November 10, 2015

Ms. Lori Littrell  
Atlantic Richfield Company  
150 W. Warrenville Road  
Naperville, IL 60563  

RE: Lima Refinery  
Permit - Intermediate  
Acknowledgement  
RCRA C – Hazardous Waste  
Allen  
OHD005051826  

Subject: Hazardous Waste Permit Modification - Class 1 Acknowledgment

Dear Ms. Littrell:

On July 6, 2015, Ohio EPA received notification for a Class 1 hazardous waste permit modification from Lima Refinery dated June 30, 2015. The modification implemented the following change to the permit:

- Reduce monthly reporting to annual reporting for on-going annual corrective action operation and maintenance activities within the Lima Refinery.
- Update Permit Condition E.9(c) to reflect the reduced reporting requirements.

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](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 Melissa Boyers of my staff at 419-373-3066.

Sincerely,

John Pasquarrette  
Manager, Northwest District Office  
Division of Materials and Waste Management

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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).
After implementing corrective measures for soils, samples will be collected to determine if Constituents of Concern (COCs) are present at levels above the MCSs. If COCs are present at levels above the MCSs, a post-remedial risk evaluation will be conducted. If the post-remedial risk evaluation shows that the COCs that are present at levels above the MCSs do not pose a significant risk above Ohio EPA’s acceptable risk level of 10-5 or Hazard Index of less than 1, then no further corrective measures will be implemented. However, if the post-remedial risk evaluation shows that the COCs that are present at levels above the MCSs do pose a significant risk above Ohio EPA’s acceptable risk level of 10-5 or Hazard Index greater than 1, then further corrective measures will be implemented.

(b) Specific Remedies

Specific remedies for individual SWMUs, SWMU groups, and areas at the facility are described in Attachment 1. These remedies were implemented in accordance with the CMICWP approved by U.S. EPA and the Terms and Conditions of this Permit. In the case of a newly discovered waste management unit, the remedy will be selected by Ohio EPA and the terms and conditions of this permit.

(c) Progress Reports

The Permittee must submit to Ohio EPA an annual cover inspection report for SWMU 46 (Old Primary Pond).

The Permittee must submit to Ohio EPA an annual “No Excavation” and “SWMU Location” inspection report for sign inspections at:

- SWMU 8 (L-6 Landfill)
- SWMU 46 (Old Primary Pond)
- SWMU 57 (North Ditch)
- SWMU 67 (Former Coke Pile)
- SWMU Group A (SWMU’s 3 and 5)
- SWMU Group E
- SWMU Group F
- Area 3

The Permittee must submit inspection reports to Ohio EPA annually for SWMU Group F in accordance with the Operation and Maintenance (O&M) Plan in the approved Construction Completion Report.

The Permittee must reassess the technical impracticability (TI) of light non-aqueous phase liquid (LNAPL) remediation at Area 3 in five-year intervals to determine if advances in technology would allow removal of LNAPL, and report the reassessment results to Ohio EPA. The first report was submitted on October 30, 2007.

The Permittee must submit to Ohio EPA an annual report on Area 3 TI Zone monitoring to Ohio EPA in accordance with the Technical Impracticability Demonstration for the Area 3 LNAPL report.

(d) Corrective Measures Completion Report

Within forty-five (45) days of completion of corrective measures implementation, the Permittee shall submit to Ohio EPA a Corrective Measures (CM) Completion Report and Operation and Maintenance (O&M) Plan.