

Mike DeWine, Governor Jon Husted, Lt. Governor Laurie A. Stevenson, Director

September 17, 2021

Olymbec USA LLC c/o B. Venky Venkatesh, CHMM Senior Project Director EnSafe, Inc. 525 Vine Street, Suite 1755 Cincinnati, OH 45202 Re: Closed Loop Refining &
Recovery/Closed Loop Glass Solutions
Technical Assistance
Correspondence
RCRA C – Hazardous Waste
Franklin County
OHR000201145

Subject: Final Closure Report for 2200 Fairwood Avenue, Columbus, Ohio

Dear Mr. Venkatesh:

On September 23, 2020, Olymbec USA LLC (Olymbec) voluntarily submitted to the Ohio Environmental Protection Agency (Ohio EPA) a clean-up plan for the former Closed Loop Refining & Recovery, Inc./Closed Loop Glass Solutions, LLC facility located at 2200 Fairwood Avenue, Columbus, Ohio (the "Closed Loop Facility"). Olymbec gave the public the opportunity to submit written comments regarding the clean-up plan via notification on Ohio EPA's website and publication in the Columbus Dispatch, and subsequently revised the plan accordingly.

On November 3, 2020, Ohio EPA notified Olymbec that, based on our review of the clean-up plan and subsequent submittals, Ohio EPA believed that they addressed the administrative requirements of Ohio Administrative Code (OAC) Chapters 3745-65 and 3745-66 and the substantive requirements of OAC Chapters 3745-54 and 3745-55 and were consistent with 40 C.F.R. Part 300 of the U.S. Environmental Protection Agency National Contingency Plan (NCP).

On August 19, 2021, Ohio EPA received a final cleanup report from B. Venky Venkatesh, CHMM, with EnSafe Inc. ("EnSafe"). Mr. Venkatesh was the On-Scene Coordinator for the closure activities and removal action at the Closed Loop Facility. Olymbec, as the property owner, and EnSafe's Michael Johnson, a registered Ohio Professional Engineer, each certified that the Closed Loop Facility has been cleaned up according to the specifications in the clean-up plan and the substantive requirements of OAC rules 3745-55-11 through 3745-55-15. Clean up of the Closed Loop Facility was accomplished by the removal of cathode ray tubes (CRTs) and CRT-related materials from the warehouse and abatement and off-site management of lead-containing dust inside the warehouse.

To verify the cleanup activities at 2200 Fairwood Avenue, Andy Maneff from Ohio EPA's Central District Office, conducted several inspections during the closure activities and removal action, including a final inspection on July 14, 2021. He also reviewed documents

pertaining to the clean-up activities and determined that the activities proposed in the cleanup plan were conducted adequately.

Based on this inspection and review, Ohio EPA concurs that Olymbec has conducted activities in the warehouse at 2200 Fairwood Avenue according to the clean-up plan and the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11 through 3745-55-15.

Please be advised that Olymbec's compliance with the clean-up plan does not discharge Olymbec from any other obligations to investigate and possibly clean up contamination from all releases of hazardous waste or hazardous constituents at the Closed Loop Facility, regardless of when the waste was placed in the unit. This requirement is known as RCRA Corrective Action. Ohio EPA expressly reserves the right to take action against Olymbec pursuant to Chapter 3734 of the Ohio Revised Code and other applicable law to enforce compliance with the State of Ohio's hazardous waste laws and rules.

If you have any questions concerning the closure process or the status of the Facility, please contact Andy Maneff by phone at (614) 728-3884.

Sincerely,

Melisa Witherspoon, Chief

Division of Environmental Response and Revitalization

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