F of the Part B permit application.

B.11. General Inspection Requirements.
OAC Rules 3475-54-15 and 3745-54-73

The Permittee shall follow the inspection schedule set out in Section F and Appendix 3 of the approved Part B permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by OAC Rule 3745-54-15(C). Records of inspection shall be kept for a minimum of three years.

B.12. Personnel Training.
OAC Rule 3745-54-16

The Permittee shall conduct personnel training, as required by OAC Rule 3745-54-16. This training program shall contain at least the elements set forth in the Section H and Appendix 5 of the approved Part B permit application. The Permittee shall maintain training documents and records as required by OAC Rules 3745-54-16(D) and (E).

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B.13. General Requirements for Ignitable, Reactive, or Incompatible Waste.
OAC Rule 3745-54-17

(a) The Permittee shall comply with the requirements of OAC Rule 3745-54-17 and shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in Section C, D and F of the approved Part B permit application.

(b) The Permittee shall provide electrical grounding for all containers and tanks, and transport vehicles during all operations involving the handling of flammable and/or combustible wastes.

(c) The Permittee shall provide, and require the use of, spark proof tools during all operations involving the handling of all flammable and/or combustible wastes.

(d) The Permittee shall prohibit smoking and open flames in each area where flammable, ignitable, combustible, reactive or incompatible waste are managed, and shall post appropriate signs.

(e) Where applicable, all wiring and electrical equipment at the proposed facility shall meet the National Fire Protection Association's standards for hazardous locations (See National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp.176 through 189).

B.14. Required Equipment.
OAC Rule 3745-54-32

At a minimum, the Permittee shall maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the approved contingency plan contained in Section F, G and Appendix 4 of the approved Part B permit application.

B.15. Testing and Maintenance of Equipment.
OAC Rule 3745-54-33

The Permittee shall inspect, test and maintain the equipment required by Condition B.14. as necessary to assure its proper operation in time of emergency, as specified in OAC Rule 3745-54-33, Section F, and appendix 3 and 4 of the approved Part B permit application, and the terms and conditions of this permit.

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B.16. Access to Communications or Alarm System.
OAC Rule 3745-54-34

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

B.17. Required Aisle Space.
OAC Rule 3745-54-35

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

B.18. Arrangements with Local Authorities.
OAC Rule 3745-54-37

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

(i) familiarize all emergency response agencies which are likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, and possible evacuation routes as depicted and explained in Section G and Appendix 4 of the approved Part B permit application;

(ii) inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility, and any further requirements related to emergency response imposed by terms and conditions of this permit; and

(iii) familiarize the local ambulance services, fire department, hospitals and any other local emergency service, with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions, or releases at the facility.

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(b) When a State or local agency declines to enter into the arrangements set forth in OAC Rule 3745-54-37(A), the Permittee shall document the refusal in the operating record as required by OAC Rule 3745-54-37(B).

(c) The Permittee shall, in accordance with OAC Rule 3745-54-53, submit a copy of the approved contingency plan, including all amendments, revisions or modifications to all local police departments, fire departments, hospitals, and local emergency response teams that may be called upon to provide emergency services. The Permittee shall notify such agencies and the local authorities, in writing, within ten (10) days of the effective date of any amendments of, revisions to, or modifications to the contingency plan.

(d) The Permittee shall, in accordance with OAC Rule 3745-54-53, submit a copy of the approved contingency plan, and all revisions amendments and modifications to the Ohio Environmental Protection Agency's Division of Emergency and Remedial Response.

B.19. Surface Water Management Plan

The Permittee shall follow the Surface Water Management Plan as outlined in Section F.3.8 of the approved application.

B.20. Implementation of Contingency Plan.
OAC Rules 3745-54-51 and 3745-54-56

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

In regard to spills and related toxic gas releases, the plan must describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented. At a minimum, the plan must be implemented in the following situations:

(a) any spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons;

(b) any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons that may result in a fire or explosion hazard, as determined by the Emergency Coordinator;

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(c) any spill or release of material that exhibits the characteristics of reactivity as defined by OAC Rule 3745-51-23 and which results in the release of gases that may threaten human health or the environment;

(d) any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination;

(e) any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits.

(f) The Permittee must remove all waste residues from leaks and spills of hazardous waste in all pump houses within 24 hours of discovery of such incidents.

B.21. Content of the Contingency Plan.
OAC Rule 3745-54-52

The Permittee shall comply with OAC Rule 3745-54-52 and the contingency plan, as set forth in Section G and Appendix 4 of the approved Part B permit application.

B.22. Contingency Plan - Released Material and Emergency Response Material and By-products.
OAC Rule 3745-54-56

All liquid or solid material resulting from fire, explosion, released material or emergency response material and by-products that the Permittee is required to evaluate to determine whether such material is hazardous waste in accordance with OAC Rule 3745-52-11, shall be collected and managed as a hazardous waste until such time as the Permittee can demonstrate that such waste is not hazardous in accordance with OAC Rules 3745-51-03(C) and (D) as required by OAC Rule 3745-54-56(G).

B.23. Amendments to Plan.
OAC Rule 3745-54-54

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

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B.24. Copies of Plan.
OAC Rule 3745-54-53

The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-53 regarding contingency plan distribution.

B.25. Emergency Coordinator.
OAC Rule 3745-54-55

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

B.26. New Waste Management Procedures

Prior to initiating new waste management procedures which vary from normal operations the Permittee must notify the Ohio EPA, Northwest District Office. The Permittee must be prepared to submit a feasibility study demonstrating the applicability of the proposed procedure upon request.

B.27. Emergency Procedures.
OAC Rules 3745-54-56 and 3745-51-01

The Permittee shall comply with the requirements set forth in OAC Rule 3745-54-56, Section G and Appendix 4 of the approved Part B permit application, and the conditions of this permit, regarding emergency procedures.

B.28. Availability, Retention and Disposition of Records.
OAC Rule 3745-54-74

The Permittee shall maintain all records at the facility in accordance with OAC Rule 3745-54-74.

B.29. Operating Record.
OAC Rule 3745-54-73

The Permittee shall comply with the requirements set forth, in OAC Rule 3745-54-73 regarding maintenance of an operating record for the facility.

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B.30. Contingency Plan Records.
OAC Rule 3745-54-73

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

B.31. Manifest System.
OAC Rules 3745-54-70, 3745-54-71 and 3745-54-76

(a) In the management of waste at the facility the Permittee shall comply with the provisions of OAC Chapter 3745-52 and OAC Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.

(b) Manifest discrepancy report. If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved with fifteen (15) days, the Permittee must submit a report, including a copy of the manifest, to the Director in accordance with OAC Rule 3745-54-71.

(c) Unmanifested waste report. This report must be submitted to the Director within fifteen (15) days of receipt of unmanifested waste and include the information required under OAC Rule 3745-54-76.

B.32. Annual Reports and Additional Reports.
OAC Rule 3745-54-77

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

B.33. Closure Performance Standard
OAC Rule 3745-55-11

During facility closure, the Permittee shall implement the provisions of the approved closure plan, Section I of the Part B application in such a manner as to achieve compliance with OAC Rule 3745-55-11 in accordance with those procedures specified in the Ohio EPA's clean closure review guidance document dated May, 1991 or the most recent revised version of such document.

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B.34. Closure Plan.
OAC Rule 3745-55-10

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

B.35. Amendment of Closure Plan.
OAC Rule 3745-55-12

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

B.36. Content of Closure Plan.
OAC Rule 3745-55-12

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

B.37. Notification of Closure.
OAC Rule 3745-55-12

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

(b) 120-days prior to closure of any RCRA management unit the Permittee must submit to Ohio EPA Northwest District Office a Sampling and Analysis Plan (SAP) to be followed to obtain 12 background samples or equivalent data from past sampling events. This background sampling data is required in order to establish clean levels for soils as described in Section 3.11 of the Ohio EPA, Closure Plan Review Guidance document.

B.38. Time Allowed For Closure.
OAC Rule 3745-55-13

After receiving the final volume of hazardous waste, the Permittee shall remove from the facility or treat or dispose of on site all hazardous waste in accordance with the approved closure plan within ninety (90) days. The Permittee shall complete all closure activities within one hundred eighty (180) days in accordance with OAC Rule 3745-55-13.

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B.39. Disposal or Decontamination of Equipment, Structures, and Soils.
OAC Rule 3745-55-14

(a) The Permittee shall decontaminate and/or dispose of all contaminated facility equipment, structures, and soils, as required by OAC Rule 3745-55-14, the approved closure plan and the terms and conditions of this permit.

(b) The Permittee shall notify the Ohio EPA Northwest District Office within five (5) working days prior to all rinseate and soil sampling.

B.40. Certification of Closure.
OAC Rule 3745-55-15

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

B.41. Financial Assurance for Facility Closure.
OAC Rule 3745-55-43

The Permittee shall maintain continuous compliance with OAC Rule 3745-55-43 and provide documentation of financial assurance which meets the wording of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Condition B.45. Changes in financial assurance mechanisms must be approved by the Director pursuant to OAC Rule 3745-55-43.

B.42. Liability Requirements.
OAC Rule 3745-55-47

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

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B.43. Survey Plat.
OAC Rule 3745-55-16

The Permittee shall submit a survey plat to the Director and the local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit, in accordance with OAC Rule 3745-55-16.

B.44. General Post-Closure Requirements.
OAC Rule 3745-55-17

(a) Post-Closure Care Period.

The Permittee shall begin post-closure care for the surface impoundment closed as a landfill after completion of closure of the unit and continue for 30 years after that date. Post-closure care shall be in accordance with OAC Rule 3745-55-17 and the Post-Closure Plan.

(b) Post-Closure Security.

The Permittee shall maintain security at the facility during the post-closure care period, in accordance with the Post-Closure Plan and OAC Rule 3745-55-17(B).

(c) Amendment to Post-Closure Plan.

The Permittee shall amend the Post-Closure Plan in accordance with OAC Rule 3745-55-18(D), whenever necessary.

(d) Post-Closure Notices.

(i) No later than 60 days after certification of closure of each hazardous waste disposal unit, the Permittee shall submit to the director and the local zoning authority records of the type, location, and quantity of hazardous waste disposed of within each cell or disposal unit, in accordance with OAC Rule 3745-55-19(A).

(ii) Within 60 days of certification of closure of the first hazardous waste disposal unit and the last hazardous waste disposal unit, the Permittee shall do the following:

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(1) Record a notation on the deed to the facility property which contains the information required by OAC Rule 3745-55-19(B)(1).

(2) Submit a certification that a notation and a copy of the instrument upon which the notation was recorded has been recorded.

(3) The Permittee shall request and obtain a Permit change prior to post-closure removal of hazardous wastes, hazardous waste residues, liners, or contaminated soils, in accordance with OAC Rule 3745-55-19(C).

(e) Certification of Completion of Post-Closure Care.
OAC Rule 3745-55-20

The Permittee shall certify that the post-closure care period was performed in accordance with the specifications in the Post-Closure Plan, as required by OAC Rule 3745-55-20.

B.45. Cost Estimate for Facility Closure and Post-Closure.
OAC Rule 3745-55-42

(a) The Permittee's most recent closure and post-closure cost estimate, prepared in accordance with OAC Rules 3745-55-42, 3745-55-44, 3745-55-97(C)(3) & (5), 3745-56-28(C)(3) and 3745-56-58(C)(2) are specified in Section I of the Part B permit application.

The Permittee must adjust the closure cost estimate and post-closure cost estimate for inflation within 30 days after the close of the firm's fiscal year and before submission of updated information to the Director, as specified in OAC Rule 3745-55-42(B) and OAC Rule 3745-55-44(B).

(c) The Permittee must revise the closure cost estimate and post-closure cost estimate whenever there is a change in the facility's Closure Plan and Post-Closure Plan, as required by OAC Rule 3745-55-42(C) and 3745-55-44(C).

(d) The Permittee must submit to the Ohio EPA and keep at the facility the latest closure cost estimate and post-closure cost estimate as required by OAC Rule 3745-55-42(D) and 3745-55-44(D).

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B.46. Financial Assurance for Facility Closure and Post-Closure.

The Permittee shall maintain continuous compliance with OAC Rule 3745-55-43 and OAC Rule 3745-55-45 provide documentation of financial assurance, which meets the requirements of OAC Rule 3745-55-51 or 3745-55-49, in at least the amount of the cost estimates required by Permit Condition B.45. Changes in financial assurance mechanisms must be approved by the Director pursuant to OAC Rule 3745-55-43 and/or 3745-55-45 or OAC Rule 3745-55-49.

B.47. Liability Requirements.

The Permittee shall maintain compliance with the requirement of OAC Rule 3745-55-47(A) to have continuous liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs.

The Permittee also shall demonstrate compliance with OAC Rule 3745-55-47(B) by maintaining liability coverage for nonsudden accidental occurrences in the amount of at least $3 million per occurrence, with an annual aggregate of at least $6 million, exclusive of legal defense costs.

B.48. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

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

B.49. General Requirements for Land Disposal Restrictions.

(a) The Permittee shall comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-59. Wastes restricted from land disposal by OAC Rules 3745-59-30, 3745-59-31 and 3745-59-33, or prohibited from land disposal by OAC Rule 3745-59-32 or by Section 3004(d) of RCRA, shall not be shipped to an off-site land disposal facility unless the appropriate notification is given to a designated land disposal facility which is permitted to treat the waste or the waste meets the treatment standards given in OAC Rules 3745-59-40 to 3745-59-44 and the applicable prohibition levels set forth in OAC Rule 3745-59-32 and Section 3004(d) of RCRA.

(b) A mixture of any restricted waste with nonrestricted waste(s) is a restricted waste under OAC Chapter 3745-59. [OAC Rule 3745-51-03(B)(2)]

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(c) The Permittee shall not in any way dilute a restricted waste or the residual from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with OAC Rules 3745-59-40 through 3745-59-44, to circumvent the effective date of a prohibition in OAC Rules 3745-59-30 through 3745-59-35, to otherwise avoid a prohibition in OAC Rules 3745-59-30 through 3745-59-35, or to circumvent a land disposal prohibition imposed by Section 3004(d) of RCRA. [OAC Rule 3745-59-03]

(d) The Permittee shall prepare and maintain a current list of the hazardous waste codes handled by the facility that are identified in OAC Rules 3745-59-30 through 3745-59-35. The list shall include all waste codes handled by the facility, and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, as promulgated or amended. This list shall be provided to the Ohio EPA as required by OAC Rule 3745-50-51.

(e) The Permittee must test, in accordance with OAC Rule 3745-59-07, any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.

(f) For restricted wastes with treatment standards expressed as concentrations in the waste extract, as specified in OAC Rule 3745-59-41, the Permittee shall test the treatment residues, or an extract of such residues developed using the test methods described in Appendix to OAC Rule 3745-51-24 (Toxicity Characteristic Leaching Procedure) to assure that the treatment residues or extract meet the applicable treatment standards of OAC Rules 3745-59-40 through 3745-59-44.

(g) For restricted wastes under OAC Rule 3745-59-32 or Section 3004(d) of RCRA, which are not subject to any treatment standards under OAC Rules 3745-59-40 through 3745-59-44, the Permittee shall test the treatment residues according to the generator requirements specified under OAC Rule 3745-59-32 to assure that the treatment residues comply with the applicable prohibitions of OAC Rules 3745-59-30 through 3745-59-35.

(h) A restricted waste for which a treatment technology is specified under OAC Rule 3745-59-42 may be land disposed after it is treated using that specified technology or an equivalent treatment method approved by the Administrator under the procedures set forth in OAC Rule 3745-59-42.

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(i) For restricted wastes with treatment standards expressed as concentrations in the waste, as specified in OAC Rule 3745-59-43, the Permittee shall test the treatment residues (not an extract of such residues) to assure that the treatment residues meet the applicable treatment standards of OAC Rules 3745-59-40 through 3745-59-44.

(j) The Permittee shall comply with all the applicable notification, certification, and record keeping requirements described in OAC Rule 3745-59-07.

(k) The Permittee shall comply with all the applicable prohibitions on storage of restricted waste specified in OAC Rule 3745-59-50.

(l) Except as otherwise provided in OAC Rule 3745-59-50, the Permittee may store restricted wastes in tanks solely for the purpose of the accumulation of such quantities of hazardous wastes as necessary to facilitate proper recovery, treatment or disposal provided that each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at the facility.

(m) The Permittee may store restricted wastes for up to one (1) year unless the Ohio EPA can demonstrate that such storage was not solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recover, treatment or disposal. [OAC Rule 3745-59-50]

(n) The Permittee may store restricted wastes beyond one (1) year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal. [OAC Rule 3745-59-50]

(o) The Permittee shall not store any liquid hazardous waste containing polychlorinated biphenyl (PCBs) at concentrations greater than or equal to 50 ppm unless the waste is stored in storage facility that meets the requirements of 40 CFR 761.65(b). This waste must be removed from storage and treated or disposed as required by OAC Rule 3745-59-50 within one (1) year of the date when such wastes are first put into storage. Condition B.42(n) above, that allows storage for over one (1) year with specified demonstration, does not apply to PCB waste prohibited under OAC Rule 3745-59-32.

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MODULE C

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MODULE D - TANK STORAGE, TREATMENT AND MANAGEMENT

D.1. MODULE HIGHLIGHTS

The Integrated Aqueous Waste Treatment System (IAWTS) consists of the following units: (1) the Truck Unloading Facility which includes ancillary, basket and grit filters, waste receiving tanks (V-Tanks), waste head-gas caustic scrubber and solids handling unit; (2) Waste Storage and Treatment Tank System (T-Tanks); (3) the filter and filter buildings; (4) the pumps and pump houses; and (5) the yard piping.

The 60 foot by 124 foot truck unloading building sets on top of a 4 foot high concrete block wall. The wire-mesh reinforced concrete floors of the truck unloading bays are sloped, longitudinally and transversely, a total of 11 inches, to 18-inch deep waste unloading sumps. The unloading sumps are lined with a corrosion resistant liner and contain 6 inch truck unloading pipes and a 6-inch sump drain pipe. The below ground portions of both the truck unloading pipes and sump drain pipes are enclosed in a 10-inch PVC shield pipe. The 6-inch pipes drain to one of the four grit filters or through alternative filtering devices. The discharge is directed to one of the six T-tanks. The 10 inch shield pipes drain to the grit filter's vault system. Tanker trucks may be unloaded by gravity drainage through the grit filters to one of the four V-tanks or unloaded directly to one of the T-tanks.

The 3 foot 9 inch by 7 foot solid handling grit filters are constructed of 1/3-inch stainless steel which is lined with a corrosion resistant liner. The four grit filters, are set below grade in two concrete vaults. The head gases from these vault systems are vented though 16-inch piping to the scrubber. The two grit filter vaults are drained by 6-inch piping enclosed in a 10-inch shield pipe to the V-tank's containment system sump. Waste is then automatically pumped to one of the V-tanks.

The four waste receiving V-tanks are set in a below ground vault which is approximately 11 feet deep. The open topped vault is sectioned in half by a 5-foot 10-inch concrete wall. Shelter is provided by a wooden framed building. The vault floor is divided into two halves and slopes toward two sumps. Sump accumulation is pumped to tanks V-5 or V-7. Four horizontal centrifugal pumps are set on the floor of the vault. Each pump is dedicated to one of the four V-tanks and draws from the bottom of the tanks through a 4 inch pipe which

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discharges over the vault wall to the above ground pipe rack. The discharge lines follow the pipe rack to one of the 6 T-tanks to be stored or treated. The head space of the four V-tanks is vented to the scrubber through 16-inch PVC vent pipes.

The six T-tanks are set upon a 143 foot by 140 foot concrete reinforced containment pad. The containment pad is lined with a protective liner. The West 13 feet of the containment pad is dedicated to the Pump House which shelters one transfer pump and one recirculating pump for each T-tank. The head space of each T-tank is blanketed with an inert gas, to create an oxygen reduced condition to reduce the potential for fire, and is vented to the caustic scrubber. The entire foundation of the containment pad is supported on 50 foot, 90 tons piles driven to refusal. The total available storage volume of the containment system is 313,423 gallons.

Filtration operations are housed in two existing filter buildings. Filter building 1 includes 2 leaf filters, an add mix tank, and a precoat tank. Building 2 includes a filter press and the polish filters. The floors of both filter buildings are lined with a corrosion resistant liner and are sloped towards a local sump. Transfer pumps are set on the floor of both filter buildings and serve to discharge wastes from the sumps to and from the various filters and tanks.

Yard piping which leads from the IAWTS to the deepwell injection pumps is situated upon above ground pipe racks. As part of the yard piping, above ground surge tanks (FAT) are set adjacent to each of the 4 injection well pump houses. The portions of the piping which cross Myers Ditch and the high pressure lines which lead from the injection pumps to the deepwells are double walled. The floor of four injection well pump houses are sloped towards local sumps. Each of the four pump houses shelter an injection pump, transfer pumps and guard filters and, upon approval, a polish filter.

Proposed changes approved under this renewal/revision are as follows: (These changes have been authorized by the Director of Ohio EPA under Findings and Orders issued to the Permittee on September 10, 1993 (Appendix II)).

(a) Construction, use and management of a new building to house the existing filter press and a filter press which will replace the two existing leaf filters.

Replacement of the existing Add Mix tank, the Precoat tank, an additional Filter Press Dip tank. Associated piping would be ancillary to the filter presses.

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(b) Augmenting of the gravity unloading/sand interceptor system with basket strainers and pumps.

(c) Replacement of six existing Filtered Acid Tanks (FAT) with double walled tanks. The tanks to be replaced include T-7, T-8, T-19, T-300, T-400 and T-600 which will result in a net decrease in the facility's overall storage capacity of 26,977 gallons.

(d) Relocation of the four guard filters from the current filter building to each of the four injection well pump houses.

(e) Installation of contained piping for all waste transfer lines to all well houses and pump houses.

D.2. Process Capacity/Annual Limitation/Waste Identification.

(a) The Permittee may store and/or treat a total volume of 126,000,000 gallons/year throughput (630,500 tons per year), but not to exceed 650,500 gallons/day throughput (This annual throughput volume reflects the limitation found in the UIC permit) of hazardous waste in the below listed tanks, subject to the terms and conditions of this Permit and as follows:

Tank No. Waste No.	Capacity (Gallons)	Dimensions	Secondary Containment of Tank	Description of of Hazardous Waste Required	Hazardous Waste
T-1 (T036)	200,000	31 ft.(ID) x 39 ft	Yes-in place	Aqueous waste	See Condition D.1.c
T-2 (T037)	200,000	31 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-5 (T038)	200,000	31 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-6 (T039)	200,000	31 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-9 (T040)	100,000	22 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-10 (T041)	100,000	22 ft.(ID) x 39 ft.	Yes-in place	Aqueous waste	" "
T-22 (V-4)	6,000	12 ft.(dia) x 8 ft.	Yes-in place	Waste receiving	" "

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Tank No. Waste No.	Capacity (Gallons)	Dimensions	Secondary Containment of Tank	Description of of Hazardous Waste Required	Hazardous Waste	
T-23 (V-5)	6,000	12 ft.(dia) x 8 ft.	Yes-in place	Waste receiving	"	"
T-24 (V-6)	6,000	12 ft.(dia) x 8 ft.	Yes-in place	Waste receiving	"	"
T-25 (V-7)	6,000	12 ft.(dia) x 8 ft.	Yes- in place	Waste receiving	"	"
T-94	500	See T&C	Yes-when installed	Filter press drip tank	"	"
T-95	3,000	See T&C	Yes-when installed	Add mix replacement	"	"
T-96	1,600	See T&C	Yes-when installed	Precoat replacement	"	"
T-98	500	See T&C	Yes-when installed	Caustic feed to filter press	"	"
T-7 (FAT-AR)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-8 (FAT-BR)	11,750	11 ft.11in. (dia) x 21ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-19 (FAT-5R)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-18 (FAT-2R)	11,750	11 ft.11in. (dia) xi 21 ft.5in.	Yes-when nstalled	Filtered acid Replacement	"	"
T-300 (FAT-3R)	11,750	11 ft.11in. (dia) x 21 ft.5in.	Yes-when installed	Filtered acid Replacement	"	"
T-600 (FAT-6R)	11,750	11 ft.11in. (dia) x 21 ft.11in.	Yes-when installed	Filtered acid Replacement	"	"

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Tank No. Waste No.	Capacity (Gallons)	Dimensions	Secondary Containment of Tank	Description of of Hazardous Waste Required	Hazardous Waste
Lab Waste Tank	2,500	See T&C	See T&C	Lab waste	" "

(b) During any calendar year, the Permittee shall not manage through tank storage hazardous waste in excess of the maximum daily and annual quantity set forth in Condition B.1(b) of this permit.

(c) The Permittee shall store and treat in tanks only the hazardous waste codes and types specified in the approved Part B permit application and summarized below:

D001 and D003 shall only be stored and treated in tanks;
D002, D004, D005, D006, D007, D008, D009, D010, D011, D013, D014, D015, D016, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005, F006, F007, F008, F009, F010, F012, F019, F037, F038, F039, K017, K049, K052, K060, K062, K107, K108, K109, K110, K131, K132, P001, P005, P010, P012, P018, P022, P030, P044, P050, P064, P078, P098, P105, P106, P119, P120, U001, U002, U003, U007, U008, U009, U012, U016, U019, U031, U034, U036, U043, U044, U051, U052, U053, U055, U056, U057, U068, U070, U072, U075, U077, U078, U080, U081, U088, U092, U102, U103, U105, U108, U112, U113, U115, U117, U121, U122, U123, U124, U125, U131, U133, U134, U135, U140, U144, U147, U148, U151, U154, U159, U161, U162, U165, U167, U169, U182, U188, U190, U196, U201, U207, U208, U210, U211, U213, U219, U220, U221, U222, U223, U226, U227, U228, U238, U239

The following waste codes are only permitted for the scrubber water waste types, which are generated by air pollution control devices and are classified as hazardous waste through the application of the "derived from" or mixture rule:

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D012, D017, F011, K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K046, K047, K048, K050, K051, K061, K064, K065, K066, K069, K071, K073, K083, K084, K085, K086, K087, K088, K090, K091, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K111, K112, K113, K114, K115, K116, K117, K118, K123, K124, K125, K126, K136, P002, P003, P004, P006, P007, P008, P009, P011, P013, P014, P015, P016, P017, P020, P021, P023, P024, P026, P027, P028, P029, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P045, P046, P047, P048, P049, P051, P054, P056, P057, P058, P059, P060, P062, P063, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P099, P101, P102, P103, P104, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P121, P122, P123, U004, U005, U006, U010, U011, U014, U015, U017, U018, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U032, U033, U035, U037, U038, U039, U041, U042, U045, U046, U047, U048, U049, U050, U058, U059, U060, U061, U062, U063, U064, U066, U067, U069, U071, U073, U074, U076, U079, U082, U083, U084, U085, U086, U087, U089, U090, U091, U093, U094, U095, U096, U097, U098, U099, U101, U106, U107, U109, U110, U111, U114, U116, U118, U119, U120, U126, U127, U128, U129, U130, U132, U136, U137, U138, U141, U142, U143, U145, U146, U149, U150, U152, U153, U155, U156, U157, U158, U160, U163, U164, U166, U168, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U183, U184, U185, U186, U187, U189, U191, U192, U193, U194, U197, U200, U202, U203, U204, U205, U206, U209, U214, U215, U216, U217, U218, U224, U225, U234, U235, U236, U237, U240, U243, U244, U246, U247, U248, U249, U328, U353, U359

(d) The Permittee is prohibited from storing or treating hazardous waste that is not identified in this permit condition or which does not meet the following Facility Waste Acceptance Conditions:

1. Limited to 5% or less oil by volume, using standard BS&W test and corrected for tank shape if necessary.

2. Limited to less than 25 ppm PCBs.

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3. Closed cup flash must exceed 140°F.

4. Must be a pumpable liquid or semi-solid, not paste or solid (it may contain solids).

5. Phenols must not exceed 30,000 ppm.

6. Reactive cyanide must be less than 250 ppm and reactive sulfide must be less than 500 ppm.

7. VOC (Volatile Organic Compounds) must not exceed 5% by weight.

8. Radiation level must not exceed background.

9. All waste streams must be compatible with existing materials of construction of the surface facility and the injection wells.

10. Acceptable injectability must be indicated from previous CWM - Vickery experience or from supplementary analytical results.

11. All waste streams accepted at the facility must have prior approval from the Ohio EPA per the WPR (Waste Product Review) process.

(e) All incoming waste streams must meet the acceptance criteria set forth in the approved Waste Analysis Plan which is located in section C and appendix 2 of the approved Part B application.

D.3. Secondary Containment and Integrity Assessments.
OAC Rules 3745-55-90 through 3745-55-93

(a) Existing Tank Systems Without Secondary Containment. For tank systems used to store or treat materials that are defined as hazardous waste in the future, the Permittee must obtain a written assessment of the existing tank system integrity within 12 months from the date the waste is defined as hazardous. [OAC Rule 3745-55-91(C)] The assessment shall be certified by an independent, qualified, registered professional engineer. [OAC Rules 3745-55-91(A) & (B)]

(b) Existing Tank Systems with Secondary Containment. The Permittee shall design, construct, and operate the secondary containment system, in accordance with the detailed design plans and descriptions contained in the Part B permit application. [OAC Rules 3745-55-93(B) through (F)]

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(c) The Permittee shall comply with the following conditions until such time as secondary containment that meets the requirements of OAC Rule 3745-55-93 is provided:

(i) For ancillary equipment, a leak test (or other integrity method as approved by the Director) must be conducted annually using the procedures in the Part B permit application. [OAC Rule 3745-55-93(I)(3)]

(ii) If a tank system or component is found to be leaking or unfit for use as a result of the leak test or assessment, the Permittee shall comply with Permit Condition D.5. of this Permit and notify the Director, in accordance with Permit Condition D.7. of this Permit. [OAC Rule 3745-55-93(I)(4)]

D.4. Certification of Tank Systems.
OAC Rules 3745-55-92, 3745-55-93 and 3745-50-42

(a) Existing Tank Systems.

The Permittee shall keep on file at the facility a written assessment that is reviewed and certified by an independent, qualified professional engineer, in accordance with OAC Rule 3745-50-42(D), that attests to the structural integrity and suitability of each existing tank system for handling hazardous waste, as required under OAC Rule 3745-55-91.

Existing tanks at the facility are T-1, T-2, T-5, T-6, T-9, T-10, T-22, T-23, T-24 and T-25. The age of the following tanks have not been identified within the Part B application: T-7 (FAT A), T-8 (FAT-B), T-19 (FAT-5), T-300 (FAT-3), T-400 (FAT-2), T-600 (FAT-6) and Lab Waste Tank (See condition D.11).

(b) New Tank Systems.

The Permittee shall keep on file at the facility a written statement(s) by those persons required to certify the design of the tank systems and supervise the installation of the tank systems in accordance with the requirements of OAC Rule 3745-55-92, that attest that the tank systems were properly designed and installed. These written statements must also include the certification as required by OAC Rule 3745-50-42(D). New tanks at the facility are T-94, T-95, T-96, T-98. Proposed replacements tanks are T-7, T-8, T-19, T-300, T-400 and T-600.

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

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

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

D.6. Response to Leaks or Spills.
OAC Rule 3745-55-96

(a) In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions:

(i) Stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

(ii) Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak or at an earlier practicable time to prevent further release and to allow inspection and repair of the tank/containment system to be performed.

(iii) Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection:

(1) prevent further migration of the leak or spill to soils or surface water, and

(2) remove and properly dispose of any visible contamination of the soil or surface water.

(iv) Close or repair the system in accordance with the Closure Plan unless the following actions are taken:

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(b) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

(i) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

(ii) For a release to the environment caused by a leak from a component of the tank system that is below ground and does not have secondary containment, the Permittee must provide this component with secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(iii) For a release to the environment caused by a leak from the aboveground portion of the tank system that does not have secondary containment, and can be visually inspected, the Permittee shall repair the tank system before returning it to service.

(iv) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee shall provide secondary containment that meets the requirements of OAC Rule 3745-55-93 before the component can be returned to service.

(v) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93.

(c) For all major repairs to eliminate leaks or restore the integrity of the tank system, the Permittee must obtain a certification by an independent, qualified, registered professional engineer in accordance with OAC Rule 3745-50-42(D) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

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D.7. Inspection Schedules and Procedures.
OAC Rule 3745-55-95

(a) The Permittee shall inspect the tank systems, in accordance with the Inspection Schedule and shall complete the items in Permit Conditions D.6(b) and D.6(c) as part of those inspections:

(b) [OAC Rule 3745-55-95(A)] The Permittee shall inspect the overfill controls, in accordance with the procedure and schedule in the Part B permit application.

(c) [OAC Rule 3745-55-95(B)] The Permittee shall inspect the following components of the tank system once each operating day:

(i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;

(ii) Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design;

(iii) Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation).

(d) The Permittee shall document compliance of permit Condition D.6 in the operating record of the facility.

D.8. Recordkeeping and Reporting.
OAC Rule 3745-55-96

(a) The Permittee shall report to the Director, within 24 hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment.

[OAC Rule 3745-55-96(D)(1)] (A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned-up, need not be reported.) [OAC Rule 3745-55-96(D)(2)] (Releases that are contained within a secondary containment system need not be reported).

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(b) Within 30 days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information to the Director: [OAC 3745-55-96(D)(3)]

(i) Likely route of migration of the release;

(ii) Characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

(iii) Results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time period, the Permittee should provide the Director with a schedule of when the results will be available. This schedule must be provided before the required 30-day submittal period expires;

(iv) Proximity of downgradient drinking water, surface water, and populated areas; and

(v) Description of response actions taken or planned.

(c) The Permittee shall submit to the Director all certifications of major repairs to correct leaks within seven days from returning the tank system to use in accordance with OAC Rule 3745-55-96(F).

(d) The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of the tank system. [OAC Rule 3745-55-92(G)]

(e) The Permittee shall keep on file at the facility the written assessment of the tank system's integrity. [OAC Rule 3745-55-91(A)]

(f) The Permittee shall maintain at the facility a record of the results of leak tests and integrity tests conducted, in accordance with Permit Conditions D.2(d)(i) through D.2(d)(ii).

D.9. <u>Closure and Post-Closure Care.</u>
OAC Rule 3745-55-97

(a) At closure of the tank system(s), the Permittee shall follow the procedures in the Closure Plan. [OAC Rule 3745-55-97(A)]

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(b) If the Permittee demonstrates that not all contaminated soils can be practically removed or decontaminated, in accordance with the Closure Plan, then the Permittee shall close the tank system(s) and perform post-closure care following the contingent procedures in the Closure Plan and in the Post-Closure Plan. [OAC Rules 3745-55-97(B) & (C)]

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

(a) The Permittee shall not place ignitable or reactive waste in the tank system or in the secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place it in the operating record. [OAC Rule 3745-55-98(A)]

(b) The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) incorporated by reference in OAC Rule 3745-50-11. [OAC Rule 3745-55-98(B)]

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

(a) The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same tank system or the same secondary containment system, unless the procedures specified in the Part B permit application are followed. The Permittee shall document compliance with this condition and place that documentation into the operating record. [OAC Rule 3745-55-99(A)]

(b) The Permittee shall not place hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the requirements of Permit Condition D.10(a) are met. [OAC Rule 3745-55-99(B)]

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MODULE E - MISCELLANEOUS TREATMENT (Filtration)

E.1. Module Highlights

Filtration units at the facility have been categorized as miscellaneous units. The filtration system consists of Grit filters, Basket strainers, Press Filters, Leaf Filters and Guard Filters. These individual units may either be used in series or parallel.

E.2. Process Capacity

Filtration system is restricted to 126,000,000 gallons/year throughput and shall not exceed 650,000 gallons/day throughput.

E.3. Design of the facility

The Permittee shall always provide and maintain the filter presses with adequate containment for purposes of collecting liquid residues generated by the filter presses.

E.4. Operation

All units shall be operated as described in Section D.2.3 of the approved permit application and to minimize fugitive emissions to the atmosphere during dumping of the filter cake. The Permittee shall clean up the floor area immediately after removing the filter cake.

E.5. Disposal of Residues

The Permittee shall dispose or recycle the filter cake and other residues generated as result of filtration operation at a RCRA approved facility.

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MODULE F - GROUND-WATER DETECTION MONITORING

F.1. MODULE HIGHLIGHTS

The following module addresses the Closure Cell (formerly ponds 4, 5, & 7) post-closure detection monitoring program at the Chemical Waste Management Inc. facility in Vickery, Ohio. Ponds 11 and 12 were clean closed and are currently conducting three (3) years of verification monitoring. All other previously closed ponds are addressed under the U.S. EPA Corrective Action Permit.

The detection monitoring system for the facility is comprised of two (2) separate monitoring systems. The first system is the capillary drain which underlies the entire closure cell. Monitoring of this unit allows the shallow overburden ground water to be monitored and provides an early warning detection system. This unit is monitored by sampling from the capillary drain piping system as it enters the sump.

The second unit monitored is the bedrock or uppermost aquifer. This unit is monitored by a system of eight (8) ground water monitoring wells. The eight wells consist of downgradient wells MW-14R, 15R, 16R, 20R, 30R, and 36R; and upgradient wells MW-24R and 37R.

The constituents monitored for in both systems and their respective background concentrations are included in condition F.3(a).

F.2. Well Location, Installation and Construction, OAC 3745-54-97

The Permittee shall maintain a ground-water monitoring system as specified below: [OAC 3745-54-97]

(a) The Permittee shall maintain ground-water monitoring wells at the locations specified on the map (Figure E-18) in the Part B permit application and in conformance with the following list:

Background Wells (upgradient)

MW-37R
MW-24R

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Point of Compliance Wells (downgradient)

MW-14R
MW-15R
MW-16R
MW-20R
MW-30R
MW-36R

(b) The Permittee shall maintain and use the capillary drain that underlies the Closure Cell as a second detection monitoring system.

(c) The Permittee shall maintain the monitoring wells identified in Permit Condition F.2(a) and the capillary drain identified in Permit Condition F.2(b), in accordance with the detailed plans and specifications presented in the Part B permit application.

(d) Should any well need to be deleted from the closure cell monitoring program, notification shall be provided in accordance with the Part B permit application (Section E.5.4). Proposed well plugging and abandonment methods shall be submitted at that time. Well plugging and abandonment certification, including actual methods used, shall be submitted to the Director within 30 days from the date the well is removed from the monitoring program.

F.3. Monitoring Parameters and Hazardous Constituents.
OAC 3745-54-98

(a) The Permittee shall monitor compliance wells MW-14R, MW-15R, MW-16R, MW-20R, MW-30R, MW-36R, and background wells MW-24R and MW-37R, and the capillary drain as described in Permit Condition F.2., for the following parameters and hazardous constituents: [OAC 3745-54-98(A)]

Parameter or Constituent	Established Background Concentrations (ug/l) Prediction Limits
Benzene	2
Chlorobenzene	5
Chloroform	5
1,2-Dichloroethane	0.5
Ethyl Benzene	5
Methanol	100

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Parameter or Constituent	Established Background Concentrations (ug/l) Prediction Limits
Methyl Ethyl Ketone	50
Methylene Chloride	5
Toluene	5
Trichloroethylene	1
1,1,1-Trichloroethane	5
Vinyl Chloride	2
1,1-Dichloroethane	5
Chloroethane	10
Ethanol	100
1,1-Dichloroethene	5
Cis-1,2-Dichloroethene	10
Trans 1,2-Dichloroethene	10
Poly Chlorinated Biphenyls	0.2
Arsenic, Dissolved	30
Cadmium, Dissolved	1
Chromium, Dissolved	10
Lead, Dissolved	25
Nickel, Dissolved	40(b)
Zinc	20
Total Phenol	62

(b) For the parameters and constituents in Permit Condition F.3(a) for which five of the eight background values have been established as of October, 1993 (Nickel), the Permittee shall establish background values in accordance with the following procedures:

Background wells MW-24R and MW-37R shall be sampled at least quarterly for dissolved nickel and in a manner to provide the additional three (3) independent background samples needed for statistical analysis within the first year after Permit approval.

F.4. Sampling and Analysis Procedures.
OAC 3745-54-97

The Permittee shall conduct all sampling and analysis in accordance with the procedures specified in section E.6.0 and condition A.29(d), (e), and (f), or as revised with the approval of the Ohio EPA, Northwest District Office, and the general quality assurance/quality control (QA/QC) procedures outlined in Appendix 14-B.

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F.5. Elevation of the Ground-Water Surface.

(a) The Permittee shall determine the elevation of the ground-water surface at each well each time the ground water is sampled at that well in accordance with Permit Condition F.7(b). [OAC 3745-54-97(F)]

(b) The Permittee shall record the surveyed elevation of the monitoring wells and capillary drain sump on the facility map.

F.6. Statistical Procedures.

When evaluating the monitoring results for parameters or hazardous constituents specified under permit condition F.3. in accordance with Permit Condition F.7., the Permittee shall use the procedures described in the permit application, section E.7 to identify statistically significant evidence of contamination.

F.7. Monitoring Program and Data Evaluation.

(a) The Permittee shall collect, preserve, and analyze samples pursuant to Permit Condition F.4.

(b) The Permittee shall determine ground-water quality at each monitoring well at the compliance point. The ground water quality in the capillary drain shall be determined at the piping system as it enters the sump. This shall be determined at least semi-annually during detection monitoring and in accordance with the permit. The Permittee shall maintain a record of ground water quality analytical data as measured and in a form necessary for the determination of statistical significance under OAC 3745-54-97(H). [OAC 3745-54-98(C)].

(c) The Permittee shall determine the ground-water flow rate and direction in the uppermost aquifer (bedrock zone) at least annually. [OAC 3745-54-98(E)]

(d) The Permittee shall determine whether there is a statistically significant evidence of contamination for chemical parameters or hazardous constituents identified in Permit Condition F.3(a) each time ground water quality is determined at the compliance point.

In determining whether statistically significant evidence of contamination exists, the Permittee must compare the ground-water quality at each monitoring well specified in Permit Condition F.2(a) to the background value specified in Permit Condition F.3(a), in accordance with the statistical procedures specified in Permit Condition F.6. [OAC 3745-54-98(F)(1)]

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The permittee must also compare the ground water quality in the capillary drain to background in accordance with the statistical procedures specified in Permit Condition F.6 [OAC 3745-54-98(F)(1)]

(e) The Permittee shall perform the evaluations described in Permit Condition F.7(d) and submit the results of the evaluation to the Ohio EPA within sixty (60) days after completion of sampling. [OAC 3745-54-98(F)(2)]

F.8. Recordkeeping and Reporting.

(a) The Permittee shall enter all monitoring, testing, and analytical data obtained in accordance with Permit Condition F.7. in the operating record. [OAC 3745-54-73(B)(6)and 55-02(A)(2)] The data must include all statistical data, ground water levels and ground water flow rate and direction determinations.

(b) For those parameters and constituents in Permit Condition F.3(a) for which insufficient background values are established at the time the Permit is issued (Nickel), the Permittee shall submit the established background values and the computations necessary to determine background values to the Ohio EPA within sixteen weeks after the first well is sampled during each quarterly event until eight (8) dissolved nickel background data points are established.

(c) As part of the annual report [OAC 3745-54-75], the Permittee shall submit the analytical results required by Permit Conditions F.7(b) and F.7(c) and the results of the initial statistical analyses required by Permit Condition F.7(d).[OAC 3745-55-02(c)]

(d) The Permittee shall comply with any reporting requirements that become necessary under Permit Condition F.9.

F.9. Special Requirements for Response to Statistically Significant Evidence of Contamination.

(a) If the Permittee determines, pursuant to Permit Condition F.7., there is a statistically significant evidence of contamination for the indicator parameters or hazardous constituents specified in Permit Condition F.3(a), the Permittee shall:

(i) Immediately implement the Verification /Validation and Response Procedures for the monitoring wells (section E.7.4) or the capillary drain (section E.7.5) as appropriate, in accordance with the permit application. [OAC 3745-54-98(G)(1)]

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(ii) If a permit change to establish a compliance monitoring program is determined to be necessary based on implementing the Verification /Validation and Response Procedures it shall be submitted within timelines set forth in the permit application. The application must include the following information if appropriate for the system being modified:

(aa) An identification of the concentration of each Appendix to OAC 3745-54-98 constituent detected in the ground water at each monitoring well at the compliance point. [OAC 3745-54-98(G)(4)]

(bb) Any proposed changes to the ground water monitoring system at the facility necessary to meet the requirements of compliance monitoring as described in OAC 3745-54-99. [OAC 3745-54-98(G)(4)]

(cc) Any proposed additions or changes to the monitoring frequency, sampling and analysis procedures or methods, or statistical procedures used at the facility necessary to meet the requirements of compliance monitoring as described in OAC 3745-54-99. [OAC 3745-54-98(G)(4)]

(dd) For each hazardous constituent detected at the compliance point, a proposed concentration limit under OAC 3745-54-94(A)(1) or (A)(2), or a notice of intent to seek an alternate concentration limit for a hazardous constituent under OAC 3745-94(B). [OAC 3745-54-98(G)(4)]

(iii) Submit a corrective action feasibility plan or all data necessary to justify an alternate concentration limit to the Agency within 180 days. [OAC 3745-54-98 (G)(5)]

(b) If the Permittee determines, pursuant to Permit Condition F.7., there is a statistically significant difference for the parameters or constituents specified in Permit Condition F.3(a), he may demonstrate that a source other than a regulated unit caused the contamination or that the detection is an artifact caused by error in sampling, analysis, or statistical evaluation or natural variation in the ground water. In such cases, the Permittee shall:

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(i) Notify the Director in writing within seven (7) days that he intends to make a demonstration. [OAC 3745-54-98(G)(6)(a)]

(ii) Within 90 days, submit a report to the Director that demonstrates that a source other than a regulated unit caused the contamination, or that the contamination resulted from error in sampling, analysis, or evaluation. [OAC 3745-54-98(G)(6)(b)]

(iii) Within 90 days, submit to the Director an application for a permit change to make any appropriate changes to the detection monitoring program at the facility. [OAC 3745-54-98(G)(6)(c)]

(iv) Continue to monitor in accordance with the detection monitoring program at the facility. [OAC 3745-54-98(G)(6)(d)]

F.10. Request for Permit Change.

If the Permittee or the Director determines the detection monitoring program no longer satisfies the requirements of the regulations, the Permittee must, within 90 days of the determination, submit an application for a permit change to make any appropriate changes to the program that will satisfy the regulations. [OAC 3745-54-98(H)]

F.11. Special Condition for Abandonment of Facility Wells

(a) The Permittee shall maintain all ground water monitoring wells denoted on Figure E-17 of the Permit Application in accordance with the detailed plans and specifications presented in the permit application section E.5.4.

(b) Should any of the wells in condition F.11.(a) that are not listed in Permit Condition F.2 be required to be abandoned, or are shown to no longer be warranted, notification shall be provided in accordance with the Part B permit application section E.5.4. Proposed well plugging and abandonment methods shall be submitted at that time. Well plugging and abandonment certification including actual methods used shall be submitted to the Ohio EPA, Northwest District Office within 30 days from the date the well(s) is removed from the monitoring programs. No well shall be abandoned without prior approval of the Ohio EPA.

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MODULE H - POST-CLOSURE CARE

H.1. MODULE HIGHLIGHTS

At present, the Facility anticipates to clean close all waste management units which are presently in operation. Post-closure care, monitoring and maintenance of these units should not be necessary.

H.2. Unit Identification.

The Permittee shall provide post-closure care for the following hazardous waste management units, subject to the terms and conditions of this permit, and as described as follows:

(a) Surface impoundments 4, 5 and 7 "closed-as-a-landfill" (Closure Cell). The Closure Cell also contains the fixed materials removed from Ponds 11 and 12 which have been clean closed.

(b) Any tank systems which require a contingency post- closure plan and can not be clean closed.

Type of Waste Unit	Unit No. or Other Designation	Maximum Waste Inventory	Description of Wastes Contained	Hazardous Waste. No
Landfill Cell	Closure	119,747 cu yds	Fixed sludge contaminated	See Note 1
		60,638 cu yds	Fixed sludge contaminated clay Pond 5	" "
		39,239 cu yds	Fixed sludge contaminated clay Pond 7	" "
		66,707 cu yds	Fixed sludge contaminated clay Pond 11	" "
		49,808 cu yds	Fixed sludge contaminated clay Pond 12	" "

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Type of Waste Unit	Unit No. or Other Designation	Maximum Waste Inventory	Description of Wastes Contained	Hazardous Waste. No
		6,344 cu yds	Concrete debris Pond 4 & Oil Water Facility	" "
		40 cu yds	Steel Oil Water Facility	" "
		28,018 cu yds	Stone & clay stockpile & retention	" "
		1,024	Tires stockpile	" "
		59,532 sq yds	Geonetting stockpile	" "

NOTE 1: The Closure Cell at the CWM, Vickery facility serves the purpose of final disposal for the materials that have been removed, as part of the approved closure plan, from Ponds 4, 5, 7, 11 and 12. Sludge, contaminated clay and debris from Ponds 4, 5 and 7 was stabilized and stockpiled. The Closure Cell was constructed in the vicinity of where Ponds 4, 5 and 7 had existed. Upon cell construction materials removed from Ponds 4, 5 and 7 were transferred to the Closure Cell. Materials from Ponds 11 and 12 were stabilized in place before transferring to the Closure Cell.

The stabilized materials which are placed in the Closure Cell carry various characteristic and listed hazardous waste codes regulated under RCRA. In addition the stabilized material is a TSCA regulated PCB waste.

Type of Waste Unit	Unit No. or Other Designation	Maximum Waste Inventory	Description of Wastes Contained	Hazardous Waste. No
Tank	T-7(FAT A)	19,313 gl	Filtered acid	See Note 2
Tank	T-8(FAT B)	19,313 gl	Filtered acid	" "

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Type of Waste Unit	Unit No. or Other Designation	Maximum Waste Inventory	Description of Wastes Contained	Hazardous Waste. No
Tank	FAT-1	15,440 gl	Filtered acid	" "
Tank	FAT-5	10,575 gl	Filtered acid	" "
Tank	FAT-2	15,440 gl	Filtered acid	" "
Tank	FAT-3	21,353 gl	Filtered acid	" "
Tank	Lab	2,500 gl	Lab waste Waste Tank	" "

NOTE 2: The following waste codes may have been stored in the tanks.

D001, D003; D002, D004, D005, D006, D007, D008, D009, D010, D011, D013, D014, D015, D016, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, F005, F006, F007, F008, F009, F010, F012, F019, F039, K017, K049, K052, K060, K062, K107, K108, K109, K110, K131, K132, P001, P005, P010, P012, P018, P022, P030, P044, P050, P064, P078, P098, P105, P106, P119, P120, U001, U002, U003, U007, U008, U009, U012, U016, U019, U031, U034, U036, U043, U044, U051, U052, U053, U055, U056, U057, U068, U070, U072, U075, U077, U078, U080, U081, U088, U092, U102, U103, U105, U108, U112, U113, U115, U117, U121, U122, U123, U124, U125, U131, U133, U134, U135, U140, U144, U147, U148, U151, U154, U159, U161, U162, U165, U167, U169, U182, U188, U190, U196, U201, U207, U208, U210, U211, U213, U219, U220, U221, U222, U223, U226, U227, U228, U238, U239, D012, D017, F011, K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K013, K014, K015, K016, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K046, K047, K048, K050, K051, K061, K064, K065, K066, K069, K071, K073, K083, K085, K086, K087, K088, K090, K091, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K111, K112, K113, K114, K115, K116, K117, K118, K123, K124, K125, K126, K136, P002, P003, P004, P006, P007, P008, P009, P011, P013, P014, P015, P016, P017, P020, P021, P023, P024, P026, P027, P028, P029, P031, P033, P034, P036, P037,

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H.3. Secondary Leachate Collection System Monitoring.

The Permittee shall maintain and monitor the Secondary Leachate Collection System, as described in Section E and Reference 27 of the approved permit application.

H.4. Post-Closure Procedures and Use of Property.

(a) The Permittee shall conduct post-closure care for each hazardous waste management unit which may not be clean closed and listed in Permit Condition H.2. above, to begin after completion of closure of the unit and continue for 30 years after that date, except that the 30-year post-closure care period may be shortened upon application and demonstration approved by Ohio EPA that the facility is secure, or may be extended by Ohio EPA if the Director finds this is necessary to protect human health and the environment. [OAC 3745-55-17(A)]

(b) The Permittee shall maintain and monitor the ground-water monitoring system and comply with all other applicable requirements of OAC 3745-54-90 thru 99 and OAC 3745-55-01 & 02 during 745-55-01 & 02 during the post-closure period. [OAC 3745-55-17(A)(1)]

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(c) The Permittee shall comply with the requirements for landfills, as follows: [OAC 3745-57-10(B)]

(i) Maintain the integrity and effectiveness of the final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, or other events;

(ii) Continue to operate the leachate collection and removal system until leachate is no longer detected;

(iii) Maintain and monitor the ground-water monitoring system and comply with all other applicable requirements of OAC 3745-54-90 thru 99 and OAC 3745-55-01 & 02;

(iv) Prevent run-on and run-off from eroding or otherwise damaging the final cover; and

(v) Protect and maintain surveyed benchmarks used in complying with the surveying and recordkeeping requirements of OAC 3745-57-09.

(d) The Permittee shall comply with all security requirements, as specified in the Part B permit application. [OAC 3745-55-17(B)]

(e) The Permittee shall not allow any use of the units designated in Permit Condition H.2. which will disturb the integrity of the final cover, liners, any components of the containment system, or the function of the facility's monitoring systems during the post-closure care period. [OAC 3745-55-17(C)]

(f) The Permittee shall implement the Post-Closure Plan. All post-closure care activities must be conducted in accordance with the provisions of the Post-Closure Plan. [OAC 3745-55-17(D) and OAC 3745-55-18(B)]

H.5. Inspections.

The Permittee shall inspect the components, structures, and equipment at the site in accordance with the Inspection Schedule. [OAC 3745-55-17(A)(1)(b)]

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H.6. Notices and Certification.

(a) No later than 60 days after certification of closure of each permitted hazardous waste disposal unit, the Permittee shall submit to the local zoning authority, or the authority with jurisdiction over local land use, and to the Director a record of the type, location, and quantity of hazardous wastes disposed of within each cell or other disposal unit of the facility. For hazardous wastes disposed of before January 12, 1981, the Permittee shall identify the type, location, and quantity of the hazardous wastes to the best of his knowledge and in accordance with any records he has kept. [OAC 3745-55-19(A)]

(b) Within 60 days of certification of closure of the first and the last hazardous waste disposal unit, the Permittee shall:

(i) Record, in accordance with Ohio law, a notation on the deed to the facility property -- or on some other instrument that is normally examined during the title search -- that will in perpetuity notify any potential purchaser of the property that:

(aa) The land has been used to manage hazardous wastes;

(bb) Its use is restricted under OAC 3745-55-10 thru 20; and

(cc) The survey plat and record of the type, location, and quantity of hazardous wastes disposed of within each cell or other hazardous waste disposal unit of the facility have been filed with the Director and the Sandusky County Recorder.

(ii) Submit a certification to the Director, signed by the Permittee, that he has recorded the notation specified in Permit Condition M.3(b)(i), including a copy of the document in which the notation has been placed. [OAC 3745-55-19(B)]

(c) If the Permittee or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous wastes and hazardous waste residues, the liner, if any; or contaminated soils, then he shall request a change to this post closure permit in accordance with the applicable requirements in Chapter OAC 3745-50. The Permittee or any subsequent owner or operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of OAC 3745-55-17(C). [OAC 3745-55-19(C)]

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(d) No later than 60 days after completion of the established post-closure care period for each hazardous waste disposal unit, the Permittee shall submit to the Director, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan.

The certification must be signed by the Permittee and an independent, registered professional engineer. Documentation supporting the independent, registered professional engineer's certification must be furnished to the Director upon request until the Director releases the Permittee from the financial assurance requirements for post-closure care under OAC 3745-55-45. [OAC 3745-55-20]

H.7. Financial Assurance.

(a) The Permittee shall maintain financial assurance during the post-closure period and comply with all applicable requirements of OAC 3745-55-40 thru 51. [OAC 3745-55-45]

H.8. Post-Closure Permit Changes.

The Permittee must request a permit change to authorize a change in the approved Post-Closure Plan. This request must be in accordance with applicable requirements of Chapter OAC 3745-50, and must include a copy of the proposed amended Post-Closure Plan for approval by the Director. The Permittee shall request a permit change whenever changes in operating plans or facility design affect the approved Post-Closure Plan, there is a change in the expected year of final closure, or other events occur during the active life of the facility that affect the approved Post-Closure Plan. The Permittee must submit a written request for a permit change at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the Post-Closure Plan. [OAC 3745-55-18(D)]

END OF PERMIT CONDITIONS

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CHEMICAL WASTE MANAGEMENT VICKERY
(OHD020273819/03-72-0191)

DRAFT

STATE PART B HAZARDOUS WASTE PERMIT
INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
DECEMBER, 1994

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CHEMICAL WASTE MANAGEMENT VICKERY
(OHD020273819/03-72-0191)

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END OF PERMIT CONDITIONS

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES	*Y/N/NA*	*RMK#*
1. Has the expiration date of the permit passed? If so,	Y	
(a) Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?	Y	
(b) Has the facility submitted an application for a permit renewal to the Director no later than (180) days prior to the expiration date of the permit? (or upon a later date if the Permittee can demonstrate good cause for late submittal) [Condition A.6.(a)]	Y	

NOTE: The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:

i. The Permittee has submitted a timely and complete application for a renewal permit under O.A.C. Rule 3745-50-40, and;

ii. Through no fault of the Permittee, a new permit has not been issued pursuant to O.A.C. Rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit [Condition A.28.]?	Y	
3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit [Condition A.1.(b) and A.5]?	N	
4. Have any provisions of the permit been identified as invalid? [Condition A.4]	N	
5. In circumstances where the Permittee has needed to receive waste from off-site during "off hours" (from 11:00 p.m. to 7:00 a.m.): Has prior notice been provided to Ohio EPA, NWDO? [Condition A.11.]	NA	

	Y/N/NA	RMK#
6. Has the facility identified any instances of noncompliance with the permit, R.C. Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment? If so,	N	
(a) Did the facility report the incident to Ohio EPA's Division of Emergency and Remedial Response within within two hours from becoming aware of the circumstances? [Condition A.21.(a)]	–	
(b) After initial notification, did the facility immediately report to Ohio EPA's Emergency Response Section any subsequent changes in the situation as conditions warranted until such time as all information as required by Condition A.21.(b) was submitted?	–	

NOTE: See Condition A.21.(b) for the specific information the Permittee is required to report.

7. Did the Permittee provide a written report to the Ohio EPA Emergency Response Section and DHWM, NWDO within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.22.]		
If so, did the report contain:	N	
(a) A description of the noncompliance (including exact dates and times)?	Y	
(b) Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and;	Y	
(c) Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?	Y	

NOTE: The Permittee need not comply with the five day written report requirement if the Director, upon good cause shown by the Permittee, waives that requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances. [Condition A.22.(c)]

8. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	Y	

	Y/N/NA	RMK#
9. Has the Permittee identified any other instances of noncompliance not provided for in Question #5?	N	
(a) If so, did the Permittee report these instances to the Ohio EPA, DHWM within (15) days of becoming aware of the noncompliance? [Condition A.23.]	—	
(b) Do the reports provided contain the information set forth in Condition A.21? [Condition A.23.]	—	
(c) Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.]	—	
10. Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?	N	
(a) If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.18.]	—	

NOTE: Such notification does not waive the Permittee's duty to comply with the permit pursuant to Condition A.5. and A.15.

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

	Y/N/NA	RMK#
1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	Y	
2. Has the permit been transferred to a new owner or operator? [Condition A.19.]	N	
(a) If so, has the transfer been conducted in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.19.(a)] and;	—	
(b) Before transferring ownership did the Permittee notify the new owner in writing of the requirements of R.C. Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.19.(a)]	—	

NOTE: The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements. [Condition A.19.(b)]

3. Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? [Condition A.20.]	Y	
4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.]	Y	
5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Y	
6. Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the HWFB? If so,	N	
(a) Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.25.]	—	

	Y/N/NA	RMK#
7. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.15.(c)]	Y	
8. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.15.(c)]	Y	
9. Is the Permittee planning any physical alterations or additions to the permitted unit(s)?	N	
(a) If so, has the Permittee given notice to the Director of such alterations/additions? [Condition A.16.]	–	
(b) Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.16.]	–	

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

	Y/N/NA	RMK#
1. As specified in Condition A.12, has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:		
(a) Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?	Y	
(b) Have access to and copy any records required to be kept under the conditions of the permit?	Y	
(c) Inspect and photograph at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?	Y	
(d) Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734 and the rules adopted thereunder?	Y	

REMARKS

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY	*Y/N/NA*	*RMK#*
1. Has the Permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.27.]	Y	
OPERATING RECORD		
2. Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74 which contains the following elements: [Condition B.29.]		
(a) A description and the quantity of each hazardous waste received?	Y	
(b) Method(s) and date(s) of treatment, storage or disposal at the facility?	Y	
(c) The location of each hazardous waste within the facility and the quantity at each location?	Y	
3. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.30.]		
(a) Waste analysis plan in accordance with O.A.C. Rule 3745-54-13 and the conditions of the permit?	Y	
(b) Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit?	Y	
(c) Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit?	Y	
(d) Post-Closure plan as required by O.A.C. Rule 3745-55-18(A) and the conditions of the permit?	Y	
(e) Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. financial assurance personnel)	Y	
(f) Personnel training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit?	Y	
(g) Inspection schedules developed in accordance with O.A.C. Rules 3745-54-15 and O.A.C. Rule 3745-55-74 and the conditions of the permit?	Y	

	Y/N/NA	RMK#
4. Have any of the documents identified in Question #3 been revised as required by the permit? If so,	Y	
(a) Has the Permittee submitted the revisions to the Ohio EPA? [Condition A.30.(b)]	Y	
(b) Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.30.(b)]	Y	
5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition A.30.(c)]	Y	
ANNUAL REPORT REQUIREMENT		
6. Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77 and the conditions of the permit? [Condition B.32.]	Y	
SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS		
7. In compliance with Condition A.13.(b) of the permit, do the Permittee's records of monitoring information specify the:		
(a) Date(s), exact place(s), time(s) and method(s) of sampling or measurement?	Y	
(b) Individual(s) who performed the sampling or measurement?	Y	
(c) Date(s) analyses were performed?	Y	
(d) Individual(s) who performed the analyses?	Y	
(e) Analytical technique(s) or method(s) used?	Y	
(f) Results of such analyses?	Y	
8. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.13.(a)]	Y	
9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the Permittee? If so,	N	
(a) Have the submittals been signed and certified according to O.A.C. Rule 3745-50-42? [Condition A.14.]	—	

WASTE MINIMIZATION REQUIREMENTS	*Y/N/NA*	*RMK#*
10. Has the Permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.31. of the permit within (180) days of permit journalization?	Y	
(a) Following the first submittal as identified above, has the Permittee submitted biennial updates to this report as required by Condition A.31.(c)?	Y	
11. Has the Permittee submitted to Ohio EPA any Waste Minimization Alternative (WMA) Plan for generators shipping greater than 200 tons of waste to the facility within six months of Ohio EPA's approval of the waste acceptance? [Condition B.5.(a)]	NA	
12. Does the Permittee submit to Ohio EPA, copies of each waste generator's current Waste Minimization Report and Waste Management Alternatives Report as required by the certification on the manifest? [Condition B.5.(b)]	NA	

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

	Y/N/NA	RMK#
1. Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards? [Condition A.17.]	Y	
2. Is the Permittee complying with the following manifest requirements set forth in O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.31.]		
(a) All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 and, if necessary, USEPA form 8700-22A in compliance with O.A.C. Rule 3745-52-20(A)?	Y	
(b) The manifest form used contains all information required by O.A.C. Rule 3745-52-20 and the minimum number of copies required by O.A.C. Rule 3745-52-22?	Y	
(c) The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with O.A.C. Rule 3745-52-20(C)(D)(E)?	Y	
(d) Prepared manifests have been signed by the facility and initial transporter in compliance with O.A.C. Rule 3745-52-23?	Y	
3. Has the Permittee received a return copy of each completed manifest within (35) days of the date the waste was accepted by the initial transporter?	Y	
(a) If not, has the Permittee complied with the manifest exception reporting requirements of O.A.C. Rule 3745-52-42?	—	
4. Has the Permittee discovered a significant discrepancy in a manifest since the date of last inspection? If so,	Y	
(a) Did the Permittee reconcile the discrepancy within (15) days?	Y	
(b) ***If the discrepancy was not reconciled within (15) days:*** Did the Permittee submit a manifest discrepancy report along with a copy of the manifest to the Director in accordance with O.A.C. Rule 3745-54-71? [Condition B.31.(b)]	—	

	Y/N/NA	RMK#
5. Has the Permittee accepted any hazardous waste from off-site without a manifest since the date of last inspection?	N	
(a) If so, did the Permittee submit an unmanifested waste report to the Director within (15) days of receipt of the waste? [Condition B.31.(c)]	–	
6. Are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by O.A.C. Rule 3745-52-40?	Y	
7. Has the Permittee received any hazardous waste on-site from a foreign source? If so,	Y	
(a) Did the Permittee notify the Director in writing at least four weeks in advance as required by O.A.C. Rule 3745-54-12(A)? [Condition B.2.(a)]	Y	

NOTE: Notice of subsequent shipments of waste from the same foreign source in the same calendar year is not required. [Condition B.2.(a)]

8. Has the Permittee received waste from an off-site source? If so,	Y	
(a) Did the Permittee inform the generator that the facility has the appropriate permits to accept the waste which is being shipped? [Condition B.2.(b)]	Y	
(b) Is the Permittee maintaining a copy of the written notice(s) as part of the operating record? [Condition B.2.(b)]	Y	

NOTE: The above requirements are not applicable if the Permittee is also the off-site generator. [See Condition B.2.(b)]

REMARKS

WASTE ANALYSIS REQUIREMENTS

GENERAL REQUIREMENTS	*Y/N/NA*	*RMK#*
1. Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with O.A.C. Chapters 3745-54 to 3745-57 and Condition B.9 of the permit? [3745-54-13(A)(1)]	Y	
2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so,	N	
(a) Were the waste analysis procedures described in Appendix 2 of the approved permit application followed?	—	
3. Is the Permittee following the procedures described in the approved waste analysis plan (Appendix 2 of approved permit application) and the requirements of O.A.C. Rule 3745-54-13? [Condition B.9.]	Y	
WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS		
4. Is the Permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.9.]	Y	
5. In accordance with Condition B.9. of the permit, does the Permittee's quality assurance plan ensure that the Permittee is, at a minimum:		
(a) Maintaining proper functional instruments?	Y	
(b) Using approved sampling/analytical methods?	Y	
(c) Verifying the validity of sampling and analytical procedures and performance of correct calculations?	Y	
6. Does the Permittee use a contract laboratory to perform analysis? If so,	Y	
(a) In accordance with Condition B.9. of the permit, has the Permittee informed the lab in writing that it must operate under the waste analysis conditions as set forth in the permit?	Y	

WASTE ANALYSIS/LDR REQUIREMENTS	*Y/N/NA*	*RMK#*
7. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?	Y	
(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42? [Condition B.49.(h)]	Y	
8. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?	Y	
If so, does the treatment facility test its waste treatment residues according to the following requirements:		
(a) ***For wastes with treatment standards expressed as a concentration in the <u>waste extract</u> (a CCWE standard found in O.A.C. Rule 3745-59-41):***		
Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B)(1); Condition D.49.(f)]	NA	
(b) ***For wastes with treatment standards expressed as concentrations in the <u>waste</u> (a CCW standard found in Rule 3745-59-43):***		
Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B)(3); Condition D.49.(i)]	NA	
9. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?	NA	
(a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B)]	NA	

NOTE: Permit conditions relating to the Waste Product Review (WPR) process were not included in the permit because the requirements of the WPR process for the facility are outlined in the May 22, 1984 Consent Decree. All WPA approvals expire on the last day of the thirteenth month from the date of Ohio EPA approval [Condition B.4.]

NITRIC ACID WASTE STREAM/SPECIAL REQUIREMENTS	*Y/N/NA*	*RMK#*
10. Upon receipt of nitric acid waste streams at the facility, is the Permittee complying with the following procedures as outlined in Condition B.8.:		
(a) The lab heats the load sample and designated receiving tank sample to 120 degrees F before the compatibility test is conducted?	NA	
(b) Prior to blending nitric acid streams, approval is obtained from the lab manager or his/her qualified designee?	Y	
i. *If an approval signature cannot be obtained prior to blending:* The verbal approval of the lab manager or designee is obtained and the Waste Compatibility Worksheet is signed the next working day?	Y	

ACCEPTANCE OF "P" WASTE CODES

11. Has the Permittee received approval from Ohio EPA prior to receipt of any "P-coded" waste streams in accordance with ORC 3734.141 and Condition B.7. of the permit?	Y	

NOTE: The Permittee may only accept P-coded waste streams that follow the derived from or carry through provisions or that the Permittee can render innocuous prior to deep well injection. Approval of a waste stream by Ohio EPA as part of the Waste Product Review satisfies all notification requirements of ORC 3734.141. [Condition B.7.]

NEW PROTOCOLS/WASTE ANALYSIS

12. Has the Permittee notified Ohio EPA, NWDO prior to administering any new protocol in the waste analysis plan? [Condition B.6.]	Y	

REMARKS

GENERAL INSPECTION REQUIREMENTS

	Y/N/NA	RMK#
1. Is the Permittee following the inspection procedures and schedules described in Appendix 3 of the approved permit application and the requirements of O.A.C. Rule 3745-54-15? [Condition B.11.]	Y	
2. Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [O.A.C. Rule 3745-54-15(A)(1)(2)]	Y	
3. Is the Permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in O.A.C. Rule 3745-54-15(1)?	Y	
(a) Is the schedule kept at the facility? [O.A.C. Rule 3745-54-15(B)(2)]	Y	
(b) Does the schedule identify the types of problems which are to be looked for during the inspection? [O.A.C. Rule 3745-54-15(B)(3)]	Y	
(c) Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [O.A.C. Rule 3745-54-15(B)(4)]	Y	
4. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection as required by O.A.C. Rule 3745-54-15(C)? [Condition B.11.]	Y	
5. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.11.]	Y	
6. In accordance with O.A.C. Rule 3745-54-15(D) and Condition B.11. of the permit, do inspection records contain the following information:		
(a) Date and time of inspection?	Y	
(b) Signature of inspector?	Y	
(c) Notation of observations made?	Y	
(d) Date/nature of any repairs or other remedial actions?	Y	

SECURITY PROVISIONS/FACILITY OPERATION

	Y/N/NA	RMK#
1. Is the Permittee complying with the security provisions of O.A.C. Rule 3745-54-14 and Section F of the approved permit application, including the following: [Condition B.10.]		
(a) Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility, or;	Y	
(b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility, or;	Y	
(c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?	Y	
2. In accordance with O.A.C. Rule 3745-54-14(C), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.10.]	Y	
3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil ground or surface waters? [Condition B.1.(a)]	Y	
4. Is the Permittee maintaining adequate aisle space to allow for the unobstructed movement of equipment and personnel through the facility in the event of an emergency as required by O.A.C. Rule 3745-54-35? [Condition B.17.]	Y	

REMARKS

PERSONNEL TRAINING

	Y/N/NA	RMK#
1. Is the facility conducting personnel training in accordance with Section H, Appendix 5 of the approved permit application and the following requirements of O.A.C. Rule 3745-54-16: [Condition B.12.]	Y	
(a) The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [O.A.C. Rule 3745-54-16(A)(B)(C)]	Y	
(b) The facility provides personnel training to new employees within 6 months after their date of employment as required by O.A.C. Rule 3745-54-16(B)?	Y	
(c) The facility provides an annual refresher training course as required by O.A.C. Rule 3745-54-16(B)?	Y	
2. Is the Permittee maintaining personnel training records as required by O.A.C. Rule 3745-54-16(D) and of the approved application, including; written job titles, job descriptions and documented employee training records? [Condition B.12.]	Y	

REMARKS

REQUIRED EQUIPMENT

	Y/N/NA	RMK#
1. Is the Permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Sections F and G and Appendix 4) at the facility? [Condition B.14.]	Y	
2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in O.A.C. Rule 3745-54-33, the inspection plans and the approved permit application? [Condition B.15.]	Y	
3. Whenever hazardous waste is being managed at the facility, has the Permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by O.A.C. Rule 3745-54-34 and Section F of the approved permit application? [Condition B.16.]	Y	

REMARKS

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES	*Y/N/NA*	*RMK#*
1. In compliance with Condition B.18.(a), does the Permittee:		
(a) Familiarize the emergency response agencies likely to respond to an emergency at the facility with:		
i. The layout of the facility?	Y	
ii. Properties of hazardous waste managed at the facility and associated hazards?	Y	
iii. Places where facility personnel will normally be working?	Y	
iv. Entrances to and roads inside the facility?	Y	
v. Evacuation routes as depicted in Section G of the permit application?	Y	
(b) Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit? and;	Y	
(c) Familiarize local ambulance services, fire depts., hospitals and any other local emergency services with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions or a release of hazardous wastes at the facility?	Y	
EMERGENCY AUTHORITIES		
2. Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? If so,	N	
(a) Has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.18.(b)]	—	
3. Has the Permittee, in accordance with O.A.C. Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18.(c)]	Y	
4. Has the Permittee notified the agencies in Question #1, in writing, within (10) days of the effective date of any amendments or revisions to the plan? [Condition B.18.(c)]	Y	

	Y/N/NA	RMK#
5. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with O.A.C. Rule 3745-54-53? [Condition B.18.(d)]	Y	
EMERGENCY COORDINATOR		
6. In accordance with O.A.C. Rule 3745-54-55 and Condition B.25. of the permit, is an emergency coordinator on premises or on call at all times?	Y	
7. In accordance with O.A.C. Rule 3745-54-55 and Condition B.25. of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:		
(a) Contingency plan?	Y	
(b) Facility layout?	Y	
(c) Waste characterization and locations?	Y	
(d) Locations of all records in the facility?	Y	
8. In accordance with O.A.C. Rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.25.]	Y	
CONTENT OF CONTINGENCY PLAN		
9. Does the Permittee have a contingency plan for the facility which contains the following elements as required by Condition B.21. and O.A.C. Rule 3745-54-52:		
(a) Describes the actions facility personnel shall take to comply with O.A.C. Rules 3745-54-51 through 3745-54-56 in response to fires, explosions or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	Y	
(b) Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team?	Y	
(c) Includes an up-to-date list of names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?	Y	
(d) Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?	Y	

AMENDMENT OF PLAN | *Y/N/NA* | *RMK#*

10. Is the Permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with O.A.C. Rule 3745-54-54? [Condition B.23.] — Y

NOTE: Also see Question #4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with O.A.C. Rule 3745-50-51.

IMPLEMENTATION OF PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.20. of the permit? If so, — Y

    (a) Did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in O.A.C. Rule 3745-54-56? [Condition B.20.] — N

    (b) Did the Permittee collect and manage released material, emergency response material and by-products [unless making a demonstration that such waste is not hazardous in accordance with O.A.C. Rules 3745-51-03(C) and (D)]? [Condition B.22.] — Y

    (c) Within (15) days of the incident did the Permittee submit, to the Director, a written report of the incident? If so, — Y

        i. Did the report contain the elements set forth in O.A.C. Rule 3745-54-56(J)? [Condition B.30.] — Y

    (d) Did the Permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.30.] — Y

ADDITIONAL REQUIREMENTS

12. Is the Permittee following the Surface Water Management Plan as outlined in Section F.3.8. of the approved application? [Condition B.19.] — Y

13. *Prior to initiating any new waste management procedures which vary from normal operations:* Did the Permittee notify Ohio EPA, NWDO and submit a feasibility study demonstrating the applicability of the proposed procedure? [Condition B.26.] — Y

CLOSURE REQUIREMENTS

GENERAL CLOSURE REQUIREMENTS	*Y/N/NA*	*RMK#*
1. Is the Permittee maintaining at the facility, the approved closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12? [Condition B.36.]	Y	
AMENDMENT OF CLOSURE PLAN		
2. Has the Permittee amended the closure plan?	Y	
(a) If so, has the plan been amended in accordance with O.A.C. Rule 3745-55-12(C)? [Condition B.35.]	Y	

NOTE: Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with O.A.C. Rule 3745-50-51.

CLOSURE PROCEDURES		
3. Has the Permittee closed the facility? If so,	N	
(a) Was closure conducted in accordance with the closure performance standard of O.A.C. Rule 3745-55-11 and the approved closure plan as set forth in the permit application? [Conditions B.33., B.34.]	—	
(b) *Within 120 prior to closure:* Did the Permittee submit to Ohio EPA, NWDO a sampling and analysis plan (SAP) for obtaining background sample data? [Condition B.37.(b)]	—	
(c) After receiving the final volume of hazardous waste, did the Permittee remove from the facility all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by O.A.C. Rule 3745-55-13? [Condition B.38.]	—	
(d) Has the Permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by O.A.C. Rule 3745-55-14 and the approved closure plan? [Condition B.39.(a)]	—	
(e) Did the Permittee notify Northwest District Office, OEPA within five (5) working days prior to all rinseate and soil sampling? [Condition B.39.(b)]	—	
(f) Has the Permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.40.]	—	

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

	Y/N/NA	RMK#
1. Is the Permittee in compliance with the requirements of O.A.C. Rule 3745-54-17 (for ignitable, reactive and incompatible wastes), the approved application and conditions of the permit? [Condition B.13.(a)]	Y	
2. Does the Permittee provide electrical grounding for all containers and tanks during the handling of ignitable, reactive and incompatible wastes? [Condition B.13.(b)]	Y	
3. Does the Permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and combustible wastes? [Condition B.13.(c)]	Y	
4. Does the Permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.13.(d)]	Y	
5. Where applicable, does all wiring and electrical equipment at the container storage building meet the National Fire Protection Association, "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp. 176 through 189.)? [Condition B.13.(e)]	Y	

REMARKS

TANK SYSTEM REQUIREMENTS

A description of the Permittee's tank system operations including the; Integrated Aqueous Waste Treatment System (IAWTS), truck unloading operation, waste storage/treatment system, filtration operations, pump houses and yard piping is included in Module D of the permit.

Existing tanks at the facility are: T-1, T-2, T-5, T-6, T-9, T-10, T-22, T-23, T-24 and T-25. [Condition D.4.(a)]

New tanks at the facility are: T-94, T-95, T-96 and T-98. Proposed replacement tanks are T-7, T-8, T-19, T-300, T-400 and T-600. [Condition D.4.(b)]

GENERAL REQUIREMENTS	*Y/N/NA*	*RMK#*
1. Is the Permittee limiting the total volume of waste managed in the tank systems to the maximum volume for each tank as authorized by Condition D.2.?	Y	
2. Does the Permittee store and treat in tanks only those hazardous wastes as specified in the approved Part B permit application and Condition D.2. of the permit?	Y	
3. Does the Permittee have on-file a written statement by a qualified, independent, registered professional engineer stating the **existing tanks** are suitable for handling hazardous wastes? [Condition D.4.(a)]	Y	
4. Does the Permittee have on-file a written statement by a qualified, independent, registered professional engineer stating the **new tanks** are suitable for handling hazardous wastes? [Condition D.4.(b)]	Y	
SECONDARY CONTAINMENT REQUIREMENTS		
5. ***For existing tanks with secondary containment:*** Is the secondary containment system for each tank system designed, installed and operated in accordance with O.A.C. rule 3745-55-93 and the terms and conditions of the permit? [Condition D.3.(b)]	Y	
INTEGRITY ASSESSMENT/ANNUAL LEAK TESTS		
6. For tank systems without secondary containment, is the Permittee complying with the following requirements:		
(a) Did the Permittee obtain an annual leak test (or use some other integrity method) for ancillary equipment? [Condition D.3.(c)(i)]	N/A	

	Y/N/NA	RMK#
(b) *For any tank system components found to be leaking or unfit for use:* Did the Permittee comply with Permit Condition D.5 and notify the Director of the incident as required by Condition D.7.? [Condition D.3.(c)(ii)]	NA	
(c) *For all existing tanks without secondary containment:* Did the Permittee obtain a written assessment of each unit by a professional engineer? [Condition D.3.(a)]	Y	
GENERAL OPERATING REQUIREMENTS		
7. Does the Permittee prevent the placement of hazardous waste in the tank if such placement could cause the unit to leak or fail? [Condition D.5.(a)]	Y	
8. Does the Permittee use appropriate controls and practices to prevent spills or overflows from the tank in accordance with Condition D.5.(b) of the permit?	Y	
9. Has a leak or spill occurred from the tank? If so,	N	
(a) Did the Permittee follow the emergency procedures as required by O.A.C. rule 3745-55-96 and Condition D.6. of the permit?	–	
(b) Did the Permittee report the leak/spill to the Director in accordance with the procedures as outlined in Condition D.8. of the permit?	✓	
INSPECTIONS		
10. Is the Permittee inspecting the tank system in accordance with the approved inspection plan, Condition D.7. of the permit, and the following requirements of O.A.C. Rule 3745-55-95:		
(a) Inspection of overfill controls in accordance with the procedures and schedule in the Part B permit application?	Y	
(b) Daily inspection of the above ground portion of the tank system to detect corrosion or release?	Y	
(c) Daily inspection of construction materials and area immediately surrounding the tank to detect erosion or signs of release?	Y	
(d) Reviewing data gathered from monitoring and leak detection equipment (e.g. pressure/temperature gauges) to ensure that the tank system(s) are being operated according to design specifications?	Y	

	Y/N/NA	RMK#
11. Is the Permittee maintaining documentation of the tank system inspections in the operating log of the facility as required by O.A.C. Rule 3745-55-95(D)? [Condition D.7.(d)]	Y	

TANK SYSTEM/SPECIAL REQUIREMENTS

12. ***Prior to placement of hazardous waste in tanks that previously held an incompatible waste and/or material:*** Does the Permittee ensure that the tank system is decontaminated prior to placement of waste in the unit and that any additional procedures as outlined in the permit application are followed? [Conditions D.11.(a) and D.11.(b)]	Y	
13. ***Prior to the placement of ignitable or reactive waste in a tank system:*** Does the Permittee ensure that the procedures as specified in the approved permit application are followed? [Condition D.10.(a)]	Y	
14. Does the Permittee document compliance with the requirements specified in Questions 12 and 13 as noted above in the facility's operating record? [Conditions D.11.(b), D.10.(b)]	Y	

NOTE: The Permittee is also responsible for maintaining protective distances between waste management areas and public ways as required by Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) incorporated by reference in O.A.C. Rule 3745-50-11. [Condition D.10.(b)]

CLOSURE AND POST-CLOSURE

15. At closure of the tank system, did the Permittee follow the procedures set forth in the approved closure plan? [Condition D.9.(a)]	NA	
16. ***During closure, if the Permittee could not demonstrate that all contaminated soils could be removed:*** Did the Permittee close the unit and perform post-closure care following a plan approved by the Ohio EPA? [Condition D.9.(b)]	NA	

REMARKS

MISCELLANEOUS TREATMENT REQUIREMENTS
FILTRATION

The filtration units have been categorized as miscellaneous units and include; grit filters, basket strainers, press filters, leaf filters and guard filters. These individual units may either be used in series or in parallel. [Condition E.1.]

GENERAL REQUIREMENTS	*Y/N/NA*	*RMK#*
1. Does the Permittee ensure that no more than 126,000,000 gallons of waste is processed per year through the treatment system? [Condition E.2.]	Y	
2. Does the Permittee ensure that no more than 650,000 gallons of waste is processed per day through the treatment system? [Condition E.2.]	Y	
3. Does the Permittee provide adequate containment in the filter press area(s) for purposes of collecting liquid residues which may be generated from filter press operations? [Condition E.3.]	Y	
4. Are the filter presses operated as described in Section D.2.3. of the approved permit application? [Condition E.4.]	Y	
(a) Are the filter presses operated to minimize fugitive emissions to the atmosphere during dumping of the filter cake? [Condition E.4.]	Y	
(b) Does the Permittee clean up the floor area immediately after removing the filter cake? [Condition E.4.]	Y	
5. Does the Permittee dispose or recycle the filter cake and other residues generated as a result of filtration operation at a RCRA approved facility? [Condition E.5.]	Y	

REMARKS

SURFACE IMPOUNDMENT REQUIREMENTS
POST-CLOSURE CARE

The Permittee is currently required to perform post-closure care for the Closure Cell. The Closure Cell was constructed in the vicinity of where Ponds 4, 5 and 7 had existed. Upon cell construction, materials removed from Ponds 4, 5 and 7 were transferred to the Closure Cell. Materials from Ponds 11 and 12 were stabilized in place before transferring to the Closure Cell.

The renewal of the surface impoundment portion of the permit reflects the storage, treatment and disposal volumes of Ponds 4, 5, 7, 11 and 12 and other miscellaneous on and off-site construction debris and is included for purposes of accomplishing post-closure activities. The units have been certified by an independent engineer (Appendix I-(A)) as being closed in accordance with the approved closure plan. The approved Part B permit application as submitted to Ohio EPA on October 25, 1988 and last updated on August 31, 1993 is incorporated into the permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern. [See Condition H.2. and Condition A.1.(a)]

GENERAL POST-CLOSURE REQUIREMENTS	*Y/N/NA*	*RMK#*
1. Is the Permittee maintaining the secondary leachate collection system as described in Section E and Reference 27 of the approved permit application? [Condition H.3.]	Y	
2. During the period of post-closure care, is the Permittee maintaining a groundwater monitoring system in accordance with OAC rule 3745-54-90 through 3745-54-99? [Conditions H.4.(b), (c)(iii)]	Y	
3. Is the Permittee maintaining the integrity and effectiveness of the final cover, including making any necessary repairs to the cap? [Condition H.4.(c)(i)]	Y	
4. *While leachate is still being detected:* Is the Permittee continuing operation of its leachate collection and removal system? [Condition H.4.(c)(ii)]	Y	
5. Does the Permittee prevent run-on and run-off from eroding or otherwise damaging the final cover? [Condition H.4.(c)(iv)]	Y	
6. Does the Permittee protect and maintain surveyed benchmarks? [Condition H.4.(c)(v)]	Y	
7. Is the Permittee complying with the security requirements for the unit(s) in post-closure as specified in the permit application? [Condition H.4.(d)]	Y	

	Y/N/NA	RMK#
8. Is the Permittee preventing any use of the unit(s) in post-closure care in a manner which would contribute to damage to the final cover, liner or any other system components? [Condition H.4.(e)]	Y	
9. Is the Permittee conducting post-closure care activities in accordance with the post-closure plan and O.A.C. Rules 3745-55-17(D) and 3745-55-18(B)? [Condition H.4.(f)]	Y	
10. Is the Permittee conducting post-closure care inspections of the structures and equipment in accordance with the approved inspection schedule and O.A.C. Rule 3745-55-17 (A)(1)(b)? [Condition H.5.]	Y	

NOTE: Any changes to the post-closure plan must be completed in accordance with Condition H.8. of the permit.

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION	*Y/N/NA*	*RMK#*
1. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; Condition B.49.(c)]		
(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?	N	
(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?	N	
(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35?	N	
(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?	N	

NOTE: If the answer to any of the Questions 1(a) through 1(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 [Condition B.49.].

Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final Rule preamble for additional information.

WASTE EVALUATION REQUIREMENTS		
2. Has the facility adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); Condition B.49.(e)]	Y	
(a) ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); Condition B.49.(e)]	Y	
(b) ***For determinations based upon analytical testing:*** Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); Condition B.49.(j)]	Y	
3. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); Condition B.49.(e)]	Y	

	Y/N/NA	RMK#
4. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); Condition B.49.(e)]	Y	
5. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Y	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24?	Y	
(b) ***For listed wastes which also exhibit a characteristic:*** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A)]	Y	

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B)]

NOTIFICATION/CERTIFICATION

6. ***For wastes that do not meet treatment standards:*** Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); Condition B.49.(j)]	Y	
If so, does the notification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); Condition B.49.(j)]	Y	
(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); Condition B.49.(j)]	Y	
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); Condition B.49.(j)]	Y	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); Condition B.49.(j)]	Y	
7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); Condition B.49.(j)]	Y	

	Y/N/NA	RMK#
8. *For wastes that meet treatment standards:* Does the Permittee submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); Condition B.49.(j)]	NA	
If so, does the notice/certification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A)(2)(a)(i); Condition B.49.(j)]		
(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07 (A)(2)(a)(ii); Condition B.49.(j)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); Condition B.49.(j)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); Condition B.49.(j)]		
(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07 (A)(2)(b); Condition B.49.(j)]		
9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A)(2); Condition B.49.(j)]	NA	
10. Does the Permittee retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A)(6); Condition B.49.(j)]	Y	

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E)]

	Y/N/NA	RMK#
11. Is the owner/operator storing land disposal restricted wastes in tanks? If so, in accordance with O.A.C. Rule 3745-59-50 (A)(2)(b) and Condition B.49.(l):		
(a) Is each tank clearly marked with a description of the contents, the quantity of each waste received and the period accumulation began, or;	Y	
(b) Is such information being maintained in the operating record for the facility?	Y	
12. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	N	
(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); Condition B.49.(n)]	NA	

ADDITIONAL LDR REQUIREMENTS

13. Has the Permittee prepared and maintained a current list of hazardous waste codes handled by the facility that are identified in O.A.C. Rules 3745-59-30 through 3745-59-35? [Condition B.49.(d)]	Y	
(a) Does the list include all waste codes handled by the facility and any associated treatment standards? [Condition B.49.(d)]	Y	
(b) When new or amended LDR treatment standards have been promulgated: Has the Permittee updated the list? [Condition B.49.(d)]	Y	
(c) Has the list been provided by Ohio EPA as required by O.A.C. Rule 3745-50-51? [Condition B.49.(d)]	Y	

NOTE: *The Permittee is prohibited from ~~storage~~ storing any liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm unless the waste is stored in an area which meets the requirements of 40 CFR 761.65(b) and (c). Condition B.38.(n) above which allows for storage over one year with specified demonstration does not apply to PCB waste prohibited under O.A.C. Rule 3745-59-32. [Condition B.49.(o)]*

ADDITIONAL PERMIT CONDITIONS

COMPLIANCE SCHEDULE/DOCUMENTS	*Y/N/NA*	*RMK#*
1. Prior to managing any hazardous waste in any new portions of the facility, did the Permittee submit the following documents in accordance with Condition A.29 of the permit to the Ohio EPA:		
(a) *At least (30) days prior to commencing construction:* All relevant detailed final design and construction plans?	NA	
(b) A schedule of the construction, including the estimated starting and completion dates?	NA	
(c) *Upon completion of construction:* A "certificate of use and occupancy" issued by the Building Official in accordance with OAC rule 4101:2-1-27 and a certification stating that the facility has been constructed in accordance with all applicable rules, permit conditions and building codes?	NA	
(d) *Within (60) days after completion of construction:* A copy of the "as built" drawings?	NA	
(e) The Certification of Construction documents required by Condition A.24. of the permit?	NA	

NOTES: The final design and construction plans mean final design and specifications necessary for commencement of the construction, as approved by the Building Official in accordance with OAC Rule 4101:2-1-23 (including ancillary equipment, blue prints, material of the construction, etc.). [Condition A.29.(b)(i)(aa)]

If the final plans submitted are inconsistent with the conceptual and/or preliminary plans contained in the approved Part B permit application, such submittal may be considered by Ohio EPA as information constituting a change to the permitted facility, requiring issuance of a revised/modified permit. [Condition A.29.(b)(ii)]

	Y/N/NA	RMK#
2. Did the Permittee submit the following tank system information to Ohio EPA in accordance with Condition A.29.(c) of the permit:		
(a) *Within (60) days prior to installation:* Tank data sheets for tanks T-94, T-95, T-96, T-98, T-7, T-8, T-19, T-300, T-400 and T-600?	NA	
(b) *Within (60) days prior to installation:* Demonstration that secondary containment meets requirements of rule OAC 3745-55-93 for tanks T-94, T-95, T-96, T-98, T-7, T-8, T-19, T-300, T-400 and T-600?	NA	
(c) *Within (60) days after the effective date of the permit:* Documentation of the age of tanks T,7-, T-8, T-19, T-300, T-400, T-600 and the lab waste tank?	NA	
(d) *Within (60) days after the effective date of the permit:* A contingent post-closure plan for the tank systems as required by OAC rule 3745-55-97?	NA	
GROUNDWATER DOCUMENTATION		
3. *Within (60) days of permit journalization:* Did the Permittee revise and submit page E-63 by striking our reference to WMI procedures (WMI Manual for Groundwater Sampling)? [Condition A.29.(d)]	NA	
4. *Within (60) days of permit journalization:* Did the Permittee revise and submit Section E.6.0 to include procedures and techniques for measurement of groundwater levels, field measurements, sample collection, chain of custody and any other pertinent aspects of sampling of the capillary drain? [Condition A.29.(e)]	NA	
5. *Within (60) days of permit journalization:* Did the Permittee revise and submit section E.6.0 by updating Tables E-8, E-9 and E-10 and providing any other necessary changes to reflect changes made in PQLs (See Condition F.3.(a))? [Condition A.29.(f)]	NA	

REMARKS

RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST

Company: Waste Management of Ohio EPA ID#: OHD 020273819

Street: 3956 St. Rt. 412 City: Vickery

County: Sandusky State: Ohio Zip: 43464

Mailing Address: _____
(If different from above)

Telephone: 419. 547. 7791 Fax #: _____

Owner/ Operator: _____
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): March 14 + 15 2000 Time(s): _____

Inspection Announced? ____ Yes X NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Dave Schill	OEPA	
	Jason Romp	OEPA	
Facility Representative:	Jim Otharson	OEPA	
	Sandy Clark	WMO	
	Robin Wuertz	WMO	

Generator Classification	Waste Management Activity
____ Conditionally Exempt SQG (CESQG)	____ Containers
____ Small Quantity Generator (SQG)	X Tank(s)
X Large Quantity Generator (LQG)	____ Other (specify)
____ No Generation	

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ___ No___N/A ___RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

      - ❑ A change in the <u>process</u> resulting in less waste.
      - ❑ A change in the <u>product</u> resulting in less waste.
      - ❑ Use of fewer and less toxic hazardous raw materials.
      - ❑ Better operations/improved housekeeping.
      - ❑ On-site recycling/reuse of hazardous materials.
      - ❑ Sending waste off-site for recycling/reuse.
      - ❑ Other activities (specify): _____

      _____

   b. ***If so,*** what hazardous wastes have been addressed?

- ❑ Solvents
- ❑ Paint related wastes
- ❑ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ❑ Contaminated oils/hydraulic fluids
- ❑ Off-spec chemicals
- ❑ Fluorescent light bulbs
- ❑ Used batteries
- ❑ Shop rags
- ❑ Other (specify): _____

_____

c. ***If not,*** why hasn't the company considered P2?

- ❑ The company just never thought about it
- ❑ Lack of information about practical alternatives
- ❑ Lack of capital to make process changes
- ❑ Lack of internal management support
- ❑ The company does not generate enough hazardous waste to consider P2
- ❑ Other reason given (specify): _____

_____

2. Does the company plan to do P2 activities in the future? Yes___ No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes ___No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes ___No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No___ N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the <u>Pollution Prevention Assessments for Hazardous Waste Generators</u> document and discuss it with them.

6. If the company does not want a P2 assessment, why not?

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes ✓ No ☐ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes ✓ No ☐ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes ✓ No ☐ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes ✓ No___ N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ✓ No ☐ N/A ___ RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ✓ No ☐ N/A ___ RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ☐ N/A ✓ RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ✓ No ☐ N/A ___ RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ✓ No ☐ N/A ___ RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No ✓ N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ☐ N/A ✓ RMK#___

c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: ***If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]***

REMARKS

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes ✓ No___

If the answer is no, show them what the statement says using a signed manifest.

NOTE: ***While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.***

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes ✓ No ☐ N/A ___RMK#___

2. Have item 1 and items (2) through (20) of each manifest been completed? [3745-52-20(B)] — Yes ✓ No ☐ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, item R and items (21) through (35) must also be completed. [3745-52-20(B)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(C)] — Yes ✓ No ☐ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(D)].***

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes ✓ No___ N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(E)] — Yes ✓ No ☐ N/A ___RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes ✓ No ☐ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes ✓ No___ N/A ___RMK#___

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes ___ No ☐ N/A ✓ RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ___ No ☐ N/A ✓ RMK#___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes ✓ No ☐ N/A ___ RMK#___

REMARKS

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-59-07(A)] If so: Yes ✓ No ❑ N/A ___RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-59-07(A)(5)] Yes ✓ No ❑ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-59-07(A)(5)] Yes ___ No ❑ N/A ✓ RMK#___

2. Does the generator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-59-03] Yes ✓ No ❑ N/A ___RMK#___

3. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-59-09(A)] Yes ✓ No ❑ N/A ___RMK#___

4. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-59-07(A)] Yes ✓ No ❑ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-59-07(A)] Yes ✓ No ❑ N/A ___RMK#___

6. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-59-09] If so: Yes ✓ No___ N/A ___RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-59-09(A)] Yes ✓ No ❑ N/A ___RMK#___

NOTE: ***The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC 3745-59-09(B)]***

7. Does the generator have LDR notification (and certification, where applicable) forms for each shipment of waste? [3745-59-07(A)(1) and (A)(2)] Yes ✓ No ❑ N/A ___RMK#___

8. Does each notification/certification form completed contain the following information? [3745-59-07(A)(1) and (A)(2)]

a. EPA hazardous waste codes for each waste? Yes ✓ No ❑ N/A ___ RMK#___

b. Appropriate treatment standards for each waste? Yes ✓ No ❑ N/A ___ RMK#___

c. The manifest number? Yes ✓ No ❑ N/A ___ RMK#___

d. Waste analysis data, where available? Yes ✓ No ❑ N/A ___ RMK#___

e. Certification signed by the generator or an authorized representative? (for wastes meeting treatment standards only) Yes ✓ No ❑ N/A ___ RMK#___

9. Does the generator produce a waste that is hazardous at the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-59-07(A)(6)] If so: Yes___ No ✓ N/A ___ RMK#___

a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the waste? [3745-59-07(A)(6)] Yes ✓ No ❑ N/A ___ RMK#___

NOTE: ***Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit, and any characteristic hazardous waste that is rendered nonhazardous via mixing or treatment.***

10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [3745-59-07(A)(7)] Yes ✓ No ❑ N/A ___ RMK#___

11. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes nonhazardous? If so: Yes___ No ✓ N/A ___ RMK#___

a. Are treated waste(s) sent to a licensed solid waste disposal facility? If so: Yes ___ No ❑ N/A ✓ RMK#___

i. Does the generator submit a notification and certification to the Director which contains the following:

1. Name and address of the facility receiving the waste? [3745-59-09(D)(1)(a)] Yes ___ No ❑ N/A ✓ RMK#___

2. A description of the waste, including EPA hazardous waste numbers and treatability group? [3745-59-09(D)(1)(b)] — Yes ___ No ❑ N/A ✓ RMK#___

3. The treatment standards applicable to the waste at the initial point of generation? [3745-59-09(D)(1)(c)] — Yes ___ No ❑ N/A ✓ RMK#___

ii. Is the certification signed by an authorized representative and does it contain the language in OAC 3745-59-07(B)(5)(a)? [3745-59-09(D)(2)] — Yes ___ No ❑ N/A ✓ RMK#___

NOTE: ***An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by OAC 3745-50-10.***

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ✓ No ❑ N/A ___ RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ✓ No ❑ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ✓ No ❑ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ✓ No ❑ N/A ___ RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes ✓ No ❑ N/A ___ RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes ✓ No ❑ N/A ___ RMK#___

   b. Emergency equipment? Yes ✓ No ❑ N/A ___ RMK#___

   c. Emergency systems? Yes ✓ No ❑ N/A ___ RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ✓ No ❑ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes ✓ No ❑ N/A ___RMK#___

c. Communication or alarm system? Yes ✓ No ❑ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes ✓ No ❑ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes ✓ No ❑ N/A ___RMK#___

f. Shutdown procedures? Yes ✓ No ❑ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ✓ No ❑ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ✓ No ❑ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ✓ No ❑ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ✓ No ❑ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ✓ No ❑ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	Name of Employee	Date(s)Trained

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes ✓ No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes ✓ No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes ✓ No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes ✓ No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] — Yes ✓ No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes ✓ No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes ✓ No ☐ N/A ___ RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes ✓ No ☐ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No ✓ N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A ___RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A ___RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A ___RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes ✓ No ☐ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes ✓ No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes ✓ No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes ✓ No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) on a weekly basis and maintained as necessary? [3745-65-33] — Yes ✓ No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log that includes the following information: [3745-65-33(B)]

   a. Date and time of test? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Name of person conducting the test? — Yes ✓ No ☐ N/A ___ RMK#___

   c. Observations made? — Yes ✓ No ☐ N/A ___ RMK#___

   d. Date/nature of any repairs? — Yes ✓ No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes ✓ No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes ✓ No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes ✓ No ☐ N/A ___ RMK#___

a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)]

Yes ___ No ❑ N/A ✓ RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No ✓ N/A ___ RMK#___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes ✓ No ☐ N/A ___ RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes ✓ No___ N/A ___ RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes ✓ No ☐ N/A ___ RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes ✓ No ☐ N/A ___ RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No ✓ N/A ___ RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A ✓ RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A ✓ RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes ✓ No ☐ N/A ___ RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ✓ No ☐ N/A ___RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ✓ No ☐ N/A ___RMK#___

   b. In good condition? [3745-66-71] Yes ✓ No ☐ N/A ___RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] Yes ✓ No ☐ N/A ___RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ✓ No ☐ N/A ___RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* Yes ✓ No ☐ N/A ___RMK#___

8. Are inspections described in Question No. 7 recorded in a log which contains the following information: [3745-66-74(B)]

   a. Date and time of inspection? Yes ✓ No ☐ N/A ___RMK#___

   b. Name of inspector? Yes ✓ No ☐ N/A ___RMK#___

   c. Observations made during the inspection? Yes ✓ No ☐ N/A ___RMK#___

   d. Date/nature of any repairs or remedial action? Yes ✓ No ☐ N/A ___RMK#___

9. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ✓ No ☐ N/A ___RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes ✓ No ☐ N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

10. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes ✓ No ☐ N/A ___RMK#___

11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ✓ No ☐ N/A ___ RMK#___

12. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ✓ No ☐ N/A ___ RMK#___

REMARKS

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

. Specify the type of tank system(s) used for hazardous waste management and if secondary containment (where required) has been provided:

NOTE: ***New Tank System - Installation commencing after July 14, 1986.***
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

(a) New tank system(s)? [3745-66-93(A)(1)] ***If so,***	Yes ✓	No___	N/A___	RMK#___
i. Has secondary containment been provided?	Yes ✓	No___	N/A___	RMK#___
(b) Existing tank system(s) used to manage: F020, F021, F022, F023, F026 or F027? [3745-66-93(A)(2)] ***If so,***	Yes ✓	No___	N/A___	RMK#___
i. Has secondary containment been provided?				
(c) Existing tank system(s) of known (documentable) age which is 15 years or greater? [3745-66-93(A)(3)] ***If so,***	Yes___	No ✓	N/A ✓	RMK#___
i. Has secondary containment been provided?	Yes___	No___	N/A ✓	RMK#___
(d) Existing tank system(s) of known (documentable) age which is less than 15 years? [3745-66-93(A)(3)]	Yes___	No___	N/A ✓	RMK#___
[Secondary containment not required until tank reaches 15 years of age]				
(e) Existing tank system(s) for which the age cannot be documented? [3745-66-93(A)(4)] ***If so,***	Yes___	No___	N/A ✓	RMK#___
i. Has secondary containment been provided?	Yes ✓	No___	N/A___	RMK#___
[Secondary containment is required for all existing tank systems for which the age cannot be documented. The tanks were required to have secondary containment when the facility turned 15 years, or by January 12, 1995.]				
2. Is the tank system used to manage a material that became a hazardous waste after January 12, 1987? [3745-66-93(A)(5)] ***If so,***	Yes ✓	No___	N/A___	RMK#___
(a) Has secondary containment been provided?	Yes ✓	No___	N/A___	RMK#___

NOTE: *Secondary containment is required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1989.*

OTE: *If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 5 of this Tank Systems Checklist.*

3. Is the secondary containment one of the following:

(a) An **External Liner**? [3745-66-93(E)(1)(a) - (1)(f)] ***If so,*** Yes ✓ No___ N/A___ RMK#___

i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes ✓ No ✗ N/A___ RMK#___

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on & infiltration from a 25-year, 24-hour storm? Yes ✓ No___ N/A___ RMK#___

iii. Is liner free of cracks and gaps? Yes___ No ✓ N/A___ RMK#___

iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes ✓ No___ N/A___ RMK#___

v. Are chemically resistant water stops in place at all joints? *(concrete liners only)* Yes ✓ No___ N/A___ RMK#___

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)* Yes ✓ No___ N/A___ RMK#___

(b) **Vault System**? [3745-66-93(E)(2)(a) - (2)(f)] ***If so,*** Yes___ No___ N/A___ RMK#___

i. Is vault system designed to contain 100% of the capacity of the largest tank? Yes___ No___ N/A___ RMK#___

ii. Is vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes___ No___ N/A___ RMK#___

iii. Are chemically resistant water stops in place at all joints? Yes___ No___ N/A___ RMK#___

iv. Is there a compatible interior coating to prevent migration into the concrete? Yes___ No___ N/A___ RMK#___

v. For **ignitable or reactive waste:** is the vault system provided with means to prevent against the formation or ignition of vapors? Yes___ No___ N/A___ RMK#___

vi. Is vault system provided with an exterior moisture barrier? Yes___ No___ N/A___ RMK#___

(c) **Double-Walled Tank**? [3745-66-93(E)(3)(a) - (3)(c)] ***If so,*** Yes ✓ No___ N/A___ RMK#___

i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes ✓ No___ N/A___ RMK#___

ii. **If metal,** are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes ✓ No___ N/A___ R___

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes ✓ No___ N/A___ RMK#___

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] — Yes ✓ No___ N/A___ RMK#___

2. Does the written assessment include the following: [OAC 3745-66-92(A)]

   (a) Certification by an independent, registered, professional engineer? — Yes ✓ No___ N/A___ RMK#___

   (b) Consideration of the design standards of the system? — Yes ✓ No___ N/A___ RMK#___

   (c) Consideration of the hazardous characteristics of the waste(s)? — Yes ✓ No___ N/A___ RMK#___

   (d) An evaluation by a corrosion expert *(if the external system/components are metal)*? — Yes___ No___ N/A ✓ RMK#___

   (e) A determination of design and operational measures that will be needed to protect the tank system from potential damage *(for underground tank components)*? — Yes ✓ No___ N/A ✓ RMK#___

   (f) Design considerations to ensure that the tank foundations will maintain the load of a full tank? — Yes ✓ No___ N/A___ RMK#___

   (g) Design considerations for anchoring the unit to prevent floatation *(for tanks situated in a seismic fault zone or saturated zone)*? — Yes___ No___ N/A ✓ RMK#___

   (h) Design considerations to ensure that the tank system will withstand the effects of frost heave *(for underground tank systems)*? — Yes___ No___ N/A ✓ RMK#___

3. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] — Yes ✓ No___ N/A___ RMK#___

   Do the written statements address all of the following:

   (a) Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] — Yes ✓ No___ N/A___ RMK#___

   (b) Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] — Yes ✓ No___ N/A___ RMK#___

   (c) Proper backfilling? [3745-66-92(C)] — Yes ✓ No___ N/A___ RMK#___

   (d) Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] — Yes ✓ No___ N/A___ RMK#___

   (e) Proper support and protection of ancillary equipment? [3745-66-92(E)] — Yes ✓ No___ N/A___ RMK#___

   (f) Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] — Yes ✓ No___ N/A___ RMK#___

4. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the Director? [3745-66-93(D)(E)] Yes ✓ No___ N/A___ RM

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

5. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] Yes ✓ No___ N/A___ RMK#___

6. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

   (a) Constructed or lined with compatible materials of sufficient strength to prevent failure? Yes ✓ No___ N/A___ RMK#___

   (b) Placed on a foundation or base capable of providing support? Yes ✓ No___ N/A___ RMK#___

   (c) Provided with a leak detection system designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? Yes ✓ No___ N/A___ RMK#___

   (d) Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? Yes ✓ No___ N/A___ RMK#___

   (e) Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? Yes ✓ No___ N/A___ RMK#___

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

7. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes ✓ No___ N/A___ RMK#___
   If not, is the ancillary equipment:

   (a) Inspected daily? **AND;** Yes___ No___ N/A ✓ RMK#___

   (b) Is ancillary equipment one of the following;

      i. Above ground piping (exclusive of flanges, joints, valves and connections)? Yes___ No___ N/A ✓ RMK#___
      ii. Welded flanges, welded joints and/or welded connections? Yes___ No___ N/A ✓ RMK#___
      iii. Sealless or magnetic coupling pumps and/or sealless valves? Yes___ No___ N/A ✓ RMK#___
      iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes___ No___ N/A ✓ RMK#___

REMARKS

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)]

   (a) Design standards? [3745-66-91(B)(1)] Yes___ No___ N/A___ RMK#_

   (b) The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes___ No___ N/A___ RMK#_

   (c) Corrosion protection measures? [3745-66-91)(B)(3)] Yes___ No___ N/A___ RMK#_

   (d) The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes___ No___ N/A___ RMK#_

   (e) A leak test has been conducted? *(For non-enterable underground tanks)* [3745-66-91(B)(5)(a)] Yes___ No___ N/A___ RMK#_

   (f) A leak test or an internal inspection by qualified P.E. has been conducted? *(For other than non-enterable underground tanks and for ancillary equipment)* [3745-66-91(B)(5)(b)] Yes___ No___ N/A___ RMK#_

   (g) Is assessment certified by independent, registered, P.E.? [3745-66-91(A)] Yes___ No___ N/A___ RMK#_

2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] ***If so,*** Yes___ No___ N/A___ RMK#_

   (a) Have tests been certified by independent, registered, P.E.? Yes___ No___ N/A___ RMK#_

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] Yes___ No___ N/A___ RMK#_

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

1. Does the o/o follow the general operating requirements below:

   (a) Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail. [3745-66-94(A)] Yes ✓ No___ N/A___ RMK#_

   (b) Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes ✓ No___ N/A___ RMK#_

   (c) If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes ✓ No___ N/A___ RMK#_

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

   (a) Spill control equipment (daily)? [3745-66-95(A)(1)] Yes✓ No___ N/A___ RMK#___

   (b) Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes✓ No___ N/A___ RMK#___

   (c) Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes✓ No___ N/A___ RMK#___

   (d) Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes✓ No___ N/A___ RMK#___

   (e) Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes___ No___ N/A✓ RMK#___

   (f) Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes___ No___ N/A✓ RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)]

   (a) Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)] **OR;** Yes___ No___ N/A✓ RMK#___

   (b) Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)] **OR;** Yes___ No___ N/A✓ RMK#___

   (c) The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes___ No___ N/A✓ RMK#___

NOTE: *Generators are not allowed to treat wastes (other than elementary neutralization) on-site without a permit.*

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Code (1977 or 1981)? [3745-66-98(B)] Yes___ No___ N/A✓ RMK#___

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] Yes___ No___ N/A✓ RMK#___

   (a) ***If so,*** have the requirements of 3745-65-17(B) been met? Yes___ No___ N/A✓ RMK#___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-991)

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] Yes___ No___ N/A___ RMK#___

   (a) Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)] **OR;** Yes___ No___ N/A___ RMK#___

   (b) Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)] Yes___ No___ N/A___ RMK#___

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so,*** did the o/o: Yes___ No✓ N/A___ RMK#___

   (a) Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] Yes___ No___ N/A___ RMK#___

   (b) Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] Yes___ No___ N/A___ RMK#___

   (c) Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] Yes___ No___ N/A___ RMK#___

   (d) Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes___ No___ N/A___ RMK#___

   (e) Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes___ No___ N/A___ RMK#___

   (f) Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes___ No___ N/A___ RMK#___

   (g) Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D)(1)(2)] Yes___ No___ N/A___ RMK#___

   (h) Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D)(3)] Yes___ No___ N/A___ RMK#___

   (i) Remediate the spill and repair the unit prior to returning it to service? [3745-66-96-(E)] Yes___ No___ N/A___ RMK#___

   (j) For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes___ No___ N/A___ RMK#___

NOTE: *The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)] Yes___ No___ N/A ✓ RM _

   (a) Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)] Yes___ No___ N/A___ RMK#__

3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes___ No___ N/A ✓ RMK#__

4. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,** Yes___ No___ N/A ✓ RMK#__

   (a) Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes___ No___ N/A___ RMK#__

   (b) If soils cannot be decontaminate/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes___ No___ N/A___ RMK#__

5. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred and <u>has</u> migrated from the zone of engineering control? **If so,** Yes___ No___ N/A ✓ RMK#__

   (a) Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes___ No___ N/A___ RMK#__

   (b) If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes___ No___ N/A___ RMK#__

REMARKS

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

ENTERED DIRECTOR'S JOURNAL

OHIO E.P.A.
AUG 10 90

UNDERGROUND INJECTION CONTROL PERMIT TO OPERATE: CLASS I WELL

Ohio Permit No.: UIC 03-72-009-PTO-I
US EPA ID NO.: OHD020273819

Date of Issuance: March 10, 1987
Effective Date: March 10, 1987

Date of Expiration: March 10, 1992

Name of Applicant: Chemical Waste Management (Well #2)

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

County: Sandusky Township: Riley

Section, Quarter Section or Latitude/Longitude: 10,937 feet from SL 9,834 feet from WL Riley Twp. Sandusky County

Injection Interval: Mt. Simon from 2803 to 2950 feet

Containment Interval: Knox, Kerbel, Conasauga and Rome from 2360 to 2803 feet

Injection Zone: Knox, Kerbel, Conasauga, Rome and Mt. Simon from 2360 to 2950 feet

Confining Zone: Black River and Wells Creek from 1816 to 2360 feet

Pursuant to the Underground Injection Control rules of the Ohio Environmental Protection Agency codified at Chapter 3745-34 of the Ohio Administrative Code, the applicant (Permittee) indicated above is hereby authorized to operate a Class I injection well at the above location upon the express conditions that the permittee meet the restrictions set forth herein.

All references to Chapter 3745-34 of the Ohio Administrative Code (OAC) are to all rules that are in effect on the date that this permit is effective. The following attachments are incorporated into this permit: A, B, C, D, E, F, G.

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

By: Mary Gavin Date 8-10-90

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

UNDERGROUND INJECTION CONTROL PERMIT TO OPERATE: CLASS I WELL

Ohio Permit No.: UIC 03-72-011-PTO-I
US EPA ID NO.: OHD020273819

Date of Issuance: March 10, 1987
Effective Date: March 10, 1987

Date of Expiration: March 10, 1992

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Name of Applicant: Chemical Waste Management (Well #4)

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

County: Sandusky Township: Riley

Section, Quarter Section or Latitude/Longitude: 10,107 feet from SL 9,065 feet from WL Riley Twp. Sandusky County

Injection Interval: Mt. Simon from 2812 to 2905 feet

Containment Interval: Knox, Kerbel, Conasauga and Rome from 2372 to 2812 feet

Injection Zone: Knox, Kerbel, Conasauga, Rome and Mt. Simon from 2372 to 2905 feet

Confining Zone: Black River and Wells Creek from 1826 to 2372 feet

Pursuant to the Underground Injection Control rules of the Ohio Environmental Protection Agency codified at Chapter 3745-34 of the Ohio Administrative Code, the applicant (Permittee) indicated above is hereby authorized to operate a Class I injection well at the above location upon the express conditions that the permittee meet the restrictions set forth herein.

All references to Chapter 3745-34 of the Ohio Administrative Code (OAC) are to all rules that are in effect on the date that this permit is effective. The following attachments are incorporated into this permit: A, B, C, D, E, F, G.

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By: Mary Cavin Date 8-10-90

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

UNDERGROUND INJECTION CONTROL PERMIT TO OPERATE: CLASS I WELL

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Ohio Permit No.: UIC 03-72-012-PTO-I
US EPA ID NO.: OHD020273819

Date of Issuance: March 10, 1987
Effective Date: March 10, 1987

Date of Expiration: March 10, 1992

Name of Applicant: Chemical Waste Management (Well #5)

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

County: Sandusky Township: Riley

Section, Quarter Section or Latitude/Longitude: 11,013 feet from SL 5,384 feet from WL Riley Twp. Sandusky County

Injection Interval: Mt. Simon from 2791 to 2930 feet

Containment Interval: Knox, Kerbel, Conasauga and Rome from 2344 to 2791 feet

Injection Zone: Knox, Kerbel, Conasauga, Rome and Mt. Simon from 2344 to 2930 feet

Confining Zone: Black River and Wells Creek from 1804 to 2344 feet

Pursuant to the Underground Injection Control rules of the Ohio Environmental Protection Agency codified at Chapter 3745-34 of the Ohio Administrative Code, the applicant (Permittee) indicated above is hereby authorized to operate a Class I injection well at the above location upon the express conditions that the permittee meet the restrictions set forth herein.

All references to Chapter 3745-34 of the Ohio Administrative Code (OAC) are to all rules that are in effect on the date that this permit is effective. The following attachments are incorporated into this permit: A, B, C, D, E, F, G.

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By: Mary Cavin Date 8-10-90

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

UNDERGROUND INJECTION CONTROL PERMIT TO OPERATE: CLASS I WELL

Ohio Permit No.: UIC 03-72-013-PTO-I
US EPA ID NO.: OHD020273819

Date of Issuance: March 10, 1987
Effective Date: March 10, 1987

Date of Expiration: March 10, 1992

Name of Applicant: Chemical Waste Management (Well #6)

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

County: Sandusky Township: Riley

Section, Quarter Section or Latitude/Longitude: 11,631 feet from SL 6,815 feet from WL Riley Twp. Sandusky County

Injection Interval: Mt. Simon from 2796 to 2930 feet

Containment Interval: Knox, Kerbel, Conasauga and Rome from 2363 to 2796 feet

Injection Zone: Knox, Kerbel, Conasauga, Rome and Mt. Simon from 2363 to 2930 feet

Confining Zone: Black River and Wells Creek from 1818 to 2363 feet

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Pursuant to the Underground Injection Control rules of the Ohio Environmental Protection Agency codified at Chapter 3745-34 of the Ohio Administrative Code, the applicant (Permittee) indicated above is hereby authorized to operate a Class I injection well at the above location upon the express conditions that the permittee meet the restrictions set forth herein.

All references to Chapter 3745-34 of the Ohio Administrative Code (OAC) are to all rules that are in effect on the date that this permit is effective. The following attachments are incorporated into this permit: A, B, C, D, E, F, G.

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By: Mary Cavin Date 8-10-90

This permit shall become effective on March 10, 1987 and shall remain in full force and effect during the life of the permit, unless 1) the statutory provisions of Section 3004(f), (g) or (m) of the Resource Conservation and Recovery Act ban or otherwise condition the authorizations in this permit; 2) the Agency promulgates rules pursuant to these sections which withdraw or otherwise condition the authorization in this permit; or 3) this permit is otherwise revoked, terminated, modified or reissued pursuant to OAC Rules 3745-34-23 and 3745-34-24.

This permit and the authorization to inject shall expire at midnight, unless terminated, on the date of expiration indicated.

Warren W. Tyler
Ohio Environmental Protection Agency

1689R

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By: Mary Snedle Date MAR 10 1987

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PART I

GENERAL PERMIT COMPLIANCE

A. EFFECT OF PERMIT

The permittee is authorized to engage in operation of underground injection in accordance with the conditions of this permit. Notwithstanding any other provisions of this permit, the permittee authorized by this permit shall not construct, operate, maintain, convert, plug, abandon, or conduct any other injection activity in a manner that allows or could allow the movement of injection, annulus or formation fluids into underground sources of drinking water (USDW). Any underground injection activity not specifically authorized in this permit is prohibited. Compliance with this permit during its term constitutes compliance for purposes of enforcement, with Sections 6111.043 and 6111.044 of the Ohio Revised Code (ORC). Such compliance does not constitute a defense to any action brought under ORC Sections 6109.31, 6109.32 or 6109.33 or any other common or statutory law other than ORC Sections 6111.043 and 6111.044. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law. Nothing in this permit shall be construed to relieve the permittee of any duties under applicable state and federal law or regulations.

This permit does not relieve owners and operators of hazardous waste injection wells of their obligation to comply with any additional regulations or requirements under the Resource Conservation and Recovery Act (RCRA) as amended or Chapter 3734 of the Revised Code and rules promulgated thereunder. This permit does not authorize any above ground generating, handling, storage, treatment or disposal facilities. Such activities must receive separate authorization under regulations promulgated pursuant to Chapter 3734 of the Revised Code and Part C of the federal Resource Conservation and Recovery Act.

B. PERMIT ACTIONS

1. Modification, Revocation, Reissuance and Termination. The Director may, for cause or upon request from the permittee, modify, revoke and reissue, or terminate this permit in accordance with OAC Rules 3745-34-07, 3745-34-23, and 3745-34-24. Also, the permit is subject to minor modifications for cause as specified in OAC Rule 3745-34-25. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

2. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to OAC Rule 3745-34-22(A); 3745-34-23 or 3745-34-24, as applicable.

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ii. The permittee has submitted a timely application which is a complete application for a new permit; and

iii. The Director, through no fault of the permittee, does not issue a new permit with an effective date on or before the expiration date of the previous permit.

c. Effect. Permits continued under ORC Section 119.06 remain fully effective and enforceable until a final action denying or revoking the permit.

d. Enforcement. When the permittee is not in compliance with the conditions of the expiring or expired permit the Director may choose to do any or all of the following:

i. Initiate enforcement action based upon the permit which has been continued;

ii. Issue a notice of intent to deny the new permit. If the permit is denied, the owner or operator then would be required to cease the activities authorized by the continued permit or be subject to enforcement action for operation without a permit;

iii. Issue a new permit under ORC Section 6111.044 with appropriate conditions; or

iv. Take other actions authorized by Underground Injection Control regulations set forth in OAC Chapter 3745-34 or any other applicable regulations or laws.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense, for permittee in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit or any order issued by the Director or a court of appropriate jurisdiction.

5. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit. This may include accelerated or additional monitoring or testing or both. If such is performed, the data collected shall be submitted to Ohio EPA in a written report.

6. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

7. Duty to Provide Information. The permittee shall furnish to the Director, within a time specified, any information which the Director may request to determine whether cause exists for renewing, modifying, revoking and reissuing, or terminating this permit. To determine compliance with this permit, or to issue a new permit the permittee also shall furnish to the Director, upon request, copies of records required to be kept by this permit.

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

By: [illegible] Date 8-10-90

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

By: Mary Cavin Date 8-10-90

10. Monitoring. Samples of injected fluids and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Monitoring results shall be reported monthly in accordance with OAC Rule 3745-34-38 in a format acceptable to the Director and as prescribed at paragraph 12 below.

    a. Monitoring the nature of injected fluids shall comply with applicable analytical methods cited and described in Table I of 40 CFR 136.3 or in Appendix III of 40 CFR Part 261 or (in certain circumstances) by other methods that have been approved by the Administrator of U.S. EPA, or by the Director.
    b. The monitoring information shall include conditions of quality assurance for each type of measurement required for reporting by the operator. Reference to established, published criteria shall be made wherever possible.
    c. Sampling and analysis shall comply with the specifications of the Waste Analysis Plan required in Part II(D)(3) of this permit.

11. Signatory Requirements. All reports or other information, required to be submitted by this permit or requested by the Director, shall be signed and certified in accordance with OAC rule 3745-34-17.

12. Reporting Requirements.

    a. Planned Changes. The permittee shall give written notice to the Director, as soon as possible, of any planned physical alterations or additions to the permitted facility. Replacements of equipment that are equivalent to existing equipment are not included in this requirement.
    b. Anticipated Noncompliance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
    c. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than thirty (30) days following each schedule date.
    d. Twenty-four (24) Hour Reporting.

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        1. The permittee shall report to the Director any noncompliance which may endanger health or the environment (e.g. Part I(H)(5) of this permit). Appropriate information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. The following shall be included as information which must be reported orally within 24 hours:

            i. Any monitoring or other information which indicates that any contaminant may cause an endangerment to an underground source of drinking water.
            ii. Any noncompliance with a permit condition, or malfunction of the injected system, which may cause fluid migration into or between underground sources of drinking water.
            iii. Any failure to maintain mechanical integrity.

        2. A written submission also shall be provided within five (5) business days of the time the permittee becomes aware of the circumstances of such noncompliance. The written submission shall contain a description

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By: Mary Caron Date 8-10-90

a. Has received authorization from the Director; and
b. Has described actions or procedures, satisfactory to the Director, that the permittee will take to ensure that the well will not endanger USDWs during this period. These actions or procedures shall include compliance with the technical requirements applicable to active injection wells unless waived by the Director in writing.

5. Closure Report. The permittee shall submit a closure report to the Director within sixty (60) days after closure or at the time of the next quarterly report (whichever is less). If the quarterly report is due less than fifteen (15) days after completion of closure, then the report shall be submitted within sixty (60) days after closure. The report shall be certified as accurate by the permittee and by the person who performed the closure operation (if other than the owner or operator). Such report shall consist of either:

a. A statement that the well was closed in accordance with Attachment A of this permit; or
b. Where actual closure differed from Attachment A of this permit, a written statement specifying the differences between Attachment A and the actual closure.

6. Standards for Well Closure. Prior to closing the well, the permittee shall:

a. Observe and record the pressure decay for a time and by a method specified by the Director and report this information to the Director;
b. Conduct mechanical integrity tests as requested by the Director to ensure integrity of casing and cement left in the ground after closure. Required testing methods may include any or all of the following:

i. Pressure tests with liquid or gas;
ii. Radioactive tracer surveys;
iii. Noise, temperature, pipe evaluation or cement bond logs; and
iv. Any other test required by the Director.

c. Flush the well with a suitable buffer fluid.

G. POST-CLOSURE CARE

1. Post-Closure Plan. The permittee shall submit a plan for post-closure maintenance and monitoring within sixty (60) calendar days of the effective date of this permit, for approval by the Director. The approved post-closure plan will be part of the Administrative Record for this permit and the permittee shall maintain and comply with this plan as if it were fully set forth herein. The obligation to implement the post-closure plan survives the termination of this permit or the cessation of injection activities.

This plan shall include the following information:

a. The pressure in the injection zone before injection began;
b. The anticipated pressure in the injection zone at the time of closure;
c. The predicted time until pressure in the injection zone decays to the point that the well's cone of influence no longer intersects the potentiometric surface of the lowermost USDW;

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H. MECHANICAL INTEGRITY

1. Standards. Each injection well must have and must maintain mechanical integrity consistent with OAC Rule 3745-34-34. Mechanical integrity demonstrations must be witnessed by an authorized representative of the Director to meet the requirement of OAC Rule 3745-34-34(F).

2. Periodic Mechanical Integrity Testing. The permittee shall conduct the mechanical integrity testing as follows:

   a. Long string casing, injection tubing and annular seal shall be tested by means of an approved pressure test in accordance with OAC Rule 3745-34-34(A)(1) at least once every twelfth month beginning with the date of the last approved demonstration and whenever there has been a well workover in which tubing is removed from the well, the packer is reset, or when loss of mechanical integrity becomes suspected during operation;
   b. The bottom hole cement shall be tested by means of an approved radioactive tracer survey at least once every twelfth month beginning with the date of the last approved demonstration;
   c. An approved temperature, noise or other approved log shall be run at least once every 36 months to test for movement of fluid along the bore hole. The Director may require such tests whenever the well is worked over. The permittee must submit logging procedures to the Director for approval at least thirty (30) days before running temperature or noise logs for the purpose of meeting this requirement;
   d. An approved casing inspection log shall be run at least once every 36 months;
   e. The permittee may request the Director to use any other test approved by the Administrator of the U.S. EPA in accordance with the procedures in OAC Rule 3745-34-34 (D).

3. Prior Notice and Report. The permittee shall notify the Director of his or her intent to demonstrate mechanical integrity at least thirty (30) calendar days prior to such demonstration. For those tests required in Part I (H)(2)(b,c,d and e) above, the permittee shall submit the planned test procedures to the Director for approval at the time of notification. At the discretion of the Director a shorter time period may be allowed. Reports of mechanical integrity demonstrations which include logs must include an interpretation of results by a knowledgeable log analyst. The permittee shall report the results of a mechanical integrity demonstration within 45 calendar days after completion thereof.

4. Gauges. The permittee shall calibrate all gauges used in mechanical integrity demonstrations to an accuracy within one-half (0.5) percent of full scale or greater, prior to each required test of mechanical integrity. A copy of the calibration certificate shall be submitted to the Director or his or her representative at the time of demonstration and every time the gauge is calibrated. The gauge shall be marked in no greater than five (5) psi increments.

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3. Insolvency. In the event of:

a. The bankruptcy of the trustee or issuing institution of the financial mechanism (not applicable to permittees using a financial statement), or
b. Suspension or revocation of the authority of the trustee institution to act as trustee, or
c. The institution issuing the financial mechanism losing its authority to issue such an instrument, the permittee must notify the Director in writing, within ten (10) business days. The owner or operator must establish other financial assurance or liability coverage acceptable to the Director, within sixty (60) days after such an event.
An owner or operator must also notify the Director by certified mail of the commencement of voluntary or involuntary proceedings under Title 11 (Bankruptcy), U.S. Code naming the owner or operator as debtor, within ten (10) business days after the commencement of the proceeding. A guarantor of a corporate guarantee must make such a notification if named as debtor, as required under the terms of the guarantee.

J. CORRECTIVE ACTION

Compliance. The permittee shall comply with the approved corrective action plan (Attachment F to this permit), and with OAC Rules 3745-34-07, 30 and 33.

K. PERMIT FEE

In accordance with OAC Rule 3745-34-16(G)(2), a fee in the amount of $1,000.00 is due each year on the anniversary date of issuance of this permit. The permittee will be notified by the Ohio EPA in writing six weeks prior to the due date of the fee.

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By: Mary Cavini Date 8-10-90

4. Any additional information specified by the Director.

The results of formation testing shall be submitted to the Ohio EPA with the next monthly report, or within 45 calendar days.

C. OPERATIONS

1. Injection Interval. Injection shall be limited to the Mt. Simon Formation in the approximate subsurface interval between 2803 feet and 2950 feet KB for Chemical Waste Management Well #2.

2. Injection Pressure Limitation [OAC 3745-34-38(A)]. Injection pressure at the wellhead shall not exceed a maximum which shall be calculated so as to assure that the pressure in the injection zone during injection does not initiate new fractures or propagate existing fractures in the injection zone. In no case, shall injection pressure initiate fractures in the confining zone or cause the movement of injection or formation fluids into an underground source of drinking water. The injection pressure shall be limited so that a maximum pressure of 790 psig (calculated at the surface, using a fluid specific gravity value of 1.085) is not exceeded. The maximum injection pressure limit shall be adjusted accordingly for differing fluid specific gravities.

3. Injection Rate Limitations. The combined monthly average injection rate for all permitted deep injection wells at the facility shall not exceed 240 gallons per minute.

4. Additional Injection Limitation. No substances other than those identified in Attachment D of this permit shall be injected. The permittee shall submit a certified statement attesting to compliance with this requirement at the time of the annual report. The only exception to this limitation is the injection of non-hazardous fluids recovered from monitor wells and other necessary fluids recovered from monitor wells required for approved well testing and/or monitoring.

5. Annulus Fluid and Pressure. Except during workovers, the annulus between the injection tubing and the long string casing shall be filled with an inert, non-reactive fluid. The pressure on the annulus shall be at least fifty (50) psig higher than injection pressure at all times throughout the injection tubing length.

6. Automatic Warning and Shut-Off System. Within one (1) year of the effective date of this permit, the permittee shall install, continuously operate and maintain an automatic warning and shut-off system to stop injection in the following situations:

a. Significant pressure change in the annulus;
b. Injection pressure reaches 790 psig;
c. Significant change in the injection/annulus pressure differential;
d. When injection/annulus pressure differential falls below fifty (50) psi.

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3. Waste Analysis Plan. The permittee shall develop and follow a written Waste Analysis Plan which describes the procedures which he will carry out to comply with permit conditions (D)(1) and (D)(2) above. This plan shall be submitted to the Director for approval within 45 days of the receipt of this permit and a copy of the plan shall be kept at the facility. The sampling and analysis shall be performed in a manner consistent with the Ohio EPA Quality Assurance Plan requirements. At a minimum, the plan must specify:

   a. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;
   b. The test methods which will be used to test for these parameters; and
   c. The sampling method which will be used to obtain a representative sample of the waste to be analyzed and the frequency of sampling and analysis for each parameter.

4. Continuous Monitoring Devices. Continuous monitoring devices shall be installed and used to monitor injection pressure, flow rate and volume, and the pressure in the annulus between the tubing and the long string of casing.

5. Monitoring Wells. The permittee shall submit an approvable ground water monitoring plan for protection of the underground sources of drinking water acceptable to the Director no later than sixty (60) days after the effective date of this permit modification. At a minimum, the ground water monitoring system must consist of: 1) a well capable of continuously monitoring pressure changes in the first permeable zone overlying the injection interval and be sampled and analyzed quarterly for constituents specified by the Director for the next two (2) years and semi-annually thereafter for a period specified in the plan; and 2) a well capable of providing semi-annual monitoring of the ground water quality in the lowermost underground source of drinking water for a time period specified in the plan. Completion of the ground water monitoring system installation will occur no later than 300 days after the effective date of this permit condition or six (6) months after the Director's approval of the plan, which ever is later.

   The following is the recommended outline for the ground water monitoring plan:

   a. Description of ground water monitoring system:

      i. Design of the monitoring system to include number of wells, monitoring zone(s) in each well, as well as the location(s) and the approximate depth(s);
      ii. Methodology for continuous monitoring of pressure or hydrostatic head levels.

   b. Drilling, well construction, and monitor zone development procedures prior to initiation of fluid sampling and continuous pressure/head measurements.

   c. Testing, sampling and analysis procedures:

      i. Testing to be performed during drilling;
      ii. Testing to be performed after well construction;
      iii. Fluid sampling and pressure/head monitoring to be performed during operation of the ground water monitoring program.

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8. Seismic Monitoring.

a. On-Site Monitoring System. Within one year of the effective date of this permit modification, the permittee must install and continuously operate a three component seismograph on-site. The installation and operation of a three component seismograph is required to insure that seismic events, including microseismic events, may be recorded.

i. An installation plan detailing the installation, type of seismograph to be used, data acquisition system and data interpretation must be submitted for the Director's review and approval within ninety (90) days of the effective date of this permit modification.
ii. Seismic data collected shall be submitted in each quarterly report, accompanied by a qualified interpretation.
iii. The Director reserves the right to require the installation of additional on-site three component seismographs, if deemed necessary.

b. Seismic Reflection Data. Within one (1) year of the effective date of this permit modification the permittee shall acquire seismic reflection data. The purpose of this data acquisition is to establish the presence or absence of significant geological structural features such as faults and/or fractures in the uppermost Precambrian rock units and the overlying Paleozoic rock units within the area of review at the Vickery, Ohio deep injection well facility. Seismic acquisition shall include the following:

i. A work plan detailing the extent of the line acquisition, data processing and interpretation. The workplan shall be submitted for the Director's approval within ninety (90) days of the effective date of this permit modification.
ii. Dated field notes/records shall be kept during all geophysical investigations. Seismic data processing steps and parameters will be documented in detail. Raw field data shall be made available upon request.
iii. During the acquisition of the seismic data, the permittee shall provide various versions of processed seismic data including, but not necessarily limited to, Brute stack, migrated and unmigrated seismic sections.
iv. Upon completion of the acquisition of the seismic data, the permittee shall submit an interpretation of the acquired data including but not limited to the following:

1. Seismic lines(s) base map illustrating surveyed shot points and/or seismic stations;
2. Geophysical mapping of the significant geologic horizons;
3. Identification of significant geologic horizons on processed seismic lines;
4. Annotated intersections of other seismic lines and wellbores;
5. Copies of synthetic seismograms utilized in interpretation (if any);
6. An evaluation of identified structural features to include fault(s) and/or fracture(s) as to extent, orientation and magnitude;
7. A plan and timetable to investigate any identified fault(s) and/or fracture(s) further so as to determine whether they may allow for the upward migration of formation fluids or injected wastes to

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2. Quarterly Reports. The permittee shall report the following for each calendar quarter within fifteen (15) days after the end of the quarter:

   a. Results of the continuous corrosion monitoring as stipulated in Part II(D) of this permit.
   b. Results of ground water monitoring as specified in ground water monitoring plan.
   c. Results of injectate analysis as stipulated in Part II(D)(2)(b).
   d. Results of the on-site seismic monitoring as stipulated in Part II (D)(8)(9).

3. Annual Reports. The permittee shall report the following for each calendar year within thirty (30) days after the end of the year:

   a. Results of the injection fluid analyses specified in the approved Waste Analysis Plan as recorded in the administrative record for this permit. This report must include statements showing that the requirements of Part I(E)(10) and Part II(C)(4) have been met.
   b. Results of pressure fall-off testing required by Part II(B)(2) of this permit.

4. Reports on Well Tests and Workovers. Within 45 calendar days, the permittee shall report to the Director the results of demonstrations of mechanical integrity, any well workover, or results of other tests required by this permit.

5. The Permittee shall submit all required reports to the Director to:

   Ohio Environmental Protection Agency
   Division of Ground Water
   Underground Injection Control Unit
   1800 WaterMark Drive
   P.O. Box 1049
   Columbus, Ohio 43266-0149

6. The Permittee shall utilize the format specified in Attachment D for reporting under permit condition E above.

F. CLASS I HAZARDOUS WASTE MANIFEST

Permittees injecting hazardous wastes which are accompanied by a manifest or delivery document shall comply with the requirements of OAC Rule 3745-65-70.

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

By: Mary Cavin Date 8-10-90

Chemical Waste Management
Well No. 2

ATTACHMENT A

PLUGGING AND ABANDONMENT

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I certify this to be a true and accurate copy of the [illegible] as it appears in the records of the Ohio Environmental Protection Agency.
By: Mary Shadle Date MAR 10 1987

TEXAS WORLD OPERATIONS, INC.
P.O. Box 56343
Houston, Texas 77056
(713) 850 - 0003

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

By: Nancy Stadle Date MAR 10 1987

CHEMICAL WASTE MANAGEMENT, INC.
VICKERY FACILITY
Typical Plugging and Abandonment Procedure

1. Move up and rig up a suitable service rig.

2. Pump 100 BBLs of 10#/gallon NaCl brine down the tubing at a rate not to exceed 2 BBL/minute or 700 psi whichever is lower.

3. Mount a spherical annular blowout preventor.

4. Hook a return line from the annulus to a tank.

5. Lift the seals out of the polished bore recepital. Remove the diesel from the annulus by pumping 10#/gallon brine down the tubing.

6. Allow the annulus and tubing pressure to equalize.

7. Remove the tubing and seal assembly.

8. Go in the hole with a 3 3/4 inch bit and 2 7/8 inch workstring, and clean the well to total depth.

9. Circulate clean and pull out of the hole.

10. Go in the hole open ended to total depth with eight (8) joints of 2 7/8 inch fiberglass tail pipe on the bottom of the workstring. (The boxes of the fiberglass must be turned to 3.75 inch O.D.) Place a 2 3/8 inch baffle between the 4th and 5th joints of fiberglass to catch the wiper plug.

11. Circulate for 15 minutes with clean 10#/gallon brine.

12. Cement by pumping 2 BBLs of weighed diesel, 800 gallons of 13.6#/gallon Epseal, wiper plug and 2 BBLs of weighted diesel, displace with brine.

13. Close the preventor and tubing, pressure the annulus to 500 psi.

14. Wait for the Epseal to cure for 24 hours.

15. Sever the fiberglass above the wiper plug.

16. Pull out of the hole and lay down the remaining fiberglass.

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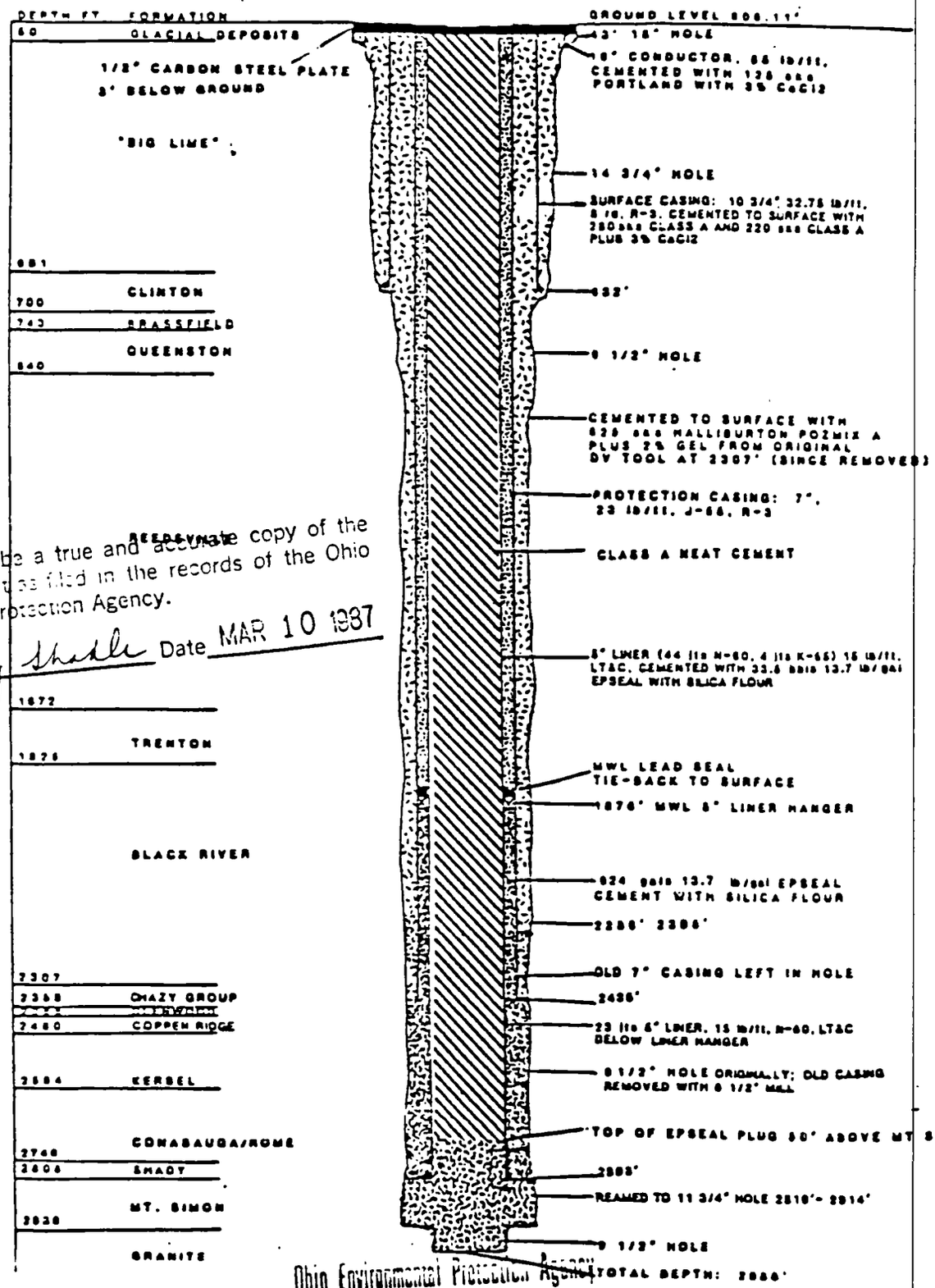
CHEMICAL WASTE MANAGEMENT
DISPOSAL WELL NO. 1-A

ABANDONMENT

FIGURE 12.0-1



Certified to be a true and accurate copy of the original document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
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NOTE: ALL DEPTHS REFERENCED TO KELLY BUSHING 6' ABOVE GROUND LEVEL

TEXAS WORLD OPERATIONS, INC.

DRAWN BY: DJ DATE: 4-25-85

Chemical Waste Management
Well No. 6

ATTACHMENT C

WELL CONSTRUCTION SPECIFICATIONS

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

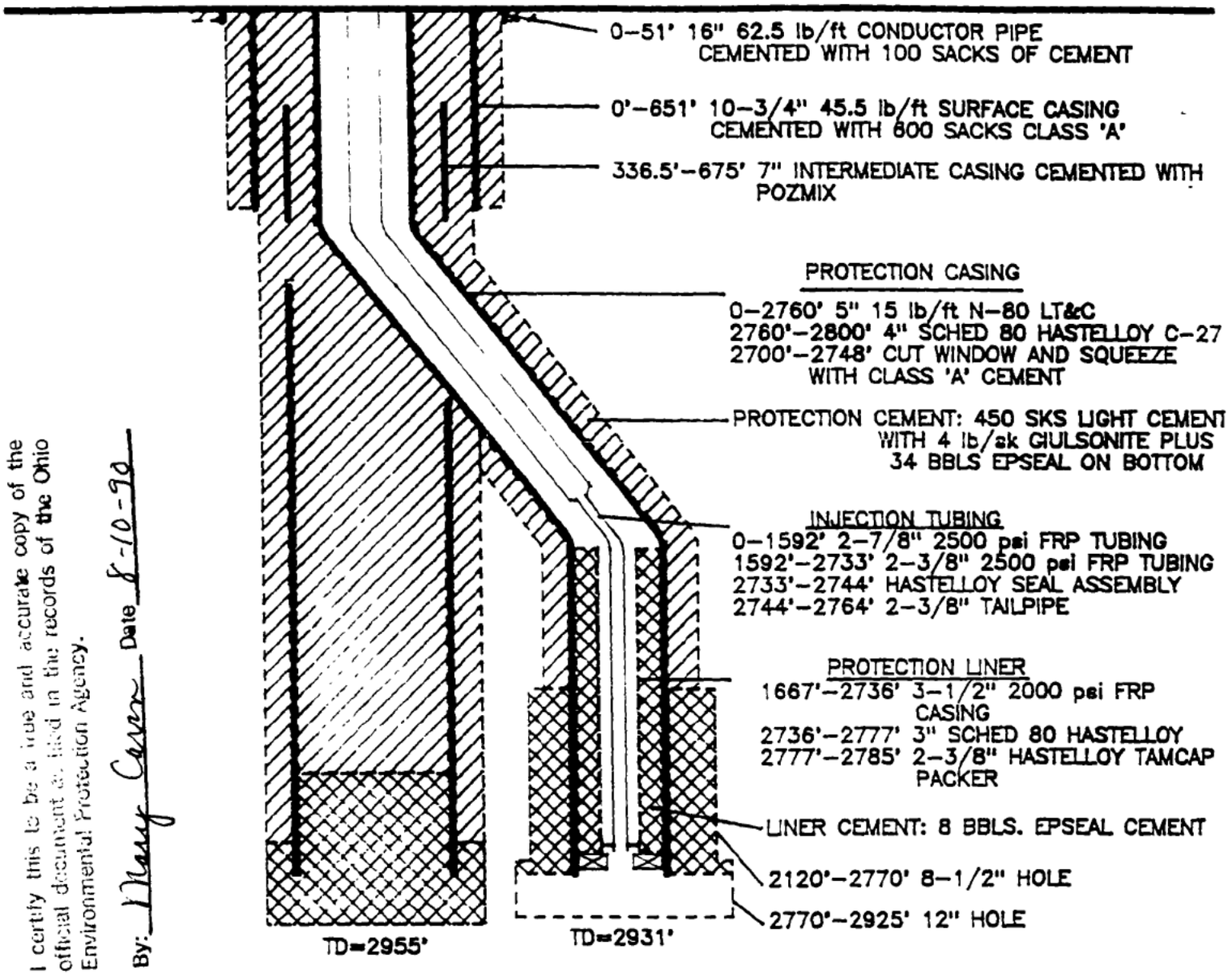
Mary Shadle Date MAR 10 1987
Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

CHEMICAL WASTE MANAGEMENT, INC.

VICKERY, OHIO

DISPOSAL WELL No. 6



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

By: Mary Carson Date 8-10-90

NOTE: ALL DEPTHS ARE REFERENCED TO KELLY BUSHING HEIGHT 9' ABOVE THE BRADENHEAD FLANGE

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Chemical Waste Management
Well No. 2

ATTACHMENT D

OPERATION AND MONITORING REQUIREMENTS

I certify this to be a true and accurate copy of the [illegible] on file in the records of the Ohio Environmental Protection Agency.

By: [illegible] Date MAR 10 1987

Ohio Environmental Protection Agency
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Chemical Waste Management
Well No. 6

ATTACHMENT D

OPERATION AND MONITORING REQUIREMENTS

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

By: Mary Shell Date MAR 10 1987

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

By: Mary Caven Date 8-10-90

Chemical Waste Management
Well No. 6

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OPERATING, MONITORING AND REPORTING REQUIREMENTS

Characteristic	LIMITATION Maximum	MINIMUM MONITORING REQUIREMENTS Frequency	MINIMUM REPORTING REQUIREMENTS
*Injection Pressure	790psig	continuous	monthly
**Annulus Pressure		continuous	monthly
***Injection Rate	240 gpm	daily	monthly
Annulus Sight Glass Level		daily	monthly
Corresponding Annulus Pressure		daily	monthly
Corresponding Waste Temperature		daily	monthly
Corresponding Injection Pressure		daily	monthly
Corresponding Flow Rate		daily	monthly
Flow Rate		continuous	monthly
Cumulative Volume		daily	monthly
****Specific Gravity	1.732	daily	monthly
*****Chemical Composition of Injected Fluid		monthly	monthly
******Chemical Composition of Injected Fluid		quarterly	quarterly

*Injection Pressure — The Maximum Allowable Surface Injection Pressure (MASIP) shall be calculated using the following formula MASIP = [0.75psi/ft - (0.433psi/ft x SG)] x Casing Depth (ft)

**Annulus Pressure Requirement — The pressure on the annulus shall always be maintained at least 50 psi higher than the injection pressure throughout the entire length of the tubing.

***Injection Rate — The combined daily maximum flow rate for all operating wells shall not exceed 240 gallons per minute.

****Specific Gravity — Specific Gravity of the injectate shall be measured no less than twice an hour and a daily average reported. As the specific changes, the maximum injection pressure shall be adjusted accordingly, not to exceed 790 psi.

*****Monthly Waste Analysis — Chemical analysis shall be conducted monthly for the parameters listed in Part II (D)(2)(a) of this permit; and in accordance with the Waste Analysis Plan after it is approved by the Director.

******Quarterly Waste Analysis — Chemical analysis shall be conducted quarterly for all possible waste constituents in the waste stream; and in accordance with the Waste Analysis Plan after it is approved by the Director.

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

By: Mary Cavin Date 8-10-90

****Specific Gravity — Specific Gravity of the injectate shall be measured no less than twice an hour and a daily average reported. As the specific changes, the maximum injection pressure shall be adjusted accordingly, not to exceed 790 psi.

*****Monthly Waste Analysis — Chemical analysis shall be conducted monthly for the parameters listed in Part II (D)(2)(a) of this permit; and in accordance with the Waste Analysis Plan after it is approved by the Director.

******Quarterly Waste Analysis — Chemical analysis shall be conducted quarterly for all possible waste constituents in the waste stream; and in accordance with the Waste Analysis Plan after it is approved by the Director.

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

By: Mary Cavin Date 8-10-90

OHIO E.P.A.
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Chemical Waste Management, Inc.
3956 State Rt. 412
Vickery, Ohio 43464
419/547-7791

May 8, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 443 911 819

Mr. Gerald Myers
Ohio Environmental Protection Agency
361 East Broad Street
Columbus, Ohio 43216

RECEIVED
OHIO EPA
- 2 1986
DIV. of SOLID & HAZ. WASTE MGT.

RE: Chemical Waste Management, Inc.
Vickery, Ohio

Dear Mr. Myers:

Listed below are the analytical parameters Chemical Waste Management, Inc. (CWM) believes would characterize the injection fluids at the site.

pH

Specific Gravity

Total organic carbon (TOC)

Sulfate (SO_4)

Acidity (as $CaCO_3$)

Total Solids @ 105° C

Total Suspended Solids

Chlorides

Total Chromium (as Cr)

Total Iron (as Fe)

Total Nickel (as Ni)

Total Zinc (as Zn)

Conductivity @ 25°C

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.
By: Mary Shadl Date MAR 10 1987

A minimum of two sample points would be necessary to obtain samples of fluid being injected to each well. The first sample point

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would be located at the discharge end of the pump transferring injection fluid from Filtered Acid Tank B (FAT B) to Filtered Acid Tank No. 2 (FAT #2). The injection fluid is distributed from FAT 2 directly to injection wells #3 and #4 for disposal. The second sample point would be located at the discharge end of the pump transferring injection fluid to Filtered Acid Tank #3 (FAT #3). The injection fluid is distributed from FAT #3 to Filtered Acid Tank #5 (FAT #5), Filtered Acid Tank #1 (FAT #1), and injection well #2. Injection fluid from FAT 5 and FAT 1 is pumped directly to injection wells #5 and #6 respectively. The transfer pumps are located in Filter Building #3.

A schematic of the flow is attached.

Should you have any questions or comments, please contact me at your convenience.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.

Steve Bowe
Environmental Manager

SB/kb

cc/Walter Heald
Bob Whiteside

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

By: Mary Thadle Date MAR 10 1987

Ohio Environmental Protection Agency
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MAR 10 1987

I certify this t e a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 8-10-90

2.6 Permitted Rates and Pressures

1. The injection pressure for each well shall not exceed a maximum of 790 psig (calculated at the surface), to assure that pressure in the injection zone during injection does not initiate new fractures or propagate existing fractures in the injection zone. This pressure is based on a fluid specific gravity of 1.085 and a fracture gradient of 0.75 psi/ft (actual measured frac gradients are 0.82 psi/ft or higher). Should the specific gravity of the liquid being injected be greater than 1.085, injection pressures will be adjusted so that a fracture gradient of .75 psi/ft is not exceeded. This pressure limitation is the same pressure as given in the existing CWM Vickery well permits.

2. The total injection rate for the wells as a group is 240 gpm. Individual well injection rates will vary, but injection will be limited by the maximum permitted injection pressure.

   Fracture gradient calculations and assumptions utilized are more fully explored in Section 11.2.3, and Section 14.

2.7 Permitted Wastes

The wastes received by the CWM Vickery facility come from many sources. Primarily waste received are from Standard Industrial Classifications (SIC) 33 (Primary Metal Industries) and 34

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By: Mary Cavin Date 8-10-90

of the processes involve the removal of base metal from the substrate thereby dissolving the metal in the aqueous phase. Additionally, plating solutions and rinse waters contain dissolve metals inherent in the plating process.

Table 2-6 gives representative chemistry for these streams. The typical streams are low to moderate in pH and high in total solids indicating a high dissolved metals content. The occasional cleaning solution typically has a higher pH (above 9) and, again, has a high total solids content. These characteristic waste streams typically carry some or all of the following hazardous waste numbers: D002, D004, D005, D006, D007, D008, D009, D010 and D011. These waste streams, along with characteristic streams from other SIC codes, account for approximately 20-40% of waste currently received at the facility.

Another high volume stream currently received at the site is leachate. Hazardous leachates can be divided into two groups, multi-source and characteristic. Multi-source leachate (MSL) is generated from solid waste disposal units that received more than one listed waste. The leachate generated from these units currently carries the hazardous waste number of the waste most prominently disposed of in that unit. Therefore, a landfill which received primarily F006 will generate a leachate carrying the hazardous waste number F006 even though other listed wastes were

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By: Mary Cavin Date 8-10-90

disposed of in the unit. Current USEPA proposed regulations will change this by creating a new hazardous waste number for MSL.

Leachates are typically neutral to slightly alkaline solutions. The higher than neutral pH is typically due to the excess lime utilized at the land disposal unit. Leachates typically have relatively low total solids concentrations corresponding to a low dissolved metals content. However, these leachates typically have one or more characteristic constituent that exceeds the extraction procedure toxicity (E.P. Toxic) levels. Leachate streams currently account for approximately 20-60% of waste receipts. Typical leachates carry all of some of the following hazardous waste numbers: D002, D004, D006, D007, D008, F006 and K062.

Smaller volume streams are generated from other SIC's. Many of these streams are the result of previous waste handling or disposal activities. An example is scrubber solution from an incinerator. The scrubber solution is used to remove the products of combustion from the incinerator flue gas. The products of combustion can be acids, oxides of sulfur, nitrogen and carbon, and other materials. These materials react with or absorb in the scrubber solution and are thereby removed from the flue gas. The resulting scrubber solution carries all the hazardous waste numbers of all waste streams incinerated and scrubber by the solution. Therefore, this aqueous stream potentially could carry all F, K, P and U codes that utilize incineration as a treatment technology. This scrubber

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By: Mary Cavin Date 8-10-90

solution would not typically be chemically comparable to the listed waste that was incinerated. For example, if U220 (toluene) and U239 (xylene) were incinerated, one would not expect to find toluene or xylene in the scrubber solution in appreciable concentrations. Although these streams are not currently received in high volume at the facility, it is anticipated that the volume will increase as more land disposal restrictions become effective. This group of waste streams account for approximately 10-20% of the current receipts.

Additionally, non-hazardous wastes are received at this site. These streams come from many sources including, but not limited to, storm water collection from site remediations and leachates from municipal landfills. These streams are typically water with very slight contamination from a non-hazardous constituent.

In addition, industrial wastes which are not defined as hazardous but should be handled in a appropriate manner to be protective of human health and the environment are disposed of at this site. These streams do not meet any chemical criteria that requires them to be identified as hazardous waste. These streams have not had incidental contact with listed hazardous wastes that require the listed hazardous waste number to carry though. However, these streams may have a high content of a non-E.P. toxic metal that inspires the generator to dispose of the material in an environmentally secure manner. Electroless nickel plating

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By: Mary Cavin Date 8-10-90

wastewater is an example. The wastewater is not E.P. toxic nor is it corrosive, but it does have a high dissolved nickel content.

Although these types of streams are not currently defined as hazardous by RCRA, they may become hazardous in the future with the adoption of the toxic characteristic leaching procedure (TCLP) and other future regulations. These non-hazardous streams currently account for 5-20% of waste receipts.

Tables 2-1, 2-2 and 2-3 list the stream description and EPA Hazardous Waste Number for wastes received during a three month period (Sep.- Nov. 1989). Tables 2-4, 2-5, 2-6 and 2-7 show the range of constituents for representative samples taken from the waste streams presented in Tables 2-1, 2-2 and 2-3. In addition, each representative samples is screened for acidity, flammability, radiation, compatibility, cyanide and sulfide as described in the Waste Analysis Plan (WAP). Although these tables are not all inclusive of waste streams and EPA Hazardous Waste Numbers received at the facility, they do represent the types of wastes handled at the facility. Additional information on EPA Hazardous Waste Numbers is given in the WAP in Appendix B.

The facility does not accept radioactive wastes, infectious wastes, explosive or shock sensitive wastes, air-reactive wastes, water reactive wastes, compressed gases, reactive wastes that generate

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ignitable wastes, PCBs, wastes with greater than 5% volatile organic compounds or wastes that the General Manager deems cannot be properly or safely managed at the facility.

2.8 Waste Analysis Criteria

The CWM Vickery Waste Analysis Plan sets compatibility criteria that assures that individual waste or waste blends are compatible with surface materials, well components, injection zone formations, and previously injected wastes.

Waste compatibility testing is discussed in detail in Section 8, and in Section 11.2.6.

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

By: Mary Cross Date 8-10-90

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TABLE 2-1

STREAM DESCRIPTIONS AND EPA HAZARDOUS WASTE NUMBE

STREAM DESCRIPTION	HAZARDOUS WAST NUMBER
Hydrochloric Acid/Pickle Liquor	K062
Hydrochloric Acid/Pickle Liquor	K062
Sulfuric Acid/Pickle Liquor	K062
Sulfuric Acid/Pickle Liquor	K062, D002
Sulfuric Acid/Pickle Liquor	K062
Sulfuric Acid/Pickle Liquor	K062
Sulfuric Acid/Pickle Liquor	K062

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By: Mary Cavin Date 8-10-90

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TABLE 2-2

STREAM DESCRIPTIONS AND EPA HAZARDOUS WASTE NUMBERS

STREAM DESCRIPTION	HAZARDOUS WASTE NUMBER
HF/Nitric Stainless Pickling	K062
HCl Pickle Liquor	K062
Truck Washings	K062, F001, F002, F003, F005
Pharmaceutical Waters	F002
Spill Clean-up	F001, F002, F003, F004, F005
Off Spec. Ferric Chloride Etchant	D002
Electrochemical Machining (H_2SO_4)	D002, D007
Acid From Chloroformate Production (HCl)	D002
Chrome Plating Solution	D002, D007
Electrochemical Machining (Nitric (Acid)	D002, D007
Scrubber Water	F002
Incinerator Scrubber Water	F002, F003, F005, U190
Leachate	D002
Nickel Catalyst Production Wash Water	Non-Hazardous
Treated Storm Water from Site Remediation	Non-Hazardous
Electroless Nickel Plating Wastewater	Non-Hazardous
Neutralized Mercaptopropionic Acid Raffinate with Zinc	Non-Hazardous
Powder Coating Manufacturing Wastewater	Non-Hazardous
Neutralization of Base Gases	Non-Hazardous
Leachate	Non-Hazardous
Leachate	Non-Hazardous

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

By: Mary Cavin Date 8-10-90

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TABLE 2-3

STREAM DESCRIPTIONS AND EPA HAZARDOUS WASTE NUMBERS

STREAM DESCRIPTION	HAZARDOUS WASTE NUMBER
Spent sulfuric/metal plating	D002, D007, D008
Hydrochloric acid/galvanizing	D002, D006, D008
Plating alkaline cleaning solution	D002, D007, D008
Plating electro polish	D002, D007, D008
Partially neutralized acids	D002, D004, D007, D008, F006
Partially neutralized acids	D007, D008, D006, D009, F006
Waste acids/pickle liquors	D002, D006, D007, D008, D010, K062
Mixed acids	D002, D007, D008
Waste etching acids	D002, D008
Spent sulfuric acid/batteries	D002, D008
Hydrochloric pickle liquor	K062
Plating brite dip solution (HF)	D002, D007, D008, D010
EP Toxic water (0-1% chloroacetaphenone)	D006, D007, D009
Surface impoundment cleanup	F006
Boiler cleaning solution (EDTA & Hydrazine)	D008
Plating rinse water	D002, D008
Plating rinse water	D002
Mixed acids	D002, D004, D005, D006, D007, D008, D009, D010, D011
Process water/contaminated with solvent	F001, F002, F003, F005
Leachate	D004, D005, D006, D007, D008, F006
Sulfuric acid/galvanizing	K062, D006, D007, D008, D011
Bedford base filtrate	D002, D004, D007, D008
Cuprous chloride catalyst dissolved in HCl	D002, D006, D007, D008
Multi-Source Leachate	D004
Multi-Source Leachate	D004, D006, D007, D008
Multi-Source Leachate	F006, D002

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

By: Mary Cavin Date 8-10-90

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TABLE 2-4

MATERIALS FROM TABLE 2-1

RANGE OF ACTUAL CHEMISTRY FROM SPECIAL WASTE ANALYSIS REPORT

COMPONENT	MINIMUM	MAXIMUM
Spec. Grav.	1.0021	1.338
pH	<0.10	1.03
Total Solids, mg/l	122,900	486,200
Suspended Solids, mg/l	18	140,020
Aluminum, mg/l	11.0	137
Arsenic, ug/l	<MDL	2960
Barium, mg/l	0.10	1.0
Cadmium, mg/l	<MDL	1.13
Chromium, mg/l	33	127.8
Copper, mg/l	0.74	40.7
Iron, mg/l	295.6	88,090
Lead, mg/l	1.6	3600
Magnesium, mg/l	15.5	400
Mercury, ug/l	<MDL	99
Nickel, mg/l	<MDL	179
Selenium, mg/l	<MDL	12.5
Silver, mg/l	<MDL	0.40
Thallium, mg/l	<MDL	20.3
Zinc, mg/l	14.5	15,090
Chlorides, mg/l	30.26	288,000
Sulfates, mg/l	1650	434,688
Calcium, mg/l	10.98	1230
Potassium, mg/l	2.80	45.0
Sodium, mg/l	37.5	10,200
PCB's, mg/l	<MDL	<MDL

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By: Mary Carr Date 8-10-90

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TABLE 2-6

MATERIALS FROM TABLE 2-3 IDENTIFIED
OTHER THAN MULTI-SOURCE LEACHATE
RANGE OF ACTUAL CHEMISTRY FROM SPECIAL WASTE ANALYSIS REPORT

COMPONENT	MINIMUM	MAXIMUM
Spec. Grav.	1.000	1.702
pH	<0.10	13
Total Solids, mg/l	100	1,668,150
Suspended Solids, mg/l	78	31564
Aluminum, mg/l	0.2	252
Arsenic, ug/l	<MDL	48600
Barium, mg/l	<MDL	9.8
Cadmium, mg/l	0.016	3140
Chromium, mg/l	0.19	37650
Copper, mg/l	0.09	36790
Iron, mg/l	1.195	43600
Lead, mg/l	0.28	21950
Magnesium, mg/l	1.6	780
Mercury, ug/l	<MDL	71,120
Nickel, mg/l	<MDL	2500
Selenium, mg/l	<MDL	36,333
Silver, mg/l	<MDL	17.3
Zinc, mg/l	0.319	123,250
Chloride, mg/l	<MDL	474,183
Sulfates, mg/l	189	1,855,391
Calcium, mg/l	1.7	214,200
Potassium, mg/l	0.3	5680
Sodium, mg/l	31.5	77,000
Nitrates, mg/l	<MDL	26,853
PCB's, mg/l	<MDL	<MDL
Manganese, mg/l		215
Fluoride, mg/l	<MDL	16,576
Thallium, mg/l		7.5

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

By: Mary Cavin Date 8-10-90

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TABLE 2-7

MATERIALS FROM TABLE 2-3 IDENTIFIED AS MULTI-SOURCE LEACHATE

RANGE OF ACTUAL CHEMISTRY FROM SPECIAL WASTE ANALYSIS REPORT

COMPONENT	MINIMUM	MAXIMUM
Spec. Grav.	1.004	1.016
pH	8.80	9.80
Total Solids, mg/l	11,550	22,250
Suspended Solids, mg/l	130	750
Aluminum, mg/l	1.1	20.6
Arsenic, ug/l	234	403
Barium, mg/l	0.36	0.65
Cadmium, mg/l	<0.05	<0.05
Chromium, mg/l	0.16	0.22
Copper, mg/l	0.54	12.3
Iron, mg/l	5.11	1700
Lead, mg/l	0.48	8.9
Magnesium, mg/l	17.5	470
Mercury, ug/l	0.636	5.438
Nickel, mg/l	0.63	4.40
Selenium, mg/l	<0.5	6206
Silver, mg/l	<0.05	<0.05
Zinc, mg/l	0.40	0.55
Chloride, mg/l	1281	1281
Sulfates, mg/l	1005	1005
Calcium, mg/l	2.58	195
Potassium, mg/l	449	2250
Sodium, mg/l	<MDL	404
Nitrates, mg/l	<MDL	<MDL
PCB's		<0.1

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

By: Mary Cavin Date 8-10-90

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Chemical Waste Management
Well No. 2

ATTACHMENT E

FINANCIAL RESPONSIBILITY

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

By: Mary Shedl Date MAR 10 1987

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

Re: Chemical Waste Management
03-72-0191/ 0 73819
05-12-0335/OHD000/24161
03-87-0416/OHD068111327
05-57-0056/OHD093945293

April 29, 1985

Sheri K. Swibel
Assistant to General Counsel
Waste Management, Inc.
3003 Butterfield Road
Oak Brook, Illinois 60521

Dear Ms. Swibel:

I hereby acknowledge receipt of certificates of insurance on behalf of the facilities referenced above. The certificates were issued by National Union Fire Insurance Co. (Policy #PRM-9310984) and American Motorists Insurance Co. (Policy #3YM445335-02), effective April 25, 1985.

Chemical Waste Management and Solvent Resource Recovery, Inc. continue to be in compliance with Ohio's financial responsibility rules for hazardous waste facilities.

If you have questions, please contact me at (614) 462-8943.

Sincerely,

Deborah L. Tegtmeyer
Surveillance & Enforcement Section
Division of Solid & Hazardous Waste Management

DLT/maf

cc: Steve White, Chief, DSHWM
Kevin O'Grady, DSHWM
Ben Chambers, NWDO
Don Marshall, SWDO
~~George Simmons~~, Chemical Waste Mgt.-Vickery
Richard Tighe, Chemical Waste Mgt.-Springfield
Ray Kellas, Ohio Waste Systems
Robert Kohnen, Solvent Resource Recovery

10935 bcc: Steve Bowe
Kirk Stemple
Kathy Trent
Rich Zilles

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL
MAR 10 1987

E-1

State of Ohio Environmental Protection Agency
361 E. Broad St., Columbus, Ohio 43216-1049, (614) 466-8565

I certify this to be a true and accurate copy of the official document filed in the records of the Ohio Environmental Protection Agency.
MAR 10 1987

Chemical Waste Management, Inc.
3003 Butterfield Road
Oak Brook, Illinois 60521
312/654-8800

April 25, 1985

Ms. Deborah Tegtmeyer
Surveillance & Enforcement Section
Division of Solid and Hazardous Waste Management
Ohio Environmental Protection Agency
361 E. Broad St.
Columbus, OH 43216-1049

RE: Certificates of Insurance for O.L.D. -
USEPA ID # OHD020273819

Dear Ms. Tegtmeyer:

This letter summarizes our previous conversation regarding the applicability of liability insurance requirements to O.L.D.'s deepwells.

As we discussed, when Ohio adopted UIC regulations, the RCRA financial responsibility regulations found at O.A.C. 3745-55-47 were adopted by reference. In so doing, injection well owners/operators became obligated to provide evidence of financial assurance for closure and liability assurance.

As you know, Waste Management, Inc.'s March 30, 1985 financial test and corporate guarantee letters identified the costs of plugging O.L.D.'s wells. These costs were shown separately from the RCRA costs.

On April 22, 1985, I sent you new certificates of insurance for O.L.D. The insurance coverage applies to the entire site and not just the RCRA regulated portions. Therefore, the liability insurance requirement for the wells is satisfied by the submission of the RCRA insurance certificates.

If you have questions feel free to call me at 312/654-8800.

Yours truly,

Sheri K. Swibel

Sheri K. Swibel
Assistant to General Counsel

SKS/pw

cc: Walter Heald
Steve Bowe
Kathy Trent

E-2

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL
MAR 10 1987

I certify this to be a true and accurate copy of the [illegible] in the records of the Ohio [illegible] Agency.

By: [illegible] Date MAR 10 1987

April 24, 1985

MEMO TO: DISTRIBUTION

FROM: Sheri Swibel

RE: Certificates of Insurance

This memo follows up on my March 4 memo regarding the status of WMI's pollution liability insurance.

On Monday, April 22, new certificates of insurance from WMI's new insurer were sent certified mail to the agency responsible for regulating your hazardous waste activities. Copies of those certificates are attached. As a courtesy, I also phoned each agency today to assure them that the sites would be in compliance on April 25.

Each site should now have on file either two or three insurance certificates. Except for Coalinga and GROWS which are receiving theirs today, all sites should already have on file a certificate of sudden, accidental insurance from American Motorists Insurance Co. The effective date of this policy is 1/1/84; the limits of liability are $1 million per occurrence and $1 million annual aggregate. Excess sudden and accidental liability coverage is provided by National Union Fire Insurance. If you operate(d) a disposal site, non-sudden, accidental insurance is also required. National Union has issued certificates for this type of coverage as well.

For those sites which use the financial test/corporate guarantee to demonstrate compliance with the closure/post-closure care financial assurance requirements, a copy of the recently submitted test/guarantee is also enclosed. WMI considers the closure/post-closure cost estimate data contained in the financial test to be business confidential. If a customer (or anyone else) requests, in writing or orally a copy of the test, kindly forward the inquiry to me. If a customer is on-site and wishes to examine the financial test, you may show it to him. However, you should not allow him to copy the information.

If you have any questions, feel free to call me at 312/654-8800.

SKS/pw

Attachment

I certify this to be a true and accurate copy of the ... records of the Ohio Environmental Protection Agency.

By: [illegible] Date MAR 10 1987

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Ohio Environmental Protection Agency
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MAR 10 1987

DISTRIBUTION:

Ray Kellas
Cliff McDaniel
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John Costanzo

George Spira
Jim Bock
Art Dudzkinski
Rodger Henson
Ed Aromi
Corpus Christi
Kerri Mullins
Jane Fitzgerald
Joe Zorn
Bakersfield
Coalinga
Craig McKenzie
Scott Otterson
John Furman

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

Mary Shadle MAR 10 1987

E-4

Ohio Environmental Protection Agency
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MAR 10 1987

liability insurance covering bodily injury and property damage to Waste Management, Inc. ("Insured"), of 3003 Butterfield Rd, Oak, Brook, IL 60521 in connection with the Insured's obligation to demonstrate financial responsibility under rule 3745-55-47 of the Administrative Code. The coverage applies at:

Name, Address	Ohio Permit #	EPA Identification Number
Chemical Waste Management, Inc. (Ohio Liquid Disposal) 3956 State Route 412 Vickery, OH 43464	03-72-0191	OHD020273819

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

By: Mary Shadle Date MAR 10 1987

for non-sudden accidental occurrences. The limits of liability are $3,000,000 each occurrence and $6,000,000 annual aggregate exclusive of legal defense costs. The coverage is provided under Policy No. PRM-9310984 issued on April 25, 1985. The effective date of said policy is April 25, 1985.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

   (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

   (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of rule 3745-55-47 or paragraph (F) of rule 3745-66-47 of the Administrative Code.

   (c) Whenever requested by the Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.

   (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Director.

   (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is identical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more states.

R. S. Davis

Robert S. Davis
Vice President
Authorized Representative of
National Union Fire Insurance Co.
of Pittsburgh, PA
70 Pine St.
New York, New York 10270

CERTIFICATE ISSUED TO:

Director
Ohio Environmental Protection Agency
361 East Broad
Columbus, OH 43215
ATTN: Deborah Tegtmeyer
Division of Solid & Hazardous
Waste Management

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

3003 Butterfield Road • Oak Brook

March 30, 1985

Director, Ohio Environmental
Protection Agency
Division of Hazardous Materials
Management
361 East Broad Street
Columbus, OH 43215

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

By: Mary Steele Date MAR 10 1987

Dear Director:

I am the chief financial officer of Waste Management, Inc., 3003 Butterfield Road, Oak Brook, Illinois, 60521. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: NONE

2. This firm guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

EPA Identification # Name Address	Current Closure Estimate	Current Post-Closure Estimate
#AZT050010180 Chemical Waste Mgmt, Inc. 2301 W. Broadway Road Phoenix, AZ 85005	$ 140,080	Not Applicable
#COD000695007 Chemical Waste Mgmt, Inc. (Denver-Arapahoe Chem.Waste Processing) 25700 E. Yale Aurora, CO 80014	6,814,000	698,000

312 654-8800 • Telex: 253094 • TWX: 910-651-0029

Ohio Environmental Protection Agency
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EPA Identification # Name Address	Current Closure Estimate	Current Post-Closure Estimate
#FLD000776708 Chemical Waste Management, Inc. 2700 N.W. 48th St. Pompano Beach, FL 33067	24,174	Not Applicable
#OHD020273819 Chemical Waste Mgmt., Inc. (Ohio Liquid Disposal) 3956 State Route 412 Vickery, OH 43464 Ohio EPA Permit #03720191	10,350,000	11,250,720
Ohio EPA Permit #03720191 Ohio EPA Permit #5 21N00016501 (RCRA) through 21N00016506 (UIC)	468,000	Not Applicable
#OHD000724161 Chemical Waste Mgmt., Inc. 3106 Snyder-Domer Road Springfield, OH 45502 Ohio EPA Permit #05120335	68.744	Not Applicable
#OHD068111327 Ohio Waste Systems, Inc. (Evergreen Landfill) 6525 Wales Road Northwood, OH 43619 Ohio EPA Permit #03870416	278,890	1,107,600
#ALD000622464 Chemical Waste Mgmt., Inc. P.O. Box 55 Emelle, AL 35459	2,201,700	2,165,600
#CAT000624056 Chemical Waste Mgmt., Inc. P. O. Box 5716 Bakersfield, CA 93388	460,749	548,598
#CAT000646117 Chemical Waste Mgmt., Inc. (Kettleman Hills) 35250 Old Skyline Road Kettleman City, CA 93239	1,741,648	1,284,210

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

By: [illegible] Date MAR 10 1997

Ohio Environmental Protection Agency
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MAR 10 1987

EPA Identification # Name Address	Current Closure Estimate	Current Post-Closure Estimate
#ILD074411745 Waste Management of Illinois, Inc. (E.S.L. Inc.) Rt 1, Box 109, Laraway Rd. Elwood, IL 60421	517,329	7,200,000
#ILD010284248 Waste Management of Illinois, Inc. (C.I.D.) 138th & Calumet Expwy. Calumet City, IL 60409	1,009,281	3,537,120
ILD098642464 Chemical Waste Mgmt., Inc. d/b/a Trade Waste Incineration 7 Mobile Avenue Sauget, IL 62201	222,394	Not Applicable
#IND000708446 Indiana Waste Systems, Inc. (Wheeler Landfill) State Rd 130 & Jones Rd Wheeler, IN 46393	138,083	1,618,650
#TXD000761254 Chemical Waste Mgmt., Inc. 6901 Greenwood Road Corpus Christi, TX 78417	1,283,944	697,015
#TXD000838896 Chemical Waste Mgmt., Inc. P.O. Box 2563 Port Arthur, TX 77640	2,330,119	2,493,629
#WID098547854 Waste Management of Wisconsin, Inc. Metro Landfill 10712 S. 124th Street Franklin, WI 53132	728,712	8,8[illegible]
#WID003967148 Waste Management of Wisconsin, Inc. Omega Hills-North N 96 W 12730 County Line Road Germantown, WI 53022	2,437,222	2,[illegible]

I certify this to be a true and accurate copy of th[illegible] official document as filed in the records of the Ohi[illegible] Environmental Protection Agency.

By Mary Hadle Date MAR 10 198[illegible]

Ohio Environmental Protection Agency
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MAR 10 1987

EPA Identification # Name Address	Current Closure Estimate	Current Post-Closure Estimate
#MID000810408 Michigan Waste Systems, Inc. (Woodland Meadows Landfill North) 4620 Hannan Road Wayne, MI 48184	20,000	570,783
Subtotal	$31,235,069	$44,426,618
GRAND TOTAL		$75,661,687

3. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to Ohio EPA through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 and 3745-66 of the Administrative Code or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assuances are shown for each facility: NONE

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

Alternative II

1. Sum of current closure and post-closure cost estimates $75,661,687

2. Current bond rating of most recent issuance of this firm ..... Standard Poor's AA-
and name of rating service..... Moody's A1

3. Date of issuance of bond 12-15-1984

4. Date of maturity of bond 12-15-1994

*5. Tangible net worth of $461,584,000

... this to be a true and accurate copy of the ... as filed in the ... of the Ohio ... Protection Agency.
... 10 1987 E-11
... Date
Ohio Environmental Protection Agency
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MAR 1 0 1987

*6. Total assets in U.S. $1,706,901,000

7. Is line 5 at least $10 million ?..... Yes

8. Is line 5 at least 6 times line 1?..... Yes

*9. Are at least 90% of firm's assets located in the U.S.? ..... No

10. Is line 6 at least 6 times line 1?..... Yes

I hereby certify that the wording of this letter is identical to the wording specified in paragraph (f) of rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.

Donald F. Flynn,
Senior Vice President & Chief
Financial Officer & Treasurer

March 30, 1985

Enclosures:
Arthur Andersen & Co. Special Report dated March 30, 1985
Waste Management, Inc. Corporate Guarantee letter for Michigan Waste Systems, Inc. dated March 30, 1985
Waste Management, Inc. Annual Report 1984

I certify this to be a true and accurate copy of the [illegible] is filed in the records of the Ohio [illegible] Protection Agency.

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
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MAR 10 1987

ARTHUR ANDERSEN & CO.

33 WEST MONROE STREET
CHICAGO, ILLINOIS 60603
(312) 580-0033

March 30, 1985

Mr. Donald F. Flynn
Senior Vice President, Chief Financial
Officer and Treasurer
Waste Management, Inc.
3003 Butterfield Road
Oak Brook, IL 60521

Dear Mr. Flynn:

We have examined the consolidated balance sheet of Waste Management, Inc. and Subsidiaries (the "Company") as of December 31, 1984, and the related statements of income, stockholders' equity and changes in financial position for the year then ended and have expressed an unqualified opinion on those statements in our report dated February 21, 1985. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read your letter dated March 30, 1985, to the Director of the Ohio Environmental Protection Agency supporting the Company's use of the financial test to demonstrate financial assurance, as specified in Sections 3745-55 and 3745-66 of the Ohio Administrative Code. As further required by such regulations, we have compared the data specified in your letter as having been derived from the independently audited financial statements referred to above with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is furnished solely for the use of the Company and the Company's distribution to the Director of the Ohio Environmental Protection Agency and is not to be used for any other purpose.

Very truly yours,

Arthur Andersen & Co.

I certify this to be a true and accurate copy of the [illegible] filed in the records of the Ohio Environmental Protection Agency.

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL
MAR 10 1987

Waste Management, Inc.
3003 Butterfield Road • Oak Brook, Illinois 60521

March 30, 1985

Director, Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street
Columbus, Ohio 43215

Dear Director:

Guarantee made this March 30, 1985 by Waste Management, Inc., a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor, to the Ohio Environmental Protection Agency, obligee, on behalf of our subsidiary of Chemical Waste Management, Inc. of 3003 Butterfield Road, Oak Brook, Illinois 60521.

RECITALS

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in paragraph (f) of rule 3745-55-43 and 3745-55-45 of the Administrative Code or paragraph (e) of rule 3745-66-43 and 3745-66-45 of the Administrative Code.

2. Chemical Waste Management, Inc. owns or operates the following hazardous waste management facilities covered by this guarantee:

EPA Identification # Name Address	Guarantee For
#OHD020273819 Chemical Waste Mgmt., Inc. (Ohio Liquid Disposal) 3956 State Route 412 Vickery, OH 43464 Ohio EPA Permit #03720191	Closure and Post-Closure
#OHD000724161 Chemical Waste Mgmt., Inc. 3106 Snyder-Domer Road Springfield, OH 45502 Ohio EPA Permit #05120335	Closure

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

By: Mary Shadle Date MAR 10 1987

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by Chapters 3745-55 and 3745-66 of the Administrative Code for the closure and post-closure care of facilities as identified above.

Ohio Environmental Review
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4. For value received from Chemical Waste Management, Inc., guarantor guarantees to EPA that in the event that Chemical Waste Management, Inc. fails to perform "closure and post-closure care" of the above facilities in accordance with the closure or post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Chemical Waste Management, Inc., in the amount of the current closure or post-closure cost estimates as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the Director, Ohio EPA and to Chemical Waste Management, Inc. that he intends to provide alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Chemical Waste Management, Inc. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Chemical Waste Management, Inc. has done so.

6. The guarantor agrees to notify the Director by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by the Director of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care, he shall establish alternate financial assurance as specified in Chapter 3745-55 and 3745-66 of the Administrative Code, as applicable, in the name of Chemical Waste Management, Inc. unless Chemical Waste Management, Inc. has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure, or any other modification or alteration of an obligation of the owner or operator pursuant to Chapters 3745-55 and 3745-66 of the Administrative Code.

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

By: [illegible] Date MAR 10 1987 E-15

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

9. Guarantor agrees to remain bound under this guarantee for so long as Chemical Waste Management, Inc. must comply with the applicable financial assurance requirements of Chapters 3745-55 and 3745-66 of the Administrative Code for the above-listed facilities, except that guarantor may cancel this guarantee by sending notice by certified mail to the Director and to Chemical Waste Management, Inc., such cancellation to become effective no earlier than 120 days after receipt of such notice by both Ohio EPA and Chemical Waste Management, Inc. as evidenced by the return receipts.

10. Guarantor agrees that if Chemical Waste Management, Inc. fails to provide alternate financial assurance as specified in Chapters 3745-55 and 3745-66 of the Administrative Code, as applicable, and obtain written approval of such assurance from the Director within 90 days after a notice of cancellation by the guarantor is received by the Director from guarantor, guarantor shall provide such alternate financial assurance in the name of Chemical Waste Management, Inc.

11. Guarantor expressly waives notice of acceptance of this guarantee by the Ohio EPA or by Chemical Waste Management, Inc. Guarantor also expressly waives notice of amendments or modifications of the closure and/or post-closure plan and of amendments or modifications of the facility permits.

I hereby certify that the wording of this guarantee is identical to the wording specified in paragraph (h) of rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date first above written.

Effective Date: March 30, 1985

WASTE MANAGEMENT, INC.

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

By: Mary Shadle Date MAR 10 1987

Donald F. Flynn
Senior Vice President/Chief
Financial Officer/Treasurer

Subscribed and sworn to before me Christine M. Dieck, this 30th day of March, 1985.

Christine M. Dieck
Notary Public

My commission expires: 2-23-86

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

Chemical Waste Management
Well No. 2

ATTACHMENT F

CORRECTIVE ACTION PLAN

I certify this to be a true and accurate copy of the [illegible] filed in the records of the Ohio Environmental Protection Agency.

By: Mary Hadle Date MAR 10 1987

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

ATTACHMENT F

CORRECTIVE ACTION PLAN

A. Protection of USDW

Should upward fluid migration occur through the wellbore of any previously unknown, improperly plugged or unplugged well in the 3.5 mile radius area of review due to injection of permitted fluids, injection will be shut-in until proper plugging can be accomplished. Any flowage from such undiscovered wells will be considered noncompliance with this permit. Should any problem develop in the casing of the injection well, injection will be shut-in until such repairs can be made as to remedy the situation.

B. Prior Releases

Ohio EPA retained the services of URM consultants, Austin, Texas, to analyze information on prior releases of wastes into the Maynardsville and Rome Formations. Their conclusions were that no threat existed to human health or the environment as a result of these prior releases. However, if any future datum indicates anything to the contrary, Ohio EPA will require that appropriate action be taken by the facility.

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

By: Mary Carson Date 8-10-90

OHIO E.P.A.

AUG 10 90

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Chemical Waste Management
Well No. 2

ATTACHMENT G

QUALITY ASSURANCE ACKNOWLEDGEMENT

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

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

ATTACHMENT G

QUALITY ASSURANCE ACKNOWLEDGEMENT

I herby affirm that all chemical data submitted for Injection Well Permit No. _____ is of known quality and was obtained from samples using methods prescribed in the Ohio EPA Quality Assurance Plan and the approved "Sampling and Analysis Plan". I also acknowledge the right of Ohio EPA to inspect the operation sampling protocols calibration records, analytical records and methods and Quality Assurance Sampling and Analyses plan for the monitoring operations required.

_____ Date

_____ Authorized Agent Signature

For _____
Name of Company

1814R(31)

I certify this to be a true and accurate copy of the [illegible] as filed in the records of the Ohio [illegible] Protection Agency.

By Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
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MAR 10 1987

OHIO ENVIRONMENTAL PROTECTION AGENCY

Revised Ohio Hazardous Waste Installation and Operation Permit

Date of Issuance: December 30, 1988
Effective Date: December 30, 1988

US EPA ID No.: OHD020273819
Ohio Permit No.: 03-72-0191

Name of Facility: Chemical Waste Management, Inc.

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

Person to Contact: F. G. Nicar, General Manager

This Revised Ohio Hazardous Waste Installation and Operation Permit is issued pursuant and subject to Sec. 3734.05 (H) of the Ohio Revised Code and Rule 3745-50-51 of the Ohio Administrative Code.

The Ohio Hazardous Waste Installation and Operation Permit with the above-referenced permit number as it may have been revised or modified prior to this date, is hereby incorporated by reference in its entirety except as it may be revised herein.

This revision of the permit shall remain in effect until such time as the Ohio Hazardous Waste Installation and Operation Permit is renewed, withdrawn, suspended or revoked.

The permittee shall comply with all requirements of the revised Part A permit application as attached hereto and incorporated herein. Specifically, all statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the revised permit application are hereby incorporated as express, binding terms and conditions of this revised permit.

Other Special Terms and Conditions of this revised permit are attached hereto and are incorporated herein by reference.

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

By: Mary Caven Date 12-30-88

Richard L. Shank, Ph.D.
Director

1899R(47)

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

DEC 30 1988

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

Summary of Revision to Hazardous Waste Installation

and Operation Permit

Chemical Waste Management, Inc.
US EPA ID No.: OHD020273819
Ohio Permit No.: 03-72-0191

1. Decrease in tank storage (SO2) process design capacity from 1,439,000 gallons to 1,139,000 gallons;

2. Removal of three (3) 400,000 gallon tanks from service;

3. Decontamination of one (1) 400,000 gallon tank and returned at a later date to non-hazardous service;

4. Installation of four (4) 200,000 gallon tanks;

5. Installation of two (2) 100,000 gallon tanks; and,

6. Installation of secondary containment for the six (6) tank area.

1899R(48)

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

By: Mary Cavin Date 12-30-88

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

DEC 30 1988

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

Special Terms and Conditions

US EPA ID No.: OHD020273819
Ohio Permit No.: 03-72-0191

Name of Facility: Chemical Waste Management, Inc.
Vickery, Ohio

1. Only those hazardous wastes as identified by the USEPA Hazardous Waste Number(s) set forth in the approved permit application, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.

2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.

3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.

4. Each tank system, prior to being put into service, shall be inspected by an independent, qualified installation inspector or an independent, qualified, registered professional engineer, either of whom is trained and experienced in the proper installation of tank system and component for the presence of any of the following items:

   a. weld breaks
   b. punctures
   c. scrapes of protective coatings
   d. cracks
   e. corrosion
   f. other structural damage or inadequate construction or installation

   All discrepancies shall be remedied before the tank system is placed in use.

5. Prior to start-up and at the conclusion of separate phases of tank construction and installation, Chemical Waste Management shall obtain and submit to Ohio EPA, for its approval, written statements of those persons required to supervise the installation of the tank system in accordance with the applicable tank construction and installation requirements of this permit and paragraphs (b) through (f) of 40 CFR 265.192 which statements attest that the tank system was properly installed and that appropriate repairs, pursuant to paragraphs (b) through (d) of 40 CFR 265.192, were performed.

1899R(49)

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

By: Mary Cevin Date 12-30-88

Ohio Environmental Protection Agency
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DEC 30 1988

PUBLIC NOTICE Sandusky County

REVISION TO OHIO HAZARDOUS WASTE INSTALLATION AND OPERATION PERMIT

Notice is hereby given of the final issuance on December 30, 1988, of a Revised Hazardous Waste Installation and Operation Permit to: Chemical Waste Management, Inc., 3956 State Route 412, Vickery, Ohio 43464, US EPA ID No.: OHD020273819, Ohio Permit No.: 03-72-0191. This action is not preceded by a proposed action and is appealable to the EBR.

Ohio Environmental Protection Agency
Response to Comments Concerning
the Chemical Waste Management
Draft Revised Hazardous Waste Installation
and Operation Permit No. 03-72-0191

September 22, 1988

INTRODUCTION

A public hearing was conducted by Ohio EPA on the evening of August 8, 1988, at the Fremont Ross High School in Fremont, Ohio. The purpose of this meeting was to afford the citizens in the Vickery area an opportunity to submit written comments or present oral testimony relevant to the draft hazardous waste permit revision for the Chemical Waste Management at Vickery. The public comment period on this matter officially closed August 22, 1988.

While the subject matter of the public meeting was the draft hazardous waste permit revision, a number of comments were received concerning other operations at the site.

This responsiveness summary will be divided into two sections, the first section will address comments received which pertain specifically to the draft hazardous waste permit revision.

The second section of the responsiveness summary will address all other comments.

SECTION I

Responses to comments on the Draft Revised Hazardous Waste Permit.

1. Comment : The permit should be a modification instead of a revision.

   Response: Ohio Administrative Code Rule 3745-50-51 (B)(1)(e) states that a permit change request is classified as a modification if " A treatment, storage, or disposal facility requesting additional operational capacity when such additional capacity may present a potential increased risk of hazard to the public health and the environment when compared to the operational capacity previously approved for treatment, storage or disposal at the facility." The Revised Hazardous Waste Permit issued on March 10, 1987 includes a storage capacity in tanks of 1,439,000 gallons. The new Revised Hazardous Waste Permit will reduce the storage capacity in tanks to 1,139,000 gallons. Ohio EPA believes that the new tank system does not present a potential increased risk of hazard to the public health and the environment. Ohio EPA believes that the tank system provides a better protection to the public health and the environment.
   Given the above, Ohio EPA decided that the permit change request should be classified as a revision.

2. Comment : Contractors tend to wander on and off site uncontrolled.

   Response: All contractors must sign-in and sign-out at the guard post. Entries and exits on site are always monitored. Also, Chemical Waste Management has an operations manager on site 24 hours/day to monitor activities on site. In addition, Ohio EPA has an inspector on-site 40 hours a week and conducts random off-hour inspections.

SECTION II

Responses to comments on other operations at the site.

1. Comment : I am concerned about the removal of the old tanks. A permit to dismantle the old tanks should be acted on before any permit to install new tanks is issued.

   Response: On February 1, 1988, Chemical Waste Management submitted to Ohio EPA a closure plan for the old tanks (W-tanks). Revisions to the closure plan were received on June 2, 1988. On July 19, 1988 Ohio EPA approved the closure plan with modifications.

2. Comment : Ohio EPA reaction to Myers Ditch Spill on March 5, 1988.

   Response: The spill was largely contained on-site and the off-site discharge had no demonstrated adverse impact on the environment. This incident reflects positively on the surface water management plan for the Chemical Waste Management. The company has submitted a report outlining the details of the spill. Ohio EPA believes that the steps outlined in the report indicate proper handling of the situation.

3. Comment : How can Chemical Waste Management operate with an expired Part A Permit.

   Response: Ohio Administrative Code Rule 3745-50-56 states that: " A facility operating pursuant to a Hazardous Waste Permit that has expired may continue to operate in accordance with the terms and conditions of the expired permit until the Renewal Permit is issued or denied if:
   A) The permittee has submitted a timely and complete application for a renewal permit under Rule 3745-50-40 of the Administrative Code; and
   B) Through no fault of the permittee, a new permit has not been issued pursuant to the Rule 3745-50-40 of the Administrative Code on or before the expiration date of the previous permit."

   Chemical Waste Management submitted a complete application on September 26, 1984. In accordance with the provisions of Sec. 119.06 of the Ohio

Revised Code, CWM permit will remain in effect until formal action is taken on their application by Ohio EPA.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Revised Ohio Hazardous Waste Installation and Operation Permit

Date of Issuance: March 10, 1987
Effective Date: March 10, 1987

US EPA ID No.: OHD020273819
Ohio Permit No.: 03-72-0191

Name of Facility: Chemical Waste Management, Inc.

Mailing Address: 3956 State Route 412
Vickery, Ohio 43464

Facility Location: 3956 State Route 412
Vickery, Ohio 43464

Person to Contact: Frederick Nicar, General Manager

This Revised Ohio Hazardous Waste Installation and Operation Permit is issued pursuant and subject to Sec. 3734.05 (H) of the Ohio Revised Code and Rule 3745-50-51 of the Ohio Administrative Code.

The Ohio Hazardous Waste Installation and Operation Permit with the above-referenced permit number as it may have been revised or modified prior to this date, is hereby incorporated by reference in its entirety except as it may be revised herein.

This revision of the permit shall remain in effect until such time as the Ohio Hazardous Waste Installation and Operation Permit is renewed, withdrawn, suspended or revoked.

The permittee shall comply with all requirements of the revised Part A permit application as attached hereto and incorporated herein.

Any Special Terms and Conditions of this revised permit are attached hereto and are incorporated herein by reference.

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

By: Mary Shadle Date MAR 10 1987

Warren W. Tyler

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

MAR 10 1987

1886R(2)

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

Summary of Revision to Hazardous Waste Installation

and Operation Permit

Chemical Waste Management, Inc.
US EPA ID No.: OHD020273819
Ohio Permit No.: 03-72-0191

1. Addition of waste streams D011 and F019 to correct errors on the Part A and accomodate changes in the Federal Lists of Hazardous Waste;

2. Decrease in tank storage (S02) capacity;

3. Addition of treatment in tanks (T01), to correct previous permit which included this activity as storage in tanks (S02) or as treatment other (T04);

4. Decrease in injection well (D79) disposal capacity;

5. Decrease in surface impoundment (S04) storage capacity;

6. Change in process code designation to T02 at 100,000 gallons per day to correct previous permit which included these activities as treatment other (T04) and surface impoundment storage (S04);

7. Change in process code designation of injection well disposal (D79) to treatment filtration (T04) at 650,000 gallons per day in order to correct previous permit;

8. Deletion of treatment other (T04) which is more correctly described by new process codes treatment in tanks (T01) and surface impoundment treatment (T02);

9. Change in facility owner to Chemical Waste Management Holdings, Inc.; and,

10. Change in facility contact person to Frederick Nicar, General Manager.

1886R(3)

Ohio Environmental Protection Agency
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MAR 10 1987

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

By: Mary Shadle Date MAR 10 1987

SPECIAL TERMS AND CONDITIONS

US EPA ID No.: OHD020273819
Ohio Permit No.: 03-72-0191

Name of Facility: Chemical Waste Management, Inc.

1. Chemical Waste Management's Vickery facility is prohibited from receiving for final treatment, storage and disposal, any acutely hazardous materials (i.e. P-coded wastes) as listed in 40 CFR 261.33. This prohibition shall take effect on January 1, 1987, in accordance with Ohio Revised Code Section 3734.141.

2. The treatment of wastes in existing surface impoundments shall be conducted only as needed to facilitate the closure of impoundment cells #11 and #12.

3. Within six (6) months of the effective date of this revised permit, Chemical Waste Management must provide Ohio EPA with a certification of the structural integrity of tanks W-3, W-4, W-5, and W-7. This certification must be made by an independent registered professional engineer. Such a certification may reflect the results of inspection or testing which may have been conducted within the six (6) months preceding the issuance of this revised permit, should such results be available.

4. Chemical Waste Management is prohibited from introducing additional receipts of offsite wastes into surface impoundments #11 and #12.

5. Order Number 3 (Waste Product Review) of the Director's Findings and Orders issued August 26, 1986, shall remain in effect.

6. The requirements of Order Number 2(a) of the Director's Findings and Orders issued August 26, 1986, shall remain in effect until such time as an alternative operations plan for the CWM-Vickery facility is approved by the Director. CWM shall submit a proposed operations plan to the Director by no later than seven (7) days from the effective date of this revised permit. The operations plan shall address scheduling waste receipts at the facility and provisions for continuous monitoring of compliance with all applicable environmental requirements. CWM shall implement the provisions of the operations plan upon receipt of approval by the Director.

1886R(4)

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

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
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MAR 10 1987

7. Chemical Waste Management shall submit an annual report to the Director for review, within 14 days of the end of each calendar year, that provides a comprehensive review of all facility activities that transpired during the year. The report shall describe in sufficient detail: (A) the facility's record of compliance during the year with Ohio Revised Code Chapters 3734, 3704, and 6111, the rules adopted under those Chapters, the terms and conditions of all existing permits and any orders entered into to enforce such requirements. The report shall include a narrative summarizing all incidents of non-compliance and the corrective measures taken in remediation; (B) the operation and maintenance of all facility processes and systems relating to hazardous waste management including, but not limited to, measures taken to assure effective performance (of facility processes and systems), adequate funding, adequate operator staffing and training, adequate laboratory controls or quality assurance procedures; and (C) information summarizing the nature and amount of waste actually received and the movement of such waste managed at the facility.

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

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
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MAR 10 1987

OHIO ENVIRONMENTAL PROTECTION AGENCY

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

FACT SHEET

Facility Name:	Chemical Waste Management, Inc. (CWM)
Facility Location:	3956 State Route 412, Vickery, Ohio 43464
US EPA ID Number:	OHD020273819
Ohio Permit Number:	03-72-0191

Chemical Waste Management, Inc. (CWM) operates a liquid hazardous waste treatment facility near the intersection of State Routes 412 and 510 in Riley Township, Sandusky County. The facility is situated on 70 acres of land. Final disposal of treated hazardous wastes is conducted through the injection of the material into six deep wells. The company is authorized by their existing permit to store and treat wastes in surface impoundments and above ground tanks. In order to manage such a facility: (1) in compliance with the Ohio EPA hazardous waste rules; (2) in compliance with a consent decree; and, (3) with the assurance of protecting human health and the environment, the storage and treatment of any future new wastes in surface impoundments must be ceased.

The proposed revisions are necessary in order to: (1) add waste streams: D011 and F019 to correct errors on the Part A and accommodate changes in the federal hazardous waste lists; (2) decrease existing tank storage; (3) conduct treatment in tanks which was previously and incorrectly classified as storage and treatment other (T04); (4) decrease in injection well capacity; (5) decrease and eventually cease all surface impoundment activity; (6) change previous process code designation to T02 at 100,000 GPD from treatment other (T04) and surface impoundment storage (S04); (7) change process code designation of injection well filtration equipment (D79) to treatment filtration (T04), thus correcting previous permit.

The revisions proposed in this draft permit are necessary to ensure that the facility will be operated in compliance with these rules and other provisions of the Ohio EPA hazardous waste rules, interim standards and chapters and U.S. EPA guidance. Specifically, Special Term and Condition No. 1 is necessary to assure compliance with Section 3734.141 of the Ohio Revised Code (ORC). The statutory ban on the land disposal of acutely hazardous waste is authorized under amended Substitute House Bill 506. Special Term and Condition No. 2 is necessary in order to assure compliance with a consent decree filed in the

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OHIO EPA

Sandusky Court of Common Pleas on May 22, 1984. Storage and treatment in the referenced surface impoundment will be conducted in accordance with Ohio Administrative Code (OAC) Rule 3745-66-11. Special Term and Condition No. 3 is necessary in order to certify the structural integrity of several treatment tanks. This requirement is consistent with OAC Rule 3745-66-94(D). Special Term and Condition No. 4 is necessary in order to ensure the proper closure of surface impoundment #11 and #12. This condition is an extension of the above cited consent decree and amplifies OAC Rule 3745-66-11. Special Term and Condition No. 5 is included to reflect changes in the prior permit which are needed to demonstrate compliance with the orders and decree. This condition is also necessary in order to assure the safety and well-being to human health and the environment.

A public notice has been issued concurrently with the issuance of the draft revised permit. The public notice should appear in the Fremont News Messenger on December 30, 1986. The comment period will end February 13, 1987.

A public meeting has been scheduled in regard to this revised permit. The hearing will be held Monday, February 2, 1987, at 7:00 p.m. in the Fremont Junior High School Cafeteria, 501 Croghan Street, Fremont.

Copies of the application and of the draft revised permit are available for public inspection at the Ohio EPA, Northwest District Office, 1035 Devlac Grove Drive, Bowling Green, Ohio 43402, tel. (419) 352-0461 during normal business hours until the close of the comment period. Questions concerning the draft permit should be directed to the Northwest District Office, Attn: Chuck Hull at the office indicated above.

1886R(5)

GENERAL

EPA

Consolidated Permits Program
(Read the "General Instructions" before starting.)

F | O H D 0 2 0 2 7 3 8 1 9 | D

I. EPA I.D. NUMBER	
II. FACILITY NAME	
III. FACILITY MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
IV. FACILITY LOCATION	

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the Instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X" YES	MARK "X" NO	MARK "X" FORM ATTACHED	SPECIFIC QUESTIONS	MARK "X" YES	MARK "X" NO	MARK "X" FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP CHEMICAL WASTE MANAGEMENT INC VICKERY

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 NICAR FREDERICK GENERAL MGR.	419 547 7791

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 3956 STATE ROUTE 412

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 VICKERY	OH	43464

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

3956 STATE ROUTE 412

B. COUNTY NAME

SANDUSKY COUNTY

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE
6 VICKERY	OH	43464	

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Environmental Protection Agency.

By: Mary Shadle Date MAR 10 1987

EPA Form 3510-1 (8-80)

CONTINUE ON REVERSE

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
(specify) Hazardous Waste Facility	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: CHEMICAL WASTE MANAGEMENT INC

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, M = PUBLIC (other than federal or state), S = STATE, O = OTHER (specify), P = PRIVATE: P

D. PHONE (area code & no.): A 312 572 8800

E. STREET OR P.O. BOX: 3003 BUTTERFIELD ROAD

F. CITY OR TOWN: OAK BROOK

G. STATE: IL

H. ZIP CODE: 60521

IX. INDIAN LAND
Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): N 2IN0000016*CD	D. PSD (Air Emissions from Proposed Sources): P AIR PERMITS
B. UIC (Underground Injection of Fluids): U 2IN000016	E. OTHER (specify): 037200105
C. RCRA (Hazardous Wastes): R 03-72-0191	E. OTHER (specify):

(specify) Air Permits have been applied for with OEPA for Storage and Treatment Operations.

(specify) Boiler #1 & #2

(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The Vickery Facility receives only aqueous wastes for treatment and Deepwell disposal. Historically wastes were received in surface impoundments prior to filtration and Deepwell injection. CWM proposes to construct and operate an Integrated Aqueous Waste Treatment System which will treat all wastes received by the facility before they are filtered and Deepwell injected. When the system is put into operation the facilities surface impoundments will be closed. The facility also had an Oil Reclamation Facility which has been decommissioned.

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

By: Mary Shadle Date MAR 10 1987

Ohio Environmental Protection Agency
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XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Milo Harrison, Senior Vice President	Milo Harrison	10/31/86

COMMENTS FOR OFFICIAL USE ONLY

(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S0004

FORM 3 RA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F O H D 0 2 0 2 7 3 8 1 9 1

OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
5 8	0 3	0 1

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[X] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

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UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C D U P 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
	S 0 2	1.439×10^6	G	
2	T 0 1	650,000	U	
3	D 7 9	2.4×10^9	G	
4	S 0 4	161.5×10^6	G	

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5	T 0 2	100,000	U	
6	T 0 4	650,000	U	
7	D 8 3	2.2×10^8	G	
8	T 04a	350	D	
9				
10				

I certify this to be a true and accurate copy of the original document on file in the records of the Ohio Environmental Protection Agency.

By: Mary Shukle Date MAR 10 1987

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

S02 - Includes all existing site waste storage and treatment tanks (including sand interceptors, V-4, V-5, V-6, V-7, W-3, W-4, W-5, W-7, all F.A.T. Tanks, Lab Tank and Sluice Tank).

T04 - Filtration (volume equal to that material treated in tanks)

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

By: Mary Shedle Date MAR 10 1987

Ohio Environmental Protection Agency
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IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous wastes: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

...nued from page 2.
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EP	D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
	0 2 0 2 7 3 8 1 9 1	W DUP	2 DUP

...CRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
	D001	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5
	D001	89,000	T	S02 T01 D79	" " " "
	D002	89,000	T	S04 T02 D79	" " " "
	D002	89,000	T	S02 T01 D79	" " " "
	D003	89,000	T	S04 T02 D79	" " " "
	D003	89,000	T	S02 T01 D79	" " " "
	D004	89,000	T	S04 T02 D79	" " " "
	D004	89,000	T	S02 T01 D79	" " " "
	D005	89,000	T	S04 T02 D79	" " " "
0	D005	89,000	T	S02 T01 D79	" " " "
1	006	89,000	T	S04 T02 D79	" " " "
2	D006	89,000	T	S02 T01 D79	" " " "
3	D007	89,000	T	S04 T02 D79	" " " "
4	D007	89,000	T	S02 T01 D79	" " " "
5	D008	89,000	T	S04 T02 D79	" " " "
6	D008	89,000	T	S02 T01 D79	" " " "
7	D009	89,000	T	S04 T02 D79	" " " "
8	D009	89,000	T	S02 T01 D79	" " " "
9	D010	89,000	T	S04 T02 D79	" " " "
0	D010	89,000	T	S02 T01 D79	" " " "
1	D011	89,000	T	S04 T02 D79	" " " " ✓
2	011	89,000	T	S02 T01 D79	" " " "
3	D013	89,000	T	S04 T02 D79	" " " "
4	013	89,000	T	S02 T01 D79	" " " "
5	D014	89,000	T	S04 T02 D79	" " " "
6	D014	89,000	T	S02 T01 D79	" " " "

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EPA I.D. NUMBER (enter from page 1): H D 0 2 0 2 7 3 8 1 9 — 1

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D. DESCRIPTION OF HAZARDOUS WASTES (continued)

A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
D015	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
D015	89,000	T	S02 T01 D79	" " " "
D016	89,000	T	S04 T02 D79	" " " "
D016	89,000	T	S02 T01 D79	" " " "
F001	89,000	T	S04 T02 D79	" " " "
F001	89,000	T	S02 T01 D79	" " " "
F002	89,000	T	S04 T02 D79	" " " "
F002	89,000	T	S02 T01 D79	" " " "
F003	89,000	T	S04 T02 D79	" " " "
F003	89,000	T	S02 T01 D79	" " " "
F004	89,000	T	S04 T02 D79	" " " "
004	89,000	T	S02 T01 D79	" " " "
F005	89,000	T	S04 T02 D79	" " " "
F005	89,000	T	S02 T01 D79	" " " "
F006	89,000	T	S04 T02 D79	" " " "
F006	89,000	T	S02 T01 D79	" " " "
F019	89,000	T	S04 T02 D79	" " " "
F019	89,000	T	S02 T01 D79	" " " "
F007	89,000	T	S04 T02 D79	" " " "
F007	89,000	T	S02 T01 D79	" " " "
F008	89,000	T	S04 T02 D79	" " " "
F008	89,000	T	S02 T01 D79	" " " "
F009	89,000	T	S04 T02 D79	" " " "
F009	89,000	T	S02 T01 D79	" " " "
F010	89,000	T	S04 T02 D79	" " " "
F010	89,000	T	S02 T01 D79	" " " "

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A. I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
H D 0 2 0 2 7 3 8 1 9 — 1	W — DUP — 2 — DUP

E. ...TION OF HAZARDOUS WASTES (continued)

A. EPA HAZARD. TENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
F012	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
F012	89,000	T	S02 T01 D79	" " " "
K017	89,000	T	S04 T02 D79	" " " "
K017	89,000	T	S02 T01 D79	" " " "
K049	89,000	T	S04 T02 D79	" " " "
K049	89,000	T	S02 T01 D79	" " " "
K052	89,000	T	S04 T02 D79	" " " "
K052	89,000	T	S02 T01 D79	" " " "
K060	89,000	T	S04 T02 D79	" " " "
K060	89,000	T	S02 T01 D79	" " " "
K062	89,000	T	S04 T02 D79	" " " "
K062	89,000	T	S02 T01 D79	" " " "
P001	89,000	T	S04 T02 D79	" " " "
P001	89,000	T	S02 T01 D79	" " " "
P005	89,000	T	S04 T02 D79	" " " "
P005	89,000	T	S02 T01 D79	" " " "
P010	89,000	T	S04 T02 D79	" " " "
P010	89,000	T	S02 T01 D79	" " " "
P012	89,000	T	S04 T02 D79	" " " "
P012	89,000	T	S02 T01 D79	" " " "
P018	89,000	T	S04 T02 D79	" " " "
P018	89,000	T	S02 T01 D79	" " " "
P022	89,000	T	S04 T02 D79	" " " "
22	89,000	T	S02 T01 D79	" " " "
P030	89,000	T	S04 T02 D79	" " " "
P030	89,000	T	S02 T01 D79	" " " "

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D O 2 0 2 7 3 8 1 9 1	W DUP 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

Line No.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	P044	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
2	P044	89,000	T	S02 T01 D79	" " " "
3	P050	89,000	T	S04 T02 D79	" " " "
4	P050	89,000	T	S02 T01 D79	" " " "
5	P064	89,000	T	S04 T02 D79	" " " "
6	P064	89,000	T	S02 T01 D79	" " " "
7	P078	89,000	T	S04 T02 D79	" " " "
8	P078	89,000	T	S02 T01 D79	" " " "
9	P098	89,000	T	S04 T02 D79	" " " "
10	P098	89,000	T	S02 T01 D79	" " " "
11	P105	89,000	T	S04 T02 D79	" " " "
12	P105	89,000	T	S02 T01 D79	" " " "
13	P106	89,000	T	S04 T02 D79	" " " "
14	P106	89,000	T	S02 T01 D79	" " " "
15	P119	89,000	T	S04 T02 D79	" " " "
16	P119	89,000	T	S02 T01 D79	" " " "
17	P120	89,000	T	S04 T02 D79	" " " "
18	P120	89,000	T	S02 T01 D79	" " " "
19	U001	89,000	T	S04 T02 D79	" " " "
20	U001	89,000	T	S02 T01 D79	" " " "
21	U002	89,000	T	S04 T02 D79	" " " "
22	U002	89,000	T	S02 T01 D79	" " " "
23	U003	89,000	T	S04 T02 D79	" " " "
24	U003	89,000	T	S02 T01 D79	" " " "
25	U007	89,000	T	S04 T02 D79	" " " "
26	U007	89,000	T	S02 T01 D79	" " " "

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W OHD020273819 1 | W DUP 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U008	89,000	T	S04T02D79	*For all waste combinations and closure method, see p. 4 of 5.
2	U008	89,000	T	S02T01D79	" " " "
3	U009	89,000	T	S04T02D79	" " " "
4	U009	89,000	T	S02T01D79	" " " "
5	U012	89,000	T	S04T02D79	" " " "
6	U012	89,000	T	S02T01D79	" " " "
7	U016	89,000	T	S04T02D79	" " " "
8	U016	89,000	T	S02T01D79	" " " "
9	U019	89,000	T	S04T02D79	" " " "
10	U019	89,000	T	S02T01D79	" " " "
11	U031	89,000	T	S04T02D79	" " " "
12	U031	89,000	T	S02T01D79	" " " "
[illegible]	U034	89,000	T	S04T02D79	" " " "
14	U034	89,000	T	S02T01D79	" " " "
15	U036	89,000	T	S04T02D79	" " " "
16	U036	89,000	T	S02T01D79	" " " "
17	U043	89,000	T	S04T02D79	" " " "
18	U043	89,000	T	S02T01D79	" " " "
19	U044	89,000	T	S04T02D79	" " " "
20	U044	89,000	T	S02T01D79	" " " "
21	U051	89,000	T	S04T02D79	" " " "
22	U051	89,000	T	S02T01D79	" " " "
[illegible]	U052	89,000	T	S04T02D79	" " " "
24	U052	89,000	T	S02T01D79	" " " "
[illegible]	U053	89,000	T	S04T02D79	" " " "
26	U053	89,000	T	S02T01D79	" " " "

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IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U055	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
2	U055	89,000	T	S02 T01 D79	" " " "
3	U056	89,000	T	S04 T02 D79	" " " "
4	U056	89,000	T	S02 T01 D79	" " " "
5	U057	89,000	T	S04 T02 D79	" " " "
6	U057	89,000	T	S02 T01 D79	" " " "
7	U068	89,000	T	S04 T02 D79	" " " "
8	U068	89,000	T	S02 T01 D79	" " " "
9	U070	89,000	T	S04 T02 D79	" " " "
10	U070	89,000	T	S02 T01 D79	" " " "
11	U072	89,000	T	S04 T02 D79	" " " "
12	U072	89,000	T	S02 T01 D79	" " " "
13	U075	89,000	T	S04 T02 D79	" " " "
14	U075	89,000	T	S02 T01 D79	" " " "
15	U077	89,000	T	S04 T02 D79	" " " "
16	U077	89,000	T	S02 T01 D79	" " " "
17	U078	89,000	T	S04 T02 D79	" " " "
18	U078	89,000	T	S02 T01 D79	" " " "
19	U080	89,000	T	S04 T02 D79	" " " "
20	U080	89,000	T	S02 T01 D79	" " " "
21	U081	89,000	T	S04 T02 D79	" " " "
22	U081	89,000	T	S02 T01 D79	" " " "
23	U088	89,000	T	S04 T02 D79	" " " "
24	U088	89,000	T	S02 T01 D79	" " " "
	U092	89,000	T	S04 T02 D79	" " " "
26	U092	89,000	T	S02 T01 D79	" " " "

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OHD020273819 1	W DUP 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U102	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
2	U102	89,000	T	S02 T01 D79	" " " "
3	U103	89,000	T	S04 T02 D79	" " " "
4	U103	89,000	T	S02 T01 D79	" " " "
5	U105	89,000	T	S04 T02 D79	" " " "
6	U105	89,000	T	S02 T01 D79	" " " "
7	U108	89,000	T	S04 T02 D79	" " " "
8	U108	89,000	T	S02 T01 D79	" " " "
9	U112	89,000	T	S04 T02 D79	" " " "
10	U112	89,000	T	S02 T01 D79	" " " "
11	U113	89,000	T	S04 T02 D79	" " " "
12	U113	89,000	T	S02 T01 D79	" " " "
13	U115	89,000	T	S04 T02 D79	" " " "
14	U115	89,000	T	S02 T01 D79	" " " "
15	U117	89,000	T	S04 T02 D79	" " " "
16	U117	89,000	T	S02 T01 D79	" " " "
17	U121	89,000	T	S04 T02 D79	" " " "
18	U121	89,000	T	S02 T01 D79	" " " "
19	U122	89,000	T	S04 T02 D79	" " " "
20	U122	89,000	T	S02 T01 D79	" " " "
21	U123	89,000	T	S04 T02 D79	" " " "
22	U123	89,000	T	S02 T01 D79	" " " "
23	U124	89,000	T	S04 T02 D79	" " " "
24	U124	89,000	T	S02 T01 D79	" " " "
25	U125	89,000	T	S04 T02 D79	" " " "
26	U125	89,000	T	S02 T01 D79	" " " "

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O	H	D	0	2	0	2	7	3	8	1	9	T/A	C	1	

D RIPTION OF HAZARDOUS WASTES (continued)

	EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	U131	89,000	T	S04	T02	D79		*For all waste combinations and closure method, see p. 4 of 5
	U131	89,000	T	S02	T01	D79		" " " "
	U133	89,000	T	S04	T02	D79		" " " "
	U133	89,000	T	S02	T01	D79		" " " "
	U134	89,000	T	S04	T02	D79		" " " "
	U134	89,000	T	S02	T01	D79		" " " "
	U135	89,000	T	S04	T02	D79		" " " "
	U135	89,000	T	S02	T01	D79		" " " "
	U140	89,000	T	S04	T02	D79		" " " "
0	U140	89,000	T	S02	T01	D79		" " " "
1	U144	89,000	T	S04	T02	D79		" " " "
2	U144	89,000	T	S02	T01	D79		" " " "
	U147	89,000	T	S04	T02	D79		" " " "
4	U147	89,000	T	S02	T01	D79		" " " "
5	U148	89,000	T	S04	T02	D79		" " " "
6	U148	89,000	T	S02	T01	D79		" " " "
7	U151	89,000	T	S04	T02	D79		" " " "
8	U151	89,000	T	S02	T01	D79		" " " "
9	U154	89,000	T	S04	T02	D79		" " " "
20	U154	89,000	T	S02	T01	D79		" " " "
21	U159	89,000	T	S04	T02	D79		" " " "
22	U159	89,000	T	S02	T01	D79		" " " "
23	U161	89,000	T	S04	T02	D79		" " " "
	U161	89,000	T	S02	T01	D79		" " " "
25	U162	89,000	T	S04	T02	D79		" " " "
26	U162	89,000	T	S02	T01	D79		" " " "

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EPA I.D. NUMBER (enter from page 1) | FOR OFFICIAL USE ONLY

H D 0 2 0 2 7 3 8 1 9 | 1 | W | DUP | 2 | DUP

D ... IPTION OF HAZARDOUS WASTES (continued)

A. EPA HAZARD. STENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
U165	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
U165	89,000	T	S02 T01 D79	" " " "
U167	89,000	T	S04 T02 D79	" " " "
U167	89,000	T	S02 T01 D79	" " " "
U169	89,000	T	S04 T02 D79	" " " "
U169	89,000	T	S02 T01 D79	" " " "
U182	89,000	T	S04 T02 D79	" " " "
U182	89,000	T	S02 T01 D79	" " " "
U188	89,000	T	S04 T02 D79	" " " "
U188	89,000	T	S02 T01 D79	" " " "
U190	89,000	T	S04 T02 D79	" " " "
U190	89,000	T	S02 T01 D79	" " " "
U196	89,000	T	S04 T02 D79	" " " "
U196	89,000	T	S02 T01 D79	" " " "
U201	89,000	T	S04 T02 D79	" " " "
U201	89,000	T	S02 T01 D79	" " " "
U207	89,000	T	S04 T02 D79	" " " "
U207	89,000	T	S02 T01 D79	" " " "
U208	89,000	T	S04 T02 D79	" " " "
U208	89,000	T	S02 T01 D79	" " " "
U210	89,000	T	S04 T02 D79	" " " "
U210	89,000	T	S02 T01 D79	" " " "
U211	89,000	T	S04 T02 D79	" " " "
211	89,000	T	S02 T01 D79	" " " "
213	89,000	T	S04 T02 D79	" " " "
U213	89,000	T	S02 T01 D79	" " " "

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By: Mary Shadle Date

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Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

...m page 2.
...copy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

...NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
...0273819	W DUP	2 DUP

...TION OF HAZARDOUS WASTES (continued)

...ARD ...NO (...code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
19	89,000	T	S04 T02 D79	*For all waste combinations and closure method, see p. 4 of 5.
19	89,000	T	S02 T01 D79	" " " "
20	89,000	T	S04 T02 D79	" " " "
20	89,000	T	S02 T01 D79	" " " "
21	89,000	T	S04 T02 D79	" " " "
21	89,000	T	S02 T01 D79	" " " "
22	89,000	T	S04 T02 D79	" " " "
22	89,000	T	S02 T01 D79	" " " "
23	89,000	T	S04 T02 D79	" " " "
23	89,000	T	S02 T01 D79	" " " "
26	89,000	T	S04 T02 D79	" " " "
26	89,000	T	S02 T01 D79	" " " "
27	89,000	T	S04 T02 D79	" " " "
27	89,000	T	S02 T01 D79	" " " "
28	89,000	T	S04 T02 D79	" " " "
28	89,000	T	S02 T01 D79	" " " "
38	89,000	T	S04 T02 D79	" " " "
38	89,000	T	S02 T01 D79	" " " "
39	89,000	T	S04 T02 D79	" " " "
39	89,000	T	S02 T01 D79	" " " "

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...3510-2 (6-80)

CONTINUE ON REVERSE

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

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EPA I.D. NO. (enter from page 1)
F OHD020273819 T/A C 16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground—level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 22 190	082 58 400

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E CWM Holdings, Inc.	312-572-880

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 3003 Butterfield Road	G Oak Brook	IL	60521

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Donald A. Wallgren	Donald A. Wallgren	

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Milo D. Harrison	M D Harrison	10/31/86

CONTINUE ON PAGE

Continued from page 4.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING (see page 4)

A topographic map showing a one-mile halo around the facility is provided in Appendix 1.

Additional topographic maps and drawings showing the existing interim and ultimate facility layouts are provided in Appendix A as submitted September 21, 1984.

A location map of the facility is provided in Section B.

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By: Mary Shell Date MAR 10 1987

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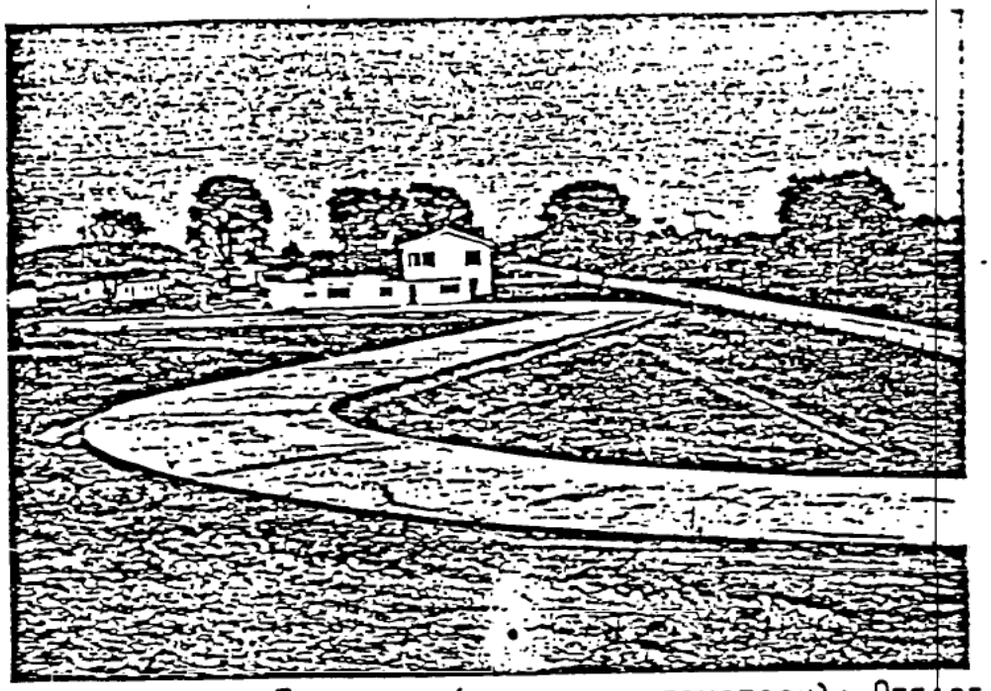
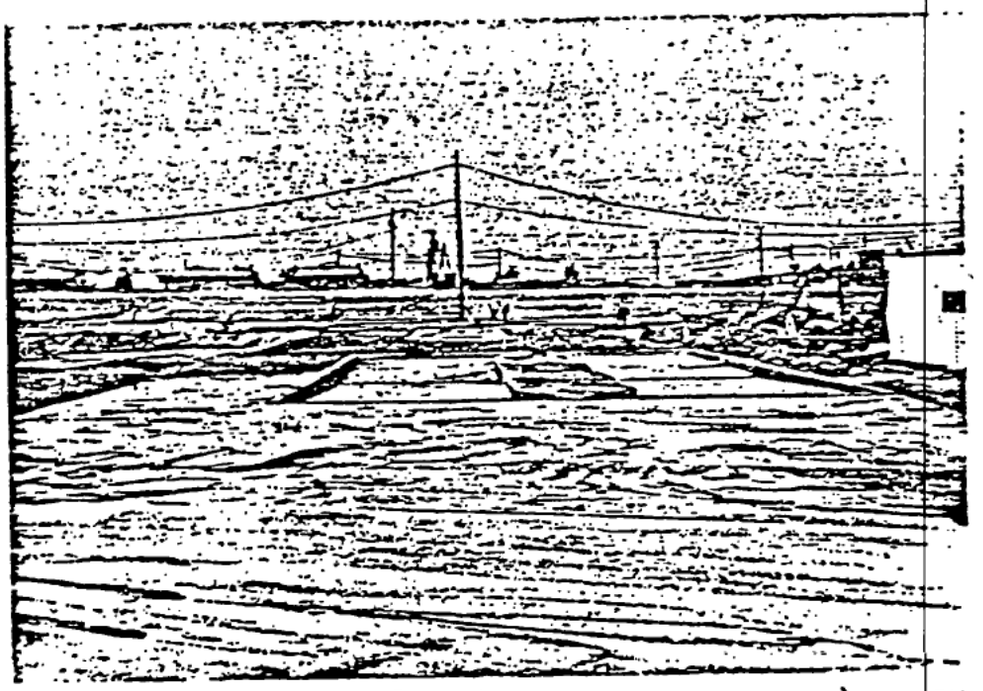


1. NEW (WEST) ENTRANCE (UNDER CONSTRUCTION); OFFICE BLDG./MAIN LABORATORY IN CENTER, THE RECEIPT CONTROL STATION AT NEAR END OF BUILDING; & HIGHWAY 412 AT RIGHT.



2. SAMPLING STATION PAD (UNDER CONSTRUCTION), WITH NEW TRUCK SCALE PLATFORM BEHIND.

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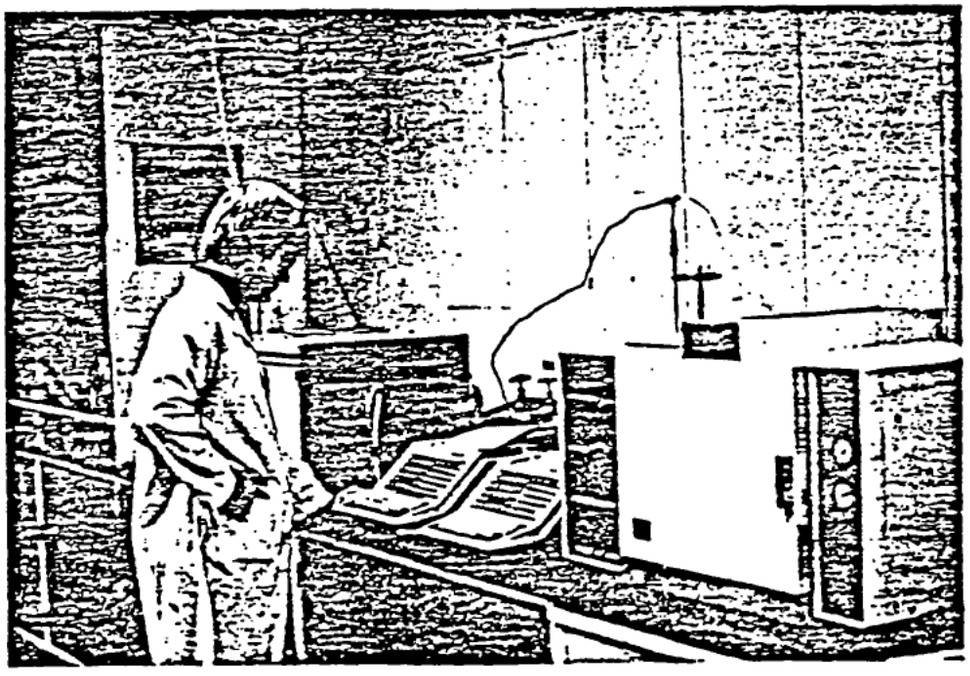
By: Mary Shelle Date MAR 10 1987

3. MAIN LABORATORY--FUME HOOD.



4. MAIN LABORATORY--AUTOMATED ANALYTIC EQUIPMENT.

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MAR 1 0 1987

By: Mary Shade Date

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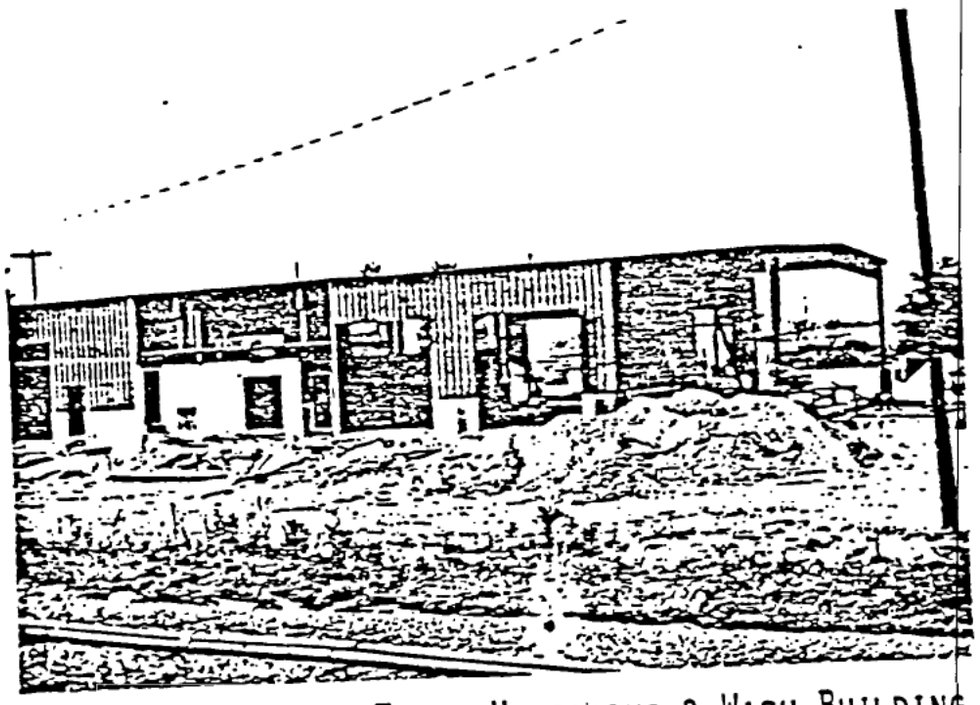

5. SOUTH SIDE OF TRUCK UNLOADING & WASH BUILDING (UNDER CONSTRUCTION); SOUTHSIDE OF WASH BAY AT LEFT END, TWO INTERIOR & ONE EXTERIOR UNLOADING BAY AT RIGHT END.

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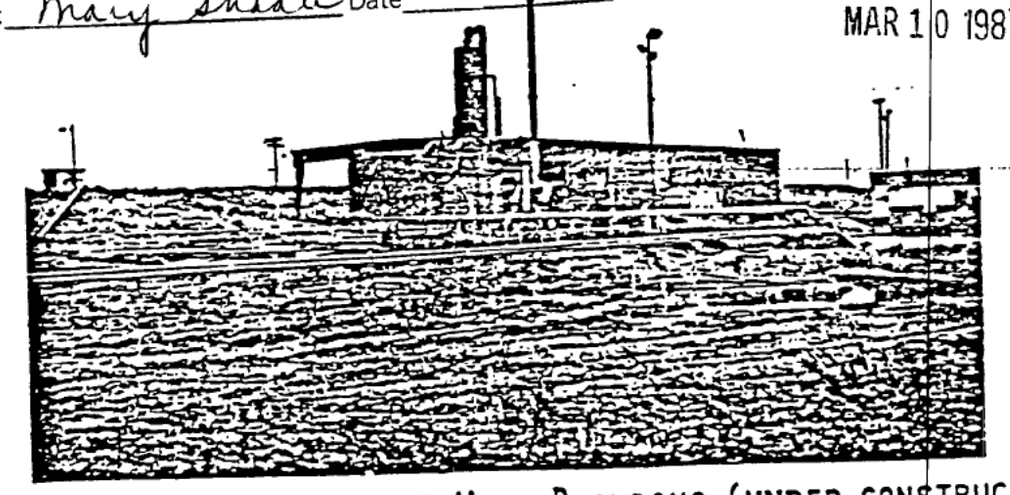
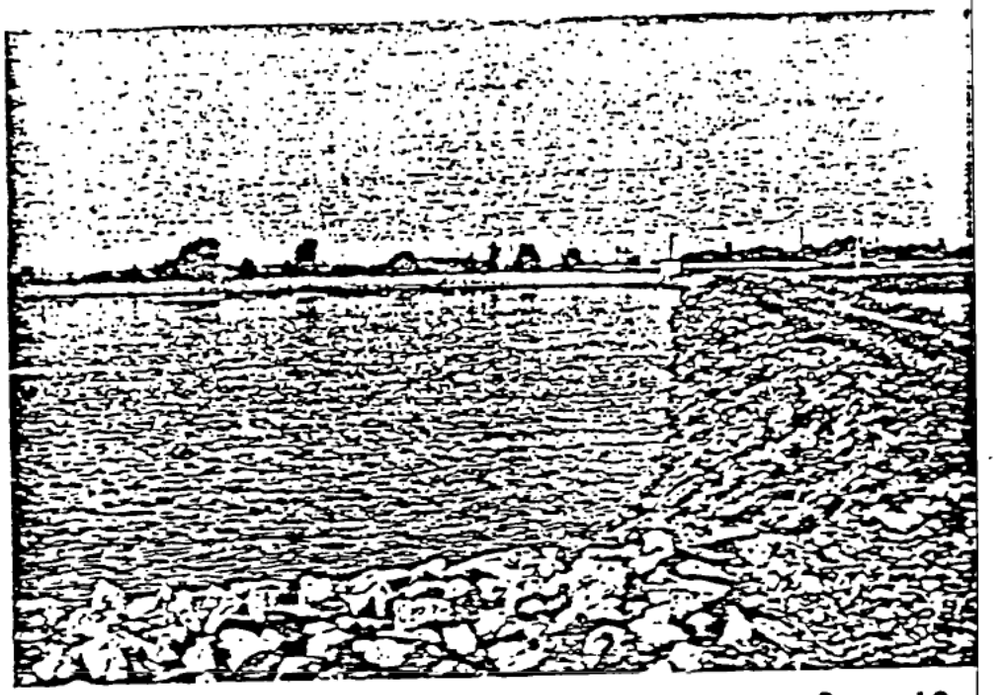


6. TRUCK UNLOADING & WASH BUILDING (UNDER CONSTRUCTION), WITH CAUSTIC SCRUBBER & PIPE RACKS FOR ODOROUS WASTE TREATMENT SYSTEM (EXISTING) IN FOREGROUND; NORTH DIKE OF POND 11 IN LEFT BACKGROUND.



7. VIEW LOOKING NORTH ALONG DIKE BETWEEN POND 12 AT LEFT AND POND 11 AT RIGHT

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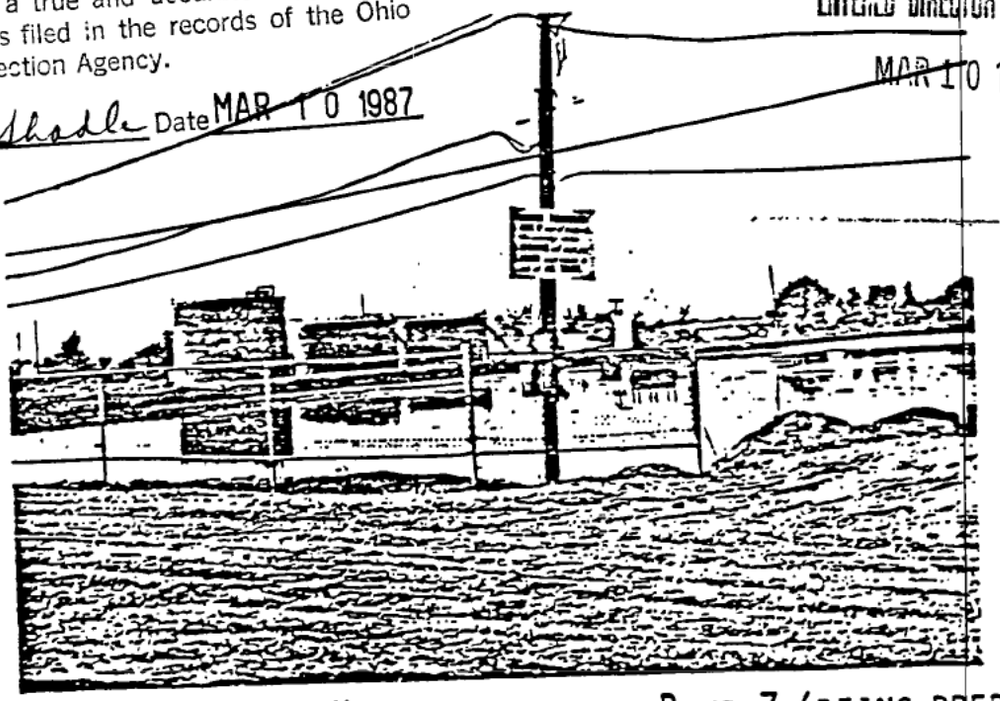
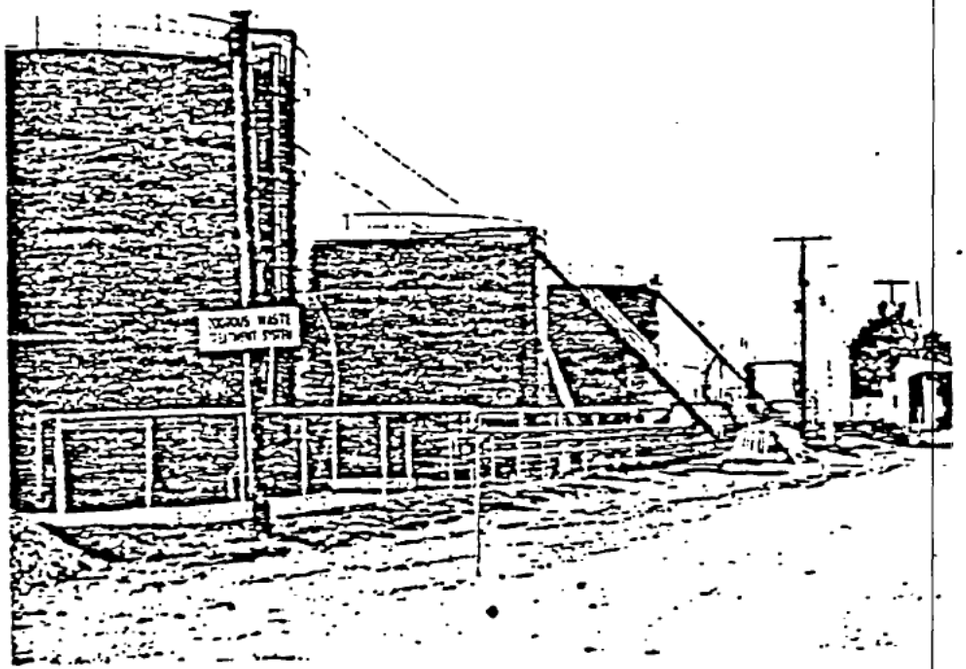


8. VIEW LOOKING NORTHWEST ACROSS POND 7 (BEING PREPARED FOR CLOSURE) TOWARD ODOROUS WASTE TREATMENT SYSTEM (EXISTING); NITROGEN TANK VISIBLE IN CENTER RIGHT, AND OHIO TURNPIKE IN RIGHT DISTANCE.



9. CLOSEUP OF ODOROUS WASTE TREATMENT SYSTEM, TANKS T-3, T-4, & T-11, LEFT TO RIGHT; ALSO NITROGEN TANK VISIBLE AT RIGHT.

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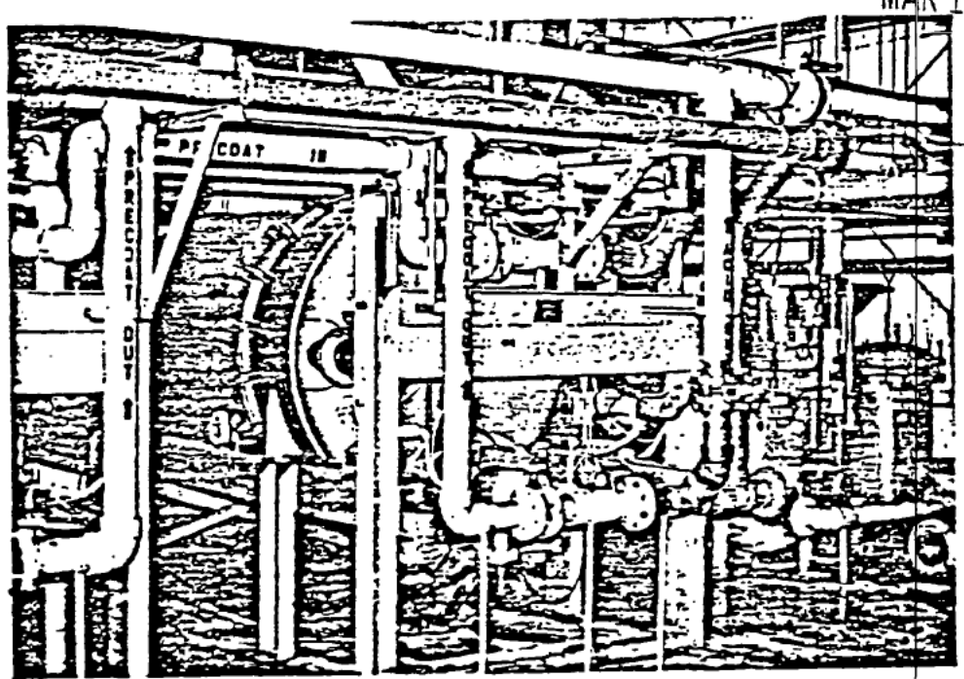

10. INTERIOR OF FILTER BUILDING SHOWING PRESSURE LEAF FILTER AND POLISH FILTERS.

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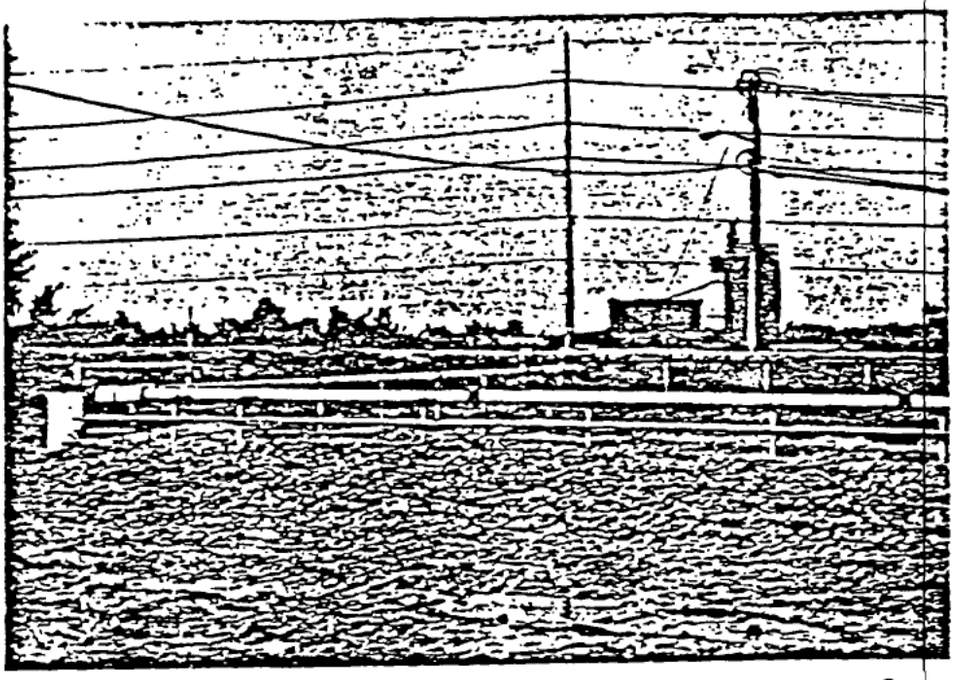
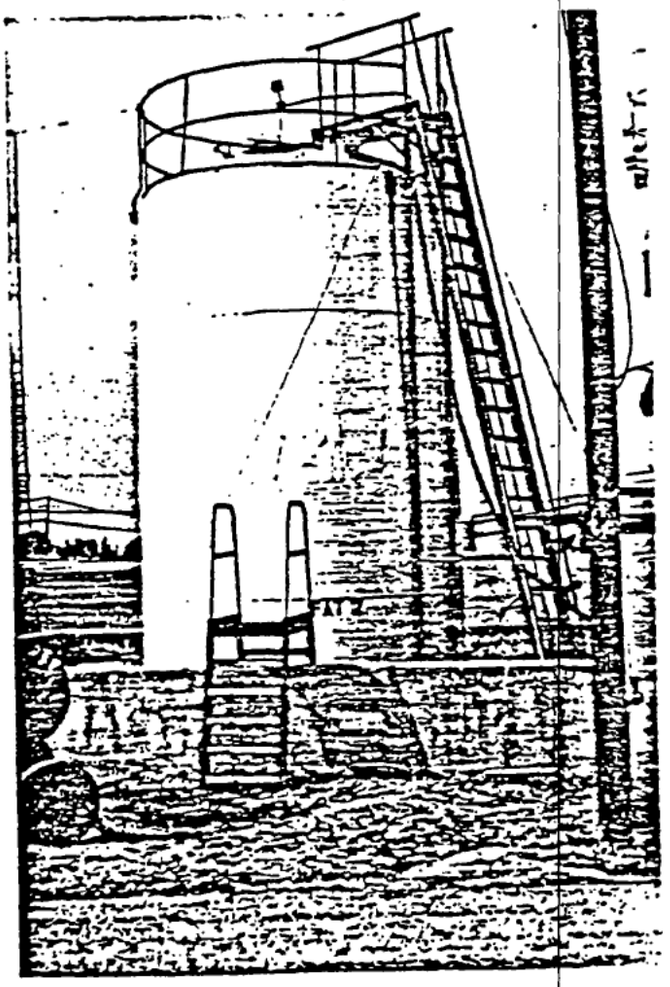


11. TYPICAL INJECTION WELL SUPPLY PIPING, WITH PUMP HOUSE 3 AND TANK FAT-3 IN RIGHT BACKGROUND.

12. CLOSEUP OF TANK FAT-2 SHOWING SECONDARY CONTAINMENT.



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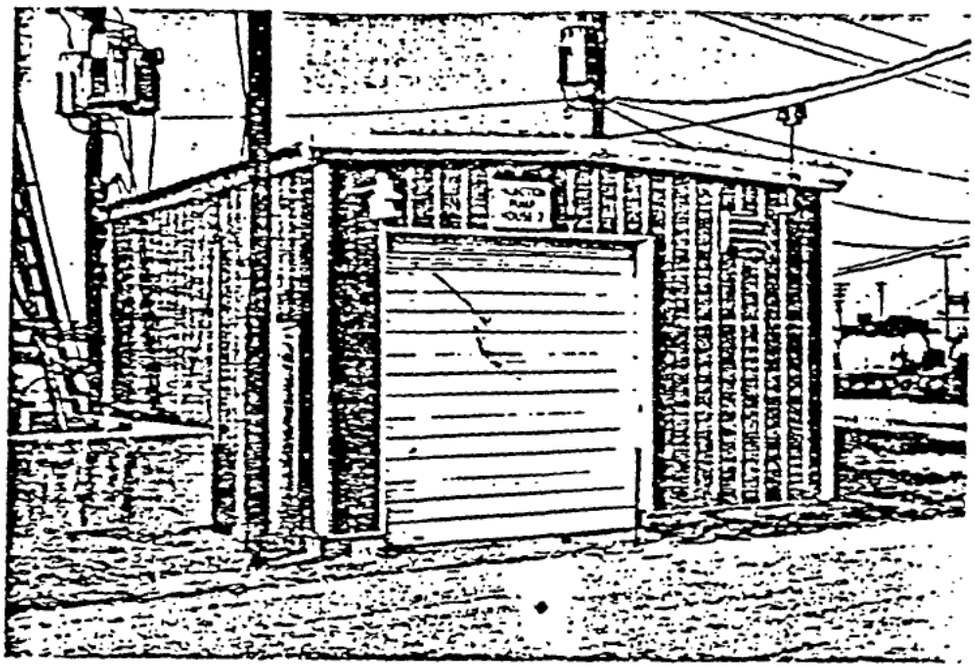

13. PUMP HOUSE 2.

14. CLOSEUP OF TYPICAL WELL HEAD FOR INJECTION WELLS; RESERVOIR FOR ANNULUS LIQUID AT REAR.

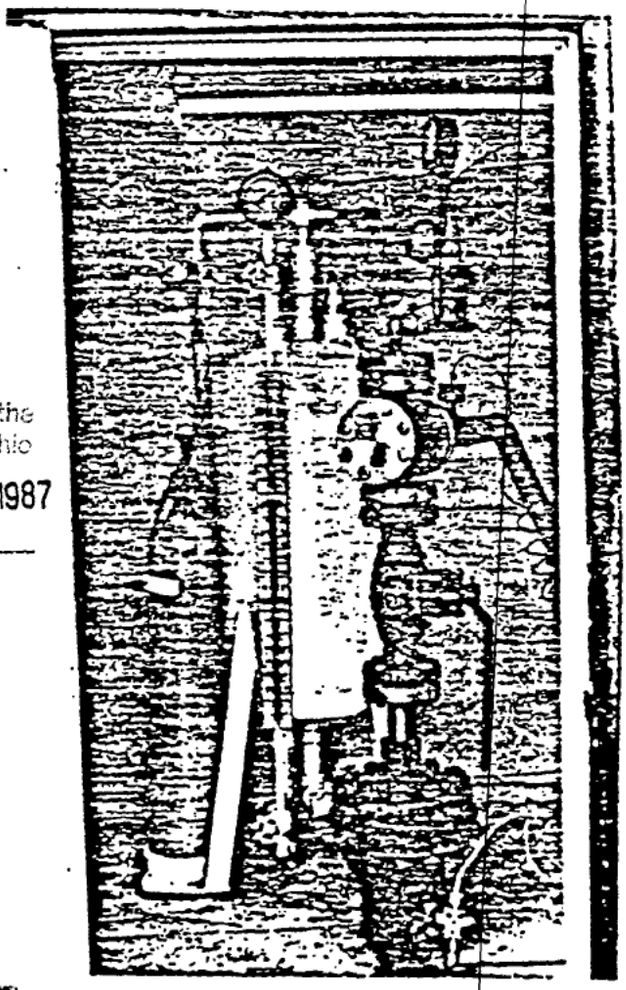

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FIGURE B-1
LOCATION MAP

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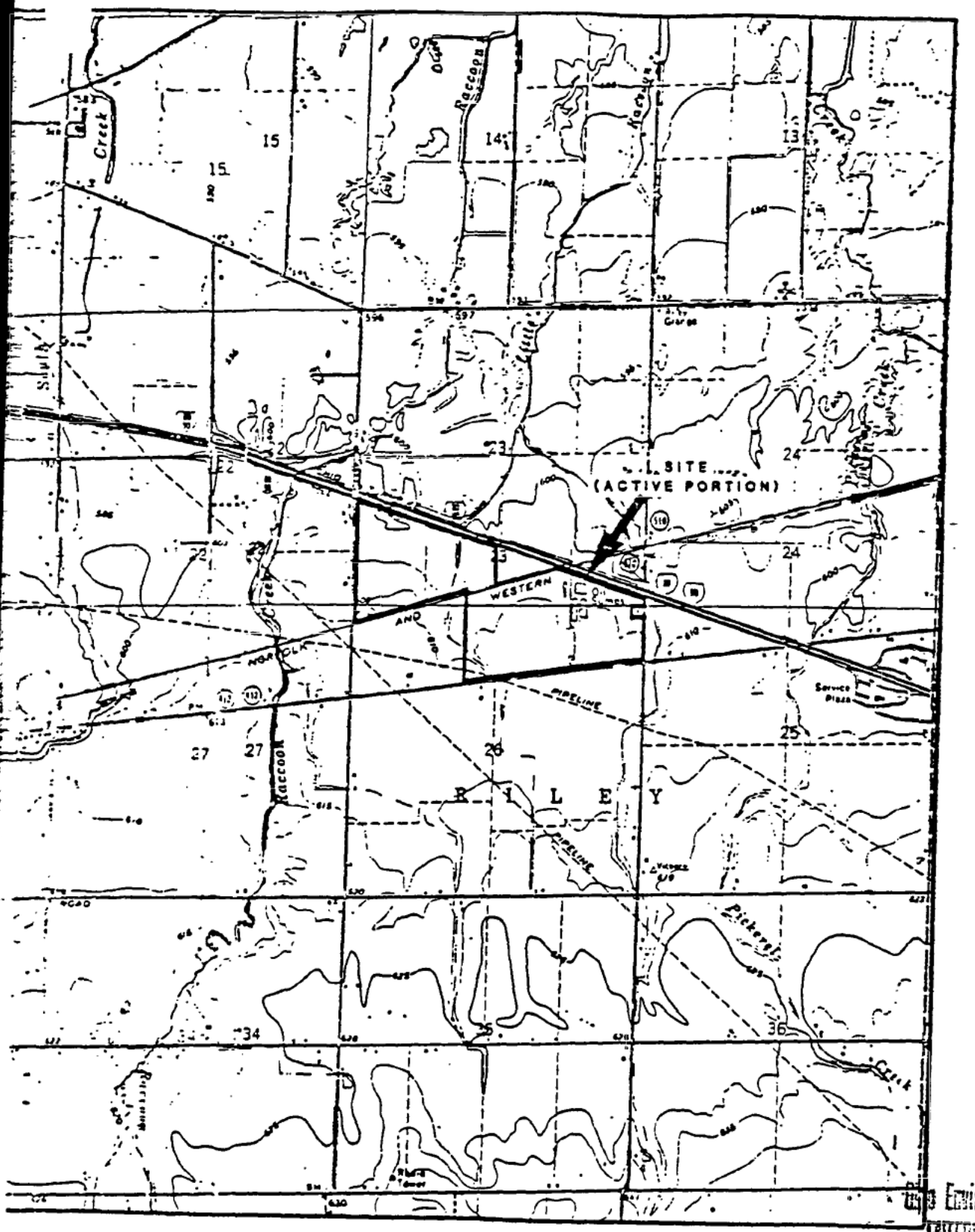
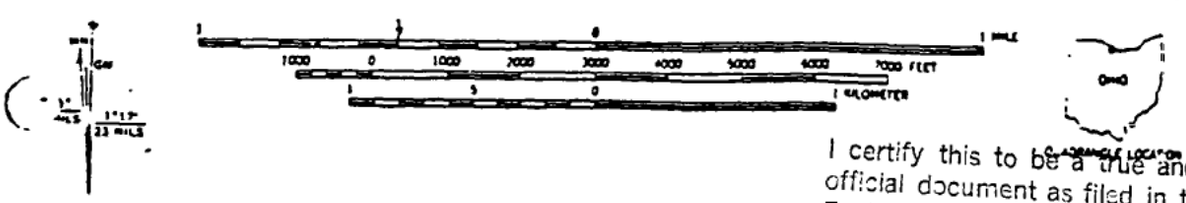
APPENDIX I

USGS QUADRANGLE MAP





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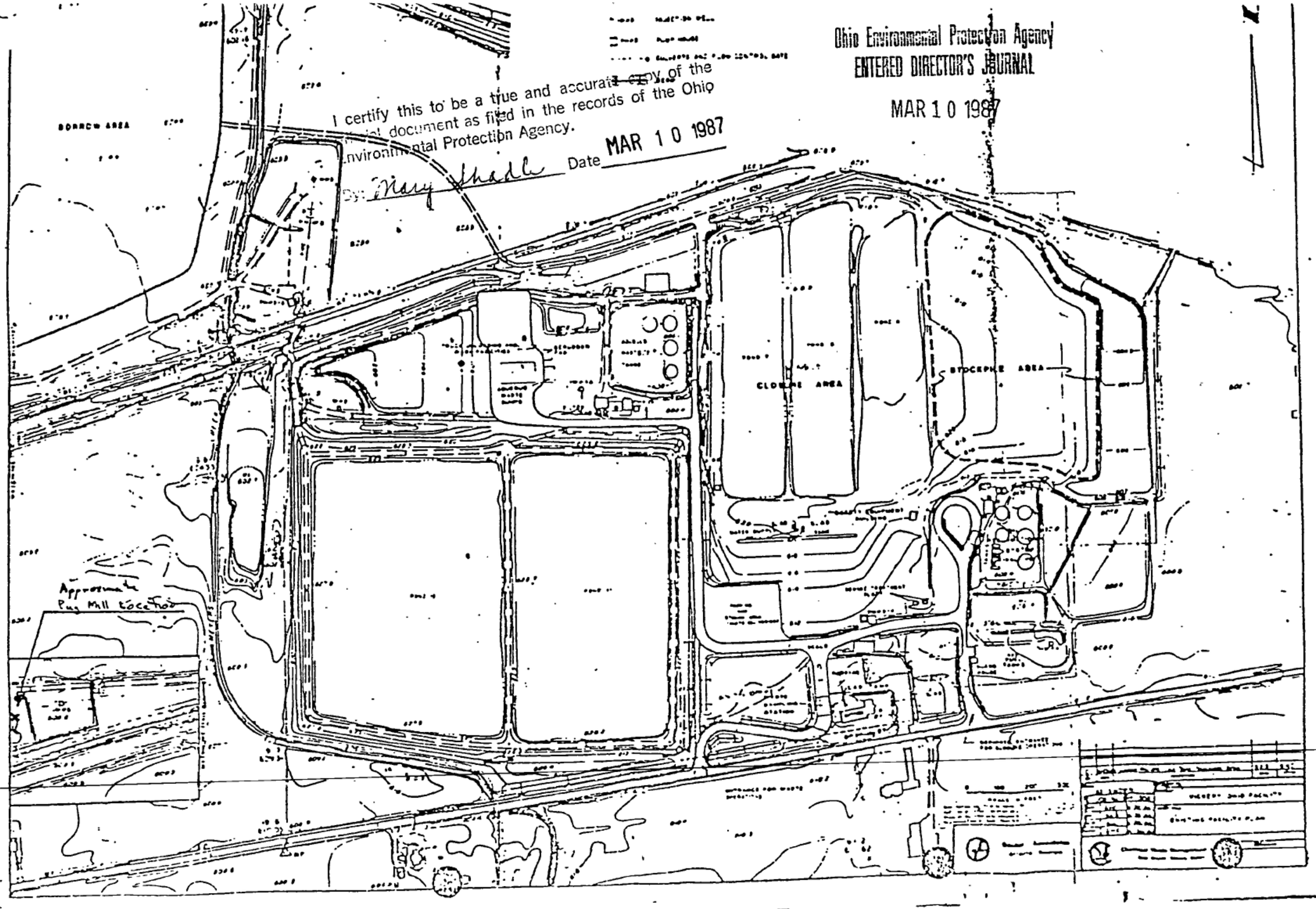

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Chemical Waste Management, Inc.
3956 State Rt 412
Vickery, Ohio 43464
419 547-7791

RECEIVED
OHIO EPA
JUN 30 1988
DIV. of SOLID & HAZ. WASTE MGT.

HAND DELIVERED

June 29, 1988

Dr. Richard Shank
Director
Ohio Environmental Protection Agency
1800 WaterMark Drive
Columbus, OH 43266

Dear Dr. Shank:

Per discussions with your office, attached are five (5) signed copies of Chemical Waste Management Vickery's amended "Part A" application. Also attached as exhibits are five (5) copies of the technical support documents to the Permit revision.

We look forward to meeting with your staff to discuss the revision.

If you should have questions or comments, please contact Scott Maris or myself at (419) 547-7791.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.

Fred G. Nicar
General Manager

FGN/tr
wp

Attachment

cc w/letter only: Edward Kitchen
Edward Lim
Ghassan Khaled
Charles Hull
Peggy Brannigan
Scott Maris
Dave Coker

BY CVD DATE 1-18-88
CHKD. BY ERS DATE 1-19-88

ALPHA CONSULTANTS, LTD.
ENGINEERS

SHEET NO. ___ OF 1
JOB NO. 8738

SUBJECT: G.W.M.I. - VICKERY, OH. PROPOSED TANK FARM & TANKS

TABLE NO. V

[redacted]

BY CVD DATE 1-18-88
CHKD. BY BDS DATE 1-19-88

ALPHA CONSULTANTS, LTD.
ENGINEERS

SHEET NO. 2 OF 2
JOB NO. 8738

SUBJECT C.W.M.I. - VICKERY, OH. PROPOSED HF PROCESS BUILDING & TANKS

TABLE NO. VII

[redacted]

BY CVD DATE 1-18-88
CHKD. BY BDS DATE 1-19-88

ALPHA CONSULTANTS, LTD.
ENGINEERS

SHEET NO. 2 OF 2
JOB NO. 8738

SUBJECT C.W.M.I. - VICKERY, OH. PROPOSED HF PROCESS BUILDING & TANKS CON'T.

TABLE NO. VII

[redacted]

BY CVD DATE 1-18-88
CHKD. BY BRS DATE 1-19-88

ALPHA CONSULTANTS, LTD.
ENGINEERS

SHEET NO. 1 OF 2
JOB NO. 8738

SUBJECT CHEMICAL WASTE MANAGEMENT, INC. - VICKERY, OH.
PUMP LIST - AQUEOUS WASTE PROCESS BUILDING

TABLE NO. X.

BY CYD DATE 1-18-88

ALPHA CONSULTANTS, LTD.
ENGINEERS

SHEET NO. 2 OF 2

BY CVD DATE 3-22-88
CHKD. BY BDS DATE 3-30-88

ALPHA CONSULTANTS, LTD.
ENGINEERS

SHEET NO. 1 OF 1
JOB NO. 8738

SUBJECT C.W.M.I. - VICKERY, OH. PUMP LIST; DRUM DECANTING

TABLE NO. XI

[redacted]