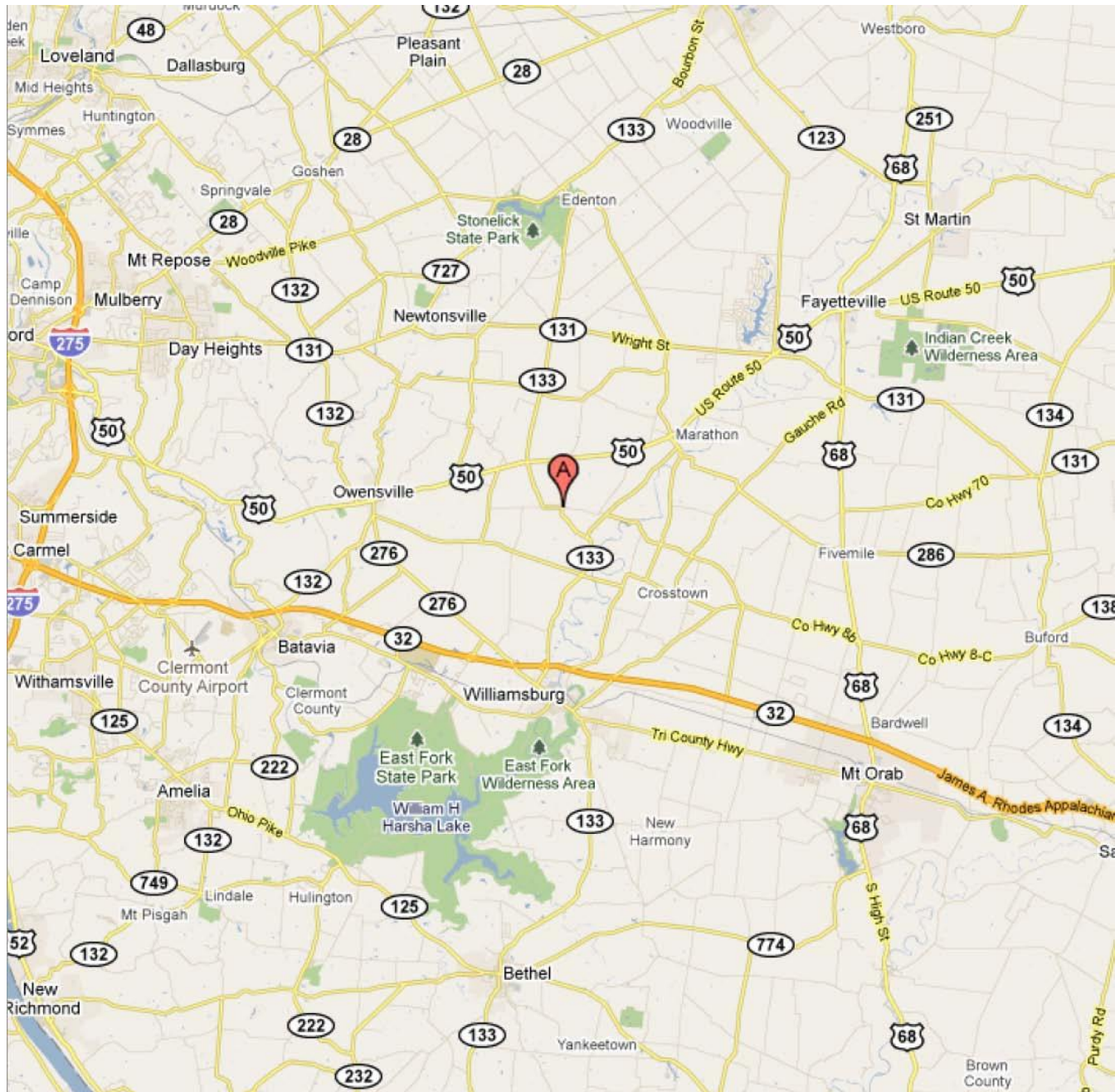
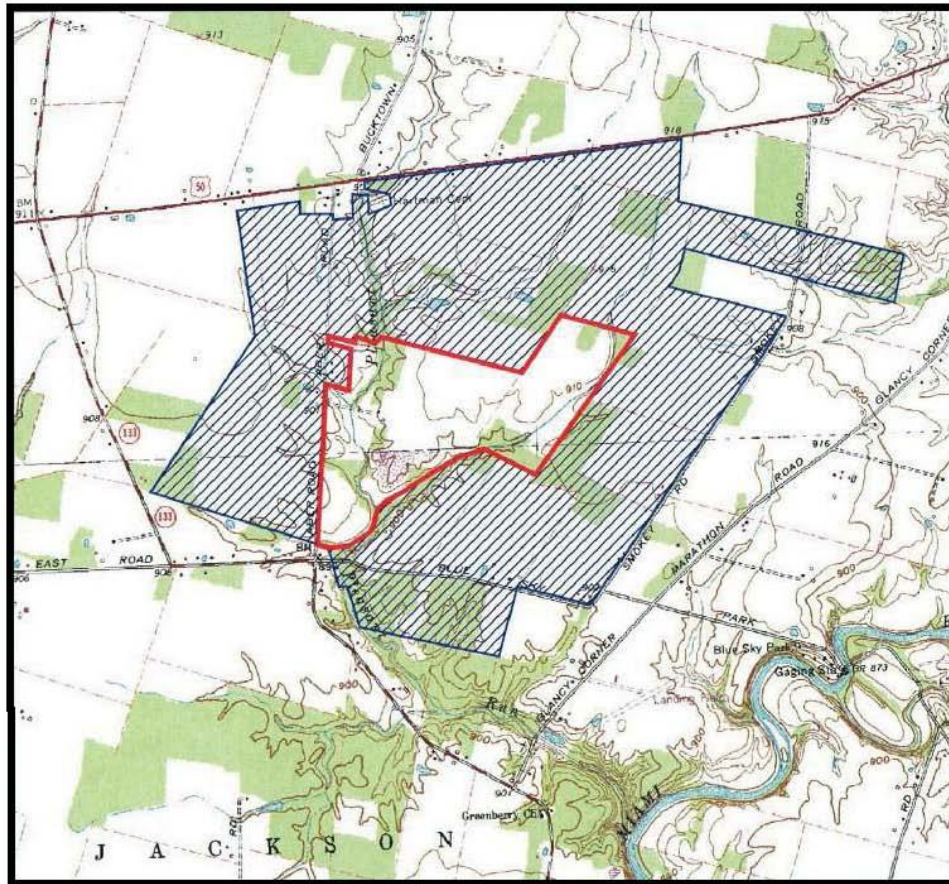


CECOS Review

August 2011





LEGEND



SITE



PERMITTED FACILITY

WILLIAMSBURG, OHIO
38084-A1-TF-024
1988
PHOTOREVISED 1988
DMA 4162 II SE-SERIES V852

NEWTONSVILLE, OHIO
N3907.5-W8400/7.5
1988
ANS 4162 II NE-SERIES V822

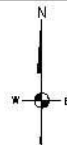
CONTOUR INTERVAL 10 FEET
1000 2000 3000 4000 5000 FT.

CLERMONT COUNTY

SITE BOUNDARY MAP
(AFTER OEPA, 1996)

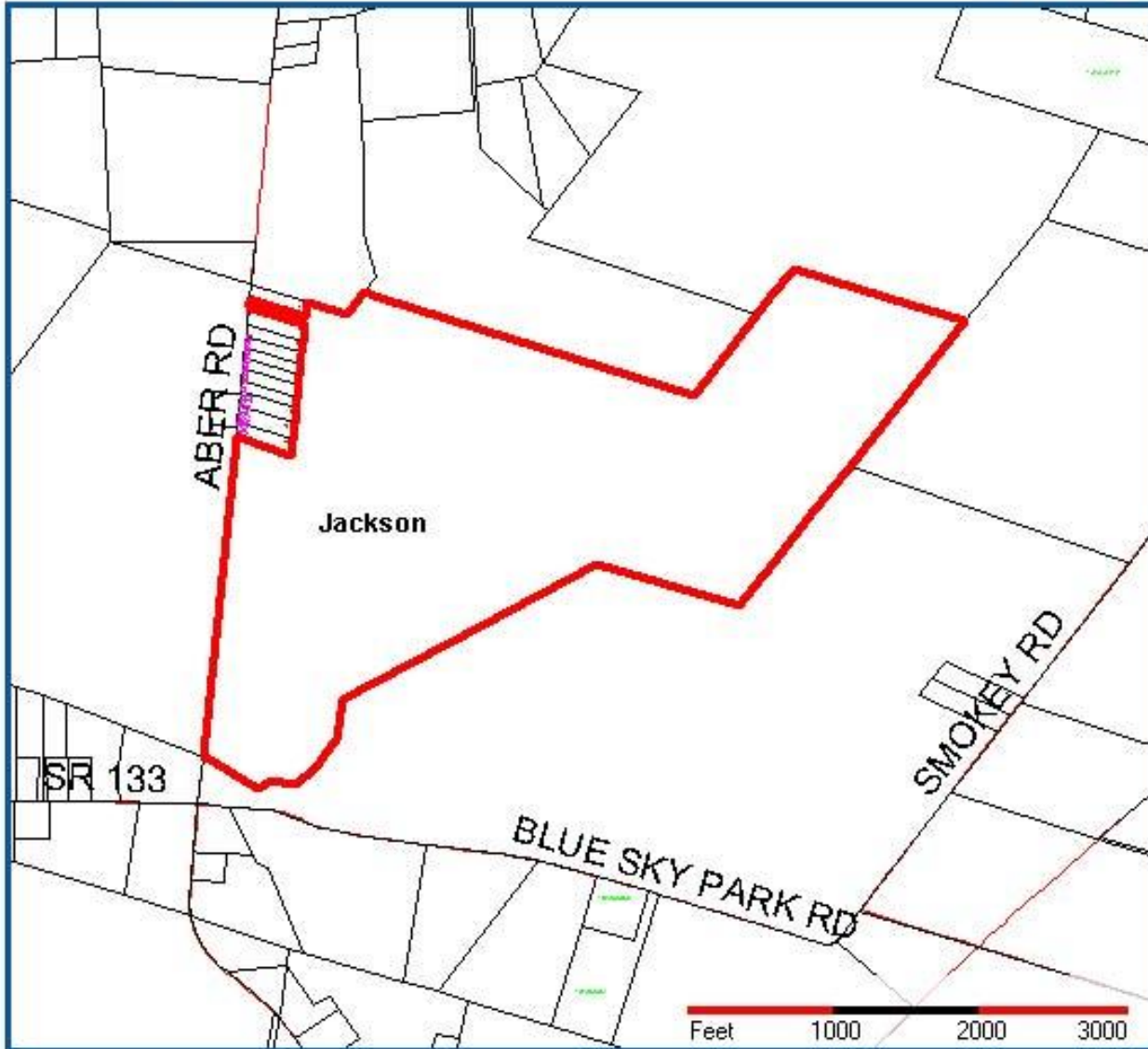


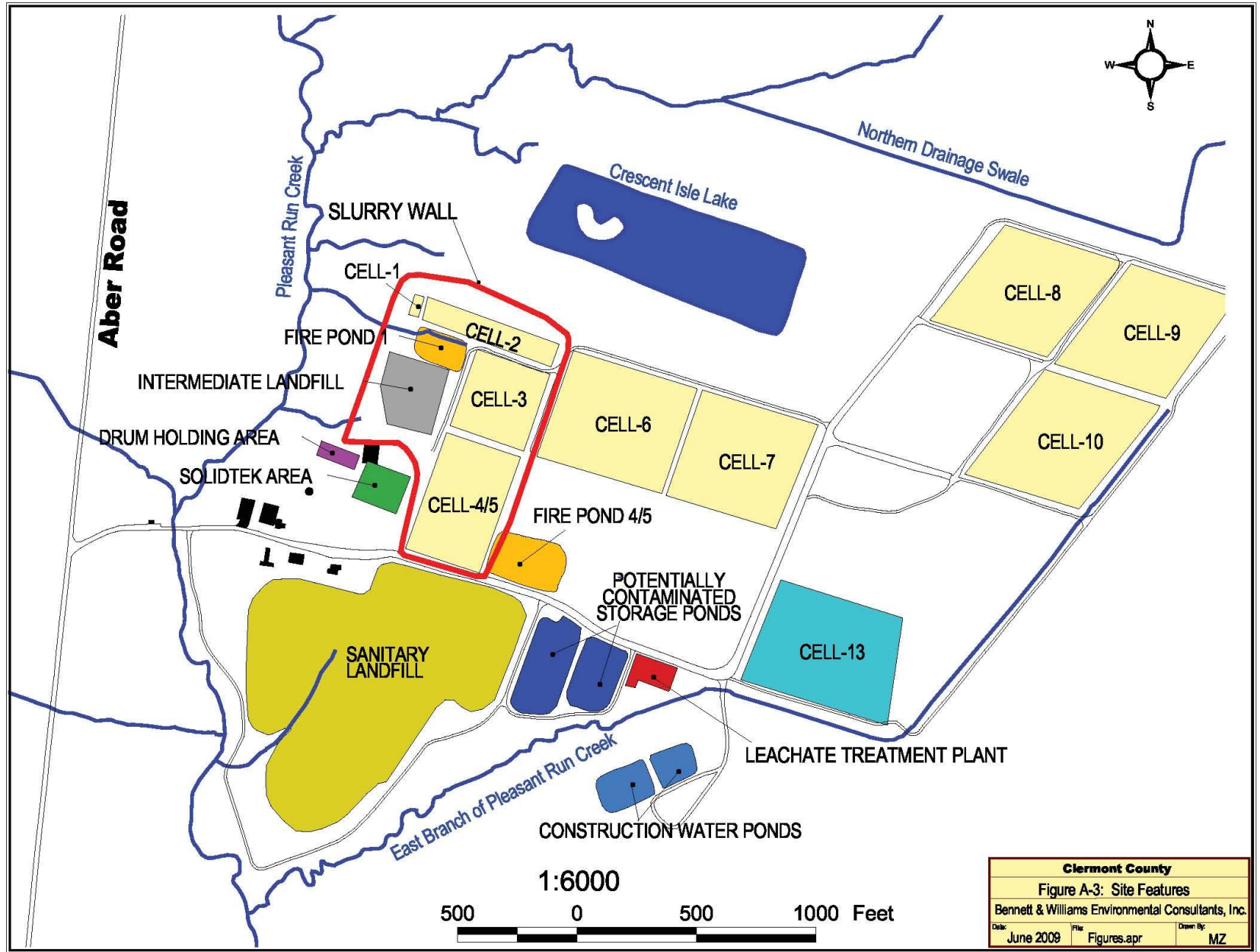
QUADRANGLE LOCATION

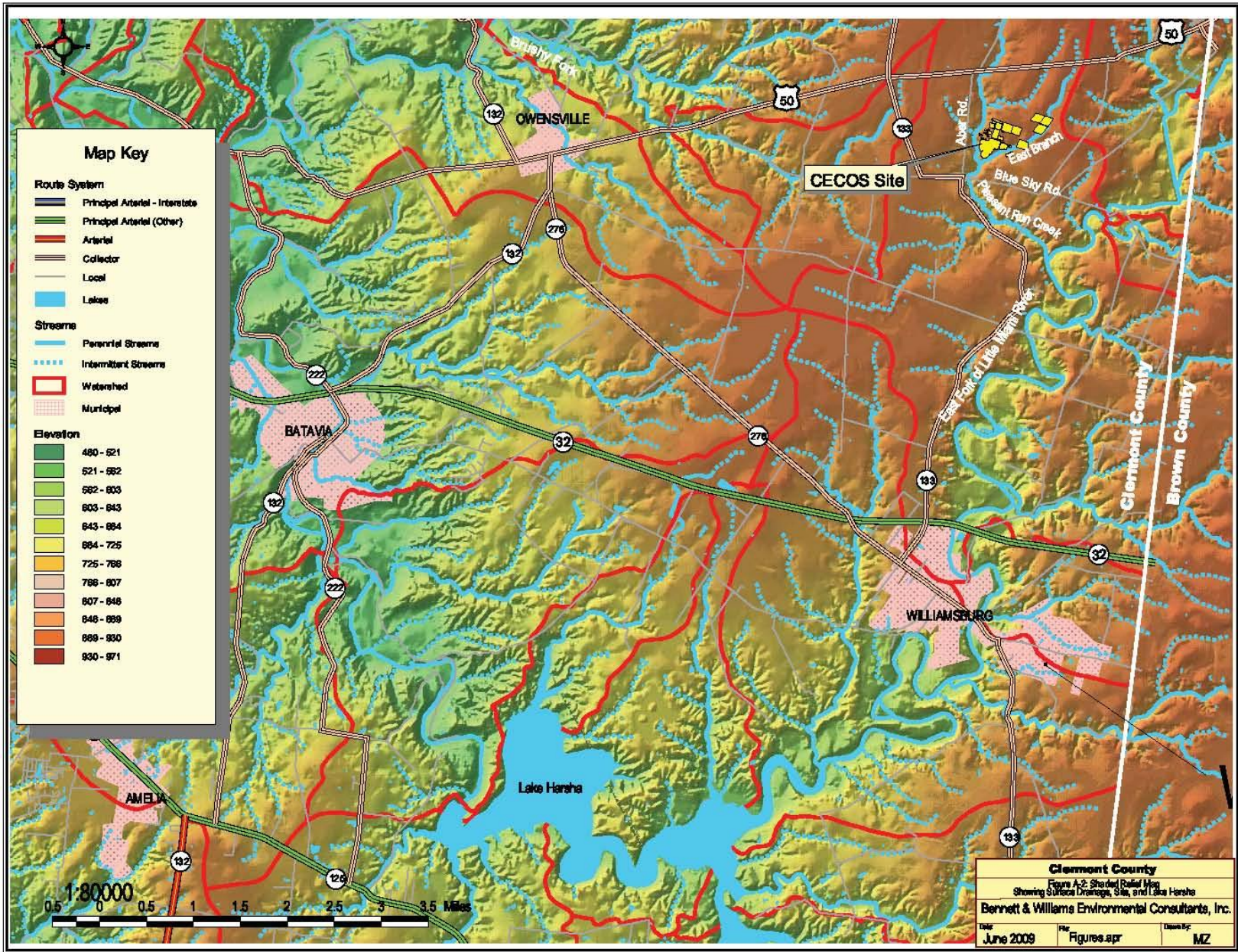


**BENNETT & WILLIAMS
ENVIRONMENTAL CONSULTANTS, INC.**

JOB NO. 626	DWG. BY: RDC	DATE: JUNE 2009	DWG. FILE: 626-08	FIGURE: A-1
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**EXECUTIVE SUMMARY
OF CLERMONT COUNTY'S PETITION
FOR MODIFICATION OF THE POST -CLOSURE PLAN
GOVERNING THE MONITORING AND MAINTENANCE OF THE
CECOS HAZARDOUS WASTE FACILITY**

Over one billion pounds of hazardous waste - PCBs, asbestos, pesticides, benzene and other organic compounds, halogenated ethanes and other volatile materials, and virtually every other type of chemical- are entombed at the CECOS facility on Aber Road in eastern Clermont County, above Lake Harsha. The vast majority of these wastes will remain dangerous virtually forever.

Although the wastes were brought to the site in metal drums or other containers, and were disposed of in gigantic lined pits called cells, the wastes are not contained in any meaningful sense. The drums and other containers quickly deteriorate, the liners fail, precipitation and other sources of water in the cell comes into contact with and becomes contaminated by the waste inside the cells, and the resulting leachate eventually escapes through the liners into the ground water, and then into the surface water. The evidence that has accumulated since the facility was closed in 1997 indicates that this process is, alarmingly, well under way: more constituents and higher concentrations of contaminants are being found in the leachate in the cells, and measurements of water quality in the leak detector layers and underdrains reveal that some leachate has already penetrated the liner systems.

The myriad long-term problems created by the burial of hazardous wastes are supposed to be addressed by a post-closure plan. The plan for the post-closure care of a facility has two principal elements: (1) maintenance of the waste containment systems to prevent or, if that is not possible, at least minimize and delay the escape of leachate; and (2) monitoring to promptly detect any contaminants that escape containment. The existing post-closure plan ("PC Plan") for the CECOS facility was approved by Ohio EPA on September 23, 1994, but immediately challenged by Clermont County before the Environmental Review Appeals Commission ("ERAC") because it was inadequate to provide long-term protection to the citizens of the County.

The appeal was never adjudicated. Instead on April 26, 2007, CECOS, the County and OEPA filed a Joint Stipulation and Settlement Agreement with ERAC which provided for CECOS to submit an amended PC Plan, the County to submit a Petition for modification of the Plan under OAC 3745-66-18, and the Director to take action on CECOS' Amendment and the County's petition.

On December 14, 2007, CECOS submitted a draft revised PC Plan. At the request of OEPA, Clermont County submitted extensive comments on the draft plan, pointing out that, compared to the PC Plan, the revised plan proposed significant and unjustified reductions in monitoring. On June 18, 2008, OEPA issued a Notice of Deficiency (NOD) on CECOS' December 14, 2007 Plan. The NOD adopted most of the County's comments and identified elements that OEPA expects CECOS to include in its Amended PC Plan. To date, CECOS has not formally submitted a comprehensive Amended PC Plan to OEPA.

This document is Clermont County's formal submission of a petition pursuant to OAC 3745-66-18(G). In the decade and a half since the PC Plan was approved by OEPA, the assumptions and conclusions about the site upon which the original Plan were based have been undercut by new data, and by statistical and other analyses of this, as well as earlier data. This new information, which is presented in detail in this Petition, makes it clear that the facility poses a significant threat to the public and the environment; and sets forth a number of specific changes that must be made to the Plan to reduce the imminence and magnitude of the danger.

One change relates to the need to mandate, and institute a mechanism to pay for, long-term care of the site. As the threat posed by this facility is virtually infinite, post-closure care must also be permanent. A number of changes describe the improvements that are needed in the manner in which cells and other aspects of the site are inspected, maintained, and evaluated. A third set of issues concerns the need to integrate, maintain, and make available to the OEPA, the County and other affected third parties all material information relating to the site.

But dominating the landscape is the fact that the existing PC Plan does not prescribe a monitoring plan that will reliably or promptly detect the presence of escaping hazardous constituents. The Plan does not have sufficient monitoring wells; many preferential pathways and other critical sites for the detection of ground-water contamination are unmonitored or poorly monitored; the number of parameters being monitored and the frequency of sampling is inadequate; the characterization of the ground-water flow regimes at the site is outdated and insufficiently detailed; sampling techniques are inconsistent with regulatory guidance; and the statistical protocol used to determine whether contamination is present is dangerously inferior. The surface water sampling plan is equally flawed. This Petition examines each of these shortcomings in detail, and prescribes specific modifications that should be made to the PC Plan to rectify them, and the Director is urged to order them.

The risks posed by this site are real, and they are substantial. Over the next fifty years, the facility will generate more than 13 million gallons of dangerously toxic leachate. It is imperative that all feasible measures be taken to prevent this site from creating a danger to the health and safety of the citizens of the County.

Write a letter to Director Scott Nally encouraging him to promptly consider the petition presented on behalf of the citizens of Clermont County concerning the issues at the Cecos Hazardous Waste site and place a phone call to 614-644-2782 soliciting his help with this pending issue between Cecos/OhioEPA/Clermont County and the protection of the county water supply.

**Mr. Scott Nally, Director
Ohio Environmental Protection Agency
P. O. Box 1049
Columbus, Ohio 43216-1049**

Phone: 614-644-2782

Contact the Representatives encouraging them to become informed and pursue assistance from the EPA in moving this issue forward to a resolution of protection for Clermont County residents/taxpayers and the county water supply.

**Senator Tom Niehaus
Ohio Senate, Room 38 Statehouse tniehaus@mailr.sen.state.oh.us
Columbus, Ohio 43215 Phone: 614-466-8082**

**Representative Danny Bulp, 88th District
77 S. High Street, 11 th floor district88@ohr.state.oh.us
Columbus, Ohio 43215 Phone: 614-644-6034**

**Representative Joe Uecker, 66th District
77 S. High Street, 12th floor Joe@JoeUecker.com
Columbus, Ohio 43215 Phone: 614-446-8134**