



State of Ohio Environmental Protection Agency

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Northwest District Office

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DIV. OF HAZARDOUS WASTE MGMT. Bob Taft, Governor
Frank R. LaRocca, Lieutenant Governor
Joseph P. Koncelik, Director

October 26, 2006

Mr. Michael Darr
Environmental Business Manager
BP Products North America, Inc.
1150 South Metcalf Street
Lima, Ohio 45804

**Re: Hazardous Waste Permit Modification
Class 1A Approval
BP Products North America
Premcor Refining Group, Inc.
Ineos USA, LLC
U.S. EPA ID# OHD 005051826/ Ohio Permit # 03-02-0390**

Dear Mr. Darr:

On September 6, 2006, Ohio EPA received a request for Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number - 060906-1A-1) from BP Products North America, Inc. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51.

The following modification has been made to your June 20, 2003, Ohio Hazardous Waste Facility Installation and Operation Permit. Also, the records of Ohio EPA have been changed accordingly:

To remove SWMU 1 (Land Treatment Unit or LTU) from the Performance Based Groundwater Monitoring program requirements and the facility permit.

In accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), BP Products North America, Inc., shall send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Pamela Allen at (614) 644-2980, or by e-mail at pamela.allen@epa.state.oh.us.

Table 6 - Point of Compliance

SWMU or Area	Sand Unit	POC
SWMU 4	Middle Sand	Unit Boundary
SWMU 7	Middle Sand	Unit Boundary
SWMU 46	Middle Sand	Unit Boundary
SWMU 62	Middle Sand	Facility Boundary
SWMU 63	Middle Sand	Facility Boundary
Area 3	Upper Sand	Initial POC - Area of the Plume Final POC - Area Boundary

- 2) After implementing corrective measures for soils, samples will be collected to determine if Constituents of Concern (COCs) are present at levels above the MCSs. If COCs are present at levels above the MCSs, a post-remedial risk evaluation will be conducted. If the post-remedial risk evaluation shows that the COCs that are present at levels above the MCSs do not pose a significant risk above Ohio EPA's acceptable risk level of 10^{-5} or Hazard Index of less than 1, then no further corrective measures will be implemented. However, if the post-remedial risk evaluation shows that the COCs that are present at levels above the MCSs do pose a significant risk above Ohio EPA's acceptable risk level of 10^{-5} or Hazard Index greater than 1, then further corrective measures will be implemented.

- 3) For ground water, if a COC is detected at concentrations above its MCS, the Permittee will be required to evaluate the analytical results and collect additional samples in accordance with the PBGWMP to confirm that a release to ground water has occurred. If it is determined that a release to ground water has occurred, the Permittees will be required to evaluate and if necessary, implement appropriate corrective measures response actions. These actions are required to provide additional information on the potential impact to human health or the environment of surface or ground water, or migration off-site to evaluate the risks to human health and the environment. These actions can include:

c) Specific Remedies

Specific remedies for individual SWMUs, SWMU groups, and areas at the facility are described below. These remedies shall be implemented in accordance with the CMICWP approved by U.S. EPA and the Terms and Conditions of this Permit.

~~1) SWMU 1 - Land Treatment Unit~~

~~i) Implement corrective measures in accordance with the CMICWP approved by U.S. EPA.~~

~~ii) Perform long-term ground water monitoring for contaminants of concern (COCs) in accordance with the PBGWMP.~~

2) SWMU 7 - L-5 Landfill

i) Implement corrective measures in accordance with the CMICWP approved by U.S. EPA.

ii) Perform long-term ground water monitoring for contaminants of concern (COCs) in accordance with the PBGWMP.

3) SWMU 8 - L-6 Landfill

Implement corrective measures in accordance with the CMICWP approved by U.S. EPA.

4) SWMU 46 - Old Primary Pond

i) Implement corrective measures in accordance with the CMICWP approved by U.S. EPA.

ii) Perform long-term ground water monitoring for contaminants of concern (COCs) in accordance with the PBGWMP.

5) SWMU 52 - South Plant Sewer System and SWMU 53 - North Plant Sewer System

MODULE G - POST-CLOSURE CARE

G.1 Module Highlights

This section is applicable to units with in-place closure approval by Ohio EPA.

AFU, Oily Sludge, and Drying Pit Ponds (Surface Impoundment)

An above and below-grade surface impoundment used to store liquid/sludge waste. Wastes disposed in the unit included dewatering process water, various tank bottom wastes, and storm water. The pond was taken out of service in 1985, and in 1986 the sludge was stabilized and partially removed. Ohio EPA is requiring the RCRA closure of this unit to be incorporated as part of corrective action. See Module E of this permit for specifics.

Primary and C Ponds (Surface Impoundment)

An above and below-grade surface impoundment used to store liquid wastes. Wastes disposed in the unit included storm and process water. The Primary Pond closed portion of this unit will require thirty (30) years of post-closure ground water monitoring. C Pond will not require post-closure ground water monitoring, as it has been clean closed.

~~LTU (Land Treatment Unit)~~

~~An above and below-grade surface impoundment used for the land application of hazardous wastewater treatment unit sludge. Ohio EPA is requiring the RCRA closure of this unit to be incorporated as part of corrective action. See Module E of this permit for specifics.~~

G.2. Unit Identification

The Permittee shall provide post-closure care for the following hazardous waste management unit as found in this Permit and OAC Chapter 55, subject to the terms and conditions of this permit: