

Timeline of the Major Operational and Regulatory Events in the History of the CECOS site, Clermont County, Ohio

Date	Event
1972 – 1982	<ul style="list-style-type: none"> Clermont Environmental Reclamation (CER) operates 19-acre sanitary landfill under State of Ohio permit
1976	<ul style="list-style-type: none"> State of Ohio approves disposal of industrial waste at CER
1977	<ul style="list-style-type: none"> Joint venture between CER and NEWCO Chemical Waste Systems of Ohio, Inc. (NEWCO) operates landfill as Clermont Environmental Reclamation Company
1979	<ul style="list-style-type: none"> NEWCO renamed CECOS International of Ohio; site now named/operated by CECOS/CER Company USEPA approves polychlorinated biphenyls (PCBs) disposal at site
1980	<ul style="list-style-type: none"> USEPA grants site interim status for hazardous waste disposal under RCRA OEPA issues Permit to Install Sanitary Landfill stops receiving hazardous wastes Fireponds 1 and 2 combined into a single pond; renamed Firepond 1
1980-1984	<ul style="list-style-type: none"> CECOS operates four spray irrigation fields for disposal of sanitary landfill leachate and sewage sludge
1981	<ul style="list-style-type: none"> Solidification Basin filled and covered; but did not undergo formal RCRA closure USEPA issues Part A permit for CECOS site
1982	<ul style="list-style-type: none"> USEPA issues Part A permit modifications for CECOS site
1983	<ul style="list-style-type: none"> Browning Ferris Industries, Inc. purchases CECOS International
1984	<ul style="list-style-type: none"> CECOS submits RCRA Part B permit application CECOS prepares and submits the Toxic Substances Control Act (TSCA) Monitoring Program to USEPA
1985	<ul style="list-style-type: none"> Criminal indictments brought against CECOS, BFI and two CECOS employees for violations of hazardous waste laws
1987	<ul style="list-style-type: none"> USEPA issues CECOS a RCRA Section 3008(h) Administrative Order on Consent
1988	<ul style="list-style-type: none"> OEPA and USEPA issue Notice of Intent to deny facility's Part B Permit Clermont County General Health District denies CECOS renewal of its solid waste disposal facility license Release of hazardous liquids and vapors from Cell 2 State of Ohio vs. CECOS International, Inc. civil complaint filed for violations of hazardous waste laws and regulations
1988-present	<ul style="list-style-type: none"> OEPA cites CECOS for various violations and deficiencies pertaining to site operation under existing RCRA permits
1989	<ul style="list-style-type: none"> A gas control system is installed over Cell 2 CECOS submits a Comprehensive Detection Water Monitoring Program to USEPA
1990	<ul style="list-style-type: none"> BFI discontinues all commercial hazardous waste disposal activities at the site In a Plea Agreement concerning the 1985 criminal proceeding, CECOS agrees to one guilty charge and is penalized \$3.5 million CECOS submits an updated closure/post-closure plan to OEPA USEPA requests modifications to the proposed CECOS Comprehensive Detection Water Monitoring Program CECOS completes a RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS)
1991	<ul style="list-style-type: none"> Firepond 1 closed as a landfill Dioxin and related compounds identified in some landfill leachate; offsite disposal of leachate and pumping of leachate from standpipes is suspended USEPA directs CECOS to construct and operate on-site leachate pretreatment
1992	<ul style="list-style-type: none"> OEPA issues a Notice of Deficiency (NOD) for CECOS' 1990 closure/post-closure plan USEPA presents a Statement of Basis for proposed remedy of known subsurface contamination Chemical Waste Management accepts some dioxin-containing waste from CECOS; leachate pumping (with off-site disposal) resumes

1993-present	<ul style="list-style-type: none"> • CECOS constructs and operates a Leachate Treatment System
1993	<ul style="list-style-type: none"> • CECOS revises/submits closure/post-closure plan; OEPA issues another NOD
1994-1996	<ul style="list-style-type: none"> • OEPA grants CECOS' requests for closure period extension for Firepond 4/5 and Old Drum Holding Area (ODHA) due to subsurface contamination
1994	<ul style="list-style-type: none"> • Following additional CECOS revisions, OEPA approves Modified Closure/Post-Closure Plan for Selected Hazardous Waste Management Units and Operations Support Facilities • Clermont County Board of Commissioners appeals to the Ohio Environmental Board of Review to vacate the approved closure plan • USEPA issues a Record of Decision (ROD) for remediation of portions of CECOS site • USEPA issues Consent Order detailing ROD corrective measures requirements
1995	<ul style="list-style-type: none"> • Firepond 4/5 closed as a landfill • CECOS submits a Draft Corrective Measures Investigation (CMI) Workplan • USEPA partially approves the CECOS CMI Workplan • CECOS requests modifications to TSCA monitoring requirements from USEPA
1996	<ul style="list-style-type: none"> • One modification to the TSCA monitoring program allowed by USEPA • CECOS completes ODHA closure • CECOS submits Preliminary Design Documents for the CMI to USEPA • USEPA, in March, June, July and September, approves various portions of the CMI Design Documents following requested revisions to the CECOS submission
1997	<ul style="list-style-type: none"> • OEPA instructs CECOS to commence the approved plan post-closure activities • CECOS initiates and completes CMI construction activities at the site
1997-1998	<ul style="list-style-type: none"> • CECOS constructs a slurry wall (vertical barrier) around Cells 1, 2, 3, 4/5, the Intermediate Landfill, and Firepond 1
1988	<ul style="list-style-type: none"> • USEPA conducts Final Construction Inspection, identifying deficiencies in CMI • CECOS submits several iterations of CMI Construction Completion Report before USEPA final acceptance • CECOS submits the Revised Post-Closure Plan Modification Application to OEPA; OEPA does not accept any of the requested modifications • CECOS activates the hydraulic control system inside the slurry wall
1999	<ul style="list-style-type: none"> • USEPA issues CECOS a Notification of Non-Performance for failure to maintain required hydraulic control • CECOS prepares and submits a Workplan to address the hydraulic control deficiencies; approved by USEPA with modifications • Allied Waste Industries, Inc. acquires CECOS International, Inc.
2000	<ul style="list-style-type: none"> • CECOS submits report identifying implemented corrections to the hydraulic control system to USEPA and OEPA • USEPA issues an Order to Modify CMI Well Design and Meet Leachate Pumping Requirements
2001	<ul style="list-style-type: none"> • CECOS provides USEPA a Construction Observation Report documenting leachate well design changes • OEPA requests that the approved post-closure plan be modified
2002	<ul style="list-style-type: none"> • CECOS notifies the OEPA that the approved post-closure plan should not be modified
2003	<ul style="list-style-type: none"> • Due to clogging of some leachate lines, CECOS requests the USEPA consider additional well design change
2004	<ul style="list-style-type: none"> • CECOS submits a Draft RCRA Post-Closure Plan for Closed Hazardous Waste Units to OEPA
2005	<ul style="list-style-type: none"> • CECOS requests reductions in the CMI Monitoring Plan from USEPA • USEPA approves reductions in the site CMI Monitoring Plan; CECOS implements Changes • CECOS submits a second Draft RCRA Post-Closure Plan for Closed Hazardous Waste Units to OEPA
2007	<ul style="list-style-type: none"> • A Joint Stipulations and Settlement Agreement is filed with the Environmental Review Appeals Commission (ERAC) by counsel for the OEPA, CECOS and Clermont County concerning submission of a revised post-closure plan and a revised petition • CECOS prepares various portions and versions of an amended Post-Closure Plan,

	<ul style="list-style-type: none"> submitting the final plan in December OEPA issues a new National Pollutant Discharge Elimination System (NPDES) permit for the facility
2008	<ul style="list-style-type: none"> OEPA issues a NOD on CECOS' Amended Post-Closure Plan CECOS submits a Petition to Cease Groundwater Recovery within the slurry wall to USEPA CECOS submits proposed reductions to TSCA monitoring requesting elimination of most of the monitoring requirements to USEPA Clermont County files a Notice of Appeal with ERAC with regard to the OEPA approval of the Baseflow and Continuous Monitoring Sampling and Analysis Plans submitted by CECOS as part of the NPDES permit requirements Republic Services, Inc. merges with Allied Waste Industries, Inc. USEPA issues initial approval with conditions/modifications to shut down the groundwater gradient control system
2009	<ul style="list-style-type: none"> USEPA issues final approval with conditions/modifications to shut down groundwater gradient control system CECOS submits revised CMI O&M Manual to USEPA OEPA requests an amended post-closure plan be submitted within 60 days (by December) CECOS responds to OEPA stating that submission of a revised PC Plan is not obligatory
2010	<ul style="list-style-type: none"> CECOS submits a Technical Appraisal of the Continuous Monitoring Program to OEPA OEPA provides comments to CECOS on the Technical Appraisal of the Continuous Monitoring Program CECOS submits a permit modification proposing a revised statistical plan to OEPA
2011	<ul style="list-style-type: none"> CECOS submits class I modification to the September 23, 2010 Post-Closure Plan Modification - Groundwater Detection Monitoring Plan CECOS submits Trigger Values for the NPDES Base Flow Stream Monitoring Program CECOS submits an NPDES Permit Renewal Application
2012	<ul style="list-style-type: none"> CECOS submits an Amended Post Closure Plan CECOS and Clermont County meet and negotiate issues in the Petition and Amended Post Closure Plan at the OEPA Director's request Ohio EPA responds to the Clermont County Petition of the 2007 Post Closure Plan Ohio EPA issues conditional approval of 2012 Amended Post Closure Plan Clermont County and CECOS enter into an agreement for additional monitoring and analysis outside of the PCP, direct correspondence and annual meetings, and for the County to drop the appeal of the NPDES Sampling and Analysis Plan Clermont County filed a motion to dismiss the appeal of the NPDES Sampling and Analysis Plan before the Environmental Reviews Commission CECOS decommissions the use of several wells CECOS files a no exposure certification form and withdraws NPDES permit renewal application