RE: Diamond Hard Chrome Inc.
Remediation Response
Approval
RCRA C - Hazardous Waste
Cuyahoga County
OHR000012880

Subject: Post Closure Plan Conditional Approval with Modifications
Diamond Hard Chrome, Inc.; 6300 Kinsman Avenue, Cleveland, Cuyahoga County; OHR000012880; Site ID# 218-002939-002

Dear Mr. Tankovich:

On September 12, 2006, Ohio EPA sent a letter accepting the closure certification for the Diamond Hard Chrome, Inc. facility located at 6300 Kinsman Avenue, Cleveland, Ohio. The Ohio Environmental Protection Agency (EPA) determined that Diamond Hard Chrome had closed the facility according to the approved closure plan and Rules 3745-66-11 through 66-15 of the Ohio Administrative Code (OAC). The September 12, 2006 letter also notified Diamond Hard Chrome that the facility must continue in post-closure care, in accordance with an approved post-closure plan and OAC rules 3745-66-16 through 66-21.

A post-closure plan was received by the Agency on November 12, 2009. A Notice of Deficiency regarding this plan was issued on March 31, 2011. Ohio EPA worked incrementally with DHC to address the deficiencies and revise the post-closure plan.

On April 15, 2015, Ohio EPA, North East District Office, received the document: Post-Closure Plan for the Former Diamond Hard Chrome Plating Shop Located at 6300 Kinsman Avenue; Cleveland, Ohio – Cuyahoga County – OHR 000 012 880 dated February 2015. The post-closure plan was submitted to demonstrate that Diamond Hard Chrome's proposal for post-closure complies with the substantive requirements of OAC rules 3745-55-11, 3745-55-12, and 3745-55-18. This Post-Closure Plan for the facility replaces all previous Plans submitted by Diamond Hard Chrome; it describes the final plan for post-closure care of the facility as a RCRA hazardous waste landfill.
The owner/operator and the public were given the opportunity to submit written comments regarding the post-closure plan in accordance with the hazardous waste rule requirements. The comment period ended June 10, 2015; no public comments were received by Ohio EPA.

Based upon review of Diamond Hard Chrome's submittal, I conclude that the post-closure plan for the hazardous waste landfill at 6300 Kinsman Avenue, as modified herein, meets the performance standard contained in OAC rule 3745-55-11, and complies with the pertinent parts of OAC rules 3745-55-12 and 3745-55-18.

The post-closure plan submitted to Ohio EPA on April 15, 2015 is hereby approved with the conditions and modifications detailed in Attachment 1.

Compliance with the approved post-closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan.

Please be advised that approval of this post-closure plan does not release Diamond Hard Chrome from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00 (made payable to "Ohio Treasurer of State ") which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

When post-closure is completed, OAC rule 3745-55-20 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and a qualified professional engineer that the facility has completed the post-closure care period in accordance with the approved post-closure plan. The certification by the
owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049
Attn: Erik Hagen, ERAS

A copy should also be sent to:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
North East District Office,
2110 East Aurora Road
Twinsburg, Ohio 44087
Attn: Patricia Dunbar

If you have any questions about implementing this post-closure plan, contact Patricia Dunbar at 330.963.1279 or patricia.dunbar@epa.ohio.gov.

Sincerely,

Craig W. Butler
Director

Attachment

ec: Patricia Dunbar, DERR, NEDO
John Palmer, DERR, NEDO
Harry Courtright, DERR, NEDO
Rod Beals, DERR, NEDO
Erik Hagen, Manager, ERAS, DERR, CO
Connie Livchak, FARU-DMWM, CO
RCRAInfo Data Entry
Robert Casarona, legal counsel
Joe O'Brien, O'Brien Environmental Services
Tony Datillo, Enviromatrix
ATTACHMENT 1 - CONDITIONS OF APPROVAL AND MODIFICATIONS TO THE DIAMOND HARD CHROME POST-CLOSURE PLAN DATED FEBRUARY 2015.

Post-Closure Plan
Table of Contents
The Table of Contents does not match the body of the plan; e.g., Section 1.2 Purpose and Objective is on page 5; Section 2.1 Facility History is on page 6; Sections 8.0 and 9.0 pages need revised; Section 12.0 – need to include sections 12.1, 12.2, and 12.3.

With regard to the Figures on page 3 of the Table of Contents, the page numbers for Figures 2-5 are incorrect.

The facility will make the indicated changes and submit them to Ohio EPA within 60 days of this approval.

Figures
Figure 3: Map Showing Proximate Water Bodies, included with the February 2015 post-closure plan, shall be replaced with the figure submitted by O'Brien Technical Services to Ohio EPA, dated March 4, 2015.

Figure 4: Outline of RCRA Landfill on Property is not referenced in the text. The plan is hereby modified to include a reference to this figure on page 16 of this plan.

Figure 5: Location of monitoring Wells and Point of Compliance, The plan is hereby modified to add a reference to this figure after the first paragraph of Section 8.1. In addition, the facility will highlight or otherwise note the location of the Point of Compliance monitoring well (MW-12) on Figure 5.

Corrections to the figures will be made by the facility within 60 days of this approval.

Section 10.0 Institutional Controls
'Within 60 days of approval, DHC will implement the institutional controls described in Section 10.0.'

Section 12.0 Post-Closure Cost Estimate, Financial Assurance, and Certification of Completion
Section 12.1 is hereby replaced with: 'A post-closure cost estimate, and supporting information, is provided in Appendix D.'

Appendix A
The following statement is hereby incorporated into Appendix A, Section 5.2: 'Water level data loggers have been installed in the wells that are a part of the remedial system. These loggers will be used to obtain water levels during sampling events.'

The following statement is hereby incorporated into Appendix A, Sections 5.4 and 5.5: 'Purging and sampling of wells that are part of the remedial system will be done through a sample port.'

The facility shall submit a description of the sampling port, and purging/sampling methods to be employed on remedial system wells within 60 days of this approval.

The following sentence is hereby deleted from Section 9.0: 'In addition, the installation of an upgradient and/or downgradient interceptor trench is being considered.'

Appendix B
The sentence in Appendix B, Section 1.2.3 that reads 'The annual report will include the OEPA Supplementary Annual Reporting Form for Groundwater Monitoring Information,' is hereby modified to read, 'The annual report will include the Ohio EPA Supplementary Annual Reporting Form for Groundwater Monitoring Information, and will be submitted to Ohio EPA by March 1st of the calendar year following the sampling event(s).'</n
The sentence in Appendix B, Section 1.2.3 that reads 'Should corrective action be required this information along with the effectiveness of the corrective actions program will be provided to the director of OEPA semi-
annually,' is hereby modified to read, 'Since the facility is in corrective action, this information along with the
effectiveness of the corrective actions program will be provided to the director of Ohio EPA semi-annually.'

The following statement is hereby incorporated into Appendix B, Section 2.1: 'Water level data loggers
have been installed in the wells that are a part of the remedial system. These loggers will be used to obtain
water levels during sampling events.'

The following statement is hereby incorporated into Appendix B, Sections 2.1 and 2.2: 'Purging and
sampling of wells that are part of the remedial system will be done through a sample port.'

The facility shall submit a description of the sampling port, and purging/sampling methods to be employed
on remedial system wells within 60 days of this approval.

Appendix C
Within 60 days of approval, DHC will submit a revised Appendix C that includes all components of Section
9.2.2 of the Post-Closure Plan. (For example, Appendix C shall include the cap maintenance schedule; the
definition of a major crack; and the type of material to be used for repairs to the cap, which must be of
similar or better properties/characteristics as the original material.)

Appendix D
The facility will update the post-closure cost estimates for the facility to reflect current conditions, and submit
this information within thirty days of this approval to:

Ohio Environmental Protection Agency
Division of Materials and Waste Management
P.O. Box 1049
Columbus, Ohio 43216-1049
Attn: Melissa Cheung

Within 60 days of approval, the facility will submit a revised Appendix D, to include updated cost data; post-
closure cost estimates; and all language describing financial assurance for the facility.

The following sentence is hereby incorporated at the end of Appendix D, Section 1.0: 'The facility will
establish and maintain financial assurance in compliance with the applicable rules found in Ohio
Administrative Code 3745 Chapters 55-40 through 51.'

Appendix E
The facility will submit enlarged Figures 1 and 2, appropriately annotated, within 60 days of approval of this
plan.

Section 4.0 Ground Water Containment System
Within 60 days of this approval, the facility will submit a detailed description of the remedial system as
constructed, drawings or photographs illustrating the system, details of how secondary containment was
provided, and details of how the secondary containment will be monitored in order to detect a release from
the primary containment.

Section 4.2 Monitoring, Inspection, Recordkeeping
The plan is hereby modified to state that the inspection frequency for the remedial system is daily,
commencing with this approval.

Section 4.3 Corrective Action Implementations Schedule
The plan is hereby modified to delete section 4.3.

End of Document