



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

August 5, 2016

Mr. Steven L. Renninger
On-Scene Coordinator
U.S. EPA Region 5
Emergency Response Branch
26 W Martin Luther King Drive
Cincinnati, Ohio 45268

**Re: Terry Corp
Remediation Response
Correspondence
RCRA C - Hazardous Waste
Montgomery County
OHR000201541**

Subject: ARARs for U.S. EPA Time Critical Removal

Dear Mr. Renninger:

In a letter dated August 5, 2016, you requested that Ohio EPA identify any State applicable or relevant and appropriate requirements (ARARs) which apply to the removal action USEPA plans to take at the Terry Corp Site in Dayton, Ohio. The following list provides the ARARs identified by Ohio EPA's Hazardous Waste Program based on what we currently know about planned activities at the site. This list does not identify ARARs for any of the other state regulatory programs.

Ohio Administrative Code Sections:

1. **3745-51-07:** Residues of hazardous waste in empty containers
2. **3745-52-11:** Hazardous waste determination requirements for generators
3. **3745-52-20 through 23:** Manifest requirements for hazardous waste shipments
4. **3745-52-30 through 33:** Pre-transport and transport requirements
5. **3745-52-34:** Accumulation time for hazardous waste
6. **3745-54-14:** Security requirements for hazardous waste facilities
7. **3745-54-16:** Personnel training requirements for hazardous waste management
8. **3745-54-17:** Requirements for ignitable, reactive, or incompatible wastes
9. **3745-54-30 through 37:** Preparedness and prevention requirements
10. **3745-54-50 through 56:** Contingency plan and emergency procedures
11. **3745-54-101:** Corrective action for waste management units
12. **3745-55-11 through 19:** Closure and post-closure requirements
13. **3745-55-71 through 78:** Use and management of containers
14. **3745-270:** Land disposal restrictions
15. **3745-279:** Used oil management standards

Sincerely,

A handwritten signature in cursive script that reads "Cathy L. Altman".

Cathy L. Altman, SWDO, HW-DERR

ec: George Strobel, SWDO HW-DERR
Dave Combs, SWDO, SIU