November 8, 2016

Mr. Randall Drummond
Materion Brush Inc.
14710 West Portage River South Road
Elmore, Ohio 43416-9502

Re: Materion Brush Inc
Permit - Intermediate
Acknowledgment
RCRA C – Hazardous Waste
Ottawa County
OHD004212999

Subject: Hazardous Waste Permit Modification - Class 1 Acknowledgment

Dear Mr. Drummond:

On September 28, 2016, Ohio EPA received notification for a Class 1 hazardous waste permit modification from Materion Brush Inc. dated September 28, 2016. The modification implemented the following change to the permit:

Correct language on page 45 of the permit terms and conditions. This language is part of the introductory text and is considered an information change.

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 website: 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 Wendy Miller of my staff at (419) 373-3114.

Sincerely,

Colleen Weaver
Hazardous Waste Manager, Northwest District Office
Division of Environmental Response and Revitalization

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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).
4. Active Settling Lagoon No. 5 (WMU #9)

5. Waste Lagoon No. 6 (WMU #10) (RCRA Closed)

Tetrachloroethene, trichloroethene, and cis-1,2-dichloroethene have been reported in downgradient water monitoring wells associated with the units included in this module at concentrations exceeding concentration limits identified in Table 4-1 of the Integrated Ground Water Monitoring Program.

The seven units listed above are either contiguous or in close proximity of each other and may be contributing the above mentioned contaminants to the same plume of contaminated ground water. Establishing standards for the three regulated hazardous waste management units under different rules from the remaining WMUs is duplicative and impractical. Therefore, through a permit modification request, this permit has been modified to describe an integrated ground water monitoring program for both sets of units. The detailed monitoring program is incorporated into this permit as Section E of the approved permit application and is, hereafter, referred to as the “Integrated Ground Water Monitoring Program” (IGWMP).

The IGWMP is based primarily on the elements in the December 11, 2001, “Ten Points of Agreement” letter from the Ohio EPA to the permittee (see Appendix F of the IGWMP). For the purposes of this monitoring program, the plume is considered to be “expanding” if the contaminant levels at the Point of Action (POA) wells (listed in Table F-1 of the permit terms and conditions) exceed calculated residential risk levels. Consequently, the IGWMP includes the following:

1. A description of the wells in the monitoring network, their locations and relevance to the monitoring plan.

2. Details of the sampling plan, such as, sampling frequency, test methods, etc.

3. The basis and procedures for calculating risk levels and, consequently, whether the plume is expanding.

4. The steps to be taken if the monitoring program reveals that the plume of contaminated ground water is expanding.

F.1 Well Location, Installation, and Construction

The Permittee shall maintain the ground water monitoring system in compliance with the requirements specified below:

(a) The Permittee shall maintain a ground water monitoring network consisting of the wells listed in Table F-1 in this condition and shown on the figure in