



State of Ohio Environmental Protection Agency

Northeast District Office

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CERTIFIED MAIL

December 27, 2005

RECEIVED
OHIO EPA

DEC 29 2005

DIV. OF HAZARDOUS
WASTE MGT.

Ms. Allison Knowles
Von Roll America (VRA), Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: HAZARDOUS WASTE PERMIT MODIFICATION CLASS 1A APPROVAL
TIME EXTENSION FOR COMPLETION OF RFI WORK PLAN
VON ROLL AMERICA (VRA), INC. OHD 980 613 541 / 02-15-0589**

Dear Ms. Knowles:

Ohio EPA received a request, dated December 13, 2005, for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number - OHD 980613541 - 051215-1A-1) from Von Roll America (VRA), Inc. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code Rule 3745-50-51.

FOR APPROVAL

Permit conditions A.27(e) and E.5 (a) require VRA to submit a written RCRA Facility Investigation (RFI) to the Ohio EPA within 270 days after the effective date of the RCRA draft permit. The draft permit was journalized on March 23, 2005, and 270 days from the journalization or effective date was December 18, 2005. In VRA's December 13, 2005, Class 1A permit modification request, the facility is requesting an extension of 180-days to submit the RFI.

Ohio EPA granted one request for a 180-day extension in a permit modification dated June 2, 2005. Ohio EPA is not willing to approve an additional 180-days, but is willing to approve a ninety (90) day extension. The new compliance date is now March 18, 2006.

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

Page 14, item A.27 (e)

Page 59, item E.5 (a)

VON ROLL AMERICA, INC.
CLASS 1A APPROVAL
PAGE 2

Attached are copies of the permit revisions. This has been included to ensure that all involved parties have written confirmation of the changes*. If you have any questions concerning this action, please contact Patricia Natali at the Ohio EPA East Liverpool field office, (330) 385-8447.

Sincerely,



William T. Skowronski
District Chief
Northeast District Office

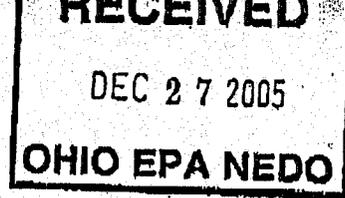
WTS:ddw

Attachment

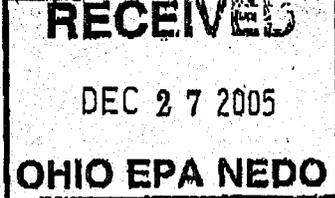
cc: Pamela Allen, Manager, ITTSS, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO
Patricia Natali, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
John Gaitskill, USEPA, Region V
ec: Michelle Tarka, DHWM, NEDO
Sherry Slone, DHWM, NEDO

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), [Facility Name] 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.

key words: C1A, approval, RFI extension



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- (d) RESERVED
 - (i) RESERVED
 - (ii) RESERVED
 - (iii) RESERVED
 - (iv) RESERVED
 - (e) The Permittee shall submit a written RFI Workplan to Ohio EPA within 270 360 days after the effective date of this permit according to Permit Condition E.5(a).



addressed under the RFI, CMS, and CMI phases, as determined to be necessary on a case-by-case basis.

E.3 Identification Of Waste Management Units (WMUs)
OAC Rules 3745-50-44(D) & 3745-54-101

The 1993 PA/VI documented releases to soil and groundwater at one area of concern (AOC), the former Charter Oil Facility Release Area (COFRA). Interim Measures related to contamination at the former COFRA are ongoing pursuant to a consent agreement with Ohio EPA. This AOC will be addressed through the Corrective Action process. No corrective action is being required at the other WMUs at this time.

See Attachment 4 of this permit for a list and description of all WMUs and AOCs.

E.4 Reserved.

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

The Permittee shall conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous waste(s) and hazardous constituent(s) from the COFRA area identified in Permit Condition E.3, and any newly identified units per 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 Attachment 5 (U.S. EPA's CAP).

(a) RFI Workplan

The Permittee shall submit a written RFI Workplan to Ohio EPA within ~~270~~ 360 days after the effective date of this permit or, in case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

- (i) If necessary, Ohio EPA shall provide written comments on the RFI Workplan to the Permittee.
- (ii) Within forty-five days of receipt of Ohio EPA's comments, the Permittee shall submit either an amended or new RFI Workplan that incorporates Ohio EPA's comments.
- (iii) Ohio EPA shall approve or modify and approve, in writing, the amended or new RFI Workplan. The RFI Workplan, as approved or