



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

January 27, 2015

Mr. Patrick W. Keely
Senior Compliance Manager
Spring Grove Resources Recovery, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

RE: Spring Grove Resources Recovery, Inc.
Permit - Intermediate
Acknowledgement
RCRA C – Hazardous Waste
Hamilton County
OHD000816629

Subject: Hazardous Waste Permit Modification - Class 1 Acknowledgment

Dear Mr. Keely:

On November 20, 2014, Ohio EPA received notification for a Class 1 hazardous waste permit modification from Spring Grove Resource Recovery, Inc. dated November 14, 2014. The modification implemented the following change to the permit:

Removed all references to "Appendix Z" and replaced it with "Corrective Measures Implementation (CMI) work plan" in Module Z of the permit.

With this letter, Ohio EPA acknowledges the above referenced Class 1 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>. Please use the "Advanced" search function and search under the document type of "Permit – Intermediate" 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 Jeff Smith of my staff at (937) 285-6070 .

Sincerely,

A handwritten signature in black ink, appearing to read "Russell B. Brown". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Russell B. Brown
Manager, Southwest District Office
Division of Materials and Waste Management

program.

- (b) The monitoring system consists of the ground water wells as specified in Table Z-3 and shown on the ground water elevation map in attached Figure Z-2.

Table Z-3 Ground Water Monitoring Wells

Well	Gradient	Purpose
MW-1A	Side gradient	Potentiometric Map, Concentrations
MW-2A	Up gradient	Potentiometric Map, Concentrations
MW-4	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-5	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-6	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-7	Down gradient	Potentiometric Map, POC ¹ , Concentrations
MW-8	Down gradient	Potentiometric Map, POC ¹ , Concentrations

¹ – Point of compliance.

- (c) Wells identified in Permit Condition Z.3(b) must be cased in a manner that maintains the integrity of the monitoring well bore hole and complies with the detailed plans and specifications presented in the Corrective Measures Implementation (CMI) work plan. The casing must be screened and packed with gravel or sand, where necessary, to enable collection of ground water samples. The annular space above the sampling depth must be sealed to prevent contamination of samples and the ground water.
- (d) The Permittee must remove or replace any monitoring well in Permit

Condition Z.3(b) in accordance with the Appendix to OAC Rule 3745-50-51 permit modification process. Each change must be accompanied by a revised map as specified on Figures Z-1 and Z-2.

- (e) Whenever any of the wells specified in Permit Condition Z.3(b) are replaced, the Permittee must demonstrate to Ohio EPA that the ground water quality at the replacement well meets the criteria in Permit Condition Z.3(a) within a 365 day period of the date of replacement.

Z.4. Sampling and Analysis Procedures

- (a) The Permittee must implement an IGWMP as presented in the Quality Assurance Project Plan (QAPP) found in the CMI work plan. This program includes procedures designed to ensure monitoring results that provide a reliable indication of ground water quality below the units/areas and are in compliance with this Permit Condition.
- (b) The Permittee must implement the Sampling and Analysis Plan (SAP), as presented in the CMI work plan, which includes sampling and analytical methods that are appropriate for ground water sampling and that accurately measure hazardous constituents in ground water samples.
- (c) Field and analytical data must be validated in accordance with the procedures specified in the data validation procedures that are outlined in the CMI work plan.
- (d) Ground water sample purge water must be sent to an appropriate facility for disposal and/or treatment according to the sampling results.

Z.5. Ground Water Surface Elevation

The Permittee must determine the ground water surface elevation at each well identified in the table in Permit Condition Z.3(b) each time ground water is sampled using the methods in the Standard Operating Procedure found in the CMI work plan.

Z.6. Sampling Frequency

Data on each hazardous constituent specified in Permit Condition Z.2(a) will be collected from all wells listed in Permit Condition Z.3(b). Frequency of sampling is to be on a semiannual basis for wells MW-1A, MW-5, MW-6, and MW-7, and quarterly for MW-4 and MW-8. Wells are identified in attached Figures Z.1 and Z.2.

- (i) Ground water monitoring data collected in accordance with this permit including actual levels of constituents.
- (ii) The laboratory results from each of the wells and their associated qualifiers including the laboratory sheets for the full volatile and semi-volatile analyses (must include method codes, method detection limits, and units of measurement);
- (iii) The date each well was sampled (tabulated);
- (i) The date, time, and identification of all blanks and duplicates;
- (ii) Any field log documentation of deviation from the procedures in the CMI work plan, including documentation of parameter omissions during the sampling event;
- (iii) The date the Permittee received the results from the laboratory;
- (iv) The date the Permittee completed their review of the analytical laboratory's verification of the accuracy and precision of the analytical data and determined its quality.
- (v) The results of the data validation review per Permit Condition Z.8(a)(vii) including: report completeness, chain of custody, sample receipt form, signed statement of validity, technical holding time review, data qualifiers including their definitions, dilutions, blank data, spikes, spike percent recovery, surrogate recovery, and an explanation of any rejected results;
- (vi) Results of all blanks and duplicates (trip, field, equipment, and method);
- (vii) Results of the field parameters;
- (viii) The statistical evaluation of the data (must include all computations, results of statistical tests, and date the statistical evaluation was completed) as specified in the Statistical Plan required in Permit Condition Z.7;
- (ix) Any change in well status (i.e., going from unaffected to affected status and vice versa);
- (x) Ground water surface elevations taken at the time of sampling of

(ii) Collection, preservation, and analysis of samples pursuant to Permit Conditions Z.4, Z.5, and Z.6. Statistical analysis must be conducted pursuant to Permit Condition Z.7

(iii) The Permittee must conduct a semiannual sampling program for each chemical parameter and hazardous constituent specified in Permit Condition Z.2(a) from each well (background and compliance) specified in Permit Condition Z.3(b) during the permit period and any extensions due to corrective action implementation.

Additional quarterly sampling will be conducted at MW-4 and MW-8. Modifications to this frequency will be considered after trend analyses have been conducted.

(iv) The Permittee shall compare the concentration of each hazardous constituent measured at each well at the compliance point specified in Permit Condition Z.2(b) to its GWACI specified in Table Z-1 each time water quality is determined in accordance with procedures specified in Permit Condition Z.7.

(v) The Permittee must maintain a record of ground water analytical data as measured and in a form necessary for the determination of statistical significance under Permit Conditions Z.7 and Z.8 for the permit period.

(vi) The Permittee must determine the ground water flow rate and direction in the uppermost aquifer at least annually using the procedures specified in the CMI work plan.

(d) Response Action

(i) Based on the results of the Permittee's ground water monitoring program, if the GWACI detailed in Table Z-1 have not been exceeded, then the Permittee shall continue under routine IGWMP monitoring. OR

(ii) Based on the results of the Permittee's ground water monitoring program, if the GWACI in Table Z-1 have been exceeded or an increasing trend is determined, then the Permittee must implement corrective actions to remove or treat in place any hazardous constituents specified in Permit Condition Z.2(a) that exceed their