August 8, 2019

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

Re: Vickery Environmental Inc
Permit - Intermediate
Approval
RCRA C – Hazardous Waste
Sandusky County
OHD020273819

Subject: Hazardous Waste Permit Modification - Class 1A Approval

Dear Mr. Lonneman:

On June 28, 2019, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Vickery Environmental Inc. dated June 28, 2019. The modification requested the following changes to the permit:

- Update permit conditions E.9.d(iv)(d) and E.9.d(v)(d) to include a semi-annual inspection and maintenance schedule for Stabilized Waste Area 1 (SWA-1) and SWA-2; and
- Define the semi-annual inspections as occurring between March and May and September and November;
- Add language under permit conditions E.9.d(iv)(d) and E.9.d(v)(d) to list the minimum points of inspection that must be completed on a semi-annual basis for the operations and maintenance (O&M) inspections;
- A general timeframe for completing repairs was added underneath both permit conditions.

With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility's permit application and/or permit. The updated application/permit can be retrieved from the Agency's eDocument Search web site: http://edocpub.epa.ohio.gov/publicportal/edochome.aspx. Using the search function, search under the document type of "Permit" and then refine the search using the facility's RCRA ID number (Secondary ID) which is noted in the RE: block above.

If you have any questions concerning this letter, please contact Dawn Pleiman of my staff at dawn.pleiman@epa.ohio.gov or (419) 373-3148.

Sincerely,

Melisa Witherspoon
Chief
Division of Environmental Response and Revitalization

enclosure

ec: Colleen Weaver, Manager, DERR-NWDO  Michael Terpinski, Supervisor, DERR-NWDO
Bradley Mitchell, Manager, DERR-CO  Gary Deutschman, DERR-NWDO
Dawn Pleiman, DERR-NWDO

1 Please note: If the modification application included a claim for confidentiality, Ohio EPA will retain the confidentiality of the document(s) until the Director makes a final determination in accordance with OAC Chapters 3745-49 and 3745-50 as to whether the document(s) constitutes a trade secret and must remain confidential. Ohio EPA will notify you of any determination made as to the confidentiality of the document(s).
(d) The Permittee must perform operation and maintenance (O&M) inspections of SWA-1 on a semi-annual basis (once between March through May and once between September through November) in accordance with the Corrective Measures Completion of Work (CMCW) Report dated February 6, 2019.

1. Inspections of the existing clay cap and cover must assess and document, at a minimum, the following items: adequate drainage; vegetation quality and density; exposed stabilized waste; evidence of cap erosion; evidence of animal damage; evidence of ponding; evidence of surface cracks or fissures; and evidence of unauthorized trespassing or construction.

2. The Permittee must repair any deficiencies noted from the O&M inspections in a timely manner.

(e) A risk mitigation plan, reducing construction worker exposure, must be developed and added to the permit in the event that excavation or other construction activities must be performed within the footprint of the unit. The risk mitigation plan must be submitted ninety (90) days prior to the anticipated date for activities to be performed.

(v) Stabilized Waste Area 2 (SWA-2)

(a) SWA-2 is comprised of WMUs 6 & 9.

(b) A clay cap was placed and stabilization already performed at this area and is a component of the remedy.

(c) The Permittee must obtain an Environmental Covenant in accordance with Ohio’s Environmental Covenant law, ORC Sections 5301.80 to 5301.92, that will declare the site is restricted to industrial use only.

1. The environmental covenant must also prohibit building construction within the footprint of the unit.

2. The standard for the environmental covenant will be achieved when proof of said recording is filed with the Sandusky County Recorder and a copy is forwarded to Ohio EPA.

(d) The Permittee must perform O&M inspections of SWA-2 on a semi-annual basis (once between March through May and once between September through November) in accordance with the CMCW Report dated February 6, 2019.

1. Inspections of the existing clay cap and cover must assess and document, at a minimum, the following items: adequate drainage; vegetation quality and density; exposed stabilized
waste; evidence of cap erosion; evidence of animal damage; evidence of ponding; evidence of surface cracks or fissures; and evidence of unauthorized trespassing or construction.

2. The Permittee must repair any deficiencies noted from the O&M inspections in a timely manner.

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

Within 45 days after receiving approval of the CMI Workplan, the Permittee must provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-54-101 (B) and (C).