



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-8357 FAX: (937) 285-8249  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korfeski, Director

**Certified Mail**

January 12, 2010

Mr. Daniel McCabe, President  
Environmental Enterprises, Inc.  
4650 Spring Grove Avenue  
Cincinnati, Ohio 45232

**Re: Class 1A - Approval  
Hazardous Waste Permit Modification - Tracking Number 091217-1A-1  
U.S. EPA ID OHD083377010 / Ohio Permit 05-31-0466**

Dear Mr. McCabe:

On December 16, 2009, Ohio EPA received a Class 1A (Class 1 requiring prior approval) Hazardous Waste Facility Installation and Operation Permit modification from Environmental Enterprises, Inc. This modification was assigned a Permit Information Tracking System (PITS) ID number of OHD083377010-091217-1A-1. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51 and has updated our records accordingly.

This permit modification extends the interim compliance date in Section E.4 of the Permit, approved by the Director on September 30, 2009 from 90 days to 120 days, after the effective date of the Renewal, to comply with the requirement to submit a Current Conditions Report. Note that the Current Conditions Report will be due on January 28, 2010.

**FOR APPROVAL**

The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit:

Section E.4 of the Permit has been updated from 90 days to 120 days. Revised pages 44 and 45 have been updated and inserted into the Permit as necessary.

Mr. Daniel McCabe, President  
Environmental Enterprises, Inc.  
January 12, 2010  
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If you have any questions, please contact Tom Koch at the Ohio EPA Southwest District Office.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff G. Hines". The signature is fluid and cursive, with a large initial "J" and "H".

Jeff G. Hines,  
District Chief  
Southwest District Office

ec: Dave Sholtis, DHWM, CO  
Michael Allen, Supervisor, Engineering Unit, DHWM, CO  
Tom Koch, DHWM, SWDO

JGH\bp

JAN 12 2010

#### E.4 Current Conditions Report

The Corrective Actions process requires that an initial evaluation of all available information describing the current conditions at the site be performed. Therefore, the Permittee shall submit for review within 120 days after the effective date of this permit a Current Conditions Report (CCR) for approval. The scope of work for each of the information elements to be addressed within the CCR is found in U.S. EPA's CAP.

The CCR shall provide background information on the Facility, including each of the areas identified in Table J-1 of the permit application, the contaminants and potentially affected media associated with each area, and any interim measures implemented to date. The objective of the CCR is to evaluate existing data to:

- Screen areas of concern for inclusion in the RFI below for any area the Permittee proposes to screen based on existing data;
- Develop a preliminary conceptual site model;
- Identify preliminary interim measures/corrective measures; and,
- Identify data gaps.

The CCR shall serve as a baseline conditions report upon which the subsequent stages (ie. IM, RFI, CMS, CMI) of the corrective actions process are established. Based on the approved CCR the Permittee shall identify gaps in available data and develop investigations that address such data gaps within the RFI Work plan described in Permit Condition E.5.

#### E.5 RCRA Facility Investigation (RFI) OAC Rule 3745-54-101

The Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs, identified in Permit Condition E.3 above and Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in U.S. EPA's CAP.

##### a) RFI Workplan

Based on the findings of the approved CCR, the Permittee must submit a written RFI Workplan to Ohio EPA within 90 days after approval of the CCR or, in case of a newly discovered waste management unit, on a time frame established by Ohio EPA.