

RCRA Corrective Action Statement of Basis & Public Comment Period

February 2024

Facility Name: Ranco North America Plain City

U.S. EPA I.D.: OHD004288270

Location:

8115 U.S. Route 42 N
Plain City, Ohio 43064

Activity:

RCRA corrective action Statement of Basis for the remedies selected.

Comment Period:

February 29, 2024 – April 30, 2024

Public Meeting:

April 23, 2024
6:00 pm
Plain City Municipal Building
800 Village Dr.
Plain City, OH 43064

Submit Comments to:

Submit written comments by email to Publiccomment@epa.ohio.gov and indicate the comments concern the Ranco, Statement of Basis.

Former Ranco North America Plain City Facility**What does the facility do?**

Ranco North America (currently owned by L&R Ranco Investments, LLC) manufactured thermal controls for 60 years at this site in Plain City. Manufacturing activities have ceased, and all buildings have been demolished, except for the Remediation Treatment Building (RTB), a maintenance shed, and the former Credit Union Building which will be demolished soon.

The site consists of two major geographic areas covering about 73 acres: the former Manufacturing Complex and the West Field. The former Manufacturing Complex is 37 acres and includes the former Wastewater Treatment Plant (WWTP) area, a RCRA Landfill, the former Credit Union building, and the former main manufacturing building which includes former ancillary structures. The second geographic area is known as the West Field, which is about 36 acres. The West Field was never developed but portions were used for disposal of plating sludge and other material.

Ranco historically operated multiple surface impoundments for containment of metal plating sludges from plating operations and lime sludges from the production of drinking water. Plating solutions contained cyanide until 1991. After 1991, acid solutions were used for the plating operations that contained cadmium, hexavalent chromium, nickel, copper, and zinc. Parts degreasing also took place on site using Trichloroethylene (TCE), 1,1,1-Trichloroethane (1,1,1-TCA), and alcohols.

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What is the Statement of Basis?

The Statement of Basis is the document which describes the process Ohio Environmental Protection Agency (Ohio EPA) uses under the Resource Conservation and Recovery Act (RCRA) to select measures for containing or cleaning up a hazardous waste management facility. This Statement of Basis will be public noticed and will allow the community to review and provide comments to Ohio EPA. If public comments are received, they will be addressed by Ohio EPA in a response to comments. A Decision Document will then be issued by the Director of Ohio EPA.

What is the history of corrective action at the facility?

In 1974, the existing surface impoundments were emptied and the sludge was placed in a large pit along the south bank of Robinson Run. Ohio EPA subsequently requested the sludge be removed. Ranco moved and buried the sludge in a series of trenches in the West Field. Other plating sludges in the West Field were not buried but were mixed in surface piles using an Army Corps of Engineers research material (Chemfix® Process) and left on the surface. In 2009, all the trenches and surface piles in the West Field were excavated/removed and sent offsite for treatment and proper disposal.

In 1986, Ranco agreed to close the operating surface impoundments through a consent agreement with U.S. EPA. The two surface impoundments at the facility were certified closed on July 5, 1989, and consolidated into a single RCRA Landfill at the facility.

Several Interim Measures (IMs) have taken place at the facility. IMs are actions that correct any actual or potential releases of hazardous waste or hazardous constituents from sources or areas at the facility which may present an endangerment to human health or the environment.

Significant IMs which have been completed include:

- 1996 – Ground Water Interceptor Trench to intercept shallow ground water from flowing to Robinson Run,
- 1998-1999 – Excavation of the Acid /Alkaline Pipeline and adjacent soil,
- 2009 – Removal of plating sludge from the West field,
- 2013 – The installation of a deeper potable well at the Northeast residential property, and
- 2016 – Removal of a portion of the Western storm sewer along with adjacent soil.

Ranco is currently subject to site-wide corrective action because it historically operated as a treatment, storage disposal (TSD) facility. The Ranco facility has not operated as a TSD facility since December 5, 1988. Ranco is conducting remedial activities as documented in an amended post-closure plan (APCP) dated September 25, 2017. Ranco modified the previous post-closure plan (dated 1993) to add corrective action investigations over a series of work plans to investigate the various areas of the property. The investigations have since concluded that current site conditions do not pose unacceptable risk to human health and the environment and no additional corrective measures are necessary.

As a result of the prior investigations, it has been determined that land use restrictions will be required through the use of an environmental covenant (EC). A site governance plan (SGP) will also be required.

The SGP describes Ranco's future and continuing obligations to ensure the remedies will be protective of human health and the environment. It will contain a soil management plan, operation and maintenance (O&M) plan, and ground water monitoring plan along with a study of ground water discharging to Robinson Run to determine the feasibility of interceptor trench shut down.

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With respect to the potential for future recreational development of the property, all future soil management and/or property development activities which disturb soil at the site must ensure that the human health is protected through mitigating or controlling risks resulting from the excavation or disturbance of soil at the Site. Also, the design and implementation of an engineering control measure, such as an asphalt barrier (parking lot), vapor migration system or other engineered measure must be approved by Ohio EPA.

In typical RCRA Corrective Actions, a RCRA Facility Investigation (RFI) concludes by identifying the need for corrective measures, which leads to a Corrective Measures Study (CMS). However, the January 3, 2024, RFI report concludes that no further corrective action measures are required at the Ranco facility and that a CMS would not be necessary.

The IMs were intended to serve, in part, as a final remedy for the site besides an EC and SGP, which includes a soil management plan, O&M plan, a ground water monitoring plan and a study of Robinson Run and ground water to shut down the interceptor trench. These will be considered the other components of the final remedy. Ohio EPA concurs with the findings of the RFI.

What would the Statement of Basis allow the facility to do?

This Statement of Basis concludes that no further corrective action should be required at the facility besides an EC and SGP.

The EC will prohibit residential land use and the use of ground water to the north and east of the property. The EC will also require implementation of a soil management plan when disturbing soil. The SGP will require a ground water monitoring plan and a study of the Robinson Run and ground water to shut down the interceptor trench.

What is the regulatory basis to support this Statement of Basis?

The regulatory basis is part of the Corrective Action obligations under the ACP dated September 25, 2017. Accordingly, Ohio EPA is issuing a draft action indicating the Director's intention with respect to the issuance of a Final Decision Document to Ranco for the implementation of the chosen remedies.

Who can I contact for more information?

For additional information, please contact Chris Bulinski at christopher.bulinski@epa.ohio.gov or (614) 728-5036.

What is the history of the hazardous waste program?

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

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

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How can I become more involved?

petition Ohio EPA's Environmental Review Appeals Commission Board to review the decision.

The comment period begins on February 29, 2024, and ends on April 30, 2024. Copies of the statement of basis and other pertinent documents are available for review by the public at the following locations:

Plain City Library
305 W Main Street, Plain City, Ohio 43064

The statement of basis is available for review by the public online on Ohio EPA's website:

<https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization/announcements/>

The statement of basis is also available via Ohio EPA's eDocument portal:

<http://edocpub.epa.ohio.gov/publicportal/ViewDocument.aspx?docid=2744352>

After the close of the public comment period, Ohio EPA will review all comments received and decide whether to issue the RCRA Corrective Action Decision Document based on the Statement of Basis. Ohio EPA will make a final determination on the need for corrective measures after the public comment period has ended and public comments, if any, have been considered.

A public meeting will be held at the Plain City Municipal Building, 800 Village Dr., Plain City, OH on April 23, 2024 at 6:00 p.m. Representatives from Ohio EPA will attend to provide information about the Site and answer any questions. An announcement with the public meeting information will also be posted on Ohio EPA's website: <https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization/announcements/>.

The final Decision Document will include a notification to those who submitted written comments during the official comment period. Ohio EPA will also prepare and send to all responders a document answering significant comments. Within 30 days of a final decision, any person who submitted written comments may