Subject: Hazardous Waste Permit Modification - Class 1A Approval

Dear Ms. Kaiser:

On July 9, 2018, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Ross Incineration Services Inc (RIS) dated July 2, 2018. The modification requested the following change to the permit:

Amend the compliance schedule found in Module E to allow for an additional 90 days to submit a clean copy of the RIS Application – Section J – Corrective Action.

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

If you have any questions concerning this letter, please contact Karen Nesbit of my staff at (330) 963-1159.

Sincerely,

Bradley Mitchell
RCRA Hazardous Waste Program Manager
Division of Environmental Response and Revitalization

Enclosure

ec: Karen Nesbit, District Office Technical Reviewer, Ohio EPA, NEDO, HW-DERR
   Natalie Oryshkewych, District Office Manager, Ohio EPA, NEDO, HW-DERR
   Bradley Mitchell, Manager, Ohio EPA, Central Office, HW-DERR

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).
currently at depth, or currently covered by a barrier, that subsequently becomes surface soil) meets industrial use risk standards. The Soil Management Plan must include procedures for agency notification, evaluating excavated materials, and documenting material excavations, management, and disposition. The site-wide Health and Safety Plan will provide procedures that ensure worker protection from potentially contaminated soil and other contaminated materials.

(2) Within forty-five (45) days of receipt of any Ohio EPA comments on the Soil Management Plan, the Permittee must submit either an amended or new plan that incorporates Ohio EPA’s comments.

(3) Ohio EPA will approve or modify and approve, in writing, the amended Soil Management Plan or new Soil Management Plan. The Permittee must implement the approved plan upon approval.

Ohio EPA will accept but not approve or disapprove the Health and Safety Plan. The Permittee is responsible for the protection of site personnel and compliance with all applicable health and safety laws and regulations.

(4) Within one hundred twenty (120) days of the approval of the amended or new Soil Management Plan, the Permittee must submit a modification in accordance with OAC Rule 3745-50-51, to incorporate the approved amended or new Soil Management Plan into this permit and become a condition of this permit. Such permit modifications shall be Class One. Subsequent changes to the approved amended or new Soil Management Plan must be authorized by Ohio EPA.

(iv) The Permittee must develop and implement an Inspection and Maintenance Plan for the North Landfill area in SWMUA 1. The Inspection and Maintenance Plan must include inspection, maintenance and repair of landfill cap, mowing, and other measures necessary to ensure that the contact barrier is maintained.

(1) The Permittee must prepare and submit an Inspection and Maintenance Plan for the maintenance of the contact barrier
Within one hundred twenty (120) days of the approval of the amended or new Sediment Management Plan, the Permittee must submit a modification in accordance with OAC Rule 3745-50-51, to incorporate the approved amended or new Sediment Management Plan into this permit and become a condition of this permit. Such permit modifications shall be Class One. Subsequent changes to the approved amended or new Sediment Management Plan must be authorized by Ohio EPA.

(xiii) The Permittee must dredge Dawley Ditch to remove sediments plus 6 inches of underlying soil to reduce ecological risk from persistent bioaccumulative toxic pollutants. The Permittee may implement an alternative remedy which may include moving the ditch and capping the existing ditch bed, sediment encapsulation, or another option. If other remedies are applied, the inspection and maintenance of such remedy (if required) should be incorporated into the Facility-Wide Inspections and Maintenance Plan. The remedy shall satisfactorily manage a minimum of 90% of the current hazardous constituent loading in the contaminated sediments and soil. The final remedy must also address human health (i.e. barriers or controls to minimize contact with any remaining residual contamination).

(1) The Permittee must prepare and submit a Dawley Ditch Remediation Plan within twenty-four (24) months of the date of this permit modification. The Permittee must complete implementation of the Dawley Ditch Remediation Plan no later than June 30, 2020. Prior to completion of the final remedy implementation, the Permittee shall maintain the current natural barrier to human direct contact.

(2) Within forty-five (45) days of receipt of any Ohio EPA comments on the Dawley Ditch Remediation Plan, the Permittee must submit either an amended or new plan that incorporates Ohio EPA's comments.

(3) Ohio EPA will approve or modify and approve, in writing, the amended Dawley Ditch Remediation Plan or new Dawley Ditch Remediation Plan. The Permittee must implement the approved plan upon approval.

(4) Within thirty (30) days of the approval of the amended or new Dawley Ditch Remediation Plan, the Permittee must submit a