September 15, 2017

Mr. Stephen C. Lonneman  
Vickery Environmental, Inc.  
3956 State Route 412  
Vickery, Ohio 43464

Re: Vickery Environmental Inc.  
Permit - Intermediate Approval  
RCRA C – Hazardous Waste  
Sandusky County  
OHD020273819

Subject: Hazardous Waste Permit Modification - Class 1A Approval

Dear Mr. Lonneman:

On August 16, 2017, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Vickery Environmental, Inc. dated August 16, 2017. The modification requested the following change to the permit:

Vickery Environmental, Inc. requested a 45-day extension (from 90 to 135 days) for submittal of the Corrective Measures Implementation (CMI) Work Plan required by Permit Condition E.9(b).

With this letter, Ohio EPA approves the above referenced Class 1A modification\(^1\) submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility’s permit application and/or permit. The updated application/permit can be retrieved from the Agency’s eDocument Search website:
Using the search function, search under the document type of “Permit” and then refine the search using the facility’s RCRA ID number (Secondary ID) which is noted in the Re: block above.

If you have any questions concerning this letter, please contact Dawn Pleiman of my staff at (419) 373-3148.

Sincerely,

Shannon Nabors  
Chief, Northwest District Office

\(^1\) Please note: If the modification application included a claim for confidentiality, Ohio EPA will retain the confidentiality of the document(s) until the Director makes a final determination in accordance with OAC Chapters 3745-49 and 3745-50 as to whether the document(s) constitutes a trade secret and must remain confidential. Ohio EPA will notify you of any determination made as to the confidentiality of the document(s).
(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Final Report. The CMS Final Report, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Final Report must be authorized by Ohio EPA.

E.9 Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Permittee must implement one or more of the Corrective Measures authorized by Ohio EPA. Ohio EPA will authorize one or more of the Corrective Measures in the CMS, and will notify the Permittee in writing of the decision. The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; (2) attain media 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 applicable standards for management of wastes.

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 relative cost associated with the alternative.

In authorizing the proposed Corrective Measures, Ohio EPA may also consider such other factors as may be presented by site-specific conditions.

(a) Permit Modification

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51 to require implementation of the corrective measure(s) authorized. The Permittee must not implement the corrective measure until the permit is modified pursuant to OAC Rule 3745-50-51.

(b) CMI Work Plan

The Permittee must submit a written CMI Work Plan to Ohio EPA within one hundred thirty-five (135) days from the notification by Ohio EPA of the requirement to implement corrective measures. The CMI Work Plan must contain the Specific Remedies as outlined below.

(i) Within forty-five (45) days of receipt of Ohio EPA’s comments, the Permittee must submit either an amended or new CMI Work Plan that addresses Ohio EPA’s comments.
(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMI Work Plan. The CMI Work Plan, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMI Work Plan must be authorized by Ohio EPA.