July 15, 2016

Mr. Daniel McCabe  
Environmental Enterprises, Inc.  
10163 Cincinnati-Dayton Road  
Cincinnati, OH 45241

RE: Environmental Enterprises Inc.  
Permit - Intermediate Approval  
RCRA C – Hazardous Waste  
Hamilton  
OHD083377010

Subject: Hazardous Waste Permit Modification - Class 1A Approval

Dear Mr. McCabe:

On June 22, 2016, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Environmental Enterprises, Inc. dated June 14, 2016. The modification requested the following change to the permit:

Extension of the RFI work plan deadline in the Hazardous Waste 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 Pam Hull of my staff at (937) 285-6091.

Sincerely,

Bonnie Buthker  
Chief, Southwest District Office
E.4 Current Conditions Report

The Corrective Actions process requires that an initial evaluation of all available information describing the current conditions at the site be performed. Therefore, the Permittee shall submit the review within 120 days after the effective date of this permit a Current Conditions Report (CCR) for approval. The scope of work for each of the information elements to be addressed within the CCR is found in U.S. EPA’s CAP.

The CCR shall provide background information on the Facility, including each of the areas identified in Table J-1 of the permit application, the contaminants and potentially affected media associated with each area, and any interim measures implemented to date. The objective of the CCR is to evaluate existing data to:

- Screen areas of concern for inclusion in the RFI below for any areas the Permittee proposes to screen based on existing data;
- Develop a preliminary conceptual site model;
- Identify a preliminary interim measures/corrective measures; and,
- Identify data gaps.

The CCR shall serve as a baseline conditions report upon which the subsequent stages (ie. IM, RFI, CMS, CMI) of the corrective actions process are established. Based on the approved CCR the Permittee shall identify gaps in available data and develop investigations that address such data gaps within the RFI Work plan described in Permit Condition E.5.

E.5 RCRA Facility Investigation (RFI)

OAC Rule 3745-54-101

The Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs, identified in Permit Condition E.3 above and Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in U.S. EPA’s CAP.

a) RFI Workplan

Based on the findings of the approved CCR, the Permittee must submit a written RFI workplan to Ohio EPA within 60 days of Ohio EPA’s modification of this permit condition, or on a time frame established by Ohio EPA. An RFI workplan outline will be submitted immediately. In the case of a newly discovered waste management unit, the Permittee will submit a written RFI Workplan to Ohio EPA immediately, or on a time frame established by Ohio EPA.