

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

Table A-1. Timeline of the Major Operational and Regulatory Events in the History of the CECOS site, Clermont County, Ohio (continued)

Date	Event
1991	<ul style="list-style-type: none"> <li>• Firepond 1 closed as a landfill</li> <li>• Dioxin and related compounds identified in some landfill leachate; offsite disposal of leachate and pumping of leachate from standpipes is suspended</li> <li>• USEPA directs CECOS to construct and operate on-site leachate pretreatment</li> </ul>
1992	<ul style="list-style-type: none"> <li>• OEPA issues a Notice of Deficiency (NOD) for CECOS' 1990 closure/post-closure plan</li> <li>• USEPA presents a Statement of Basis for proposed remedy of known subsurface contamination</li> <li>• Chemical Waste Management accepts some dioxin-containing waste from CECOS; leachate pumping (with off-site disposal) resumes</li> </ul>
1993-present	<ul style="list-style-type: none"> <li>• CECOS constructs and operates a Leachate Treatment System</li> </ul>
1993	<ul style="list-style-type: none"> <li>• CECOS revises/submits closure/post-closure plan; OEPA issues another NOD</li> </ul>
1994-1996	<ul style="list-style-type: none"> <li>• OEPA grants CECOS' requests for closure period extension for Firepond 4/5 and Old Drum Holding Area (ODHA) due to subsurface contamination</li> </ul>
1994	<ul style="list-style-type: none"> <li>• Following additional CECOS revisions, OEPA approves Modified Closure/Post-Closure Plan for Selected Hazardous Waste Management Units and Operations Support Facilities</li> <li>• Clermont County Board of Commissioners appeals to the Ohio Environmental Board of Review to vacate the approved closure plan</li> <li>• USEPA issues a Record of Decision (ROD) for remediation of portions of CECOS site</li> <li>• USEPA issues Consent Order detailing ROD corrective measures requirements</li> </ul>
1995	<ul style="list-style-type: none"> <li>• Firepond 4/5 closed as a landfill</li> <li>• CECOS submits a Draft Corrective Measures Investigation (CMI) Workplan</li> <li>• USEPA partially approves the CECOS CMI Workplan</li> <li>• CECOS requests modifications to TSCA monitoring requirements from USEPA</li> </ul>
1996	<ul style="list-style-type: none"> <li>• One modification to the TSCA monitoring program allowed by USEPA</li> <li>• CECOS completes ODHA closure</li> <li>• CECOS submits Preliminary Design Documents for the CMI to USEPA</li> <li>• USEPA, in March, June, July and September, approves various portions of the CMI Design Documents following requested revisions to the CECOS submission</li> </ul>
1997	<ul style="list-style-type: none"> <li>• OEPA instructs CECOS to commence the approved plan post-closure activities</li> <li>• CECOS initiates and completes CMI construction activities at the site</li> </ul>
1997-1998	<ul style="list-style-type: none"> <li>• CECOS constructs a slurry wall (vertical barrier) around Cells 1, 2, 3, 4/5, the Intermediate Landfill, and Firepond 1</li> </ul>
1998	<ul style="list-style-type: none"> <li>• USEPA conducts Final Construction Inspection, identifying deficiencies in CMI</li> <li>• CECOS submits several iterations of CMI Construction Completion Report before USEPA final acceptance</li> <li>• CECOS submits the Revised Post-Closure Plan Modification Application to OEPA; OEPA does not accept any of the requested modifications</li> <li>• CECOS activates the hydraulic control system inside the slurry wall</li> </ul>
1999	<ul style="list-style-type: none"> <li>• USEPA issues CECOS a Notification of Non-Performance for failure to maintain required hydraulic control</li> <li>• CECOS prepares and submits a Workplan to address the hydraulic control deficiencies; approved by USEPA with modifications</li> <li>• Allied Waste Industries, Inc. acquires CECOS International, Inc.</li> </ul>

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Date	Event
2000	<ul style="list-style-type: none"> <li>• CECOS submits report identifying implemented corrections to the hydraulic control system to USEPA and OEPA</li> <li>• USEPA issues an Order to Modify CMI Well Design and Meet Leachate Pumping Requirements</li> </ul>
2001	<ul style="list-style-type: none"> <li>• CECOS provides USEPA a Construction Observation Report documenting leachate well design changes</li> <li>• OEPA requests that the approved post-closure plan be modified</li> </ul>
2002	<ul style="list-style-type: none"> <li>• CECOS notifies the OEPA that the approved post-closure plan should not be modified</li> </ul>
2003	<ul style="list-style-type: none"> <li>• Due to clogging of some leachate lines, CECOS requests the USEPA consider additional well design change</li> </ul>
2004	<ul style="list-style-type: none"> <li>• CECOS submits a Draft RCRA Post-Closure Plan for Closed Hazardous Waste Units to OEPA</li> </ul>
2005	<ul style="list-style-type: none"> <li>• CECOS requests reductions in the CMI Monitoring Plan from USEPA</li> <li>• USEPA approves reductions in the site CMI Monitoring Plan; CECOS implements changes</li> <li>• CECOS submits a second Draft RCRA Post-Closure Plan for Closed Hazardous Waste Units to OEPA</li> </ul>
2007	<ul style="list-style-type: none"> <li>• 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</li> <li>• CECOS prepares various portions and versions of an amended Post-Closure Plan, submitting the final plan in December</li> <li>• OEPA issues a new National Pollutant Discharge Elimination System (NPDES) permit for the facility</li> </ul>
2008	<ul style="list-style-type: none"> <li>• OEPA issues a NOD on CECOS' Amended Post-Closure Plan</li> <li>• CECOS submits a Petition to Cease Groundwater Recovery within the slurry wall to USEPA</li> <li>• CECOS submits proposed reductions to TSCA monitoring requesting elimination of most of the monitoring requirements to USEPA</li> <li>• 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</li> <li>• Republic Services, Inc. merges with Allied Waste Industries, Inc.</li> <li>• USEPA issues initial approval with conditions/modifications to shut down the ground-water gradient control system</li> </ul>
2009	<ul style="list-style-type: none"> <li>• USEPA issues final approval with conditions/modifications to shut down ground-water gradient control system</li> <li>• CECOS submits revised CMI O&amp;M Manual to USEPA</li> <li>• OEPA requests an amended post-closure plan be submitted within 60 days (by December)</li> <li>• CECOS responds to OEPA stating that submission of a revised PC Plan is not obligatory</li> </ul>
2010	<ul style="list-style-type: none"> <li>• CECOS submits a Technical Appraisal of the Continuous Monitoring Program to OEPA</li> <li>• OEPA provides comments to CECOS on the Technical Appraisal of the Continuous Monitoring Program</li> <li>• CECOS submits a permit modification proposing a revised statistical plan to OEPA</li> </ul>