



November 1, 2017

CERTIFIED MAIL NO: 9171 9690 0935 0150 2200 58

Kristin J. Pelizza, Environmental Programs Manager
National Standard, LLC
27501 Bella Vista Parkway
Warrenville, IL 60555-1609

Re: Class 1 Permit Modification
National Standard, LLC
Mount Joy Facility
ID No. PAR000514182
APS ID No. 918842
Mount Joy Borough, Lancaster County

Dear Ms. Pelizza:

Enclosed is a Class 1 Permit Modification to Solid Waste Permit No. PAR000514182 for the following changes to the Post Closure Permit issued April 25, 2008:

1. Change existing permit requirements for the groundwater abatement system as specified by the April 25, 2008 Post Closure Permit, Part III, Section C Abatement Program to allow for:
 - Continuous pumping of Well WQMP-4A to approximately 40-50 gpm as a single recovery well and allow beneficial reuse of the pumped groundwater at the Mount Joy Wire (MJW) facility as process water.
 - Discontinue operation of WQMP-6 due to low yield.
 - Installation of a remote monitoring system to monitor the recovery system.
2. Minor changes to Part III, B. of the permit (Monitoring Parameters) and Part III, G. (Reporting, Recordkeeping, and Response)
3. PADEP minor administrative changes to correct the facility Latitude and Longitude referenced on page 1 of the April 25, 2008 permit from Latitude 40°05'35" North and Longitude 79°25'29" West to the correct coordinates of Latitude 40°06'31" North and Longitude -76°28'42" West; correct reference (page 3, G. of the permit) from Rapho Township to Mount Joy Borough; and deletion of reference to 30-day submission (page 8, I. of the permit) as this requirement has been satisfied.

This permit modification is issued in accordance with Article V of the Solid Waste Management Act, 35 P.S. Sections 6018.101, et seq.

Compliance with the terms and conditions set forth in the permit is mandatory. Please note that issuance of this permit does not eliminate the necessity to comply with all federal, state, or local requirements at the permitted facility. You have the right to file an appeal as to these terms and conditions.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa. C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, PO Box 8457, Harrisburg, PA 17105-8457, 717.787.3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800.654.5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717.787.3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions about the enclosed permit or requirements of the Solid Waste Management Act, please call John Oren, Permits Section Chief at 717.705.4907.

Sincerely,



Anthony L. Rathfon
Program Manager
Waste Management Program

Enclosure

cc: Maureen Essenthier, EPA Region 3-Office of PA Remediation (w/enclosure)
Barbara R. Helbig, P.E., GHD (w/enclosure)
Jackson Edwards, Mount Joy Wire Corporation
Lancaster County Planning Commission (w/enclosure)
Mount Joy Borough (w/enclosure)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTE MANAGEMENT PROGRAM
SOUTHCENTRAL REGION

FORM NO. 13-A

MODIFICATION TO SOLID WASTE DISPOSAL AND/OR PROCESSING PERMIT

Under the provisions of Act 97, the Solid Waste Management Act of July 7, 1980, as amended, Solid Waste Permit Number PAR000514182, issued on April 25, 2008 to:

National Standard, LLC
Mount Joy Site
Latitude 40°06'31" North and Longitude -76°28'42" West
Mount Joy Borough, Lancaster County

is hereby modified as follows:

- Change existing permit requirements for the groundwater abatement system as specified by the April 25, 2008 Post Closure Permit, Part III, Section C Abatement Program to allow for:
 - Continuous pumping of Well WQMP-4A to approximately 40-50 gpm as a single recovery well and allow beneficial reuse of the pumped groundwater at the Mount Joy Wire (MJW) facility as process water.
 - Discontinue operation of WQMP-6 due to low yield.
 - Installation of a remote monitoring system to monitor the recovery system.
- Minor changes to Part III, B. of the permit (Monitoring Parameters) and Part III, G. (Reporting, Recordkeeping, and Response)
- PADEP minor administrative changes to correct the facility Latitude and Longitude referenced on page 1 of the April 25, 2008 permit from Latitude 40°05'35" North and Longitude 79°25'29" West to the correct coordinates of Latitude 40°06'31" North and Longitude -76°28'42" West; correct reference (page 3, G. of the permit) from Rapho Township to Mount Joy Borough; and deletion of reference to 30-day submission (page 8, I. of the permit) as this requirement has been satisfied.

This modification shall be attached to the existing Solid Waste Permit described above and shall become a part thereof effective on November 1, 2017.



FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

National-Standard, LLC
National-Standard RCRA Surface Impoundment
Permit No. PAR000514182
Mount Joy Borough, Lancaster County
November 1, 2017
Page 2 of 3

This Permit Modification No. 1 is based upon the following permit application documents:

1. Application for Class 1 permit modification submitted by Kristin J. Pelizza of National-Standard LLC dated June 10, 2016 and received by the Department on June 30, 2016 consisting of:
 - a. Cover Letter from National-Standard LLC to the Department dated June 10, 2016
 - b. Attachment 1 – Description of Class 1 Permit Modification and Supporting Documents
 - c. Attachment 2 – National Standard Post Closure Permit, April 25, 2008
 - d. Attachment 3 – Location Maps – Figures 1 and 2
 - e. Attachment 4 – PADEP General Information Form
 - f. Attachment 5 – PADEP Form HW-B – (Professional Certification)
 - g. Attachment 6 - PADEP Form HW-C (Compliance History)
 - h. Attachment 7 – Notification to State and Local Government
2. National-Standard response to the Department's July 13, 2016 review comments (conveyed to National Standard via email), which were received by the Department via email on July 14, 2016 and via postal service on July 19, 2016, consisting of:
 - a. Updated cover letter page 1
 - b. Attachment 1 Revised page 2 (revised July 2016)
 - c. Attachment 3 Revised Figure 1 (revised July 2016)
 - d. Attachment 4 Updated page 2 - General Information Form
 - e. Attachment 6 Updated pages 1-3 – Form HW-C Compliance History Form
3. National-Standard response to the Department's July 21, 2016 email request regarding revisions to the Preparedness, Prevention and Contingency Plan for National Standard Company Mt. Joy Wire – Impoundment (July 25, 2016), which were received by the Department via email on August 5, 2016 and via postal service on August 9, 2016.

National-Standard, LLC
National-Standard RCRA Surface Impoundment
Permit No. PAR000514182
Mount Joy Borough, Lancaster County
November 1, 2017
Page 3 of 3

PERMIT CONDITIONS:

1. The following Parts of the original permit, issued April 25, 2008, are hereby revised to reflect changes made in permit conditions and/or attachments as a result of this Class 1 permit modification and minor administrative corrections to the permit. Revised pages of the original permit are attached and will hereby replace those pages in the permit of April 25, 2008:
 - Signature Page of the April 25, 2008 permit (new page 1 – administrative correction to latitude and longitude)
 - Part I, G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE (new page 3 – administrative correction to delete Rapho Township and add Mount Joy Borough)
 - Part II, I. Bonding Requirement (new page 8 - administrative correction to delete requirement to put in place a bond within 30 days as this has already been completed.)
 - Part III, B. MONITORING PARAMETERS (new pages 9, 10, 11)
 - Part III, C. ABATEMENT PROGRAM (new pages 11 and 12)
 - Part III, G. REPORTING, RECORDKEEPING, AND RESPONSE (new pages 13 and 14)
 - List of Attachments (new page 15)
2. All other permit conditions of the April 25, 2008 post closure permit shall remain in effect.
3. Nothing herein shall be construed to supersede, amend or authorize violation of the provisions of any valid and applicable local law ordinance, or regulation, provided that said local law, ordinance or regulation is not preempted by the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. § 6018.101, et seq.

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PERMIT
FOR HAZARDOUS WASTE FACILITY POST-CLOSURE**

Permittee: National-Standard, LLC Permit Number: PAR000514182

Facility: Mount Joy Site, Mount Joy Borough, Mount Joy, PA, Lancaster County

This post-closure permit is issued by the Commonwealth of Pennsylvania Department of Environmental Protection (DEP) under authority of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. Section 6018.101 et seq. (the Act) and DEP hazardous waste regulations to National-Standard, LLC (hereafter called the Permittee), to perform post-closure monitoring and care at the hazardous waste management facility located in Mount Joy Borough, Mount Joy, PA, Lancaster County, at Latitude 40°06'31"North and -Longitude -76°28'42" West.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (Parts I - III, consisting of pages 1 through 15 and Attachments 1 through 6) and the applicable regulations contained in 25 Pa. Code Chapters 260a-270a as specified in the permit.

This post-closure permit is based on the assumption that the information submitted in the post-closure permit application attached to the Permittee's letter dated March 23, 1990, as modified by subsequent amendments dated December 18, 1990; April 13, 2004; September 30, 2005; October 20, 2005; May 5, 2006; October 4, 2006; December 22, 2006; January 8, 2007; January 22, 2007, and October 19, 2007 email to the Department and October 19, 2007 correspondence (hereafter referred to as the application) is accurate and that the facility will be monitored and maintained as specified in the application. Any inaccuracies found in this information may be grounds for the revocation or modification of this permit and potential enforcement action. The Permittee must inform DEP of any deviation from or changes in the information in the application that would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This post-closure permit is conditioned upon full compliance with all applicable provisions of the Act; DEP regulations contained in 25 Pa. Code Chapter 260a-270a and 40 CFR 260-270; The Clean Streams Law, 35 P.S. 691.1 et seq.; the Air Pollution Control Act, 35 P.S. 4001 et seq.; the Dam Safety and Encroachments Act, 32 P.S. 693.1 et seq.; the Surface Mining Conservation and Reclamation Act, 52 P.S. 1396.1 et seq.; the Coal Refuse Disposal Control Act, 52 P.S. 30.51 et seq.; all other Pennsylvania statutes related to the protection of the environment; and all Pennsylvania statutes related to the protection of public health, safety, and welfare. Violation of any of these laws and regulations is ground for enforcement action including but not limited to permit revocation.

Where reference is made herein to specific regulatory or statutory sections, such references shall be to the applicable regulatory or statutory sections as amended either in content or citation.

This post-closure permit is effective as of April 25, 2008, and shall remain in effect until April 24, 2018, unless revoked and reissued, or terminated in accordance with 25 Pa. Code 270a.41, 270a.42, 270a.43 and 40 CFR 270.41, 270.42, and 270.43 or continued.



Waste Management Program Manager

PART I - STANDARD CONDITIONS

A. EFFECT OF PERMIT

This post-closure permit authorizes only the facility monitoring and care expressly described in this post-closure permit and does not authorize any other management of hazardous waste. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations. Compliance with the terms of this post-closure permit does not constitute a defense to any action brought under the Act or any other law governing protection of public health or the environment.

B. POST-CLOSURE PERMIT ACTIONS

This post-closure permit may be modified, revoked and reissued, terminated for cause as specified in 25 Pa. Code 270a.41, 270a.42, and 270a.43, and 40 CFR 270.41, 270.42 and 270.43 or suspended in accordance with the Act. The filing of a request for a post-closure permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay or supersede the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this post-closure permit are severable, and if any provision, of this post-closure permit or the application of any provision of this post-closure permit to any circumstance is held to be invalid, the application of such provision to other circumstances and the remaining provisions of this post-closure permit shall not be affected thereby.

D. DEFINITIONS

For the purpose of this permit, terms used herein shall have the same meaning as those in Title 25 of the Pennsylvania Code (25 Pa. Code Chapter 260a-270a), unless this post-closure permit specifically states otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally, accepted scientific or industrial meaning of the term. "The Department" is the Department of Environmental Protection of the Commonwealth of Pennsylvania.

E. REPORTS, NOTIFICATIONS AND SUBMISSIONS TO THE DEPARTMENT

All reports, notifications or other submissions that are required by this post-closure permit to be sent or given to the Department should be sent certified mail or hand delivered to:

Southcentral Region - Facilities Manager
Waste Management Program – Field Operation
909 Elmerton Avenue
Harrisburg, PA 17110

F. SIGNATORY REQUIREMENTS

All reports or other information requested by the Department shall be signed and certified as required by 40 CFR 270.11.

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

The Permittee shall maintain at the Mt Joy Wire facility located in Mt Joy Borough, Mt Joy, PA, Lancaster County, until post-closure is completed, the following documents and amendments, revisions and modifications to these documents:

1. Post-closure plan required by 40 CFR 264.118 (a) and (b) and this permit.
2. Contingency plan required by 40 CFR 264.53(a) and this permit.
3. Inspection schedules and logs required by 25 Pa. Code 264a.15 and 40 CFR 264.15(b)(1) and (2) and this permit.
4. Documents required by Part I, Sections H.13, and H.14, and Part II, Section G of this permit.

H. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this post-closure permit. Any permit noncompliance constitutes a violation of the Act and the regulations promulgated thereunder and is grounds for enforcement action; including but not limited to permit revocation, revocation and reissuance, modification, and/or the imposition of fines and penalties.
2. Duty to Reapply. The Permittee must submit a complete application for a new permit at least 180 days before this permit expires.
3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application and through no fault of the Permittee, the Department has not issued a new permit.
4. Duty to Mitigate. The permittee shall take all necessary steps to prevent and abate any releases to the environment, and shall carry out such measures as are necessary to prevent significant adverse impacts on human health or the environment.
5. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and controls used by the Permittee to achieve compliance with the Act, the regulations, and the conditions of this permit. Proper operation and maintenance shall at a minimum include effective performance, adequate funding, and adequate operator training.
6. Duty to Provide Information. The Permittee shall furnish to the Department within the time specified by the Department, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or revoking this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by the Permittee pursuant to the Act, the regulations, or any permit condition.

7. Inspection and Entry. The Permittee shall allow the Department, its agents and authorized representatives to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records concerning the regulated facility or activity are kept;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the Act, the regulations, or this permit;
- d. Sample or monitor any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by the Act or the regulations; and
- e. Engage in any other activities necessary or appropriate to the documentation of events or conditions at any locations.

8. Monitoring and Records.

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from 40 CFR 261 Appendix I or an equivalent method approved by the Department. Laboratory methods must be those specified in 40 CFR 261 Appendix III; Test Methods for Evaluating Solid Waste: Physical/Chemical Methods (U.S. EPA Document SW-846); most current edition of Standard Methods of Waste Water Analysis; or an equivalent method approved in writing by the Department.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by the Act, the regulations, or this permit, and all records of all data used to complete the application for this permit for a period of at least three (3) years from the date of the sample, measurement, report or record, or application. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- c. The Permittee shall maintain records of all groundwater quality and groundwater surface elevations collected during the active life of the facility and during the post-closure care period as well.
- d. The Permittee shall, at a minimum, keep monitoring records that include the following information:

- (1) The dates, exact place, and times of sampling or measurements;
 - (2) The individuals who performed the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The individuals who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
9. Reporting Planned Changes. The Permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the post-closure permitted facility. This notice must include a description of all incidents of noncompliance reasonably expected to result from the proposed changes. The Permittee shall not modify the closed facility without first obtaining a permit modification or written approval from the Department.
10. Anticipated Noncompliance. The Permittee shall give advance notice to the Department of any planned changes in the post-closure permitted facility or activity that may result in noncompliance with permit requirements.
11. Transfer of Permits. This post-closure permit shall not be transferred or assigned to any other person or municipality. Any transfer of a permit in violation of this paragraph or the rules and regulations of the Department shall be null and void and automatically revoke that permit.
12. Twenty-Four Hour Reporting. The Permittee shall report to the Department any noncompliance with the Act, the regulations, or any condition of this post-closure permit or any occurrence or event at the facility that may endanger health or the environment.
- a. Information shall be provided orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
 - (1) Information concerning release or potential release of any hazardous waste from the facility that may endanger public drinking water supply sources.
 - (2) Any information of a release, potential release, or discharge of hazardous waste from the facility, or information of a potential or actual fire or explosion at the facility, which may threaten the environment or human health.
 - b. The description of the occurrence and its cause shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;

- (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazards to the environment and human health at or near the facility; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided to the Department within five (5) days of the time the Permittee becomes aware of the occurrence. The written submission shall contain a description of the noncompliance and its cause; the period of non-compliance (including exact dates and times); if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
13. Other Noncompliance. The Permittee shall report to the Department all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports are submitted. The reports shall contain the information listed in permit condition Part I, Section H.12.
14. Other Information. Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Department, or whenever the Permittee becomes aware of circumstances which require a modification or clarification of any fact or representation made to the Department in connection with a permit application, it shall promptly submit such facts or information to the Department.

PART II - GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY

The Permittee shall maintain the facility to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater.

B. POST-CLOSURE

1. Monitoring and Maintenance. The Permittee shall monitor and maintain the facility as required by 40 CFR 264.117(d), 40 CFR 264.118(a) and (b), [40 CFR 264.280(c), 40 CFR 264.310] and in accordance with the post-closure plan, Attachment 1.
2. Amendment to Post-Closure Plan. The Permittee shall amend the post-closure plan in accordance with 40 CFR 264.118(a) and (d) whenever necessary.

C. SECURITY

The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and 264.14(c).

D. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection plan set out in the inspection schedule, Attachment 2. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

E. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

1. Implementation of PPC Plan. The Permittee shall immediately carry out the provisions of the PPC plan, Attachment 3, and follow the emergency procedures described by 25 PA. Code 264a.56 and 40 CFR 264.56 whenever there is a fire, explosion, emission or discharge of hazardous waste or hazardous waste constituents that could threaten human health or the environment
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the PPC plan, as required by 40 CFR 264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55.
5. Emergency Procedures. The Permittee shall comply with the requirements, of 25 Pa. Code 264a.56 and 40 CFR 264.56.

F. RECORDKEEPING AND REPORTING

Required Reports. The Permittee shall comply with all applicable reporting requirements, as described in Part I, Sections E, F, H.6, H.9, H.10, H.12, H.13, and H.14, and Part II, Sections H, I, J, and K of this permit.

G. CLOSURE

Certification of Closure. The Permittee shall maintain at the facility a copy of the certification that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115 and 25 Pa. Code 264a.115.

H. COST ESTIMATE FOR FACILITY CLOSURE POST-CLOSURE CARE

1. Annual Adjustment. The Permittee shall adjust the post-closure cost estimate for inflation, and submit a copy to the Department within 30 days after each anniversary of the date on which the first cost estimate was made as required by 40 CFR 264.144(b).
2. Adjustment for Changed Conditions. The Permittee shall revise the cost estimate whenever there is a change in the facility's post-closure plan or in the measures necessary to prevent adverse effects upon the environment as required by 40 CFR 264.144(c).
3. Incapacity of Permittee or Financial Institutions. The Permittee shall comply with 40 CFR 264.148 and 25 Pa. Code 264a.148 whenever necessary.

I. BONDING REQUIREMENT

The Permittee shall maintain the bond submitted to and approved by the Department as required by 25 Pa. Code 264a.153 and 40 CFR 264.147(e). The Permittee shall comply with all applicable bond replacement requirements of 25 Pa. Code 264a.158.

J. LIABILITY INSURANCE

The Department may determine at any time after permit issuance that the Permittee may be required to submit proof of insurance or an application for insurance pursuant to 40 CFR 264.147(e).

K. NOTICE TO LOCAL LAND AUTHORITY AND DEED RECORDATION

The Permittee shall submit to the Department and to the municipality in which the facility is located a survey plat indicating the location and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks in accordance with 40 CFR 264.119(a).

In addition, the Permittee shall submit to the municipality and to the Department a record of the type, location, and quantity of hazardous waste disposed of within each cell or area of the facility in accordance with 40 CFR 264.119(b).

In addition, the Permittee shall record a notation on the deed to the facility property or on some other instrument which is normally examined during title search that will in perpetuity notify a potential purchaser of the property that the land has been used to manage hazardous waste; its use is restricted; and the survey plat and record of the type, location, and quantity of hazardous waste disposed of within each cell or area of the facility in accordance with 40 CFR 264.119(b).

PART III - GROUNDWATER MONITORING & ABATEMENT PROGRAM

A. WELL LOCATION AND CONSTRUCTION

1. The Permittee shall maintain groundwater monitoring wells at the locations specified on the map presented in Attachment 4: WQMP-2, WQMP-4A, WQMP-6, and WLMP-3 (upgradient well).
2. The Permittee shall maintain the monitoring wells identified in condition III.A.1 in accordance with the plans and specifications presented in Attachment 1. The monitoring well information section must be updated when existing wells are modified or when new wells are drilled.

B. MONITORING PARAMETERS

1. The Permittee shall maintain the approved abatement program to remove or treat any hazardous waste, hazardous constituents or decomposition byproducts and return to compliance. Table III-1 lists the Alternate Concentration Limits (ACLs) for each parameter of concern. The ACLs were based on USEPA and PADEP's review of the National-Standard Alternate Concentration Limit Demonstration Report dated September 2005. Toxicology calculations and fate and transport analyses indicate that the constituents of concern will not pose a substantial present or future potential hazard to human health or the environment as long as the ACL is not exceeded at the downgradient point of compliance (POC) wells. The downgradient POC wells for which the ACLs will be compared to are designated as WQMP-2 and WQMP-4A.

TABLE III-1 - MONITORING PARAMETERS

Parameters	Units	PADEP Act 2 MSC	USEPA Guidance	National-Standard Recommended Human Health ACL	USEPA Recommended Human Health ACL	ACL	GWPS for POC Wells
Boron (dissolved)	mg/L	6.0*	6.0 (H)*	5.5	1.1 - 1.3	2.1	6.0
Chloride	mg/L	250	250 (SDWR)	2,700	360 - 460	360*	360
Iron (dissolved)	mg/L	0.3	0.3 (SDWR)	8.2	1.6	1.6*	1.6
Manganese (dissolved)	mg/L	0.3	0.3 (H)	0.66	0.636	1.5*	1.5
Sodium (dissolved)	mg/L	-	20 (H)	-	120	230*	230
Sulfate	mg/L	250	250 (SDWR)	-	-	250*	250
Field Parameters:							
Depth to Water	Feet (BGS)	-	-	-	-	-	-
Groundwater Elevation	Feet (MSL)	-	-	-	-	-	-
Dissolved Oxygen	mg/L	-	-	-	-	-	-
Oxidation Reduction Potential	mV	-	-	-	-	-	-
pH	SU	6.5 – 8.5*	6.5 – 8.5*(SDWR)	-	-	-	6.5 – 8.5

Specific Conductance	µmhos/cm	-	-	-	-	-	-
Temperature	°C	-	-	-	-	-	-
Turbidity	NTU	-	-	-	-	-	-

MSC = Pennsylvania Act 2 Medium Specific Concentration

ACL = Alternate Concentration Limit

GWPS = Groundwater Protection Standard

H = Lifetime Health Advisory Level

SDWR = USEPA Secondary Drinking Water Regulations

* = Source for GWPS Values

BGS = Below Ground Surface

MSL = Mean Sea Level

2. The Permittee shall monitor well numbers WQMP-2, WQMP-4A, WQMP-6, and WLMP-3 (upgradient well) as described in condition III.A. for the parameters specified in Table III-1 as follows:
 - a. Beginning in calendar year 2016, groundwater samples shall be collected every Third Quarter (i.e., 2Q16, 1Q17, 4Q17, 3Q18, 2Q19, etc.) so that groundwater quality and seasonal groundwater fluctuation can be monitored. During this reduced groundwater sampling period, the abatement program shall continue as specified in condition III.C. If an increase in concentrations occur or if the abatement system is not in working order as described in condition III.C., then the sampling of groundwater monitoring wells shall revert back to quarterly monitoring for the list of parameters in Table III-1.
 - b. If it can be demonstrated from the submitted groundwater analytical data that the concentration levels of hazardous wastes, hazardous constituents, or decomposition byproducts detected at the downgradient POC wells have remained at or below Groundwater Protection Standards (GWPSs) for three consecutive years, the Department may allow the termination of the approved abatement system at the Permittee's request. Department approval is needed before a change can be made to the abatement plan. All monitoring wells shall be sampled quarterly for the first year following total discontinuation of the groundwater abatement program for the list of parameters in Table III-1 and then sampled every Third Quarter for a minimum of three consecutive years for the list of parameters in Table III-1 which will ensure that the GWPSs continue to be maintained at the downgradient POC wells following total discontinuation of the groundwater abatement program. Additionally, the Rapho Township offsite private wells (#001, #005, #008 and #009), Attachment 5 of the April 25, 2008 Post Closure Permit, shall be sampled one year after the discontinuation of the groundwater abatement program for the list of parameters in Table III-1. If the concentration levels of hazardous wastes, hazardous constituents, or decomposition byproducts for all downgradient POC wells begin to increase to concentrations above GWPSs, then the abatement system shall be put back into operation as specified in condition III.C. and the groundwater sampling shall revert back to quarterly monitoring for the first year and then every Third Quarter for the list of parameters in Table III-1.
 - c. The Permittee may petition to the Department a request to shorten the post-closure care period if it can be demonstrated from the submitted groundwater analytical data, that the concentration levels of hazardous wastes, hazardous constituents, or decomposition

byproducts for the downgradient POC wells continue to remain at GWPSs during the three consecutive year period following the total discontinuation of the groundwater abatement program. According to CFR §264.117(a)(2)(i), the Department may shorten the post-closure care period applicable to the facility if it is found that the reduced period is sufficient to protect human health and the environment.

- d. If the Permittee petitions to shorten the post-closure care period, request shall be made no later than one (1) year prior to the post-closure permit expiration date (April 24, 2018).
3. The compliance period is equal to 30 years from the date of closure (January 13, 2022) or when it can be demonstrated, from the submitted groundwater monitoring data, that the concentration levels of hazardous wastes, hazardous constituents, or decomposition byproducts at the downgradient POC wells have remained at GWPSs for the three consecutive year period following the total discontinuation of the groundwater abatement program, whichever comes first, or otherwise approved in writing by the Department.

C. ABATEMENT PROGRAM

1. The Permittee shall continue to conduct an abatement program that results in abatement of any groundwater contamination by removing or treating all hazardous waste or hazardous constituents or decomposition byproducts in accordance with 40 CFR 264.100(b), (c), (d), and (e). The Department approved groundwater abatement system includes the following modifications/stipulations which were summarized in the June 10, 2016 Class 1 Permit Modification Application and Supporting Documents:
 - a. Continuously pump well WQMP-4A at approximately 40 to 50 gpm as a single recovery well and allow beneficial reuse of the pumped groundwater at the Mt Joy Wire Corporation (MJW) facility as process water.
 - b. Discontinue operation of extraction well WQMP-6 due to low yield.
 - c. The Permittee shall monitor the groundwater recovery system by means of a remote monitoring system.
 - d. Per the National-Standard and MJW agreement signed/dated on January 9, 2013 indicating that the extracted groundwater shall be used in the MJW facility in accordance with the following PADEP requirements.
 - (1) Extracted groundwater from Well WQMP-4A shall not be used for non-contact cooling water.
 - (2) The MJW facility shall maintain compliance with the MJW National Pollutant Discharge Elimination System (NPDES) Permit PA 0042781 requirements.
 - (3) Flow to the industrial wastewater treatment plan shall not be increased.
2. The abatement system must continue as approved until it is shown that the site is in

conformance with the groundwater protection standard under 40 CFR 264.92. The Permittee may request that the abatement system as described in condition III.C.1. be terminated if he or she can demonstrate from the submitted groundwater monitoring data, that the concentration levels of hazardous wastes, hazardous constituents, or decomposition byproducts at the downgradient POC wells remain at GWPSs for three consecutive years. Department approval is needed before a change can be made to the abatement plan. If the concentration levels of hazardous wastes, hazardous constituents, or decomposition byproducts at the downgradient POC wells begin to increase to concentrations above background levels and/or alternate concentration limits after the abatement system is discontinued, then the abatement program shall resume as specified in condition III.C. 1.

D. SAMPLING AND ANALYSIS PROCEDURES

The Permittee shall use the following techniques and procedures when obtaining samples and analyzing samples from the groundwater monitoring wells described in condition III.A.

1. Samples shall be collected by the techniques described in Attachment 1 and Attachment 6.
2. Samples shall be preserved and shipped off-site for analysis in accordance with the procedures specified in Attachment 1 and Attachment 6.
3. Samples shall be analyzed according to the procedures specified in Attachment 1 and Attachment 6.
4. Samples shall be tracked and controlled using the chain of custody procedures specified in Attachment 1.

E. STATISTICAL PROCEDURES

When evaluating the monitoring results pursuant to condition III.F the Permittee shall use the procedures set forth in 40 CFR 264.97(g).

F. MONITORING PROGRAM AND DATA EVALUATION

The Permittee shall establish and implement a groundwater monitoring program to demonstrate the effectiveness of the abatement program. The Permittee shall determine groundwater quality as follows:

1. The Permittee shall collect, preserve and analyze samples pursuant to condition III.D.
2. The Permittee shall determine groundwater quality (i.e., the parameters specified in condition III.B) through the compliance period including any extension to the compliance period to illustrate conformance with the approved monitoring parameters for a period of three consecutive years following total discontinuation of the groundwater abatement program. These determinations shall be made according to the schedule established in condition III.B, unless an alternative interval is approved by the Department.
3. The Permittee shall determine the groundwater flow rate(s) and direction(s) at least annually as required by 40 CFR 264.98(e).
4. The Permittee shall compare the measured concentration of each monitored constituent with

the approved monitoring parameters each time groundwater quality is determined in accordance with condition III.F.2. The Permittee must compare the groundwater quality measured at each point of compliance monitoring well with the concentration limits specified in Table III-1 in accordance with the procedures specified in condition III.E.

5. The Permittee shall, at least annually by January 31, evaluate the data from condition III.F.1. as required by 40 CFR 264.97(g)(1), to determine if monitoring wells are still properly located.
6. The Permittee shall perform the evaluation required by condition III.F within 30 days of receipt of sample results.
7. Submittals regarding the evaluation of groundwater flow, the performance of the abatement system, and recommendations for future changes to the groundwater monitoring or abatement plan shall be performed by a professional geologist licensed and registered in the State of Pennsylvania. According to Section 2(n) and Section 3(a) of the Commonwealth's Engineer, Land Surveyor and Geologist Registration Law (Act 367 of May 23, 1945, amended December 16, 1992), "it is unlawful for any person to practice or to offer to practice geology (in the Commonwealth) unless he is licensed and registered under the laws of this Commonwealth as a professional geologist."

G. REPORTING, RECORDKEEPING, AND RESPONSE

1. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to condition III.F.2 in the operating record, as required by 25 Pa. Code 264a.97(l). This data must be reported to the Department within 30 days of the end of the calendar quarter in which samples were taken. A hard copy of the results of the sampling and data evaluation shall be provided to the Department on appropriate Hazardous Waste Monitoring Report forms and one copy of the analytical results shall be provided as electronic media for all monitoring wells noted in condition III.A. The Latitude and Longitude coordinates shall be measured and recorded to the nearest one-tenth of a second (DD° MM' SS.S") and included on the Departmental forms.
2. The Permittee must report in writing semi-annually through calendar year 2015 to the Director on effectiveness of the abatement program, as required by 40 CFR 264.100(g), and then every Third Quarter beginning in calendar year 2016. In order to demonstrate that the groundwater extraction system is being properly operated/maintained, the Permittee shall submit the pumping data from extraction well WQMP-4A to the Department on a quarterly basis via email. Additionally, the Permittee shall continue to submit a summary of the extraction well performance with future post closure groundwater monitoring reports.
3. The Permittee shall submit all reports to the Department as required by 25 Pa. Code 264.a.97(l).
4. The abatement program shall be amended either by consent order and agreement or permit modification as necessary to maintain compliance with applicable regulatory requirements.
5. If the Permittee determines, pursuant to condition III.F, that there is a statistically significant increase above the GWPSs for the parameters specified in condition III.B.1 he shall:
 - a. Determine whether the facility has caused the significant increase as required by 40 CFR 264.98(g).

- b. Notify the Department in writing within seven days, as required by 40 CFR 264.99(h)(1).
- c. Within 30 days, develop and submit a specific plan, as required by 40 CFR 264.99(g) and 264.99(h)(2)(ii), based on the outline required under 40 CFR 264.91 for a groundwater quality assessment program.
- d. Submit all reports, to the Department, as required by 25 Pa. Code 264a.97(l).
- e. Begin to implement the groundwater quality assessment program within 30 days of Department approval or permit modification.

H. PERMIT MODIFICATION

If the Permittee determines that the abatement program established by this permit no longer satisfies the requirements of the regulations, an application for a permit modification must be submitted to make any appropriate changes to the program, which will satisfy the regulations.

I. GROUNDWATER PROTECTION STANDARD

The Permittee shall assure that monitoring and corrective action measures necessary to achieve compliance with the groundwater protection standard under 40 CFR 264.92 are taken during the term of this permit.

ATTACHMENTS

(Includes June-July 2016 Revisions to April 25, 2008 Post Closure Permit)

1. **Post-Closure Plan – includes the following:**
 - a. Monitoring Well Information
 - b. Sampling and Analysis Procedures (November 1989)
2. **Inspection Schedule**
3. **Preparedness, Prevention and Contingency (PPC) Plan – Revised - August 5, 2016.**
4. **Groundwater Monitoring Well Location Map:** National-Standard Company, Post Closure Groundwater Monitoring Semi-Annual (Second Quarter) 2016 Sampling Report – April 2016 – Figure 2.
5. **Offsite Sample Locations:**
 - a. **Map** – Offsite Private wells sampled in 1984: National-Standard Post-Closure Permit Application, Volume 1 of 2, Part I., page I.168, Geology and Well Location Map, February 6, 1985.
 - b. **Aerial Photo** – Offsite Private wells, NPDES discharge, and/or Little Chickies Creek sampled by PADEP in 2001 and 2005.
6. **Sampling and Analysis Procedures Addendum:** Groundwater Monitoring System Procedures Manual Addendum for the former National-Standard Company Facility located in Mt Joy PA, Environmental Management Associates, LLC (EMA), April 13, 2004. Note: The original Groundwater Sampling Procedures Manual (November 1989) is located in Attachment 1, above.