



## Draft Hazardous Waste Permit Modification

March 2017

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**Facility Name:** Ross Incineration Services, Inc.

**U.S. EPA I.D.:** OHD 048 415 665

**Location:**

36790 Giles Road  
Grafton, OH 44044

**Facility Owner:**

Ross Incineration Services, Inc.  
36790 Giles Road  
Grafton, OH 44044

Ross Consolidated Corp.  
36790 Giles Road  
Grafton, OH 44044

**Facility Operator:**

Ross Incineration Services, Inc.  
36790 Giles Road  
Grafton, OH 44044

**Activity:**

This permit modification, initiated by the Director of Ohio EPA, will require the RIS to perform specific corrective measures as a part of its side-wide Corrective Action activities.

**Comment Period:**

April 13, 2017 to May 31, 2017

**Submit Comments to:**

Ohio EPA  
Jessica Cáceres  
Division of Environmental Response and Revitalization  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
(614) 644-2924  
jessica.caceres@epa.ohio.gov

### What is the history of the hazardous waste program?

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include: to protect human health and the environment from potential hazards of waste disposal, to reduce the amount of waste generated, and to ensure that waste produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states to assume primary responsibility for implementing the hazardous waste regulations with oversight from the United States Environmental Protection Agency (U.S. EPA). U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state program is at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of their hazardous waste program.

### How can I become more involved?

All persons, including the applicant, may submit written comments relating to this draft action. Written comments or requests for a public meeting may be submitted before the end of the comment period to the address in the box on the front of the page. Ohio EPA will hold a

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public meeting if enough people request such a gathering. The agency may modify the proposed permit modification or take other action based on new information or public comments, so your opinion is important.

The comment period begins on April 13, 2017, and ends on May 31, 2017. Copies of the modified permit application pages and the draft permit are available for review by the public at the following locations:

Ohio EPA, Northeast District Office  
2110 East Aurora Road  
Twinsburg OH 44087  
(330) 963-1200

Ohio EPA, Central Office  
Division of Environmental Response and Revitalization  
50 West Town St., Suite 700  
Columbus, Ohio 43215  
(614) 644-2621

A copy of the draft modified permit is available for review by the public at:

Grafton-Midview Public Library  
983 Main Street  
Grafton, Ohio 44044  
(440) 926-3317

The Ohio draft modified permit is available for review by the public online under the “What’s New” tab at:

[www.epa.ohio.gov/derr](http://www.epa.ohio.gov/derr)

The entire record for this draft action is available via Ohio EPA’s eDocument portal:

[http://edocpub.epa.ohio.gov/publicportal/edoc\\_home.aspx](http://edocpub.epa.ohio.gov/publicportal/edoc_home.aspx)

Using the search function, search under the document type of “Permit” and then refine the search using the package number, which is

“515”. Select from the list of documents, the document dated 01/18/2017

After the close of the public comment period, Ohio EPA will, without prior hearing, issue a modified permit (or deny the request) in accordance with Chapter 3734 of the Ohio Revised Code (ORC). If Ohio EPA approves the application, taking into account public comments, a modified permit will be issued with terms and conditions as are necessary to ensure compliance with hazardous waste rules.

### What does the facility do?

Ross Incineration Services, Inc. (RIS) operates a commercial hazardous waste incinerator with associated waste management activities. RIS is authorized to store hazardous waste in containers and tanks, and to treat hazardous waste by incineration, in tanks and in a miscellaneous unit, in accordance with its approved Hazardous Waste Facility Installation and Operation Permit and applicable hazardous waste rules.

### What is the purpose of this permit modification?

The first step in the Corrective Action process is a site investigation to define the waste management units (WMUs), Areas of Concern (AOCs), and the nature and extent of contamination at the facility; this information provides the foundation for selection and implementation of a site-wide remedy consisting of one or more corrective measures, if applicable. Upon completion of the investigation, the facility may provide Ohio EPA with proposed corrective measures or Ohio EPA may identify presumptive corrective measures. Ohio EPA then proposes corrective measures through the permit modification process. Ohio EPA has reviewed the environmental data collected and the studies completed during the facility investigation and has evaluated corrective measure alternatives. Ohio EPA has concluded that the corrective measures summarized in the attached Statement of Basis

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will protect human health and the environment as required by the rules and regulations.

Therefore, Ohio EPA is initiating this modification to administer the implementation of site-wide corrective measures. The draft modification proposes that RIS:

- Enter into an Environmental Covenant with Ohio EPA to restrict future use of the facility;
- Develop and implement a site-wide Integrated Ground Water Monitoring Program;
- Develop and implement a site-wide Soil Management Plan and Health and Safety Plan;
- Develop and implement an Inspection and Maintenance Plan for the North Landfill;
- Develop and implement an Inspection and Maintenance Plan for SWI-2 and 6;
- Develop and implement improved contact barriers for the South Landfill area;
- Develop and implement an Inspection and Maintenance plan for the South Landfill area and areas outside the South Landfill area in solid waste management unit area SWMUA 4;
- Document adequacy of existing cover for the Mixing Area or develop and implement a plan for additional cover or another acceptable isolation barrier;
- Develop and implement an Inspection and Maintenance plan for the Mixing Area;
- Evaluate and, if necessary, develop and implement improved control barriers for surface water impoundments SWI-1, 4, 5, and 8;
- Develop and implement an Inspection and Maintenance plan for surface water impoundments SWI-1, 4, 5, and 8;

- Inspection and Maintenance plans may be consolidated into a facility-wide plan;
- Develop and implement a Sediment Management Plan for the facility surface water bodies;
- Develop and implement a plan to manage contaminated sediment in Dawley Ditch within the RIS facility;
- Develop and implement a plan to inhibit waterfowl exposures to the Freshwater Lake;
- At the time of closure of a currently operating unit, evaluation of whether any contamination remains after closure, and implementation of all corrective measures necessary;
- Not construct or modify buildings without evaluation and mitigation of vapor intrusion risks;
- Provide financial assurance for corrective measures.

### What is the regulatory basis to support this permit renewal?

The Director may initiate a permit modification by issuing a draft modified permit in accordance with OAC Rule 3745-50-51(J). The Director is using the authority in this rule to incorporate RCRA Corrective Action requirements into the permit.

Accordingly, Ohio EPA is issuing a draft action indicating the director's intention with respect to the issuance of a modified permit to RIS.

### Who can I contact for more information?

For additional information, please contact John Palmer at (330) 963-1232 or Karen Nesbit at (330) 963-1159.