August 1, 2018

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

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

Subject: Hazardous Waste Permit Modification - Class 1A Approval

Dear Mr. Drummond:

On May 30, 2018, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Materion Brush Inc. dated May 30, 2018. The modification requested the following changes to the permit application:

The laboratory method for analysis of vanadium in ground water needed to be changed to a different sampling method so that the practical quantification limit (PQL) target limit of 0.005 mg/L could be maintained. The facility’s laboratory would need to switch from SW-846 Test Method 6010B to Method 6020 to maintain the current 0.005 mg/L target PQL for the Integrated Groundwater Monitoring Program (IGWMP).

- Table 5-3 was changed to reflect the use of Method 6020 for analysis of vanadium in ground water.

The modification requested another change to the permit application involving possible changes to the target PQLs in the future. Materion proposed adding a footnote to Tables 5-1 through 5-5 of the permit application to establish a procedure should there be a change in target PQLs for the IGWMP in the future. The following footnote was added to Tables 5-1 through 5-5 of the permit application:

*PQLs are target limits and may vary based on sample matrix, sample dilution, or other required adjustments required during sample analysis. In addition, target PQLs may change periodically based on laboratory updates. To manage these changes, no later than 90 days prior to beginning a semiannual monitoring event, Materion will check with the laboratory to determine if there are any known target PQL changes that could affect the upcoming monitoring event. If a change is necessary, a Class 1A permit modification incorporating these changes will be submitted to Ohio EPA for approval prior to beginning a semiannual monitoring event. If Materion becomes aware of a change 90 days or less prior to beginning a semiannual monitoring event, Ohio EPA will be informed of target PQL changes prior to analysis and a Class 1A permit modification submitted as
soon as possible after notification so it is approved by the subsequent monitoring event.

The modification also requested the following changes to Section E, page 5-10 of the permit application and Permit Condition F.1(e):

- Add a time frame for the submittal of a well abandonment report; and

With this letter, Ohio EPA approves the above-referenced Class 1A modification1 submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility’s permit application and permit. The updated application/permit can be retrieved from the Agency’s eDocument Search website: http://edocpub.epa.ohio.gov/publicportal/edochome.aspx. Using the search function, search under the document type of “Permit” and then refine the search using the facility’s RCRA ID number (Secondary ID) which is noted in the Re: block above.

If you have any questions concerning this letter, please contact Dawn Pleiman of my staff at (419) 373-3148 or by email at dawn.pleiman@epa.ohio.gov.

Sincerely,

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

BM/mrf

Enclosure

ec: Dawn Pleiman, DERR-NWDO
    Edgar Pulido, DERR-NWDO
    Michael Terpinski, Supervisor, DERR-NWDO
    Colleen Weaver, Manager, DERR-NWDO
    Chad Zajkowski, DDAGW-NWDO
    Bradley Mitchell, Manager, DERR-CO

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).
Attachment F-1 of this Module. For the purposes of this Module the term “Network” is defined as those wells listed in Table F-1 and shown on the figure in Attachment F-1.

(b) The Permittee shall conduct any additional monitoring well drilling, installation, and surveying activities in accordance with the procedures outlined in Appendix J of the IGWMP.

(c) The Permittee shall maintain all wells in the monitoring well Network in accordance with Permit Condition G.4 and the plans and specifications presented in Section 5.2 of the IGWMP.

(d) The Permittee may not remove or replace any monitoring well in the Network unless a permit modification request is submitted and approved in accordance with OAC Rule 3745-50-51. The modification request should include a revised summary table (Table F-1) and map (Attachment F-1 of this Module and Figure 1-2 of the IGWMP).

(e) All wells in the Network that are removed or replaced shall be plugged and abandoned in accordance with Ohio EPA's Technical Guidance Manual (TGM) for Hydrogeologic Investigation and Groundwater Monitoring (Chapter 9). Well plugging and abandonment methods and a State of Ohio Water Well Sealing Report will be submitted to the Director and a Northwest District office designee within 90 days from the date the wells are removed from the monitoring system.

(f) Whenever a Point of Action, Within the Plume, Plume Growth, or Background Well is replaced or any Point of Action, Within the Plume, Plume Growth, or Background Well is added to the monitoring well Network, the Permittee must:

(i) Within one year from the date of installation, sample the well for the applicable constituent groups of Appendix to OAC Rule 3745-54-98 (Appendix IX) at that well identified in Table F-1;

(ii) Within one year of the date of installation, collect from that well all groundwater samples necessary to perform any statistical analysis of data to determine if the replacement well has met its intended objective;

(iii) For replacement wells, perform a statistical comparison of the water quality at the replacement well with that of the original well;

(iv) Submit a report to Ohio EPA detailing the results of activities described in Permit Condition F.1.(f)(i), (ii), and (iii). This report is due along with the sampling report for the event immediately following the end of the first year after the installation of the new well. The