



eDocument Workflow Data Ingestion Form

DMWM - Hazardous Waste Permitting

Note: All HW Permitting Documents fall under "Permit-Intermediate" doc type.

Keyword Summary:

Secondary ID:	OHD060928561	Stamped date on doc:	9/19/2016
Facility Name:	IRG Dayton II, LLC		
County:	Montgomery	CBI/Trade Secret Info (see protocol below)	
Program:	RCRA C – Hazardous Waste	Request contains CBI/TS claim?	No
Permit Type:	Permit to Install & Operate	Was a "public" copy included?	NA
Permit Subtype:	Application & Support	Financial Assurance Info (see protocol below)	
Permit Classification:	Permit Application	Request contains FA policy/account # info?	No
Permit Purpose:	Renewal	Contingency Plan Info (see protocol below)	
Confidentiality Status:	Public Record for Publication	Request contains facility staff pers/home phone #'s?	No

CBI/Trade Secret Protocol

Applications or requests that contain a claim of Confidential Business Information (CBI) or "trade secret" **are not be ingested** into the Agency's eDoc system. However, any claims must be made at the time of application submission, as required by both OAC rule 3745-49-03 and OAC rule 3745-50-30. Permittees must comply with the complete requirements of the above-cited rules, which include, among other things, submission of a corresponding "public" copy of the application or request which should be ingested into eDocs.

Financial Assurance Info Protocol

If the application contains "original signature" financial assurance documents, these documents **must be forwarded** to CO FA staff (Shawn Sellers or Melissa Cheung) as these types of documents must be secured in CO's fireproof file cabinet. Also, even if the FA information included in a mod application is not "original signature", if it includes information like insurance policy, bank account, letter of credit or bond numbers, these impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain financial assurance mechanism details specific to policy or account numbers have been removed from this web-available version of the document."

Regarding review of FA components of mods, ERAS has set up a [tracking/request system](#) on SharePoint where DO staff can make a review request the HW FA Review Request list which can be accessed from the DMWM's Financial Assurance site.

Contingency Plan Info Protocol

If the application contains facility staff personal/home phone number information, the impacted pages should simply be physically removed and not scanned/included as a part of the ingested application. In place of the removed page, a page can be inserted which states: "Pages of this application which contain facility staff personal/home phone number information have been removed from this web-available version of the document."

Form Completed by: Jeff Smith

10/4/2016

Comments



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September 19, 2016

VIA CERTIFIED MAIL AND E-MAIL

Mr. Craig Butler, Director
c/o Mr. Jeremy Carroll
Ohio EPA
50 West Town Street, Suite 700
Columbus, Ohio 43216-1049

Re: IRG Dayton II, LLC
Updated Hazardous Waste Permit Renewal Application - Former Delphi Corp.
Wisconsin Boulevard Operations, 1515 Cincinnati Street, Dayton, Ohio
US EPA ID #OHD060928561; Ohio EPA ID #05-57-0274

Dear Director Butler:

On behalf of IRG Dayton II, LLC (IRG), enclosed is an updated Part B Hazardous Waste Permit Renewal Application (Application) for the permitted facility located at 1515 Cincinnati Street, Dayton, Ohio that is owned by IRG. This Application is being submitted to reflect Ohio EPA-approved modifications to the Permit since the original Renewal Application was submitted on August 9, 2013. A newly signed renewal application form is included with this Application; a check in the amount of \$1,500 for the renewal fees was provided in connection with the submittal of the original Renewal Application in August 2013.

Thank you for your attention to this matter. If you have any questions regarding the submittal of this Application, please contact me at 614-464-5483.

Sincerely,

Ryan D. Elliott

RDE/rde
Enclosures



Legal Counsel

Mr. Craig Butler, Director

September 19, 2016

Page 2

cc: Andrea Smoktonowicz, Esq., Ohio EPA, Legal Office
Tim Hull, Ohio EPA, SWDO

OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF MATERIALS AND WASTE MANAGEMENT

APPLICATION FOR NEW OR RENEWAL OF HAZARDOUS WASTE
FACILITY INSTALLATION AND OPERATION PERMIT

Facility Name: Former Delphi Automotive Systems, LLC Wisconsin Boulevard Operations

Facility Location: 1515 Cincinnati Street

(Street)

Dayton

Ohio

45406

(City)

(State)

(Zip Code)

Facility Mailing Address: 4020 Kinross Lakes Parkway, #200

(If different from above)

(Street)

Richfield

Ohio

44286

(City)

(State)

(Zip Code)

U. S. EPA ID No.: OHD060928561

Facility Contact: Frank Lanterman Senior Property Manager

(Name)

(Title)

Facility Telephone: (330) 659-4060

I hereby apply for new or renewal of the Ohio Hazardous Waste Facility Installation and Operation Permit Issued for the facility indicated above.

CERTIFICATION STATEMENT

I certify under penalty of law that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted

is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for the known violations.

Justin Lichter

(Name - Type or Print)

Revenue I.D. (Office Use)

Agent for IRG Dayton II, LLC

(Title - Type or Print)

\$0.00 (fee payment previously submitted)

Amount Enclosed

Justin Lichter 9/15/16
(Signature & Date)

PERMIT RENEWAL APPLICATION

IRG DAYTON II, LLC (IRG)

**FORMER DELPHI CORPORATION
WISCONSIN BOULEVARD OPERATIONS**

1515 CINCINNATI STREET

DAYTON, OHIO

RCRA HWMF Permit - Wisconsin Boulevard Facility

US EPA ID #OHD060928561

Ohio EPA ID #05-57-0274

September 2016

TABLE OF CONTENTS

SECTIONS

A PART A PERMIT APPLICATION

B FACILITY DESCRIPTION

J CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

K OTHER FEDERAL LAWS

L CERTIFICATION

FIGURES

A-1 Topographic Map
A-2 Facility Drawing – Site Features Layout
B-1 Site Location Map
B-2 Site Features Layout
B-3 100-Year Floodplain Map
B-4 Zoning Map

APPENDICES

A-1 RCRA Part A Permit Application Forms and Figures

J-1 RCRA Corrective Action Current Conditions Summary (**NOTE**: Appendix J-1 is the Current Conditions Summary as Prepared by Haley & Aldrich, Inc., for Delphi and submitted to Ohio EPA in May 2002 as part of Delphi's Part B Permit Renewal. An updated Conditions Summary will be submitted as part of the RFI process and, upon Ohio EPA approval thereof, will replace and supersede the 2002 Current Conditions Summary.)

ATTACHMENT

B-1 Legal Descriptions and Surveys of Facility parcels after 2011 and 2016 Permit Modifications

SECTION A

PART A PERMIT APPLICATION

IRG Dayton II, LLC (IRG) is submitting this updated Part B Hazardous Waste Permit Renewal Application (Application) for the former Delphi Wisconsin Boulevard Operations facility located at 1515 Cincinnati Street, Dayton, Ohio (Facility) that is owned by IRG. The following summarizes the Resource Conservation and Recovery Act (RCRA) permitting history for the Facility:

November 1980	General Motors (GM), owner/operator at the time, submits Part A application for its hazardous waste management facility to U.S. EPA;
1988	GM submits revised Part A application and revised Part B application;
1995	GM submits a second Part B permit application;
1999	Delphi Automotive Systems (Delphi) submits a Class 3 modification to the Part A Permit to change ownership;
March 19, 2001	Hazardous waste container storage was discontinued and closure activities for permitted hazardous waste container storage areas were commenced pursuant to Ohio EPA approval of a closure plan;
October 16, 2001	Ohio EPA concurs that the hazardous waste container storage areas were closed in accordance with the modified permit, the approved closure plan and OAC 3745-55-11;
January 2002	Delphi submits an Ohio EPA Change of Generator Status notification to reflect a change from a large quantity hazardous waste generator to small quantity generator status;
May 2002	Delphi submits application for renewal of Part B Permit for purpose of corrective action;
October 8, 2003	Part B Permit Renewal issued;
May 2008	Delphi submits RCRA RFI report to Ohio EPA;
September 4, 2008	Ohio EPA approves Class 1A modification extending Part B Permit for Corrective Action 5 years to expire on October 8, 2013;
September 4, 2008	Ohio EPA approves Class 1A modification extending the due date for submission of the Corrective Measures Proposal to 90 days after receipt of Ohio EPA's comments on the RFI report;

March 2010	IRG Dayton II, LLC (IRG) submits Site Identification form to Ohio EPA listing it as new owner, and also submits Hazardous Waste Information Form;
March 9, 2010	Ohio EPA approves Permit Modification for ownership change to IRG Dayton II, LLC;
May 4, 2010	IRG submits Class 1A modification request to change Facility address from 1460 Wisconsin Blvd to 1515 Cincinnati Street, Dayton, Ohio; Part A certification and Subtitle C Site Identification forms updated to address structure demolition and potential waste generation from corrective action;
July 13, 2010	Ohio EPA approves Permit Modification identifying change in Facility address from Wisconsin Ave to Cincinnati Street address, demolition, and potential waste generation from corrective action;
September 9, 2011	IRG submits Class 1A modification request to change the legal boundaries of the Facility;
October 26, 2011	Ohio EPA approves Permit Modification to change Facility boundaries;
August 8, 2013	IRG submits request for Class 1A modifications to: (1) add Love's Travel Stops & Country Stores, Inc. (Love's) as co-owner and joint permittee of the Facility as a result of a November 29, 2012 sale of part of the Facility to Love's, (2) note a name change for IRG Dayton I, LLC, (3) change the co-owner and joint permittee from IRG Dayton I, LLC to IRG Dayton II, LLC, and (4) change the contact information for both IRG and Love's.
October 7, 2013	Ohio EPA approves Permit Modifications adding Love's as co-permittee and updating the Facility contact information.
December 10, 2015	IRG submits request for Class 1A Permit Modifications, supported by an Interim Measures Report prepared by Love's environmental consultant, to: (1) remove the 'Old Cincinnati Plant Parcel' (Plant 3) from the Permit, and (2) remove Love's from the Permit.
January 29, 2016	Ohio EPA approves Permit Modifications removing the Old Cincinnati Plant Parcel from the Permit and removing Love's from the Permit.

The Facility is inactive, having ceased all operations in 2007. No waste is being stored, treated, disposed of, or accumulated. Waste may in the future be generated in connection with corrective action at the Facility.

Enclosed with this Application is an updated topographic map of the Facility (Figure A -1), a Facility drawing showing the location of site features (Figure A-2) and an updated RCRA Site Identification Form and Hazardous Waste Permit Form.

APPENDIX A-1

RCRA Part A Permit Application Forms and Figures

10. Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.Y ☐ N ☒**1. Generator of Hazardous Waste**

If "Yes," mark only one of the following – a, b, or c.

- ☐ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.

- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.

- ☐ c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities in 2-10.

Y ☐ N ☒

- 2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.

Y ☐ N ☒

- 3. United States Importer of Hazardous Waste**

Y ☐ N ☒

- 4. Mixed Waste (hazardous and radioactive) Generator**

Y ☐ N ☒**5. Transporter of Hazardous Waste**

If "Yes," mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☒

- 6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.

Y ☐ N ☒

- 7. Recycler of Hazardous Waste**

Y ☐ N ☒

- 8. Exempt Boiler and/or Industrial Furnace** If "Yes," mark all that apply.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒

- 9. Underground Injection Control**

Y ☐ N ☒

- 10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.Y ☐ N ☒

- 1. Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.

- a. Batteries ☐
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☐
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

Y ☐ N ☒

- 2. Destination Facility for Universal Waste**

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.Y ☐ N ☒

- 1. Used Oil Transporter** If "Yes," mark all that apply.

- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)

Y ☐ N ☒

- 2. Used Oil Processor and/or Re-refiner** If "Yes," mark all that apply.

- ☐ a. Processor
- ☐ b. Re-refiner

Y ☐ N ☒

- 3. Off-Specification Used Oil Burner**

Y ☐ N ☒

- 4. Used Oil Fuel Marketer** If "Yes," mark all that apply.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:☐ a. College or University☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or universityY ☐ N ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories**11. Description of Hazardous Waste****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

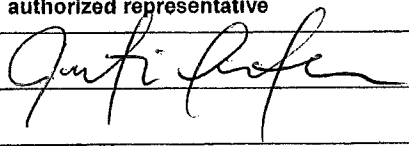
If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

IRG originally submitted the Part B Hazardous Waste Permit Renewal Application for the facility on August 9, 2013. This Application is being submitted to reflect Ohio EPA-approved approved modifications to the Permit since the original submittal, including the removal of a portion of the property subject to the Permit and the removal of former co-permittee, Love's Travel Stops & Country Stores, Inc., from the Permit.

The facility is inactive, and no waste is being stored, treated, disposed of, or accumulated at the facility. Wastes may in the future be generated in connection with corrective action.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Justin Lichter, Authorized Agent	09/15/2016

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	First Name: Justin										MI:		Last Name: Lichter									
	Contact Title: Authorized Agent																					
	Phone: 530-426-2226										Ext.:				Email: jlichter@irgra.com							
2. Facility Permit Contact Mailing Address	Street or P.O. Box: 4020 Kinross Lakes Parkway, # 200																					
	City, Town, or Village: Richfield																					
	State: Ohio																					
	Country: USA										Zip Code: 44286											
3. Operator Mailing Address and Telephone Number	Street or P.O. Box: 4020 Kinross Lakes Parkway, # 200																					
	City, Town, or Village: Richfield																					
	State: Ohio										Phone: 330-659-4060											
	Country: USA										Zip Code: 44286											
4. Facility Existence Date	Facility Existence Date (mm/dd/yyyy): Prior to 1985																					
5. Other Environmental Permits																						
A. Facility Type (Enter code)		B. Permit Number												C. Description								
6. Nature of Business: The site was historically operated for the manufacture of air planes and vehicle components, primarily brakes. The facility ceased all operations in 2007, and was purchased by IRG Dayton II, LLC in February 2013 for potential re-development. No waste is being stored, treated, disposed of, or accumulated at the site.																						

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity	Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal			Treatment (Continued) (for T81 – T94)		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
Storage			T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
S99	Other Storage	Any Unit of Measure Listed Below	T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Treatment			Miscellaneous (Subpart X)		
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below
Unit of Measure		Unit of Measure Code	Unit of Measure		Unit of Measure Code
Gallons		G	Short Tons Per Hour		D
Gallons Per Hour.....		E	Short Tons Per Day		N
Gallons Per Day		U	Metric Tons Per Hour		W
Liters		L	Metric Tons Per Day		S
Liters Per Hour.....		H	Pounds Per Hour.....		J
Liters Per Day.....		V	Kilograms Per Hour.....		X
			Million BTU Per Hour.....		X
			Cubic Yards		Y
			Cubic Meters.....		C
			Acres		B
			Acre-feet		A
			Hectares		Q
			Hectare-meter		F
			BTU Per Hour.....		I

9. Description of Hazardous Wastes - Enter information in the Sections on Form Page 5

- A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item 9.D(1).
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. **PROCESS DESCRIPTION:** If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
- In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an Incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
								(1) PROCESS CODES (Enter Code)								(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))			
X	1	K	0	5	4	900	P	T	0	3	D	8	0						
X	2	D	0	0	2	400	P	T	0	3	D	8	0						
X	3	D	0	0	1	100	P	T	0	3	D	8	0						
X	4	D	0	0	2													Included With Above	

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number		A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))
					(1) PROCESS CODES (Enter Code)										
	1														
	2														
	3														
	4														
	5														
	6														
	7														
	8														
	9														
1	0														
1	1														
1	2														
1	3														
1	4														
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2	7														
2	8														
2	9														
3	0														
3	1														
3	2														
3	3														
3	4														
3	5														
3	6														

10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

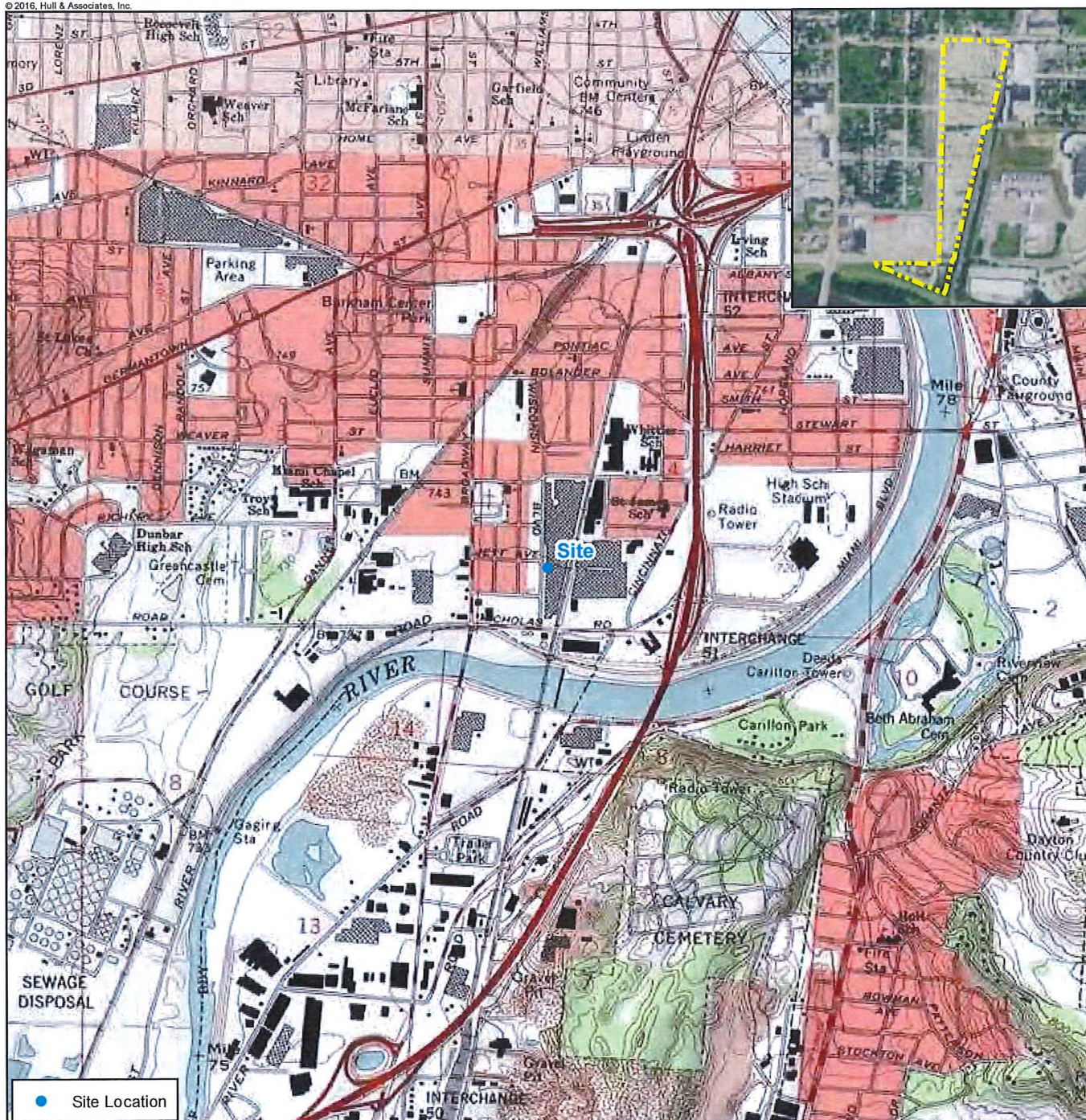
12. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

Facility Location: Latitude: 39.734829 Longitude: -84.211937

SECTION A FIGURES



DISCLAIMER

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0 500 1,000 2,000 Feet
1:24,000



Quad: Dayton South

Source: The topographic map was acquired through the USGS Topographic Map web service.

The aerial photo in the inset was acquired through the ESRI Imagery web service. Aerial photography dated 2015.



4 Hemisphere Way
Bedford, Ohio 44146

Phone: (440) 232-9945
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www.hullinc.com

RCRA Hazardous Waste Part B Permit Application
IRG Dayton II, LLC

Site Location Map

1515 Cincinnati Street
Dayton, Montgomery County, Ohio

Date:

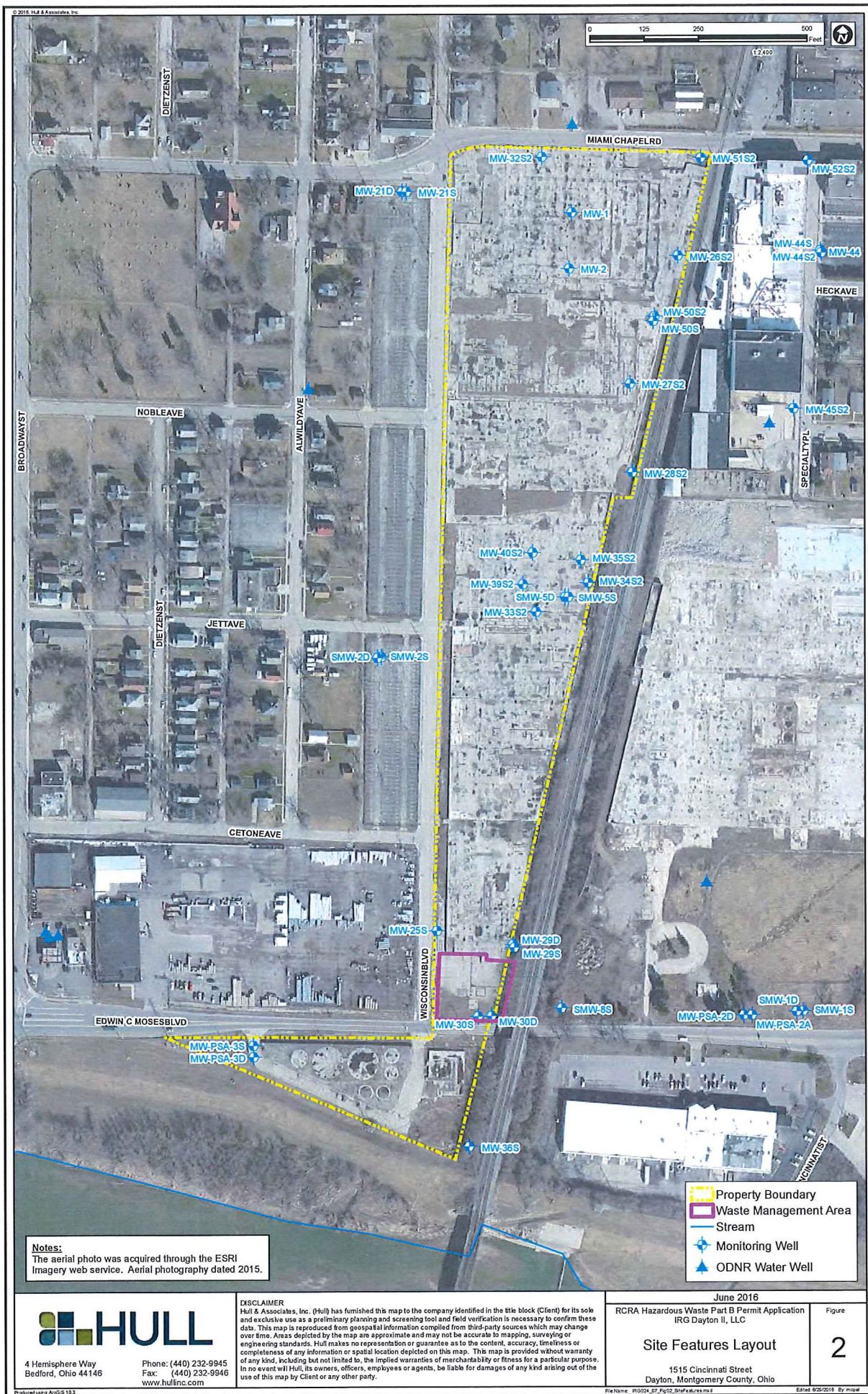
June 2016

File Name:
IRG024_07_Fig01_SLM.mxd

Edited: 6/28/2016 By: mopol

Figure

1



SECTION B

FACILITY DESCRIPTION

Section B describes the former Delphi Corporation Facility, Wisconsin Boulevard Operations, in Dayton, Ohio (Facility) for the purposes of acquainting the permit reviewer with the Facility's location, geographic setting and physical layout. Current owner, IRG Dayton II, LLC (IRG) purchased the Facility from 4780 Hinckley Cleveland LLC (f.k.a. IRG Dayton I, LLC) on February 14, 2013 with the intent of redeveloping the land for commercial and/or recreational use.

B.1 GENERAL DESCRIPTION

B.1.a Site Description

The Facility is located within the city of Dayton, Ohio, in Montgomery County, at 1515 Cincinnati Street. The Facility was developed to consist of three operating plants (Plants 1, 2 and 3) where the former owner manufactured wheel cylinders, brake shoes and brake shoe linings at the Facility until operations were discontinued in 2007. All superstructures associated with Plants 1, 2, and 3 have been demolished. The wastewater treatment plant infrastructure has been removed.

The original 47-acre Facility has been reduced in size and now comprises two individual parcels totaling 18.59 acres for which IRG is responsible for corrective action under the Permit. The new Facility boundaries are shown on Figures B-2 and B-3. The legal descriptions and corresponding surveys of the two parcels comprising the Facility are provided in Attachment B-1.

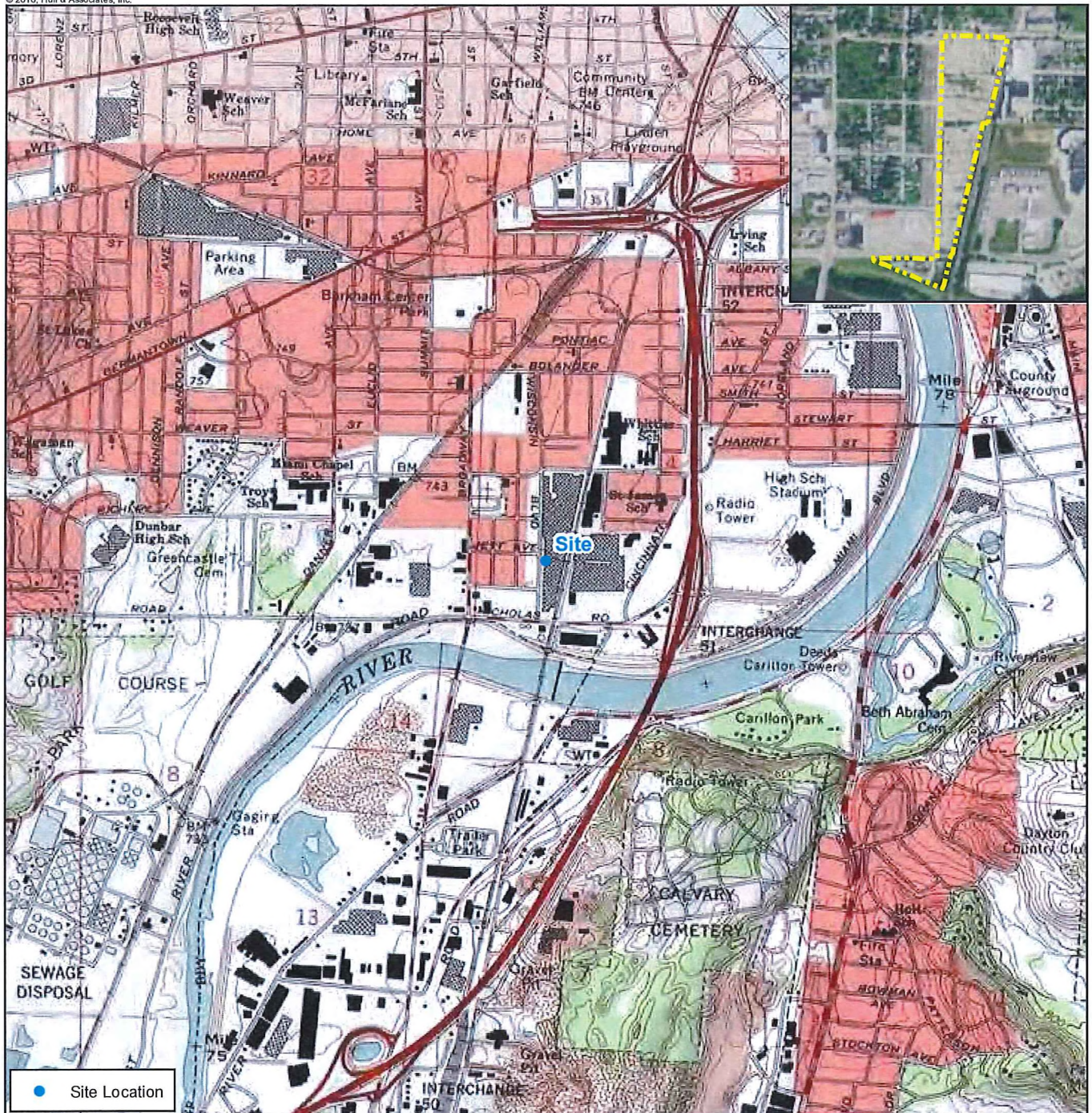
B.1.b Hazardous Waste Accumulation

Hazardous waste storage was discontinued on March 19, 2001. Hazardous waste accumulation in accordance with applicable generator requirements (pursuant to OAC 3745-52) occurred beginning in March 19, 2001 and until cessation of operations in 2007. No hazardous wastes have accumulated or been stored, treated or disposed of at the Facility since cessation of operations. Wastes may in the future be generated as part of Facility corrective actions.

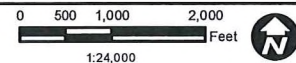
B.2 FACILITY FIGURES

A Topographic map, facility map, floodplain map, and zoning map are included that depict necessary information. Figure 1 depicts the general topography of the Facility as well as surrounding areas. Figure 2 depicts Site features including the legal boundaries of the Facility, Ohio Department of Natural Resources (ODNR) water wells located in the vicinity of the Facility, monitoring wells at and around the Facility, and the location of the former hazardous waste management area. Figure 3 includes FEMA floodplain information. The Facility is not located within a 100 year floodplain. Figure 4 is a Zoning Map showing the location of the Facility within a General Industrial District.

Section B Figures



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Quad: Dayton South

Source: The topographic map was acquired through the USGS Topographic Map web service.

The aerial photo in the inset was acquired through the ESRI Imagery web service. Aerial photography dated 2015.



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RCRA Hazardous Waste Part B Permit Application
IRG Dayton II, LLC

Site Location Map

1515 Cincinnati Street
Dayton, Montgomery County, Ohio

Date:

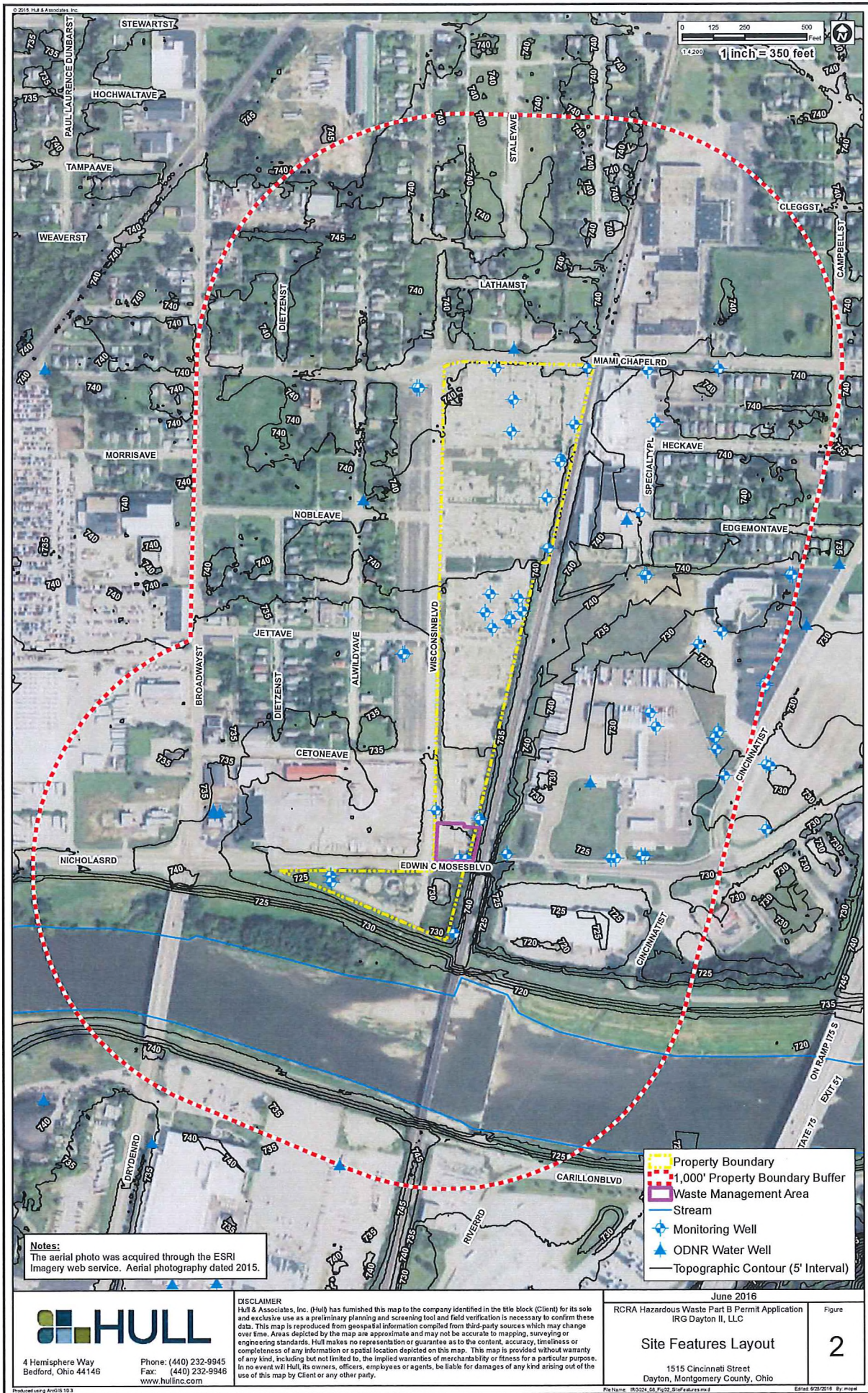
June 2016

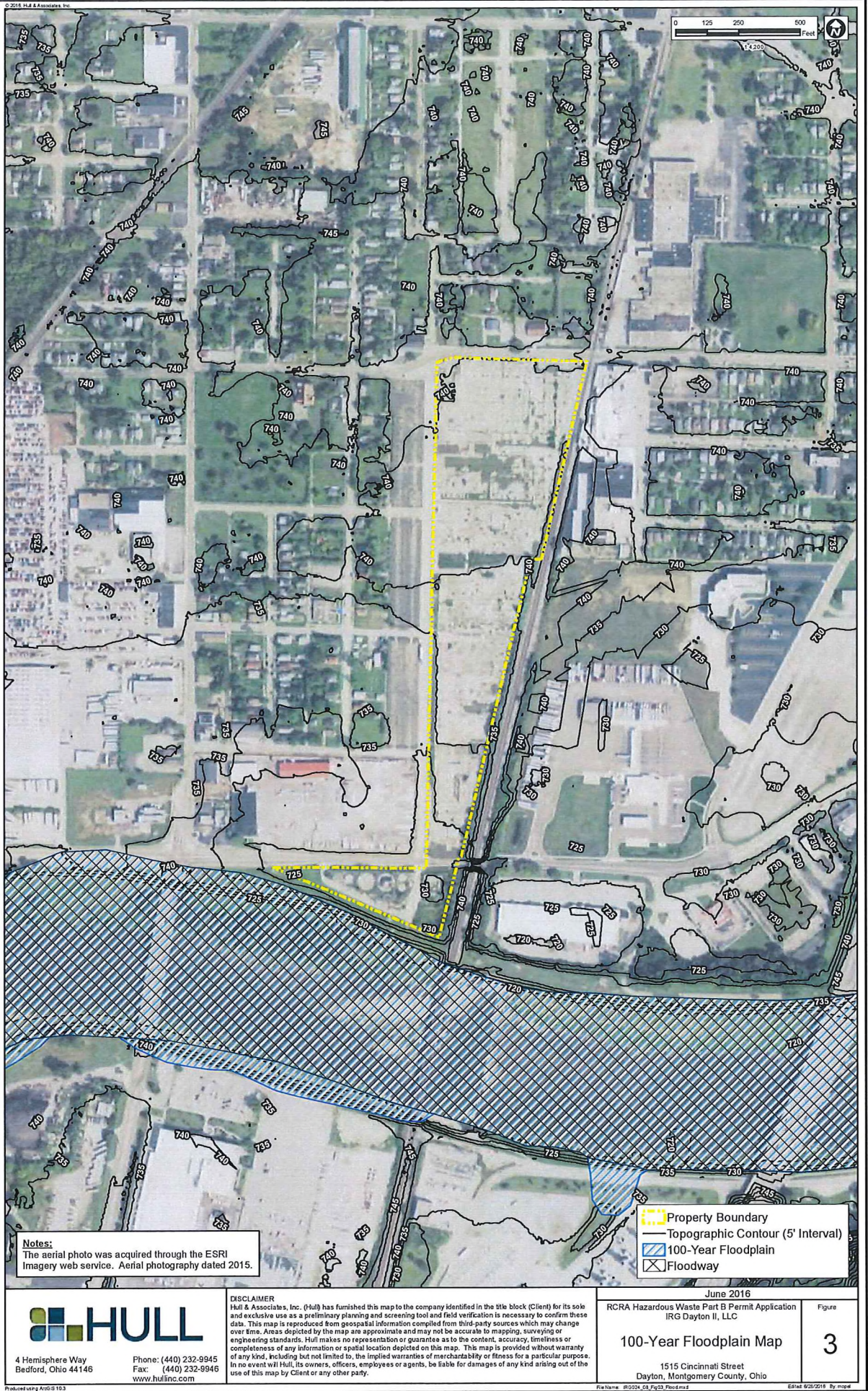
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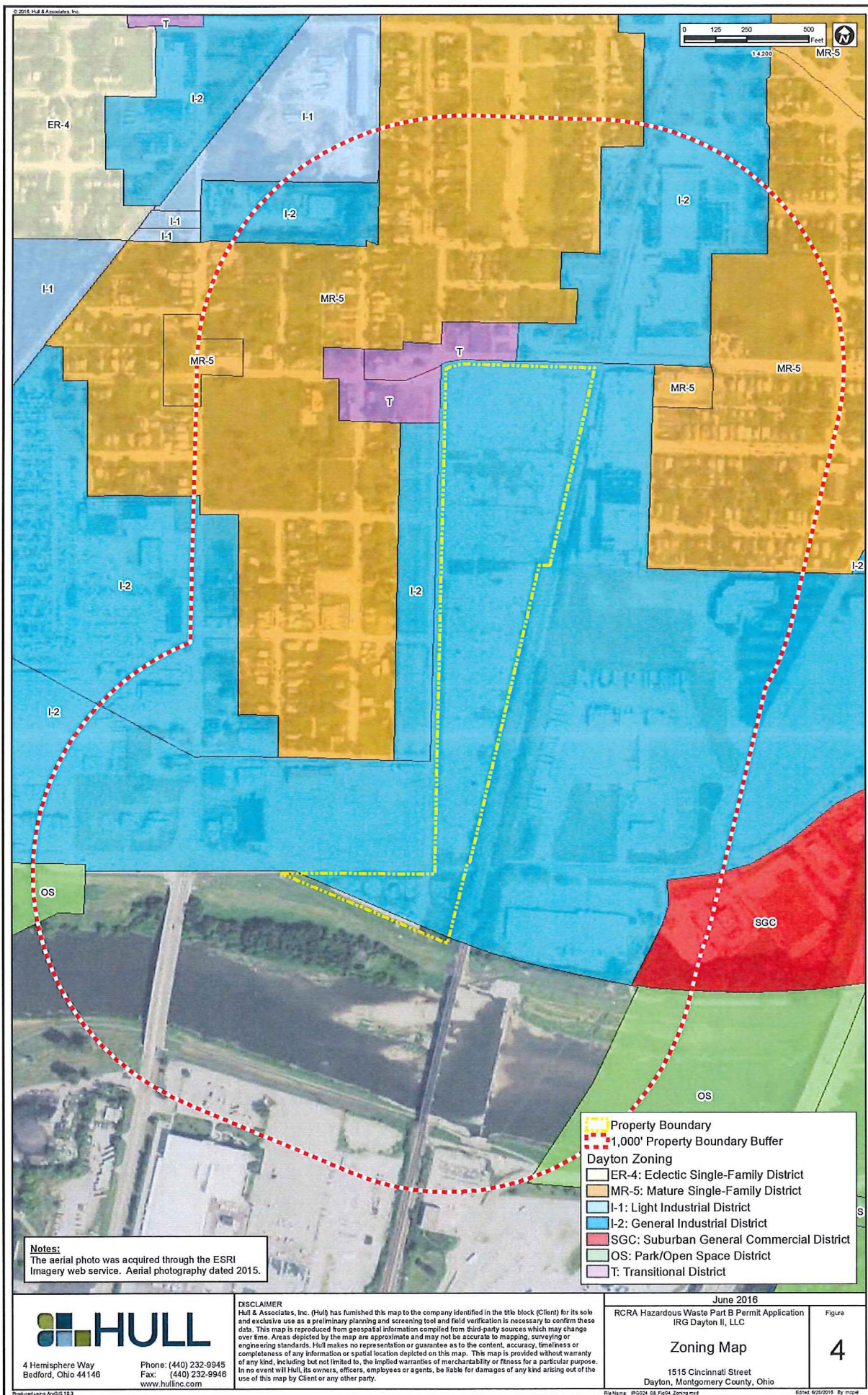
Edited: 6/28/2016 By: mopol

Figure

1







ATTACHMENT B-1

PARCEL 1
Lot 83548
OLD WATER TREATMENT LOT
2.098 ACRES

Situate in Fractional Section 4, Township 1, Range 6E, City of Dayton, County of Montgomery, State of Ohio, Lot Number 83548 of the Revised and Consecutive Numbers of Lots on the Plat of the City of Dayton and being particularly described as follows;

Beginning at a found iron pin in the South Right of Way of Edwin C. Moses Boulevard, said point being the Northeast corner of said lot 83548 and being the point of beginning for there herein description;

Thence leaving said Right of Way, S13°05'00"W a distance of 269.92 feet to a found iron pin.

Thence N65°46'50"W a distance of 690.18 feet to a found iron pin in the South Right of Way line of Edwin C. Moses Boulevard.

Thence along said Right of Way, S88°19'20"E a distance of 690.83 feet to the point of beginning. Said parcel containing 2.098 acres, more or less.

Said Parcel is subject to all legal easements, restrictions and highways of record.

The above described being the result of a survey created on August 16, 2011 by Steven J. Leesman Ohio License Number 8352.

Bearings are based upon the West Right of Way line of Cincinnati Street in Plat Book 192 Pages 18B and 18C of the plat records of Montgomery County, Ohio. Said bearing being S28°07'30"W.

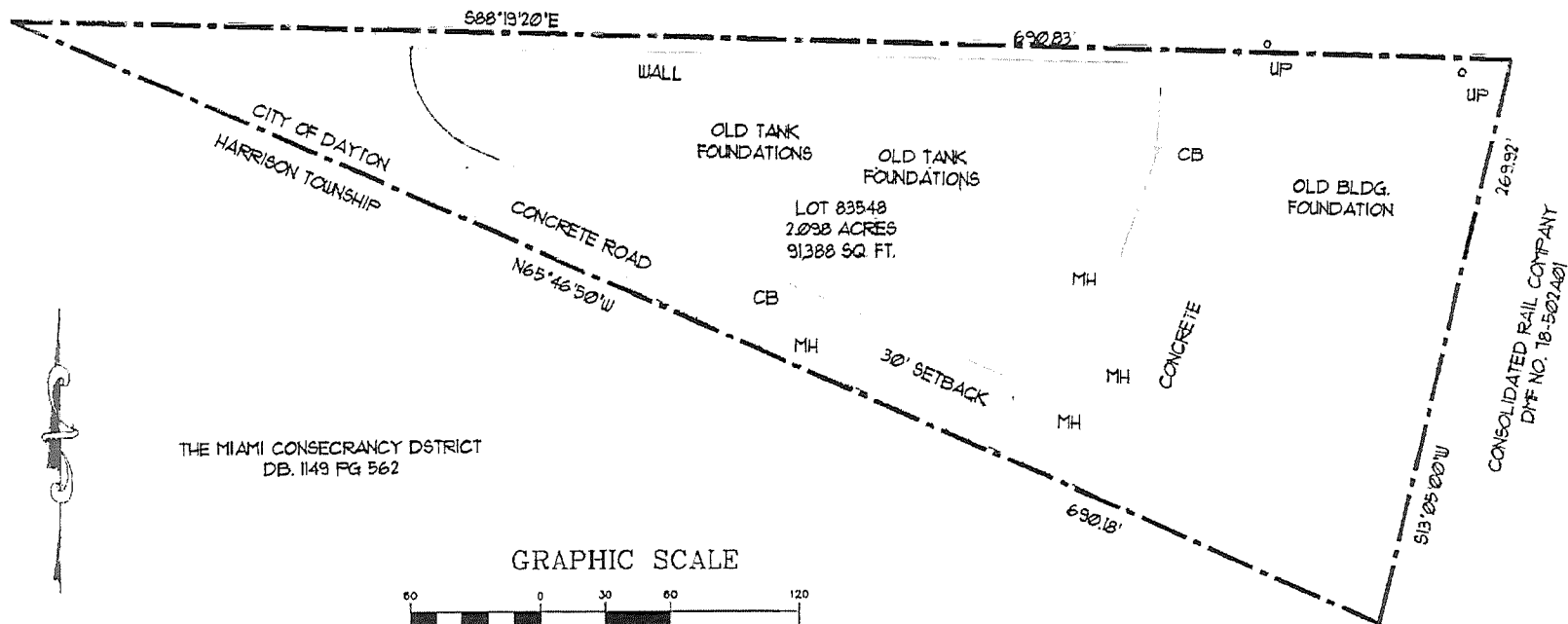
Steven J. Leesman OH# 8352

Date

OLD WASTE WATER TREATMENT PLANT PARCEL LOT #83548 2.098 ACRES TOTAL

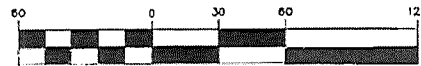
EDWIN C. MOSES BLVD (10' R/W)

Figure B-4



THE MIAMI CONSECRANCY DISTRICT
DB. 1149 PG 562

GRAPHIC SCALE



(IN FEET)
1 inch = 80 ft.



LEESMAN ENGINEERING & ASSOC.
ENGINEERING, SURVEYING, PLANNING
2720 TOPIC HILLS, CINCINNATI, OHIO 45248 513/417-0420

PARCEL 2
Lot 83553
OLD WISCONSIN BOULEVARD PLANT LOT
16.496 ACRES

Situate in Fractional Section 4, Township 1, Range 6E, City of Dayton, County of Montgomery, State of Ohio, Lot Number 83553 of the Revised and Consecutive Numbers of Lots on the Plat of the City of Dayton and being particularly described as follows;

Beginning at a found iron pin in the North Right of Way of Edwin C. Moses Boulevard, said point being the Southeast corner of said lot 83553 and being the point of beginning for the herein description;

Thence along said Right of Way line N88°22'25"W a distance of 128.91 feet to a found Mag Nail.

Thence along a curve to the Right with a Radius of 15.00 feet and a length of 23.41 feet, said curve having a Chord Bearing of N43°37'13"W and Chord Distance of 21.10 feet to a point in the West Right of Way line of Wisconsin Boulevard.

Thence along said West Right of Way line, N01°04'55"E a distance of 1959.04 feet to a found Cross Notch,

Thence along a curve to the Right with a Radius of 200.00 feet and a length of 68.79 feet, said curve having a Chord Bearing N72°42'07"E and a Chord distance of 68.45 to a found Cross Notch in the South Right of Way of Miami Chapel Street,

Thence along a curve to the Right with a Radius of 175.00 feet and a length of 11.85 feet, said curve having a Chord Bearing S86°15'27"E and a Chord distance of 11.85 to a found Cross Notch in the South Right of Way of Miami Chapel Street,

Thence along said Right of Way, S88°11'50"E a distance of 521.00 feet to a found cross notch,

Thence leaving said Right of Way, S13°05'00"W a distance of 400.68 feet to a found Iron Pin,

Thence N88°19'20"W a distance of 1.28 feet to a found Iron Pin,

Thence S13°05'00"W a distance of 411.86 feet to a found Iron Pin,

Thence N88°29'41"W a distance of 41.34 feet to a Found Cross Notch,

Thence S13°05'00"W a distance of 1221.99 feet to the point of beginning, said parcel containing 16.496 Acres, more or less.

Said Parcel is subject to all legal easements, restrictions and highways of record.

The above described being the result of a survey created on August 16, 2011 by Steven J. Leesman Ohio License Number 8352.

Bearings are based upon the West Right of Way line of Cincinnati Street in Plat Book 192 Pages 18B and 18C of the plat records of Montgomery County, Ohio. Said bearing being S28°07'30"W.

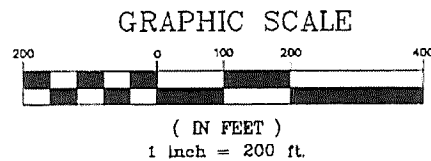
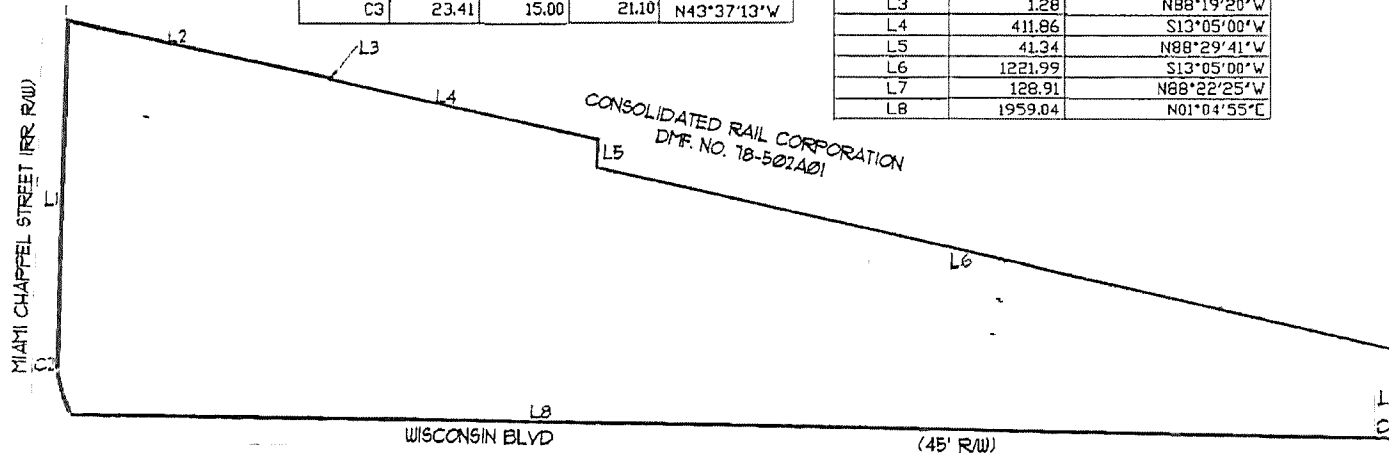
Steven J. Leesman OH# 8352

Date

OLD WISCONSIN PLANT PARCEL
LOT #83553
16.496 ACRES TOTAL

CURVE TABLE LOT 83553				
CURVE	LENGTH	RADIUS	CHORD	CHORD DIR.
C1	68.79	200.00	68.45	N72°42'07"E
C2	11.85	175.00	11.85	S86°15'27"E
C3	23.41	15.00	21.10	N43°37'13"W

LINE TABLE LOT 83553		
LINE	LENGTH	BEARING
L1	521.00	S88°11'50"E
L2	400.68	S13°05'00"W
L3	1.28	N88°19'20"W
L4	411.86	S13°05'00"W
L5	41.34	N88°29'41"W
L6	1221.99	S13°05'00"W
L7	128.91	N88°22'25"W
L8	1959.04	N01°04'55"E



LEESMAN ENGINEERING & ASSOC.
ENGINEERING, SURVEYING, PLANNING
2720 TOPIC HILLS, CINCINNATI, OHIO 45248 513/417-0420

Figure B-2

SECTION J

CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

U.S. EPA, Region 5, conducted a RCRA Facility Assessment (RFA) of the Delphi Automotive Systems — Cincinnati Street (f.k.a. Wisconsin Boulevard) Facility (Facility) in 1990. U.S. EPA issued a Preliminary Review/Visual Site Inspection (PR/VS) phase of the RFA for the Facility on April 11, 1990. A U.S. EPA Hazardous Waste Management Permit was issued for the Facility on November 18, 1996 to cover HSWA requirements that were not under the authority of Ohio EPA at the time. Ohio EPA has since been given authorization from U.S. EPA to administer RCRA Corrective Action requirements for permitted facilities and, on October 8, 2003, Ohio EPA issued a renewed Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) to Delphi for the purpose of addressing corrective action. That permit incorporated the 2002 Delphi-prepared Current Conditions Summary (attached hereto as Appendix J-1) that evaluated each Area of Interest based on historic operations, sampling data, and observation of conditions existing at the time Delphi submitted its application for permit renewal in May 2002. Since then, RCRA Corrective Action activities at the Facility have been administered by Ohio EPA through the Permit and, as discussed below, the conditions in Appendix J-1 that are related to Areas of Interest for Plant 3 are no longer relevant nor subject to Corrective Action under the Permit due to the removal of the Old Cincinnati Plant Parcel from the Permit in January 2016. Additionally, an updated conditions summary will be submitted as part of the RCRA Facility Investigation completed in accordance with paragraph 4, below. Upon Ohio EPA approval thereof, the updated conditions summary shall replace and supersede the 2002 Current Conditions Summary in Appendix J-1.

Delphi discontinued operations in 2007, and no hazardous wastes have accumulated or been stored, treated, or disposed at the Facility since the cessation of operations. After operations were discontinued, all superstructures associated with Plants 1, 2, and 3 have been demolished and the wastewater treatment plant infrastructure has been removed.

In May 2008, Delphi submitted an initial RCRA Facility Investigation (RFI) Report for the Facility. Ohio EPA has reviewed and commented on the initial RFI Report. On June 25, 2009, IRG Dayton II, LLC (IRG) purchased the Facility from Delphi and, on March 9, 2010, Ohio EPA granted a Permit modification changing the owner and operator of the Facility to IRG. On October 26, 2011, Ohio EPA approved IRG's Permit modification request to change the Facility boundaries, resulting in the original 47-acre permitted Facility being reduced in size and comprising three individual parcels totaling 31.3 acres. On November 29, 2012, IRG sold a portion of one of the remaining parcels ("Old Cincinnati Plant Parcel" 12.667 total acres) to Love's Travel Stops & Country Stores, Inc. (Love's), with Love's owning approximately 10.6 acres and IRG retaining ownership of the remaining 2.067 acres and, on August 8, 2013, IRG submitted a request for Permit Modification to add Love's to the Permit as co-owner and Joint-Permittee. Ohio EPA granted this modification on October 7, 2013.

In June and July 2013, Love's conducted certain Interim Remedial Measures (IRMs) at its portion of the Facility to identify and remove soil identified during the RFI which exceed the applicable Ohio EPA screening levels. Specifically, Love's performed the following IRMs:

- Removal of concrete slab at Plant 3 – As part of redevelopment activities on the Love’s property, concrete was removed from the Plant 3 slab, stockpiled in the northern portion of the property, and subsequently crushed for reuse. Love’s environmental consultant, PSARA, observed portions of the slab removal activities to ensure that no obviously contaminated or stained soils existed in this area of the Facility. No evidence of an existing or former release was observed during the slab removal activities.
- Submittal of Soil Management Plan – On June 24, 2013, PSARA submitted a Soil Management Plan to characterize soils that were stockpiled during the development of the Love’s property to ensure that the reuse of these soils would not result in the direct exposure of potential contaminants in soils to future receptor populations. The Soil Management Plan also set forth the protocols to be followed for sampling those soils. Ohio EPA approved the Soil Management Plan on July 2, 2013.
- Soil removal and soil sampling – Based on the future layout of the Love’s Travel Stop, the top two feet of soils (approximately 660 cubic yards) were excavated from AOI-3-02 and stockpiled in the northern portion of the Love’s property. Following the removal and stockpiling of the soils, PSARA collected a composite sample of the soils. The stockpile was divided into six sections, with a portion of the composite sample collected from each section. The sample was analyzed for Toxic Characteristic Leaching Potential (TCLP) VOCs, semi-volatile organic compounds (SVOCs), and RCRA metals, which did not reveal the presence of any hazardous materials.

A report detailing the IRMs completed and their effectiveness was submitted to Ohio EPA by Love’s and IRG on December 10, 2015, in support of a request for Permit modifications to (1) remove the Old Cincinnati Plant Parcel from the Permit, and (2) remove Love’s from the Permit as co-owner and joint-Permittee. Ohio EPA granted the requested modifications on January 29, 2016. Thus, the “Facility” is now the remainder of the original Facility after the removal of the above-described properties from the Permit and Corrective Action requirements.

On August 9, 2013, IRG filed an application to renew the Permit. Due to the modifications, IRG is now the sole Permittee responsible for the remaining areas of the Facility that require final Corrective Action measures under the Permit. Accordingly, IRG submitted an updated Application to renew the Permit to reflect the Permit modifications that were approved on January 29, 2016, and to incorporate new Corrective Action requirements into the Permit. Upon renewal of the Permit, IRG will implement Corrective Action pursuant to the following terms and conditions:

1. **Corrective Action at the Facility (OAC 3745-50-10 and OAC 3745-54-101)** – In accordance with OAC Rule 3745-50-10, waste management unit means any discernible unit at which solid waste, hazardous waste, infectious waste (as those terms are defined in ORC Chapter 3734), construction and demolition debris (as defined in ORC Chapter 3714), industrial waste, or other waste (as those terms are defined in ORC Chapter 6111), has been placed at any time, irrespective of whether the unit was intended for the management of waste or hazardous waste. Such units include any area at a Facility at

which wastes have been routinely and systematically released. For the purpose of Corrective Action, Facility is defined as all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS) and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP) (OSWER Directive 9902.3-2A, May 1994).

2. **Corrective Action Beyond the Facility Boundary (OAC 3745-54-101)** – Permittee will implement Corrective Action beyond the Facility property boundary, where necessary to protect human health and the environment, unless Permittee can reasonably demonstrate that, despite Permittee's reasonable best efforts, Permittee was unable to obtain the necessary permission to undertake such actions. With respect to the Love's property, IRG has an easement from Love's onto the Love's property to undertake such actions. Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary and agreed to between Ohio EPA and Permittee on a case-by-case basis.
3. **Identification of WMUs (OAC 3745-50-44(D) and OAC 3745-54-101)** – This requirement has been satisfied by Delphi's prior submittal of a Current Conditions Summary (Appendix J-1). The Current Conditions Summary identifies locations at the Facility for which IRG knows of the existence of waste management units (WMUs) based on an evaluation of historic operations, existing reports (including the RFA), available sampling data and observation of current conditions. It is noted that the Current Conditions Summary identifies such areas as Areas of Interest (AOIs); the term AOI as used therein includes WMUs as defined in OAC 3745-50-10. It is also noted that an updated conditions summary will be submitted as part of the RCRA Facility Investigation completed in accordance with paragraph 4, below. Upon Ohio EPA approval thereof, the updated conditions summary shall replace and supersede the 2002 Current Conditions Summary in Appendix J-1.
4. **RCRA Facility Investigation (RFI) (OAC 3745-54-101)** – The Permittee must conduct a RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs at the Facility. Delphi submitted the RFI report to Ohio EPA in 2008. In 2013, Ohio EPA's comments on the RFI were provided to IRG. Within 120 days after the effective of the renewed Permit, Permittee will submit a revised RFI Report to Ohio EPA for approval. The final RFI will address Ohio EPA's comments on the initial RFI Report, describe the procedures, methods, and results of the RFI, and contain adequate information to support further decisions concerning Corrective Action at the Facility. Ohio EPA will approve the revised RFI in writing, or send written comments to the Permittee. If Ohio EPA has further comments, the Permittee will review the comments, discuss with Ohio EPA if appropriate, and revise the RFI Report as appropriate. The final RFI Report, as approved by Ohio EPA, shall be incorporated into this Permit and become an enforceable condition of this Permit.

Subsequent changes to the approved RFI Report may be proposed by Permittee for approval by Ohio EPA.

5. **Interim Measures** – The Permittee may propose for approval of Ohio EPA, the implementation of interim remedial actions (also known as “Interim Measures”) to mitigate risks to human health and the environment, or to limit site investigation or risk assessment activities necessary to complete Corrective Action at any time during the life of the Permit. The Interim Measure will include a proposed implementation schedule for Ohio EPA approval. An Interim Measures Report may be used to form the basis of a permit modification under OAC 3745-50-51 to remove a defined portion of the permitted Facility from the Permit or to complete all or a part of the remaining Corrective Action. If, based upon review of the Permittee’s request for a Permit modification, the Interim Measures report, and other information, Ohio EPA determines that releases or suspected releases are either nonexistent or do not pose an unacceptable risk to human health and the environment, Ohio EPA will approve the requested modification.
6. **Determination of No Further Action** – Based on the results of the completed RFI and/or other relevant information, the Permittee may submit an application to Ohio EPA for a permit modification under OAC Rule 3745-50-51 to terminate all or part of the Corrective Action required under the Permit for the entire Facility, for a portion of the Facility, or for a specific WMU or release. This permit modification application must reasonably demonstrate that there are no releases of hazardous waste or constituents from the WMU(s), or entire Facility, which is the subject of the requested modification to terminate Corrective Action, that pose an unacceptable risk to human health and the environment. If, based upon review of the Permittee's request for a permit modification, the results of the completed RFI, and/or other information, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose an unacceptable risk to human health and the environment, Ohio EPA will approve the requested modification.
7. **Corrective Measures Study (CMS)** – If Ohio EPA determines that, based on the results of the RFI, corrective measures are necessary, Ohio EPA will notify the Permittee in writing that the Permittee must conduct a Corrective Measures Study (CMS) either as described below or as otherwise agreed to between Ohio EPA and the Permittee. The purpose of the CMS will be to develop and evaluate the Corrective Action alternative(s) and to outline one or more alternative corrective measure(s). To satisfy the CMS requirement, Permittee will complete the following activities:
 - i. Submit a CMS Workplan to Ohio EPA within 90 days from notification by Ohio EPA of the requirement to conduct a CMS. Within 90 days of receipt of any Ohio EPA comments, Permittee will submit an amended CMS Workplan that addresses Ohio EPA’s comments. Ohio EPA will approve, in writing, the initial or revised CMS Workplan. The CMS Workplan, as approved, will thereafter be incorporated into this Permit and become an enforceable condition of this Permit. Subsequent changes to the approved CMS Workplan may be proposed by the Permittee for approval by Ohio EPA;

- ii. Implement the CMS Workplan according to the terms and schedule in the approved CMS Workplan; and
 - i. After the completion of the CMS, Permittee will submit a CMS Final Report to Ohio EPA. The CMS Final Report will summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative. Within 90 days of receipt of any Ohio EPA comments, Permittee will submit an amended CMS Final Report that addresses Ohio EPA's comments. Ohio EPA will approve, in writing, the initial or revised CMS Final Report. The CMS Final Report, as approved or as modified and approved, will thereafter be incorporated into this Permit and become an enforceable condition of this Permit. Subsequent changes to the approved CMS Final Report may be proposed by the Permittee for approval by Ohio EPA.
8. **Corrective Measures Implementation (CMI)** – Based on the results of the CMS, the Permittee will propose, in writing, to implement one or more of the Corrective Measures developed and evaluated during the CMS. The Permittee's proposal will describe how the Corrective Measure selected for implementation will: (1) be protective of human health and the environment; (2) attain relevant and applicable cleanup standards; (3) control the source(s) of releases so as to reduce or eliminate further releases of hazardous waste(s) (including hazardous constituent[s]); and (4) comply with all relevant and applicable standards for management of wastes. Ohio EPA will review and, if reasonably acceptable, approve, the proposed Corrective Measures, in writing. If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination; (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the estimated financial costs of implementing the alternative. The approved Corrective Measure(s) will be implemented in accordance with the following:
- i. Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the approved corrective measure(s). Unless otherwise approved by Ohio EPA, the Permittee will not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.
 - ii. Within 45 days after receipt of Ohio EPA's written approval of the CMI, the Permittee will provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-54-101 (B) and (C).
9. **Newly Identified WMUs and Releases (OAC 3745-54-101)** – Within 30 days of discovery of a new WMU previously not identified at the Facility, Permittee will submit to Ohio EPA information regarding the newly identified WMU, including the location of

the WMU on a topographic map, designation of the type of WMU, general dimensions and structural description (if available), when the WMU was operated (if available), and specification of all waste(s) that have been managed at the WMU (if available). Within 45 days of discovering a new release not previously identified at the Facility, the Permittee will submit to Ohio EPA all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing WMU.

10. **Corrective Action for Newly Identified WMUs and Releases (OAC 3745-54-101)** – If Ohio EPA reasonably determines in writing, based on the information submitted in accordance with Permit Condition 9, above, that a RFI is required for newly identified WMUs, Permittee will amend the approved RFI (see Permit Condition 4, above) to include investigation of the new WMU or release and submit this amendment to Ohio EPA within 90 days Permittee's receipt of Ohio EPA's written determination, or such other time as agreed to by Ohio EPA and Permittee.
11. **Completion of Corrective Action (OAC 3745-54-101)** – After completing Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any WMUs at the Facility, Permittee shall submit a Corrective Measures Completion of Work (CMCW) Report. The CMCW Report shall document that Corrective Action construction is complete, cleanup objectives and standards have been met, and any releases of hazardous waste or constituents no longer pose an unacceptable risk to human health and the environment. The CMCW Report may be submitted for any part of the Facility for which corrective measures are complete, or for the entire Facility. The CMCW Report must be submitted as a request for permit modification pursuant to OAC Rule 3745-50-51. However, this requirement for a CMCW Report shall not apply to, and Permittee has no duty to submit a CMCW Report for, those portions of the Facility, or the entire Facility, if Permittee has proposed, and Ohio EPA has approved, a "determination of no further corrective action required" pursuant to Permit Condition 6, above, for such portions of the Facility, or the entire Facility.

Appendix J-1

RCRA Corrective Action Current Conditions Summary

(The following is the Current Conditions Summary as Prepared by Haley & Aldrich, Inc., for Delphi and submitted to Ohio EPA in May 2002 as part of Delphi's Part B Permit Renewal. An updated Conditions Summary will be submitted as part of the RFI process and, upon Ohio EPA approval thereof, will replace and supersede the 2002 Current Conditions Summary)

1.0	INTRODUCTION.....	1
2.0	FACILITY BACKGROUND.....	1
3.0	AREAS OF INTEREST	3
4.0	INFORMATION REVIEWED	3
5.0	SELECTION CRITERIA FOR AOIS REQUIRING ADDITIONAL INVESTIGATION.....	4
6.0	CONCLUSIONS	4

TABLES

J-1 Current Conditions Summary

FIGURES

J-1 Project Locus
J-2 Site Plan
J-3 Areas of Interest - Plant 1
J-4 Areas of Interest - Plant 2
J-5 Areas of Interest - Plant 3
J-6 Areas of Interest - Other Areas

1.0 INTRODUCTION

Delphi has entered into negotiations with the Southwest District Office of Ohio EPA to undergo Corrective Action under a RCRA Part B permit. In support of that effort, and to streamline the RCRA Corrective Action process, Delphi has prepared this Current Conditions Summary to replace the Description of Current Conditions (DOCC) that is traditionally required.

The current environmental conditions at Delphi Corporation's Wisconsin Boulevard Operations ("Facility") were assessed by reviewing Facility and regulatory agency files; interviewing site personnel; reviewing historic aerial photographs; and observing and documenting current conditions through several site visits. Through this process we identified 40 areas where hazardous waste or hazardous constituents were potentially treated, stored or disposed (released). These areas are identified as Areas of Interest (AOIs).

AOIs where a release of hazardous waste or hazardous constituents was known or is probable are recommended for further investigation under the RCRA Facility Investigation (RFI). This information is summarized in the enclosed matrix of AOIs and corresponding figures (Table J-1 and Figures J-2 through J-6).

Delphi seeks Ohio EPA's approval to incorporate the enclosed list of AOIs into the language of the Hazardous Waste Management Facility ("HWMF") permit for the Delphi Wisconsin Boulevard Operations.

2.0 FACILITY BACKGROUND

Delphi Corporation's Wisconsin Boulevard Operations are located at 1420 Wisconsin Boulevard in Dayton, Montgomery County, Ohio (the "Site") (Figure 1-1). The Site is approximately 47 acres with approximately 1.2 million square feet of building space. Manufacturing areas of the Facility are divided into Plants 1, 2 and 3. Plant 1 is the northern half of the Facility west of the railroad tracks. Plant 2 is the southern half of the Facility west of the railroad tracks. Plant 3 is east of the railroad tracks. A pedestrian, vehicle and utility tunnel runs beneath the railroad tracks connecting Plant 3 to Plants 1 and 2. Additional Site structures are the waste water pre-treatment plant (WPP) located south of Plant 2, the Power House located south of Plant 3 and the headquarters building located east of Plant 3 (Figure J-2).

The Site was first developed in 1906 and was reportedly used for manufacturing airplanes. The Delco Moraine division of General Motors ("GM") acquired the property in the 1930s. The Delco Moraine division of GM manufactured and assembled vehicle components, primarily brakes through 1998. In January 1999, Delphi Automotive Systems, LLC spun off from GM as a separate company. The Wisconsin Boulevard facility currently operates as the Delphi Energy & Chassis Systems Division of Delphi Corporation.

Current production activities at the Site are:

- Stamping
- Resistance welding
- Machining (drilling, grinding, riveting, etc.)
- Assembly (including gluing and bonding)
- Alkaline washing
- Oil quench heat treating
- Brake fluid formulation

Past production activity at the Site also included:

- Zinc phosphate plating
- Zinc dichromate plating
- Tin plating
- Chrome plating
- Lead-tin-copper plating (tri-plate)
- Copper/nickel powdered metal part forming (sintering)
- Oil recycling
- Solvent degreasing

The Facility operates a wellfield that draws groundwater for industrial and potable use at the Site. Volatile organic compounds have been detected in the production welts and the water is treated to remove these compounds prior to distribution at the Site. The Facility is also connected to the City of Dayton potable water system.

The Site is located adjacent to the Great Miami River. At its nearest point, the river is approximately 240 feet from the southern end of the Site. Sewers convey stormwater to the river.

In April 1990, the U.S. EPA completed a Preliminary Review/Visual Site Inspection (PR/VSI) of the Facility. The PR/VSI identified 113 SW MUs, all of which were characterized in the PR/VSI either as “never having managed hazardous waste or hazardous constituents” or where a “release was unlikely.” At the time of completion of the PR/VSI, no additional investigation was required.

The EPA Generator ID Number for the Site is OHD06092856. The Site operates under an Ohio RCRA permit dated 25 July 1996 and a Federal RCRA permit dated 18 November 1996. The Facility was a RCRA “Storage” facility meaning it was permitted to store hazardous waste for more than 90 days. Additionally, the Site was a “Large Quantity Generator” of hazardous waste, meaning it could generate more than 2,200 pounds of hazardous waste per month. Delphi closed the Facility’s HWMF on 19 March 2001. In correspondence dated 16 October 2001, Ohio EPA notified Delphi of its determination that the HWMF had been closed in accordance with the Facility’s modified permit, the approved closure plan, and OAC 3745-55-11.

The Facility currently operates as a 'Small Quantity Generator' of hazardous waste, generating hazardous waste in quantities ranging from 220 to 2,200 pounds per month. Presently the only hazardous waste streams generated at the Site are inks, glues and paint waste from maintenance activities; however, additional waste is currently and temporarily generated due to shutdown of some of the manufacturing operations.

The Facility is currently negotiating a new Part B permit with Ohio EPA which addresses RCRA corrective action for the Site. The Site is not listed on the GPRA Environmental Indicators list for facilities requiring the completion of an Environmental Indicators study.

3.0 AREAS OF INTEREST

Areas of Interest are areas associated with the Facility where evidence of past treatment, storage or disposal (or release) of hazardous waste or hazardous constituents is known or probable to have occurred. Additionally, in recognition of Delphi's Environmental Principles, AOIs include areas where there is evidence of free product in the environment.

4.0 INFORMATION REVIEWED

To identify AOIs, Haley & Aldrich, Inc. reviewed Delphi's records of spills and releases, environmental sampling data, process descriptions and diagrams, and Site and Facility figures.

The following reports were also reviewed to identify potential AOIs:

Groundwater Investigation Report – Delco Chassis South Plant, dated September 1992, prepared by CH2M Hill.

Groundwater Investigation Report – Volume 2 – Delco Chassis South Plant, dated July 1994, prepared by CH2M Hill.

RCRA Facility Assessment (PR/VS1), GMC Delco Moraine North and South, dated April 1990, prepared by USEPA.

Approximately ten Delphi personnel with knowledge of past or present operations were interviewed and several site visits were conducted. During each site visit, Delphi personnel knowledgeable of current or past operations accompanied Haley & Aldrich representatives.

Material Safety Data Sheets (MSDSs) for chemicals currently used in manufacturing and maintenance activities at the Facility were obtained from Delphi Facility personnel and reviewed for RCRA-regulated constituents and other hazardous substances.

Files maintained by the Ohio EPA Southwest District Office were accessed through a request submitted under the Freedom of Information Act. Additionally, an environmental database search was performed for a two-mile radius of the Facility. Sanborn fire insurance maps for the years 1919, 1950, 1955, 1962, 1981, and 1985 were reviewed and aerial photographs for 1938, 1956, 1962, 1983, and 1994 were also reviewed to identify potential environmental issues.

5.0 SELECTION CRITERIA FOR AOIS REQUIRING ADDITIONAL INVESTIGATION

As stated above, AOIs are areas associated with the Facility where evidence of past treatment, storage or disposal of hazardous waste or hazardous constituents is known or probable to have occurred. The identification of AOIs retained for further investigation was based on the following:

1. Areas with a confirmed release to the environment.
2. Areas with a probable release based on visual evidence or interview with knowledgeable personnel.
3. Area where a release to the environment is possible because a release pathway could not be ruled out. For example, where highly corrosive materials were used and impact of water discharging into sumps or trenches may have resulted in degradation of the integrity of that system and no evidence to the contrary was available, such systems were considered Areas of Interest warranting further investigation.
4. Areas with the likely presence of free product, regardless of its composition.

AOIs were eliminated from further investigation based on the following:

1. Areas where no hazardous waste or hazardous constituents were reportedly managed.
2. Areas where no release pathway to the environment was identified or no evidence of release was observed, documented, reported, or suspected.
3. Areas where, based on the volumes of materials managed, the potential for release was considered de minimus.

Further investigation conducted under the RFI may include cleaning of current or former process equipment and discharge systems and inspecting the integrity of such systems. In addition, analysis of soil and/or groundwater samples may be collected from certain areas. The details of the inspection and sampling program will be presented in an RFI Work Plan.

6.0 CONCLUSIONS

AOIs have been identified by reviewing Delphi and Ohio EPA records, observing site conditions, and interviewing several Delphi personnel with knowledge of current and historic Facility operations. This effort represents our attempts to support Delphi in narrowing the focus of its RFI, thus fostering cost-effective, streamlined and accelerated implementation of the RCRA Corrective Action process.

Table J-1
Current Conditions Summary

Areas of Interest	AOI Description	Summary of Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units = mg/kg or mg/l)	Further Investigation Recommended	Process/Equipment Status	Additional Information/Summary of Data Gaps
PLANT 1							
I-01	Plant 1 Stamping Operations	-Formerly used soluble oil-Vulcan JCut 44C cutting oil (current)			No	Inactive. Some units have been removed. Delphi personnel report intention to decommission.	
I-02	Backing Plate Welder and Machining Operation Area	-Soluble oil (prior to 1994)-Orion 4953R synthetic coolant not RCRA hazardous	TPH detected in soil indicates possible free product. February 1996 analytical data and Delphi correspondence dated March 1996. Delphi correspondence does not indicate whether contaminated soil was excavated and confirmatory samples collected/analyzed.	Sampling after discovery of a potential release during removal of the unit. SOIL: TPH (2/96): @ surface - 99,300 @ 5' - 28,900 @ 9' - 5,200 GROUNDWATER: Fats, Oils, Grease (3/96): <5	Yes	Inactive. Some units have been previously removed. Delphi personnel report intention to relocate or decommission units.	
I-03	Former Department 17 Plater Area	-Cyanide zinc chromate - Alkaline zinc chromate - Chromium -Tin-HCl - Cadmium -Copper -Nickel	Previous soil data indicates evidence of release. Investigation of soil associated with former Zinc Plater, September 12, 1991.	SOIL (max. concentration, 0-21 ft.): - reactive cyanide 12 - chromium 100 - cadmium 1.73 - copper 131 - nickel 24.1	Yes	Removed	Shallow soil sampling at Stevens Zinc Dichromate plater only. Chemicals used at impregnator may have included resins and organics.
I-04	Former Bulk Phosphater	-Sodium nitrite < 1% -Iron phosphate -Zinc phosphate - Mild alkaline rust inhibitor	No evidence of a release observed, documented or reported. According to Delphi personnel, only mildly alkaline materials used.		No	Inactive. Delphi personnel report intention to decommission.	
I-05	LT/225 - Web & Rim Storage Location	-Coolant/Lubricant Oil	Shallow, blind trenches cut into the concrete floor to collect oil drained from part bins. No evidence of a release observed, documented or reported.		No	Inactive	
I-06	Disc Shoe Barrel Washer	-Quali Clean S-22 C-Coolant-cutting oils	No documented or reported releases. Trench system, reportedly concrete, could not be observed. Material (highly alkaline) usage may have impacted integrity of trench system.		Yes	Inactive. Delphi personnel report intention to decommission	
I-07	Die Washing Area	-Alkaline wash solution-Oils, grease, synthetics, etc.	Delphi personnel express concern regarding the integrity of the sump. Dies are steam cleaned with an alkaline type cleaner. 2'x3' drain in center of area.		Yes	Active. Delphi personnel report intention to decommission	

Areas of Interest	AOI Description	Summary of Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units = mg/kg or mg/l)	Further Investigation Recommended	Process/Equipment Status	Additional Information/Summary of Data Gaps
1-08	Parts Washer Area (former and current)	-Alkaline washing solution - Coolant-Cutting oil	<u>Former:</u> Per July 15, 1998 Delphi internal memo, an 8" hole was discovered July 1, 1998 on the north side of the trenchwork surrounding the "Over the Hill" parts washer located in 9 department. Hole in trench may have resulted in release of waste to the environment. The parts washer was removed in appx. 1998, according to Delphi personnel. <u>Current:</u> New/Active Parts Washer installed in the same area.	No analytical data for past release.	Yes	Removed appx. 1998.	No soil investigation or remediation was performed due to the "relatively low toxicity of the pollutants of concern, the geology of the site, . . ." Data gaps: types of chemicals used and exact location of unit/trench unknown.
1-09	Former Zinc Rack Plater	-Cyanide Zinc-Alkaline Zinc -HCl-Alkaline Cleaners	Trench system could not be observed. No observed, documented or reported releases. Trench construction unknown. Material (alkaline/acid) usage may have impacted integrity of trench system.		Yes	Removed mid-late 1970's	
1-10	Former UST Area I (Tank Nos. 1-8 and 14-20)	-Fuel oil -Cutting oil -Brake fluid chemicals: butyl alcohol, mixed glycol ethers, propylene glycol, polyalkylene glycols, and hydrotreated light naphthenic distillates	Previous soil data indicates evidence of release.	Samples were collected from the floor excavation at each end of each tank and one from under the piping east of the excavation. SOIL (maximum concentrations at the surface) - benzene 0.253 - toluene 0.048 - TPH 5540 SOIL (maximum concentrations from borings 21-45 ft.): - toluene 0.013 - ethylbenzene 0.001 - xylenes 0.015 -TPH 93	Yes	Tank removal completed in January 1990. Status: currently pending with BUSTR.	Initial assessment report submitted. BUSTR requested additional sampling.
1-11	Former UST Area II (Tank Nos. 10-13)	-Brake fluid -Diacetone alcohol	Previous soil data indicates evidence of release.	Samples were collected from the floor of excavation at each end of each tank. SOIL (maximum concentrations at surface): - toluene 0.117 -ethylbenzene 3.9 -TPH 393	Yes	Tank removal completed in March 1990. Status: currently pending with BUSTR.	Initial assessment report submitted. BUSTR requested additional sampling.

Areas of Interest	AOI Description	Summary of Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units = mg/kg or mg/l)	Further Investigation Recommended	Process/Equipment Status	Additional Information/Summary of Data Gaps
I-12	Train Shed Area	-Lead -PCBs	Previous soil data indicates evidence of release. Soil investigation, 1991 and 1993. Soil staining was observed when the train tracks and bed were undercut to shore the rail's foundation in 1991. Soil samples collected from the train bed at that time for analysis. 150 cubic yards of soil was excavated and disposed offsite in 1992. Metal chips were formerly collected in a concrete-lined bin. Delphi personnel report that the bin floor may not be lined with concrete. Soil samples were collected from the chip bin and analyzed in 1993.	Maximum concentrations in soil samples collected at train shed area and from chip bin. - lead (along tracks) 2860 - lead (in chip bin) 7000 - toluene 0.155 - xylene 0.286 - TPH 38700 - Aroclor 1254 (PCB) 46.4	Yes	Inactive. The train shed area is currently not in use; however, it may be in use during decommissioning activities	Extent not determined
I-13	"Press Pit" Basement Area	-Metal chips-Coolant -Cutting oils	Basement level area with numerous saw cut trenches in concrete. Conveys oil and oily water filtered from metal chips to wastewater pretreatment plant. No evidence of a release observed, documented or reported.		No	Inactive	
PLANT 2							
2-01	Clutch Plate Bonding Machines (older machines along the western side of 18 Department)	-Mercury-Hydraulic Fluid (non-PCB) associated with machine operations	Delphi personnel report (03/2001) release of mercury to floor, equipment, and area beneath equipment when thermostat capillary tubes rupture. Reportedly, no containment system present. Area beneath equipment could not be viewed to evaluate possible release pathway.		Yes	Removed. Delphi personnel report no evidence of mercury release observed beneath equipment during equipment decommissioning, and no pathway to the environment was evident.	
2-02	Former Engine Bearing Tri-Platers #1 and #2	-Hydrofluoric Acid-Copper Cyanide-Zincate (contained cyanide) -Lead -Copper-Tin - Alkaline Cleaners	Previous soil and groundwater data indicates evidence of release. Delco Moraine correspondence, "Fluoborate Sump Leak - #1 Strip Plater," Jan. 26, 1982. Data also from January, March, April 1982. Babbit lead process was formerly located in area of Strip Tri-Plater #2.	Production wells sampled in response to a detected sump leak in 1/82. Analytical results indicated "little or no" impact to groundwater.	Yes	Inactive. Delphi personnel report intention to decommission both units	Soil samples were not available. Operations ceased July 1999. Production well not in immediate vicinity of release.
2-03	Former Aluminum/Steel Cladding Lines	-HCl -Mild Alkaline Solution-Aluminum Dust - Hydraulic Fluid (non-PCB) associated with machine operations	No evidence of a release observed, documented or reported. Weak acid/alkaline solutions discharged to wastewater pretreatment plant via concrete lined trenches.		No	Removed	

Areas of Interest	AOI Description	Summary of Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units = mg/kg or mg/l)	Further Investigation Recommended	Process/Equipment Status	Additional Information/Summary of Data Gaps
2-04	Former Rack Stripping Operation	-Nitric Acid -Alkaline Cleaners -Disodium Trioxosilicate floor cleaner	No evidence of a release observed, documented or reported. Numerous baths, labeled "nitric acid" Trenches and sump in vicinity of process area.		Yes	Inactive. Delphi personnel report plans to decommission.	Operations ceased July 1999.
2-05	Former Bliss Press No. 3662-C	-Hydraulic Fluid (non-PCB) associated with machine operations	Floor surrounding machine was stained (03/2001). Area beneath equipment could not be viewed to determine whether possible pathway to environment is present.		Yes	Inactive. Delphi personnel report plans to decommission.	Area requires further evaluation to determine whether possible pathways to the environment exist.
2-06	Former NAPCO Plater	-Hydrochloric acid - Hydrofluoric acid - Fluoborate-Cyanide-Copper - Lead-Tin	Area of floor and trenches are stained and corrosion is evident (03/2001). Delphi personnel report that waste sludges were RCRA hazardous and stabilized for land disposal.		Yes	Inactive. Delphi personnel report plans to decommission.	Operations ceased July 1999. Sampling is necessary to confirm or deny release.
2-07	Former Degreaser, Active Groundwater Recovery and Treatment	Groundwater with PCE and TCE	Previous soil and ground water data indicates evidence of release. CIJ2M Hill Groundwater Investigation Report, 1992.	Maximum concentrations in soil at 30-32' boring interval: - PCE 27.2 - TCE 0.53 VOCs detected in groundwater.	Yes	Degreaser removed 1982. Groundwater recovered from the "shallow zone" at approximately 50 gpm. Recovered water treated by a packed tower air stripper prior to discharge.	The last groundwater sampling round reported was in 1994. The extent of release is unknown.
2-08	Former Tin Platers (4)	- Tin compound - Caustic soda - Mild alkaline cleaner	No evidence of a release observed, documented or reported. Units have been completely decommissioned. Trenches and sumps formerly associated with operations.		Yes	Removed	Units removed in the 1970's, according to Delphi personnel.
2-09	Former Tri-Platers (2)	- Hydrochloric acid - Hydrofluoric acid - Fluoborate-Cyanide-Copper-Lead-Tin	No evidence of a release observed, documented or reported. Units have been completely decommissioned. Trenches and sumps formerly associated with operations.		Yes	Removed	Units removed in the 1970's, according to Delphi personnel.
2-10	Former ABS Master Cylinder Assembly	- Sword Kut (petroleum distillates, hydrotreated naphthenic) - Trim Sol TC220 soluble oil	No evidence of a release observed, documented or reported.		No	Removed	MSDSs reviewed. No RCRA hazardous constituents. Installed at location of former tin platers (See 2-08).
2-11	Former ABS Master Cylinder Machining Hydromation System	- Sword Kut (Petroleum distillates, hydrotreated naphthenic) - Trim Sol TC220 soluble oil	No evidence of a release observed, documented or reported.		No	Inactive	MSDSs reviewed. No RCRA hazardous constituents. Unit remains in place, but not operational. Installed at the location of the former tin platers (See 2-08).
PLANT 3							
3-01	Cast Iron Master Cylinder Machining and Bearingizer	- Polarsol 458 soluble oil - Houghton Oils	No evidence of release observed, documented or reported.		No	Active. Delphi personnel report intent to cease operation in September 2002.	MSDSs reviewed. No RCRA hazardous constituents.

Areas of Interest	AOI Description	Summary of Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units = mg/kg or mg/l)	Further Investigation Recommended	Process/Equipment Status	Additional Information/Summary of Data Gaps
3-01	Cast Iron Wheel Cylinder Machining/Bearingizer Spray Washer	- Novacool soluble oil - OGM Vulcan 337049 honing oil - Quali Clean S-22 C - Diacetone alcohol	No evidence of release observed, documented or reported. Delphi personnel report that trenches are concrete lined and cleaned as needed, when sludges have accumulated.		Yes.	Active. Delphi personnel report intent to cease operation in September 2002.	MSDSs reviewed. Novacool and OGM Vulcan honing contain no RCRA hazardous constituents. According to the MSDS, Diacetone alcohol is RCRA hazardous (flamm) and Quali Clean is RCRA hazardous (corrosivity). Diacetone alcohol was not a part of the manufacturing process, but was used in batches for testing parts. Diacetone alcohol is no longer used in the plant. Date ceased unknown. Quali Clean pH is 13.0-14.0; dilution for use in processes unknown. Delphi personnel report only mild alkaline solution used in spray washing unit.
3-03	5-43 Hydromation System	- Novacool soluble oil	No evidence of release observed, documents or reported		No	Active. Delphi personnel report intent to cease operation in September 2002.	MSDS reviewed. No RCRA hazardous constituents.
3-04	5-3 Hydromation System	- Novacool soluble oil	No evidence of release observed, documented or reported. MSDSs reviewed. No RCRA hazardous constituents.		No	Active. Delphi personnel report intent to cease operation in September 2002.	MSDS reviewed. No RCRA hazardous constituents.
3-05	5-1 Hydromation System	Polarsol 458 - not RCRA hazardous; Houghton Oil - not RCRA hazardous	Previous soil data indicates evidence of release. Soil investigation, 02/1998.	Maximum soil concentration in samples collected from the former site of the Hydromation unit: - TPH 99	Yes	Removed	System included below grade vault (cap 20,000-30,000 gal.). Evidence of release observed during decommissioning activities (1998).
3-06	Former vapor Degreaser, Plant 3	-PCE-TCE	Previous groundwater data indicates evidence of possible release. CIM Hill Groundwater Investigation Report, 1992.	1 soil boring collected - VOC's analyzed, but not detected. VOCs detected in groundwater.	Yes	Removed 1982.	An R&D laboratory is currently located at former site of degreaser, preventing access to immediate area for installation of soil boring. The soil boring was taken approximately 20 feet away. Sampling in the immediate vicinity of the former degreaser is necessary to confirm or deny release.

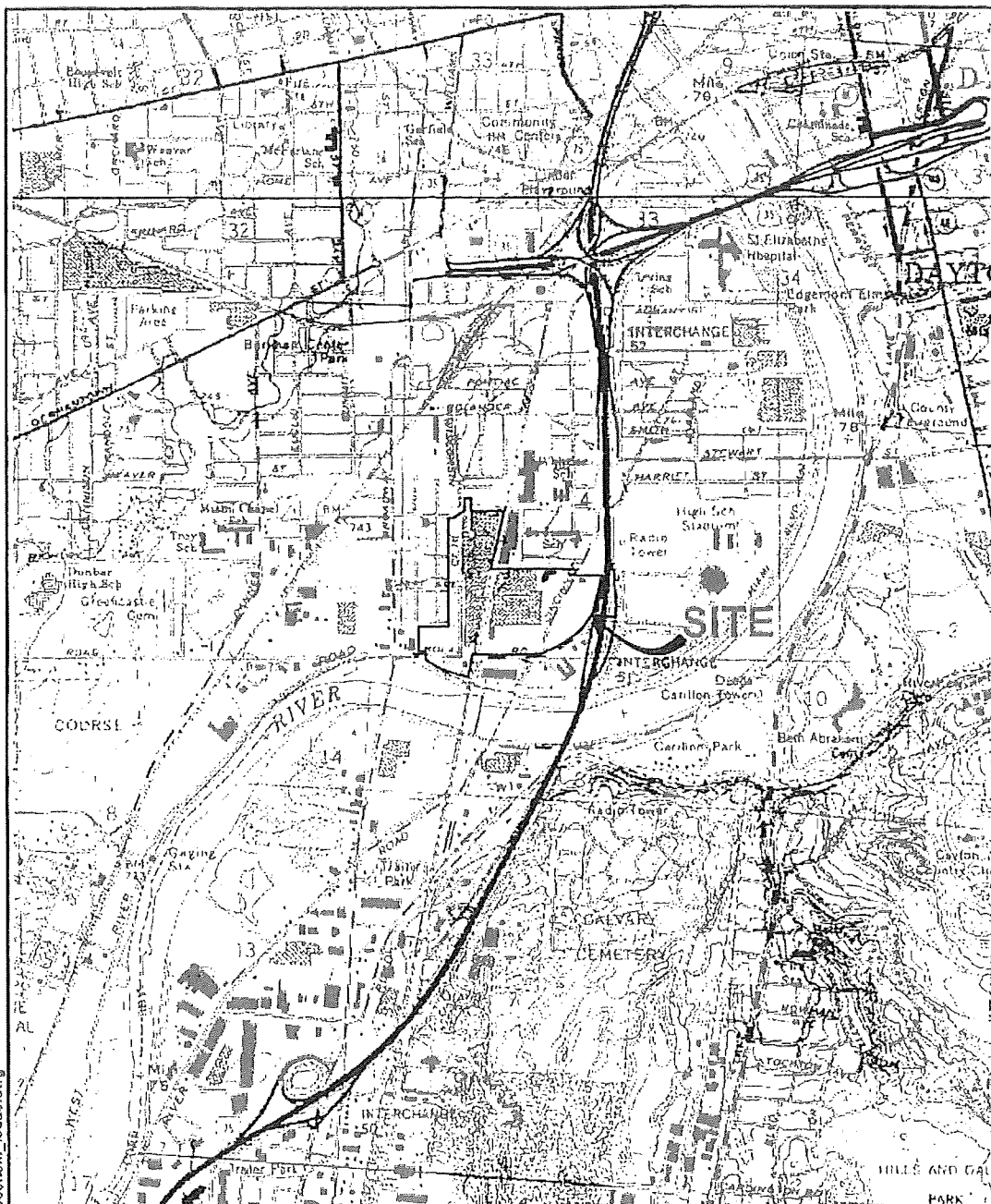
Areas of Interest	AOI Description	Summary of Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units = mg/kg or mg/l)	Further Investigation Recommended	Process/Equipment Status	Additional Information/Summary of Data Gaps
4-01	Coal Storage Yard	Coal	Coal observed stockpiled directly on the soil and uncovered (03/2001). Accumulation of fly ash on ground. Coal is purchased with an anti-freeze agent, possibly kerosene, applied according to Delphi personnel.		No	Active. Delphi personnel report intent to cease operation in August 2002.	Raw product storage
4-02	Wastewater Pre-Treatment Plant	Process waste waters from all plant operations.	Previous soil data indicates evidence of release. Sludge (F006) released to ground; oily waste release to ground; evidence of staining observed in vicinity of waste oil AST. Delphi personnel reported discovery of buried waste materials during construction of the wastewater treatment facility (1974). Batteries, tires, and miscellaneous debris observed during construction.	Maximum concentration in soil samples collected from the area of the sludge spill. - lead 2140 - Arsenic 8.09 - barium 3830 - chromium 19.9	Yes	Active. Delphi personnel report intent to cease operation in November 2002.	Sampling is necessary to confirm or deny presence of hazardous constituents
4-03	Waste Management Area	Plating sludge (cyanide), flammable spent organic solvents; spent paints, adhesives, inks; acid and alkaline sludges from electroplating operations; mineral spirits and paint sludge from general maintenance operations; mercury.	Staining observed in eastern and southern areas of hazardous waste management unit. Trenches and sump associated with management unit. Sulfuric acid spill (1978).		Yes	Closed	The hazardous waste management unit will be RCRA-closed. Potential release to the environment from this area will be investigated through corrective action. The former hazardous waste unit will no longer be subject to corrective action.

Notes

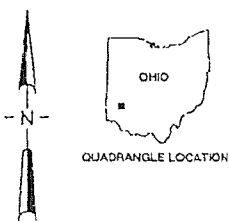
1. Additional investigation may be completed under BUSTR.

SECTION J – FIGURES

- J-1 Project Locus**
- J-2 Site Plan**
- J-3 Areas of Interest - Plant 1**
- J-4 Areas of Interest - Plant 2**
- J-5 Areas of Interest - Plant 3**
- J-6 Areas of Interest - Other Areas**



FILE NO: CLE/27405/ACAD/Wiscopin_locus.dwg



USGS QUADRANGLES:
DAYTON SOUTH, OHIO
DAYTON NORTH, OHIO

HALEY & ALDRICH

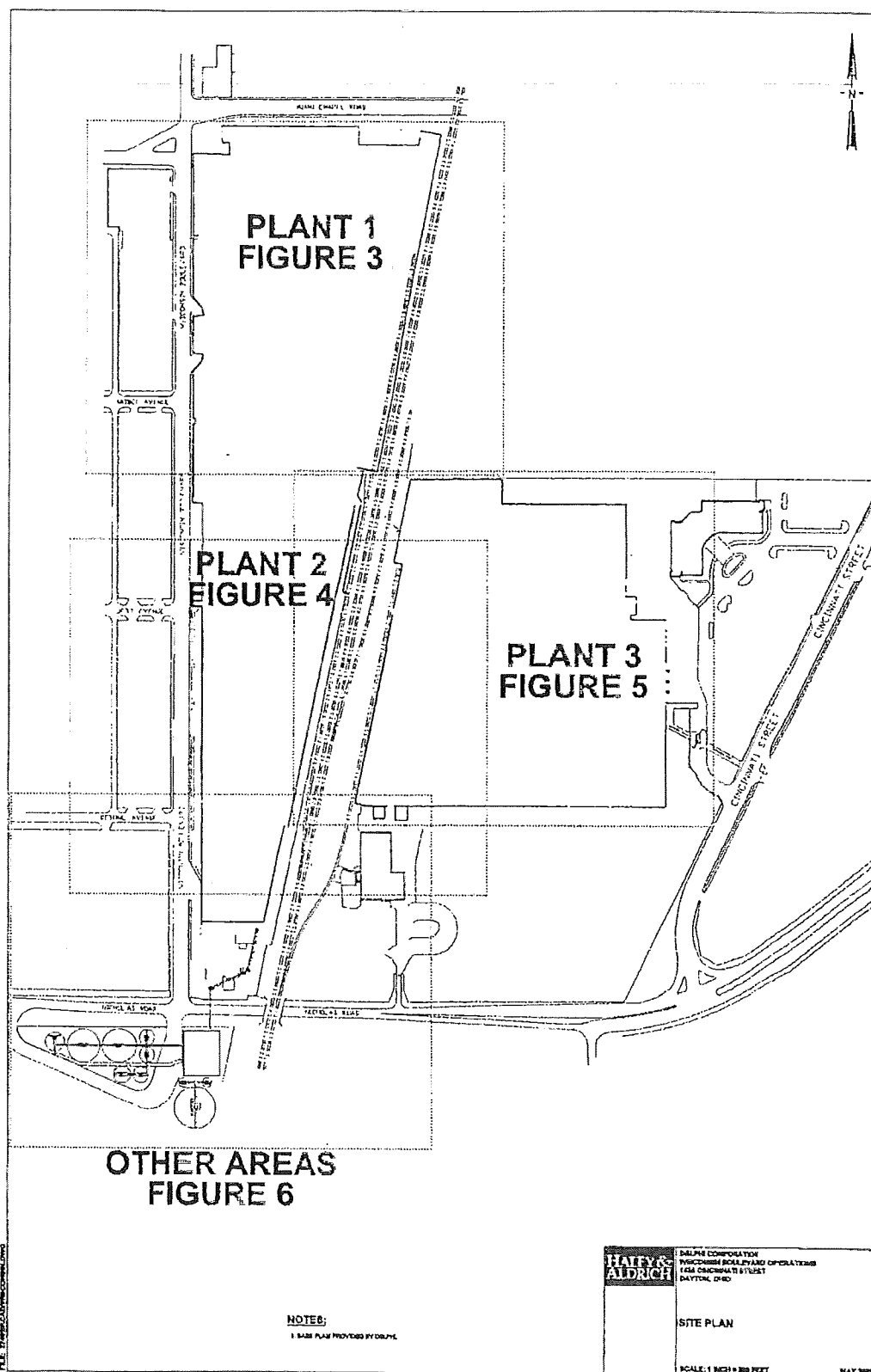
DELPHI CORPORATION
WISCONSIN BOULEVARD OPERATIONS
1435 CINCINNATI STREET
DAYTON, OHIO

PROJECT LOCUS

SCALE: 1 IN. = 2,000 FT.

MAY 2002

FIGURE J-1



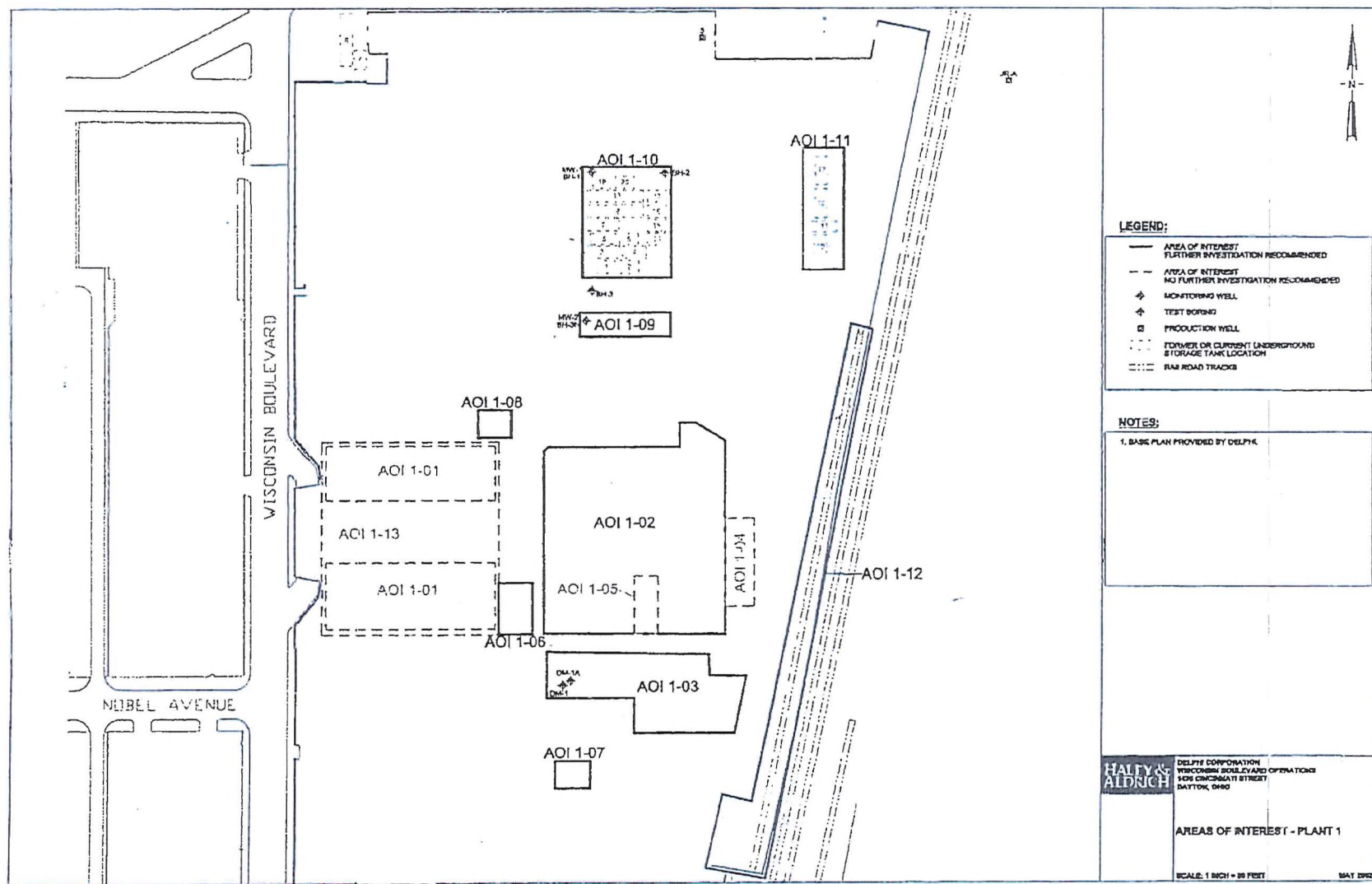
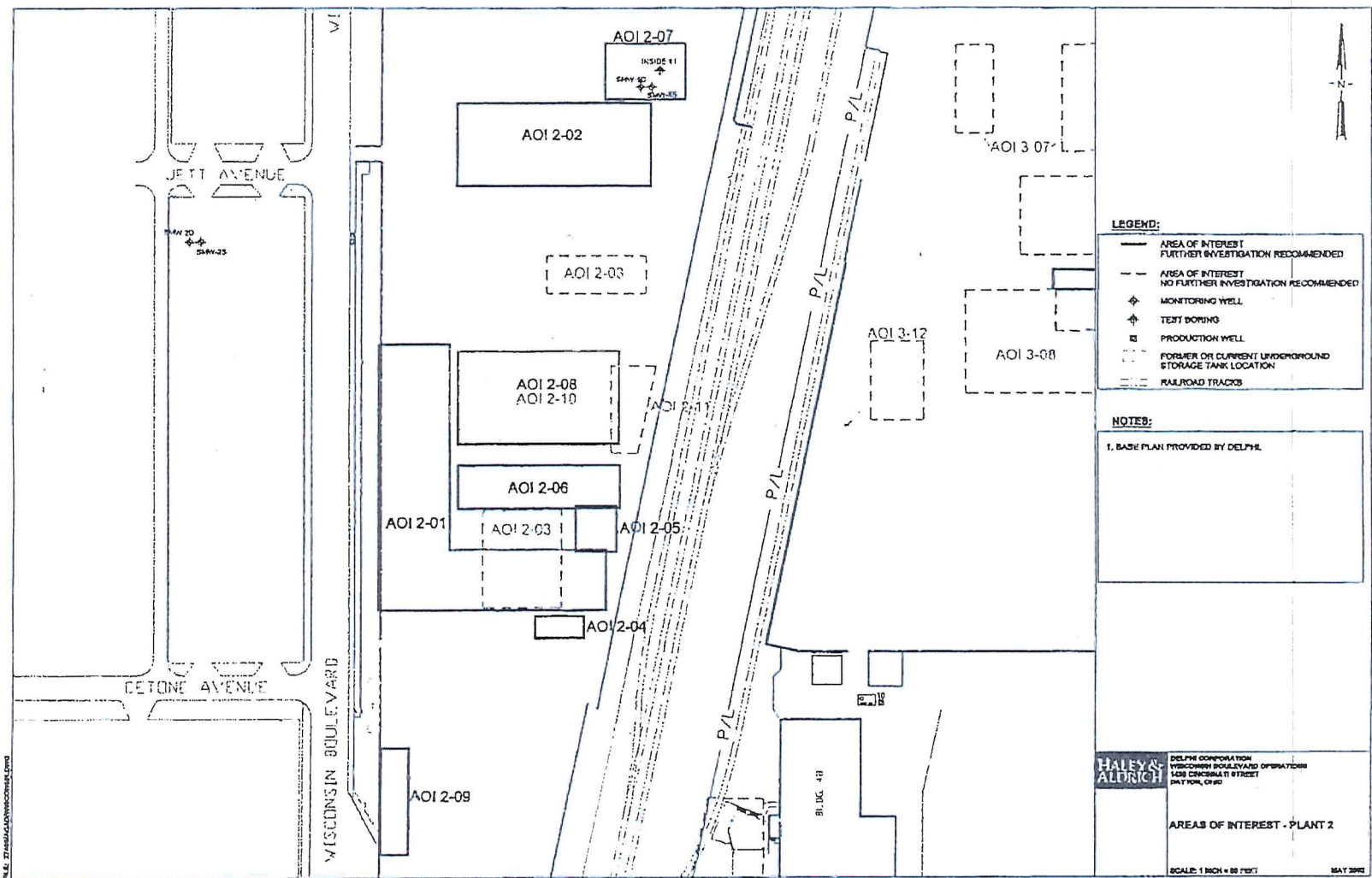


FIGURE J-3



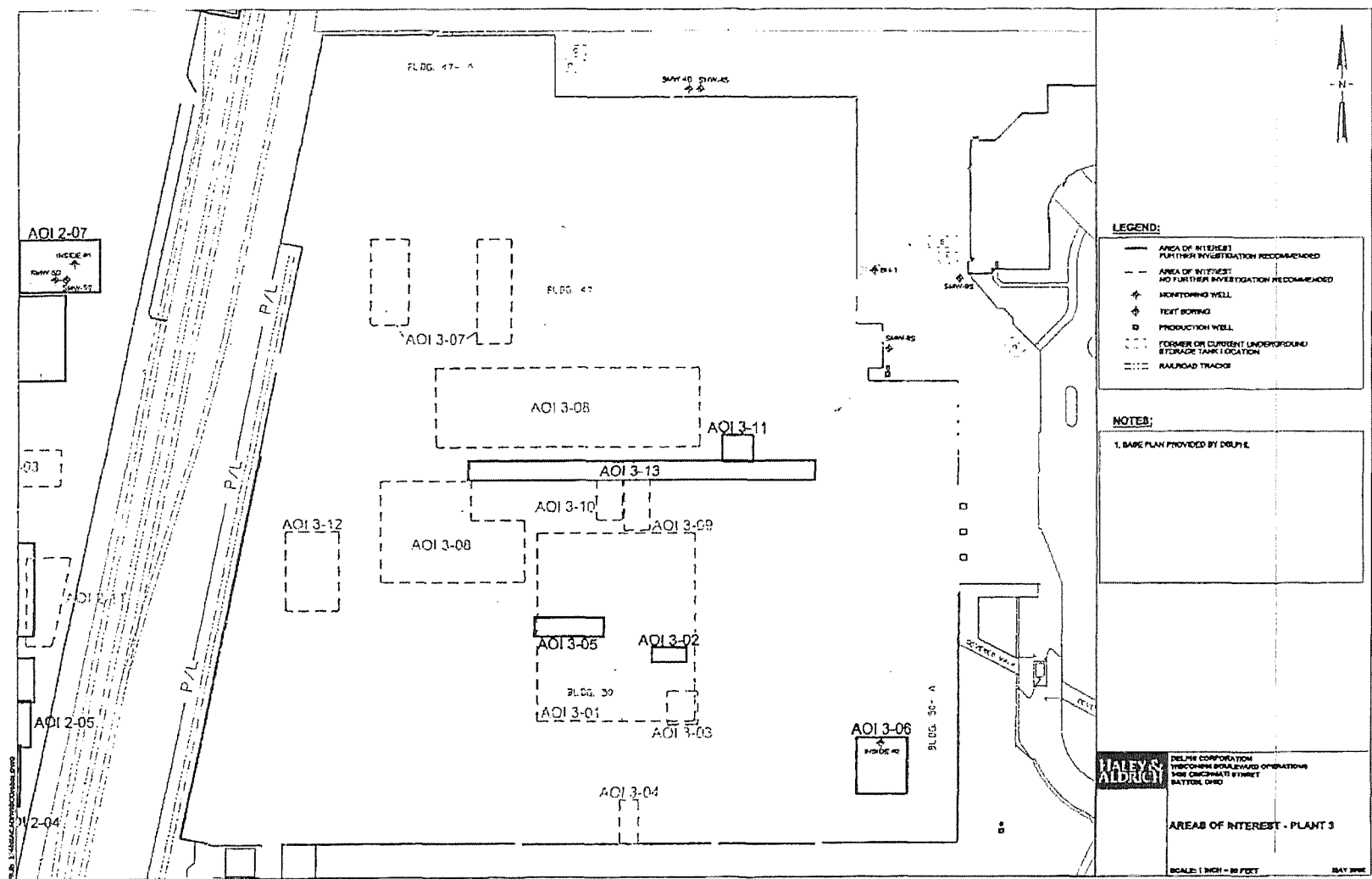


FIGURE J-8

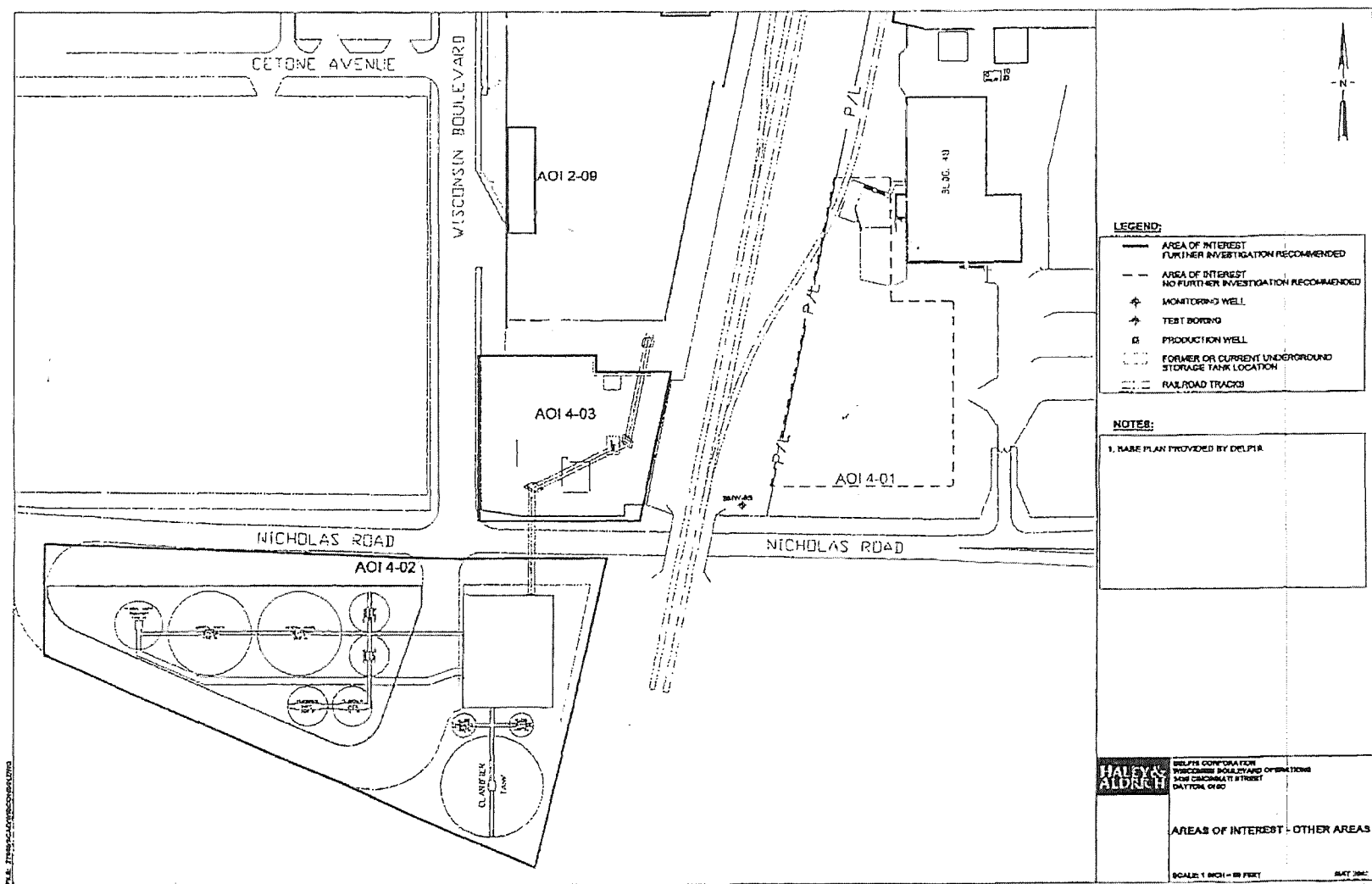


FIGURE J-4

SECTION K

OTHER FEDERAL LAWS

In accordance with 40 CFR 270.3, the following federal laws have been reviewed for their applicability to the former Delphi Wisconsin Boulevard Operations (Facility):

- The Wild and Scenic Rivers Act. 16 U.S.C. 1273 et seq.
- The National Historic Preservation Act of 1966. 16 U.S.C. 470 et seq.
- The Endangered Species Act. 16 U.S.C. 1531 et seq.
- The Coastal Zone Management Act. 16 U.S.C. 1451 et seq.
- The Fish and Wildlife Coordination Act. 16 U.S.C. 661 et seq.

The enforcement of these Acts is not expected to affect activities at the Facility, as described below.

K.1 THE WILD AND SCENIC RIVERS ACT

The Wild and Scenic Rivers Act prohibits the Regional Administrator from assisting, by license or other means, the construction of any water resource project that would have a direct and adverse effect on the values for which a national wide and scenic river was established. These provisions are not expected to affect activities at the Facility [1].

K.2 THE NATIONAL HISTORIC PRESERVATION ACT OF 1966

The National Historic Preservation Act of 1966 requires the Regional Administrator to adopt measures, when needed, that will mitigate potential adverse effects of a proposed licensed activity on properties listed or eligible for listing on the National Register of Historic Places. The provisions of this Act are not expected to affect activities at the Facility because there are no sites listed in the National Register as a historic place on or in proximity to the Facility property [2][3].

K.31 THE ENDANGERED SPECIES ACT

The Endangered Species Act requires the Regional Administrator to ensure that any actions authorized by the U.S. EPA are not likely to jeopardize the continued existence of any endangered or threatened species, or to adversely affect its critical habitat.

The Division of Wildlife of the Ohio Department of Natural Resources was contacted regarding this Act. The Division responded by stating that since the Facility is located in the metropolitan area of Dayton, it is highly unlikely that there are endangered species in the area [1].

K.4 THE COASTAL ZONE MANAGEMENT ACT

The Coastal Zone Management Act and implementing regulations (15 CFR Part 930) prohibit the EPA from issuing permits for activities affecting land or water use in the coastal zone in question until the applicant certifies that the proposed activity complies with the State

Coastal Zone Management program. The Facility is not located within a coastal zone, and is therefore not affected by this ruling.

K.5 THE FISH AND WILDLIFE COORDINATION ACT

The Fish and Wildlife Coordination Act requires the Regional Administrator to consult with the appropriate state agency exercising jurisdiction over wildlife resource conservation before issuing a permit that authorizes the impoundment, diversion, or modification of any body of water. Since activities at the Facility are not expected to create impoundments, diversions, or modifications to any water bodies, the Facility is not affected by this provision [1].

K.6 REFERENCES

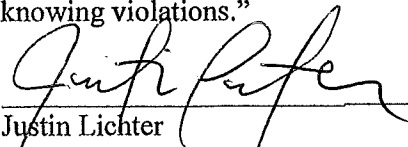
1. Debbie Woischke, Ohio Department of Natural Resources; Personal Communication, March 22, 1995.
2. Federal Register; Department of the Interior; National Park Service, National Register of Historic Places; Annual Supplemental Listing of Historic Properties, 1979-1986.
3. Glenn Harper, Dayton Historical Society; Personal Communication, January 4, 1988.

SECTION L
CERTIFICATION

In accordance with 40 CFR 270.11 (d) and OAC 3745-50-42:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Date: 9/15/16

Signature: 
Justin Lichter
Authorized Agent for IRG Dayton II, LLC