



west virginia department of environmental protection

Environmental Enforcement
601 57th Street SE
Charleston, WV 25304
Telephone: (304) 926-0470 Fax: (304) 926-0488

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

November 29, 2017

Intercontinental Export Import, Inc.
Attn: Saurabh Naik
8815 Center Park Drive, Suite 400
Columbia, MD 21045

CERTIFIED RETURN RECEIPT REQUESTED

91 7199 9991 7037 7101 4046

Re: Plan of Corrective Action – Order No. 8779

Dear Mr. Naik:

West Virginia Department of Environmental Protection (WVDEP) has received your Plan of Corrective Action (POCA), dated November 13, 2017, and the associated POCA addendums, dated November 17, 2017 and November 27, 2017. The POCA and addendums were submitted to fulfill the requirement of Item No. Four (4) under the Order for Compliance section of Order No. 8779.

WVDEP has determined that the enclosed Plan of Corrective Action and addendums are acceptable, hereby approved, and incorporated as a term and condition of the Order. Failure to adhere to the approved plan and addendums is a violation of the Order.

Should you have any questions regarding this matter, please contact me at (304) 926-0470.

Sincerely,



Jeremy W. Bandy
Chief Inspector

Enclosure

cc: David C. Simmons, Assistant Chief Inspector, EE (via e-mail)
Debora J. Peters, Environmental Resources Specialist, EE (via e-mail)
Ryan Harbison, Environmental Inspector Supervisor, EE/WW (via e-mail)
Glennnda Parsons, Environmental Inspector, EE/WW (via e-mail)
Brian A. Richards, Professional Geologist, G.E.A.R (via e-mail)



Mr. Jeremy W. Bandy
Chief Inspector
Environmental Enforcement
Mail Code - #031328
WVDEP
601 57th Street, SE
Charleston, WV 25304

November 13, 2017

RE: Plan of Corrective Action and Schedule
Intercontinental Export Import, Inc. Plant Number 1
WV/NPDES Permit No. WV0003204 – Order No. 8779

Mr. Brandy,

On behalf of Intercontinental Export Import, Inc. (IEI) Gator Engineering and Aquifer Restoration, Inc. (GEAR) has prepared the attached Corrective Action Plan and Schedule associated with the above referenced permit and order. In particular Item Number 4 on Page 6 of Order No. 8779. It is my understanding that IEI provided you a detailed inventory of all the materials that were burned at Plant No. 1 on November 2, 2017 addressing Item 2 on Page 5 of Order No. 8779.

Pertaining to Items 1 and 3 on Page 5 of Order No. 8779, IEI has already taken measures to initiate compliance with all terms and conditions of the WV/NPDES permit and the pertinent laws and rules. At the request of IEI, GEAR has been contracted to review the existing permits at Plant No. 1 and Plant No. 2. As of today, it is IEI's understanding that IEI has submitted the required information for issuance of the WV/NPDES permit modifications to incorporate regulated activity at Plant No. 2 and the permit application is administratively complete awaiting WVDEP comments or approval. If this is not the case, please notify IEI as soon as possible.

I will endeavor to address all other issues associated with your October 26, 2017 correspondence in a timely manner. I thank you for your assistance as IEI gets their operations back in order following the fire at Plant No 1.



Please don't hesitate to contact me if you have any questions or concerns. GEAR and IEI look forward to working closely with the WVDEP to satisfy Order 8779.

Sincerely,

A handwritten signature in blue ink that reads 'Brian A. Richards'.

Brian A. Richards
Professional Geologist
Gator Engineering & Aquifer Restoration, Inc.
Cell: 352 409 1606

cc:

Dr. Saurabh Naik, President and CEO, IEI, 8815 Center Park Drive, Columbia, MD. 21045
Mr. Sunny Naik, Product Development, 8815 Center Park Drive, Columbia, MD. 21045

CORRECTIVE ACTION PLAN
DEBRIS MATERIALS SITE CONTAMINATION CLEANUP
INTERCONTINENTAL EXPORT IMPORT, INC. - PLANT NO. 1
PURSUANT TO WEST VIRGINIA DEP ORDER NO. 8779

Prepared by:

Gator Engineering and Aquifer Restoration, Inc.

1928 Boothe Circle

Longwood, Florida 32750



Prepared on behalf of:

INTERCONTINENTAL EXPORT IMPORT, INC.

8815 CENTER PARK DEIVE, SUITE 400

COLUMBIA, MARYLAND 21045



November 13, 2017

Norm Hatch

Professional Engineer

Brian Richards

Professional Geologist

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1.0 INTRODUCTION

Intercontinental Export Import, Inc. (IEI) operates a polymer recycling facility located 3801 Camden Avenue, Parkersburg, Wood County, West Virginia as located on **Figure 1**. Plant No. 1 stores numerous polymer materials in the form of pellets, flake, strand, beads, plop, dust, granules, and resins. These polymer materials are sold to American and International manufacturers for polymer recycling. No recycling, extruding or other manufacturing processes are conducted at Plant No. 1. Plant No. 1 facilities are located on a site formerly occupied by Ames True Temper, Inc. that manufactured garden tools, shovels and other implements. The site presently operates under WV/NPDES Water Control Permit NO. WV0003204. This document has been prepared with the safeguards presented in the Ames True Temper Land Use Covenant dated April 12, 2011 and executed under the Voluntary Remediation and Redevelopment Act, West Virginia Code Chapter 22, and the Uniform Covenants Act, West Virginia Code Chapter 22, Article 22B, in mind. This Corrective Action Plan does not include the excavation of in-situ soils or penetration of the protective covers, concrete building floors or concrete foundations.

On October 21, 2017, a large industrial fire occurred at Plant No. 1, completely destroying the plant and its contents. Subsequent to the fire, IEI received Order No. 8779 from the West Virginia Department of Environmental Protection on October 26, 2017. Item No. 4 of the Order for Compliance requires IEI to submit for West Virginia DEP approval a proposed plan of corrective action and schedule, outlining action items and completion dates for cleanup of the debris in the burnt site area, including stormwater management for the burnt site during site activities.

It should be emphasized that this plan is a living document and may change throughout the course of the site cleanup as conditions change such as inclement weather or other unforeseen circumstances.

2.0 APPROACH - Short Term Actions

The short term objectives of this plan are the immediate protection of potentially affected human health and the environment.

2.01 Site Control

Site control is an important aspect of this Plan of Corrective Action. In order to safeguard the health and safety of site workers and the general public, access to all work areas have been restricted. Perimeter fencing has been installed at the facility for site controls to prevent unauthorized personnel from entering the work site. A site specific Health & Safety Plan will be prepared for this facility and approved by a Certified Industrial Hygienist to protect workers and the general public.



2.02 Air Monitoring

Air monitoring stations will be installed at the boundaries of the site to monitor air quality at the property boundaries to detect any potential airborne emissions coming from the burnt site area. Continuous air monitoring will be performed for airborne particulates. When metal, ash or burnt polymer material are being moved at the site, air monitoring devices will be positioned at upwind and downwind locations on the perimeter of the site. The action threshold for VOCs is recommended at 5 ppm above background. If this value is exceeded for the 15-minute average work will be halted and work may resume once instantaneous readings fall below 5 ppm work. The action level for ash and dust is 100 micrograms per cubic meter over background during a 15-minute average. Potential actions taken as a result of fugitive emissions leaving the property boundaries include temporary cessation of site cleanup activities, spraying down ash stockpiles with water, covering ash stockpiles with visqueen, or other actions as appropriate.

2.03 Temporary Storm Water Barrier Berm

A temporary storm water control barrier berm will be constructed along the northeastern boundary of the property to prevent any storm water runoff from the burnt area entering the Little Kanawha River. This berm will be earthen and covered with visqueen. River rock will also be placed along the top and sides to weigh down the visqueen and to provide erosion control for the berm. This berm will be two to five feet high depending on ground surface elevations and will remain in place throughout the burnt site cleanup activities. Stormwater from the burnt area will be collected in a sump installed at ground surface level at the lowest ground surface elevation near the center of the berm as presented in **Figure 2**. The area designated as "AREA A" on **Figure 2** will be addressed during debris removal. Presently this area will not drain into the storm drains along Broadway Avenue and the area is bordered to the southwest by a concrete building foundation and on the northeast by a concrete slab. There is a very slight elevation change sloping to the northeast. If necessary during debris removal, the storm water containment barrier will be lengthened to include "AREA A" to address the potential for fugitive storm water. For reference a USGS topographic map of the area is included as **Figure 3**.

2.04 Collected Storm Water Disposal

This plan includes the potential for pumping the collected storm water using temporary sumps or a vacuum truck into steel holding tanks (frac tanks). Stored water will either be discharged in accordance with the existing WV/NPDES permit, shipped for off-site treatment at a licensed treatment facility or characterized and discharged to the sanitary sewer under a Parkersburg Utility Board sewer permit. The collected storm water will be pumped to a nearby frac tank. Once full, the collected storm water in the frac tank will be analyzed for NPDES permit parameters, including aluminum, lead, iron, vinyl chloride, trichloroethylene, 1,1 dichloroethylene, 1,2 dichloroethylene and phthalate esters and/or other parameters required by the WVDEP or Parkersburg Utility Board which operates the local sanitary sewer

utility. If the collected storm water meets the NPDES water quality criteria, it will be discharged to Outfall No.1. If the collected storm water exceeds one or more of the WV/NPDES water quality criteria and meets the Parkersburg Utility Board requirements, it will be discharged into the sanitary sewer manhole indicated on **Figure 2**. If the water quality exceeds both the WV/NPDES requirements and the Parkersburg Utility Board requirements, the water will be treated on site and/or trucked to a state licensed water treatment center. If water is treated onsite prior to discharge or transport, treatment may include air stripping, activated carbon, or both.

3.0 APPROACH - Long Term Actions

The long term objectives of this plan are:

- to remove, transport and recycle all the steel located at the site
- characterize all burnt debris from the site and transport it for proper disposal offsite

3.01 Metal Recycling

In an effort to quickly characterize and transport the remaining burnt waste and ash debris from the site, the metal must first be picked out and removed from the debris. Two local metal recyclers have been contacted and determined that the salvage and recycling of metal components is economically feasible. A metal removal plan is being developed for the site. It is anticipated it will take approximately 6 weeks remove, cut and transport the metal to a recycling facility.

3.02 Initial Burnt Waste Characterization Sampling

Waste characterization will occur simultaneously with the construction of the temporary storm water barrier berm. A total of six grab samples will be taken at various ash locations and submitted to a certified analytical laboratory for TCLP analysis for the 8 RCRA metals and others that may be required by Waste Management, Inc. for waste characterization. Analysis for VOCs or other organic parameters should not be necessary since they would have been destroyed in the fire. This information will be used to determine the lowest cost, regulatory acceptable method of disposal of the burnt waste and ash material.

3.03 Burnt Waste Excavation Plan

A detailed excavation plan will be developed for the site. This will include stockpiling ash/burnt material for testing prior to disposal. Initial plans are to excavate and stockpile 4000 cubic yards of material. Two composite samples will be obtained from each stockpile (composite of each side and top grab samples) and analyzed by TCLP for parameters determined from the initial waste characterization sampling. This is necessary to determine if the stockpiled material is classified as hazardous waste or non-hazardous



waste. This plan will be developed and submitted to West Virginia DEP simultaneously with the construction of the storm water barrier berm.

3.04 Burnt Waste Disposal Plan

A burnt waste material disposal plan will be developed and submitted to the West Virginia DEP simultaneously during the construction of the storm water barrier berm. Initial plans are to arrange for disposal at a nearby Subtitle D permitted sanitary landfill. The closest sanitary landfill is Waste Management's Northwestern Landfill, Inc. located at 510 East Dry Run Road, Parkersburg, WV. Permit number is SWF-1025.

Once a stockpile is sampled and determined to be non-hazardous waste, it will be transported by trucks to this landfill for disposal. Documentation of each load of material (weigh tickets) will be collected and maintained. Non-hazardous special waste manifests will be prepared and maintained for each truck load of burnt waste material.

3.05 Plan Submittals to West Virginia DEP

The waste characterization sampling results, the Burnt Waste Excavation Plan, and the Burnt Waste Material Disposal Plan will be submitted to the West Virginia DEP for review and approval.

3.06 Special Waste Landfill Disposal Permit Modification

This activity includes time for the West Virginia DEP to issue a Special Waste Landfill Disposal Permit to the Northwest Landfill to exceed monthly tonnage limits operated by Waste Management in Parkersburg, West Virginia. IEI, Inc. will also apply for a Solid Waste Assessment Fee Exemption.

3.07 Burnt Waste Excavation, Transport and Disposal

This task includes all of the activities required to excavate, stockpile, sample, transport and dispose of all burnt waste material at the site. Site cleanup activities will be conducted under Level C health and safety protocol. Disposable dust masks will be worn by personnel conducting ash excavation, stockpiling and truck loading activities. If deemed necessary by the site safety officer, personnel protection may be upgraded to wearing particulate respirators. An Activity Hazard Analysis will be developed for the ash material cleanup.

4.0 SITE CLEANUP COMPLETION REPORT

A Site Cleanup Completion Report will describe the activities conducted during the cleanup. The report will include the results of laboratory analyses, copies of non-hazardous waste manifests, landfill weigh tickets, and field notes from the onsite IEI field representatives.

5.0 SCHEDULE

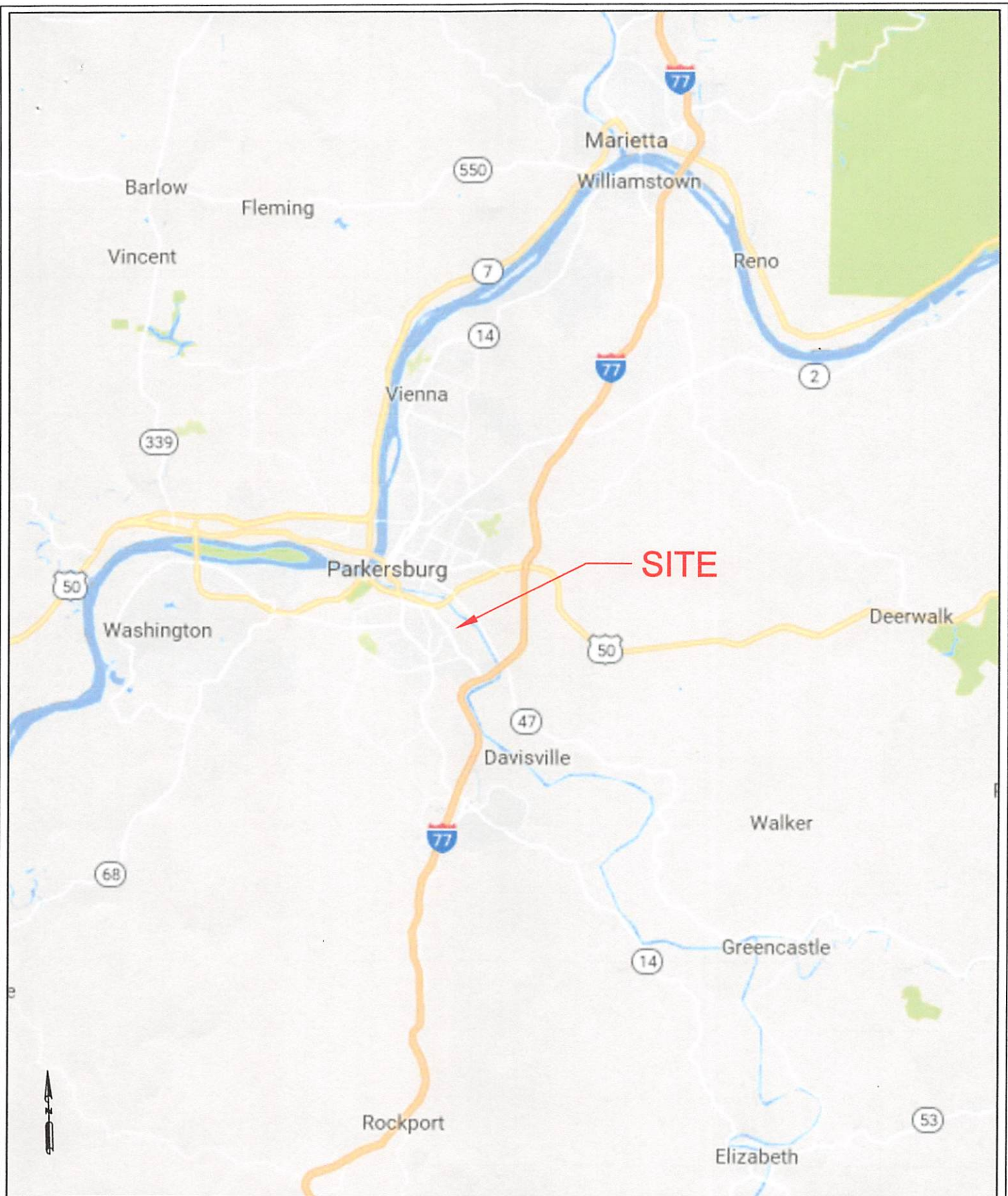
The schedule of activities is presented below:


ACTIVITY	DURATION, WEEKS	START, weeks from NTP	Finish, Weeks from NTP
Corrective Action Plan Submittal to West Virginia DEP, Review and Approval	2		
West Virginia DEP Notice to Proceed	0	0	0
Site Boundary Air Monitoring	29	1	30
Stormwater Barrier Berm Construction	5	1	6
Initial Ash and Burnt Waste Characterization Sampling	3	1	4
Metal Salvage/Recycling Decision	3	1	4
Ash and Burnt Material Excavation Plan	3	1	4
Ash and Burnt Material Disposal Plan	3	1	4
Plan Submittal to West Virginia DEP, DEP Review and Approval	3	4	7
Special Waste Landfill Disposal Permit	6	1	7
Ash Material Excavation, Transport and Disposal (Site Cleanup Activities)	23	7	30
Site Cleanup Completion Report	3	30	33

The 27 week duration for the excavation, transport and disposal of ash materials is based on the following assumptions:

- Total quantity of burnt material is estimated at 40,000 tons
- Total quantity of estimated steel is 1,000 tons
- Average load capacity of a dump truck is 15 tons
- Daily dump truck traffic to the Northwest Landfill is 20 trucks per day
- The excavation, transport and disposal activities proceed six days per week

The above schedule is preliminary based on information known at this time and may change throughout the course of the ash material cleanup. A bar chart presentation of the schedule is included in **Figure 4**.



<p>Figure No. 1</p>	 <p>G.E.A.R. Gator Engineering & Aquifer Restoration, Inc. 185 Middle Street, Suite 1351 • Lake Mary, FL 32746 • 407.878.0950</p>	<p style="text-align: center;">SITE LOCATION MAP</p> <hr/> <p style="text-align: center;">INTERCONTINENTAL EXPORT IMPORT, INC. - PLANT #1 3801 CAMDEN AVENUE PARKERSBURG, WOOD COUNTY, WEST VIRGINIA</p>	<p>Drawn by: JV Revised by: Date: 11/10/2017 Scale: NTS</p>
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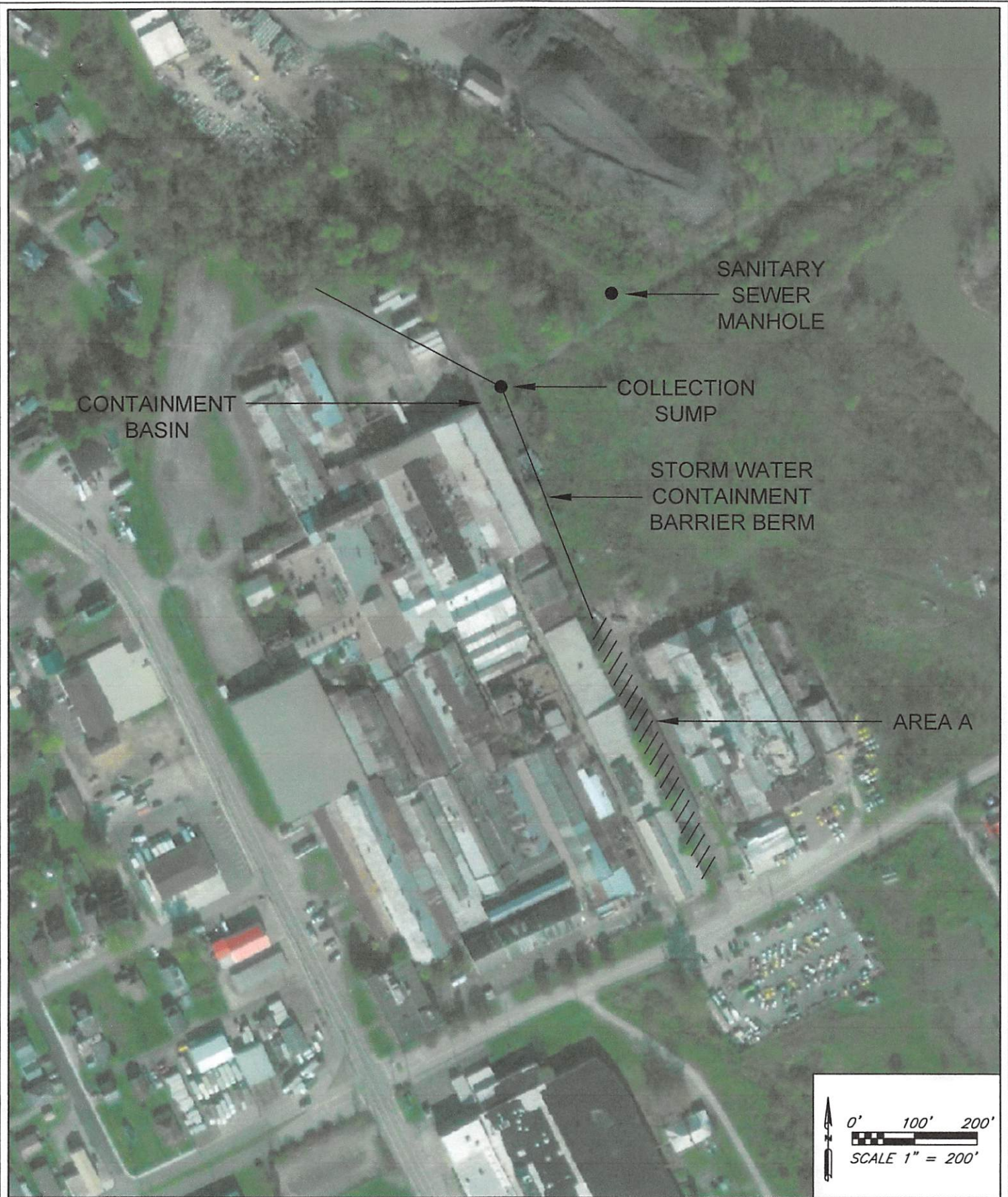


Figure No.
2



SITE PLAN WITH TEMPORARY STORM WATER BARRIER BERM
INTERCONTINENTAL EXPORT IMPORT, INC. - PLANT #1
 3801 CAMDEN AVENUE
 PARKERSBURG, WOOD COUNTY, WEST VIRGINIA

Drawn by: JV
 Revised by:
 Date: 11/10/2017
 Scale: 1" = 200'

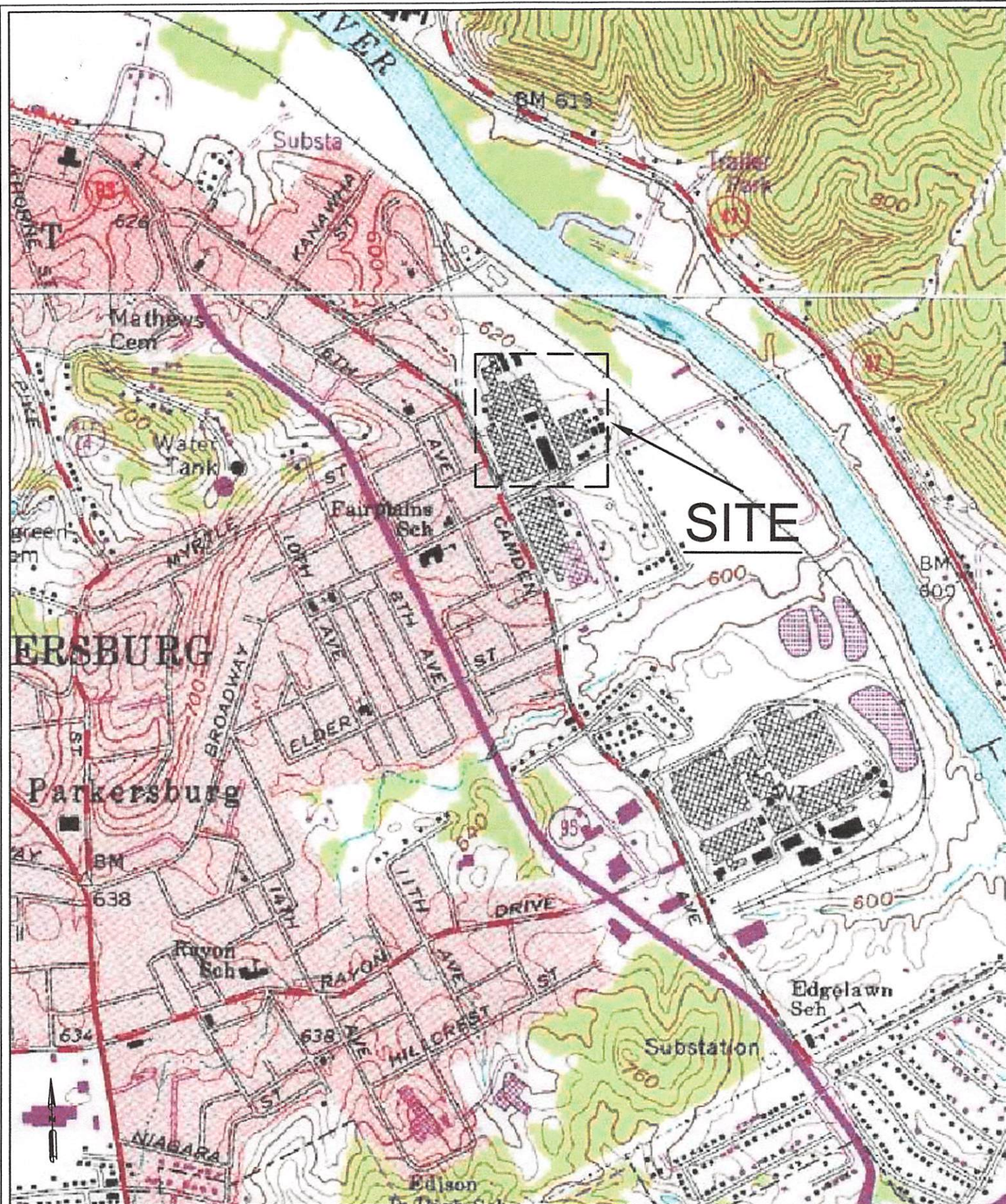


Figure No.

3



TOPOGRAPHIC MAP

INTERCONTINENTAL EXPORT IMPORT, INC. - PLANT #1
3801 CAMDEN AVENUE
PARKERSBURG, WOOD COUNTY, WEST VIRGINIA

Drawn by: JV
Revised by:
Date: 11/10/2017
Scale: NTS



Mr. Ryan Harbison
Environmental Inspector Supervisor
Water and Waste Management
WVDEP
601 57th Street, SE
Charleston, WV 25304

November 17, 2017

RE: Response to Comments - Plan of Corrective Action and Schedule
Intercontinental Export Import, Inc. Plant Number 1
WV/NPDES Permit No. WV0003204 – Order No. 8779

Mr. Harbison,

On behalf of Intercontinental Export Import, Inc. (IEI) Gator Engineering and Aquifer Restoration, Inc. (GEAR) has prepared the attached Addendum to the Corrective Action Plan and Schedule associated with the above referenced permit and order. In particular Item Number 4 on Page 6 of Order No. 8779. Your comments dated November 14, 2017 are attached for ease of reference.

Please don't hesitate to contact me if you have any questions or concerns. GEAR and IEI look forward to working closely with the WVDEP to satisfy Order 8779.

Sincerely,

Brian A. Richards
Professional Geologist
Gator Engineering & Aquifer Restoration, Inc.
Cell: 352 409 1606

cc:

Dr. Saurabh Naik, President and CEO, IEI, 8815 Center Park Drive, Columbia, MD. 21045
Mr. Sunny Naik, Product Development, 8815 Center Park Drive, Columbia, MD. 21045
Mr. Jeremy W. Bandy, Chief Inspector, Environmental Enforcement, WVDEP
Mail Code: #031328, 601 57th Street SE, Charleston, WV. 25304



ADDENDUM I

RESPONSE TO WEST VIRGINIA DEP COMMENTS DATED NOVEMBER 14, 2017

for

IEI PLANT NO. 1 PLAN OF CORRECTIVE ACTION DATED NOVEMBER 13, 2017

WV/NPDES Permit Number WV0003204 – ORDER No. 8779

Comment No. 1 – 1.0 Introduction

In reference to the last statement in the introduction of the plan where it states “It should be emphasized that this plan is a living document and may change throughout the course of the site cleanup as conditions change such as inclement weather or other unforeseen circumstances.”, please provide clarification that the agency will be made aware of any changes in the submitted plan and its schedule in writing as a potential modification of the plan

Response No. 1

Agree. The West Virginia DEP will be notified in writing of any changes to the submitted plan and its schedule. The modification to the plan will be implemented only after written approval from the West Virginia DEP.

Comment No. 2 – 2.04 Collected Storm Water Disposal

This section needs clarification on how all storm water flow that discharges from Outfalls #001 and #004 will be addressed. As we have stated during our recent conversations, there is no reliable source of information of the locations of drains located on the property that all transport storm water flow to these two outfalls. Since storm water flow discharging from the site is of utmost concern, the flow from these two outfalls needs to be contained and stored onsite with all other collected storm water from the site.

This section also states that if the collected storm water exceeds one or more of the WV/NPDES water quality criteria and meets the Parkersburg Utility Board requirements it will be discharged into a sanitary sewer manhole. Has the Parkersburg Utility Board given permission to discharge the collected storm water into their collection system?



Response No. 2

We agree that all the storm water, including storm water from Outfalls #001 and #004, will be collected and contained onsite prior to analysis/discharge. The Outfall #004 pipe will be plugged at the outfall forcing this storm water to collect within the storm water barrier berm. We plan to plug this pipe at the beginning of berm construction and monitor storm water discharge across the site. If necessary, we plan to extend the berm to direct any storm water from this drainage system to flow toward the newly installed collection sump.

The discharge from Outfall #001 will also be plugged at the outfall. Water entering the existing oil/water separator will be collected from the separator and pumped into a newly installed frac tank adjacent to the separator. Water from this frac tank will then be pumped into the collection sump frac tank. All storm water collected from the site will be routed to the collection sump frac tank.

Once full, the storm water in the collection sump frac tank will be sampled and analyzed for the stipulated NPDES water quality parameters. If the frac tank storm water meets WV/NPDES water quality criteria, Outfall #001 will be unplugged and the collected water will be discharged to Outfall #001. If the water exceeds one or more water quality criteria, it will either be discharged to the Parkersburg sanitary sewer, or treated onsite prior to discharge to Outfall #001.

Discussions are currently underway with Utility Manager, Eric Bennet, of the Parkersburg Utility Board pertaining to conditions required for discharge to the sanitary sewer. No storm water will be discharge to the sanitary sewer without the permission of the Parkersburg Utility Board.

Comment No. 3 – 3.02 Initial Burnt Waste Characterization Sampling

The second sentence in this section states “A total of six grab samples will be taken at various ash locations and submitted to a certified laboratory for TCLP analysis of the 8 RCRA metals and others that may be required by Waste Management, Inc. for waste characterization. Due to the large footprint and size of the building, we recommend a grab sample be collected from each of the sections listed on the attached map of the facility.

Response No. 3

Agree. A grab sample will be obtained from each of the sections listed on the attached map of the facility.

Additionally, at your request, Gator Engineering and Aquifer Restoration, Inc. (GEAR) initiated discussions with Jeff Hedgecock, Asbestos Program Manager of the WVDEP Division of Air Quality pertaining to the possible presence of asbestos containing materials in the burnt debris at the site.



Mr. Hedgecock has reviewed all asbestos abatement statements currently on record with the WVDEP. Mr. Hedgecock shared these documents with GEAR on November 15, 2017. IEI, Inc. also presented these documents to GEAR on November 14, 2017. Mr. Hedgecock agreed to be onsite during the initial waste characterization event. If directed by Mr. Hedgecock, asbestos samples will be collected for analysis and characterization. In the event asbestos containing material is encountered, the asbestos containing material will be collected, contained and properly disposed of by a WV licensed asbestos contractor.

Comment No. 4 – 3.04 Burnt Waste Disposal Plan

What considerations have been taken if any of the sampled material is determined to be hazardous waste. Where would that material be disposed of?

Response No. 4

If some of the burnt waste is determined to be hazardous because of the characteristic of EP toxicity, it will be mixed with other burnt waste that is not characteristic hazardous waste. If the mixture is tested to be nonhazardous by EP toxicity, then it can be disposed in a Subtitle D sanitary landfill (i.e. Waste Management). This waste handling process is allowed under the RCRA Mixture Rule for characteristic hazardous waste as referenced in 40 CFR 261.3 of the Federal Register.

If the waste mixture still tests as hazardous waste by EP toxicity, it would have to be transported to a secure hazardous waste landfill. At this time, the closest secure hazardous waste landfill is the MAX Environmental Technologies facility located in Pittsburgh, Pa.

Comment No. 5 – 3.07 Burnt Waste Excavation, Transport and Disposal

This section needs additional information on what steps will be taken to ensure that the material that is removed from the site will not be lost during the transport to the local landfill

Response No. 5

Each truckload will have a manifest that will be signed at the site and at the landfill. The manifests for each truckload will be collected and reconciled daily. Also, the trucks that will be hauling the waste are owned by Waste Management, Inc. and the waste will be disposed of at a Waste Management, Inc. landfill. This should provide additional assurance that the waste is transported and disposed properly.

From: Harbison, Ryan T <Ryan.T.Harbison@wv.gov>
Sent: Tuesday, November 14, 2017 3:51 PM
To: Brian@gearengineer.com
Cc: Bandy, Jeremy W; Simmons, David C; Parsons, Glenda M
Subject: Comments/Questions Concerning submitted Plan of Corrective Action for IEI Plant #1
Attachments: Ryan Harbison.vcf; SKM_454e17111415380.pdf

Brian,

After having the opportunity to sit down and read through the Plan of Corrective Action and Schedule concerning Order #8779, that you submitted to Jeremy Bandy and myself yesterday afternoon, I had some comments and questions regarding the submitted plan. I have listed these comments and questions below.

1.0 Introduction

- In reference to the last statement in the Introduction of the plan where it states "It should be emphasized that this plan is a living document and may change throughout the course of the site cleanup as conditions change such as inclement weather or other unforeseen circumstances", please provide clarification stating that the agency will be made aware of any changes to the submitted plan and its schedule in writing as a potential modification of the plan.

2.04 Collected Storm Water Disposal

- This section needs clarification on how all storm water flow that discharges from Outfalls #001 and 004 will be addressed. As we have stated during our recent conversations, there is no reliable source of information of the locations of drains located on the property that will transport storm water flow to these two outfalls. Since storm water flow discharging from the site is of utmost concern, the flow from these two outfalls needs to be contained and stored onsite with all other collected storm water from the site.
- This section also states that if the collected storm water exceeds one or more of the WV/NPDES water quality criteria and meets the Parkersburg Utility Board requirements it will be discharged into a sanitary sewer manhole. Has the Parkersburg Utility Board given permission to discharge the collected storm water into their collection system?

3.02 Initial Burnt Waste Characterization Sampling

- The second sentence in this section states "A total of six grab samples will be taken at various ash locations and submitted to a certified analytical laboratory for TCLP analysis for the 8 RCRA metals and others that may be required by Waste Management, Inc. for waste characterization." Due to the large footprint and size of the building, we recommend a grab sample be collected from each of the sections listed on the attached map of the facility.

3.04 Burnt Waste Disposal Plan

- What considerations have been taken if any of the sampled material is determined to be hazardous waste, Where would that material be disposed of?

3.07 Burnt Waste Excavation, Transport and Disposal

- This section needs additional information on what steps will be taken to ensure that the material that is removed from the site will not be lost during the transport to the local landfill.

Please let me know if you have any questions regarding my comments and questions above.

Thanks,
Ryan

Ryan Harbison
Environmental Protection
Environmental Inspector Supervisor
Water and Waste Management

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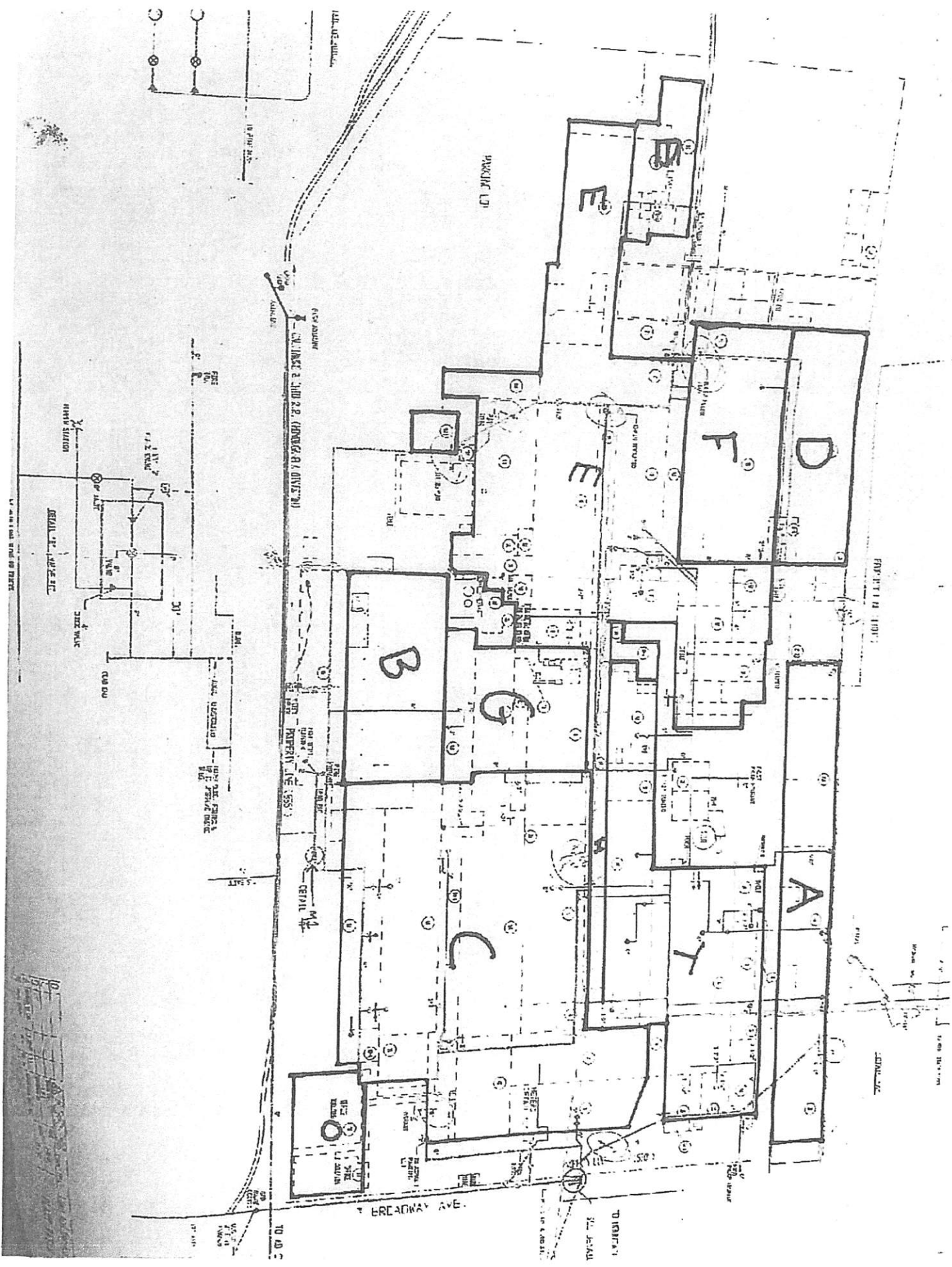


FIGURE 101

DETAIL A

DETAIL B

DETAIL C

DETAIL D

DETAIL E

DETAIL F

DETAIL G

DETAIL H

DETAIL I

DETAIL J

DETAIL K

DETAIL L

DETAIL M

DETAIL N

DETAIL O

DETAIL P

DETAIL Q

DETAIL R

DETAIL S

DETAIL T

DETAIL U

DETAIL V

DETAIL W

DETAIL X

DETAIL Y

DETAIL Z

DETAIL AA

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Mr. Ryan Harbison
Environmental Inspector Supervisor
Water and Waste Management
WVDEP
601 57th Street, SE
Charleston, WV 25304

November 27, 2017

RE: Addendum II to Plan of Corrective Action and Schedule
Intercontinental Export Import, Inc. Plant Number 1
WV/NPDES Permit No. WV0003204 – Order No. 8779

Mr. Harbison,

Please accept this letter as Addendum II to the above referenced Corrective Action Plan and Schedule. Thank you for your recent determination pertaining to rule 40 CFR 264.340 (c), which references the process of mixing hazardous waste with non-hazardous prior to treatment (see attached email for reference). EIE, Inc. and GEAR agree with your determination. If any of the waste at IEI Plant #1 is determined to be hazardous waste, this material will be managed in accordance with applicable hazardous waste requirements.

Please don't hesitate to contact me if you have any questions. GEAR and IEI look forward to working closely with the WVDEP to satisfy Order 8779.

Sincerely,

Brian A. Richards
Professional Geologist
Gator Engineering & Aquifer Restoration, Inc.
Cell: 352 409 1606

cc:
Dr. Saurabh Naik, President and CEO, IEI, 8815 Center Park Drive, Columbia, MD. 21045
Mr. Sunny Naik, Product Development, 8815 Center Park Drive, Columbia, MD. 21045

From: **Harbison, Ryan T** Ryan.T.Harbison@wv.gov
Subject: **Mixture Rule Determination**
Date: **November 24, 2017 at 10:28 AM**
To: **Brian Richards (Brian@gearengineer.com)** Brian@gearengineer.com
Cc: **Bandy, Jeremy W** Jeremy.W.Bandy@wv.gov, **Simmons, David C** David.C.Simmons@wv.gov, **Gatens, Christopher M** Christopher.M.Gatens@wv.gov, **McGee, Laura E** Laura.E.McGee@wv.gov, **Sizemore, Joe M** Joe.M.Sizemore@wv.gov, **Parsons, Glenna M** Glenna.M.Parsons@wv.gov

Brian,

WVDEP has reviewed the attached mixture rule document and have determined that the rule you referenced concerning the sampling and characterization of the waste at the IEI Plant #1 is not applicable in this situation. The attached rule 40 CFR 264.340 (c), which references the process of mixing hazardous waste with non-hazardous, applies to owners and operators of hazardous waste incinerators (see 40 CFR 264.340(a)) and is not applicable to the remedial efforts associated with the IEI warehouse fire.

Please refer to 40 CFR 268.3 which prohibits diluting waste as a substitute for proper treatment. If any of the waste at the IEI Plant #1 is determined to be hazardous waste, this material will need to be managed in accordance with applicable hazardous waste requirements.

Please make the necessary changes/corrections to the submitted Plan of Corrective Action and Schedule, and resubmit it for review. If you have any questions, do not hesitate to contact me.

Thanks,
Ryan

<p>Ryan Harbison Environmental Protection Environmental Inspector Supervisor Water and Waste Management</p> <p>(304) 926-0499 ext. 3803 Office (304) 767-4247 Mobile Ryan.T.Harbison@wv.gov 601 57th Street SE Charleston, WV 25304</p>	
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Ryan
Harbison.vcf



Mixture Rule.pdf