



**FACT SHEET
EXLINE, INC.
SALINA, KANSAS
PERMIT RENEWAL
September 8, 2014**

This fact sheet, in accordance with the requirements of Kansas Administrative Regulations (KAR) 28-31-124d, has been prepared to announce availability for public review, a draft Resource Conservation and Recovery Act (RCRA) permit that the Kansas Department of Health and Environment (KDHE) intends to issue Exline, Inc., the operator of the facility, and Exline Leasing, Inc., the owner of the facility. The facility is located at 3256 East Country Club Road, Salina, Kansas. The location of the facility is depicted in **Figure 1**.

The proposed renewal permit will require Exline to continue post-closure care and corrective action at the facility. Exline has submitted RCRA Part A and Part B permit renewal applications for post-closure care and corrective action at the facility. Any treatment, storage, or disposal of hazardous waste not authorized in this Permit is strictly prohibited.

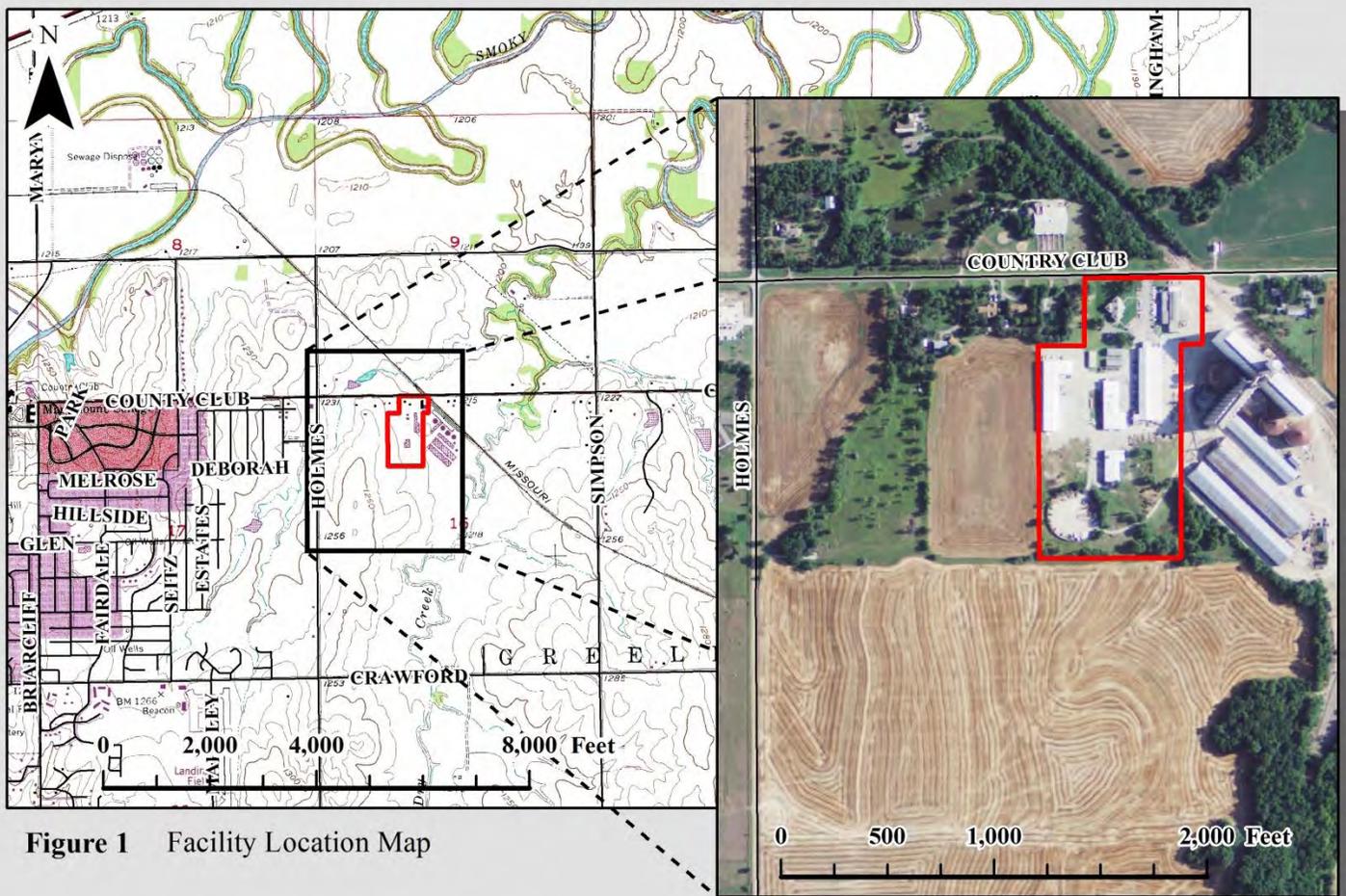


Figure 1 Facility Location Map

I. Facility Permit Overview

The Exline facility has been in operation since 1942. In 1968, Exline constructed a chrome-plating shop for the purpose of plating large stationary engine parts. Exline began discharging spent chromate-plating solutions, rinse waters, caustic cleaning solutions, and deionizer regeneration solutions to a clay-lined surface impoundment for evaporation. Exline obtained interim status as a RCRA hazardous waste treatment, storage, and disposal facility in November 1980 due to the storage of hazardous waste (D002 and D007) and was

assigned Environmental Protection Agency (EPA) identification number KSD007127327.

In 1980, the impoundment was modified by the addition of a synthetic liner. Following installation of the liner, Exline personnel noted that the routine discharges to the surface impoundment were rapidly exceeding the holding capacity. Further investigation led to the conclusion that wastewater fluid losses by infiltration prior to liner installation had been mistakenly attributed to evaporation. Several monitoring wells installed around the impoundment in 1982 revealed groundwater downgradient of the impoundment in the uppermost aquifer had been impacted by chromium. Subsequent groundwater investigations have defined the extent of the contaminant plume, which has migrated beyond the boundary of the facility to the northeast. To mitigate the source of chromium contamination, the impoundment was closed in 1984. The closure process consisted of transferring liquid waste to aboveground storage tanks along with removing the liner and contaminated soil beneath the unit. Closure was completed in 1984, and Exline submitted the necessary certification documents in January of 1985.

On July 2, 1987, under the authority of 40 CFR 270.1(c) and 270.10(e)(4), KDHE requested Part B of Exline's application for a hazardous waste post-closure permit. Exline submitted a RCRA Part B application on December 29, 1987. On October 29, 1989, KDHE issued a hazardous waste post-closure permit for the closed surface impoundment, which expired in 1994. A renewal permit was issued on October 29, 2002, which expired on November 12, 2012. Exline submitted a permit renewal application on June 18, 2012 and has subsequently revised the application to reflect current facility conditions. The groundwater underneath this facility is subject to RCRA groundwater monitoring regulations as specified in 40 CFR 264 Subpart F. The Part B application contains the procedures and plans to ensure the facility minimizes threats to human health and the environment by providing monitoring wells to track the location and concentration of the chromium and recovery wells to remediate the contaminated groundwater which has been detected at and beyond the facility boundary. A status summary of each solid waste management unit (SWMU) and area of concern (AOC) identified at the facility can be found in Attachment 3 of the draft permit. Remedial goals for past corrective action activities associated with SWMUs and AOCs were established by EPA. Remedial goals established in the draft permit for outstanding and future corrective action activities are derived from the risk-based cleanup values as summarized in the most current version of KDHE's *Risk-Based Standards for Kansas (RSK) Manual* available at http://www.kdheks.gov/remedial/rsk_manual_page.html. Additional information on the hazardous waste management activities at Exline, Inc. can be found in the draft permit and administrative record.

II. Permitting Regulatory Authority

In November 1985, the State of Kansas received final authorization from the Environmental Protection Agency (EPA) to implement a hazardous waste management program in lieu of the federal program, except for those portions covered by the 1984 Hazardous and Solid Waste Amendments (HSWA). In September 2013, authority for the corrective action portion of the RCRA program was delegated to the State of Kansas.

The draft permit sets forth all of the applicable requirements that KDHE will require the Permittee to comply with during the 10-year duration of the permit. The draft hazardous waste permit includes standard permit conditions, general facility conditions, post-closure care requirements, groundwater corrective action requirements, and corrective action requirements for SWMUs and AOCs.

The draft permit is being considered for issuance under authority of the Kansas Statutes Annotated (K.S.A) 65-3430 *et seq.* and KAR 28-31-4 through 28-31-279a and Subtitle C of RCRA, as amended by HSWA. Documents that support the permit conditions specified in the draft permit are part of the administrative record. Applicable regulations are found in 40 CFR Parts 124, 260 through 264, 268, and 270, as specified in this permit. All citations found in the draft permit to federal regulations are for the sake of convenience. Some modifications to federal regulations by applicable state regulations are noted in this permit, but all modifications to federal regulations by state regulations are incorporated. To the extent that state regulations exclude any sections of applicable federal regulations, those sections are not in effect. In the instance of inconsistent language or discrepancies between conditions found in the permit, state regulations, or federal regulations, the language of the more stringent provision will govern; otherwise, state law governs.

III. Summary of the RCRA Permitting Process

State hazardous waste laws require that the public be given at least 45 days to review the administrative record for the draft permit prior to KDHE taking a final action. The purpose of having a public comment period is to ensure that interested parties have the opportunity to evaluate the conditions specified in the final permit and to provide their input into the permit decision-making process. The public comment period will begin on September 8, 2014 and end on October 22, 2014. The administrative record, which includes the draft permit, permit application, and other relevant correspondence, will be available for public review at the following locations:

Kansas Department of Health and Environment
Hazardous Waste Permits Section
1000 SW Jackson Street, Suite 320
Topeka, Kansas 66612-1366
Contact: Mostafa Kamal
(785) 296-1609

Salina Public Library
301 W. Elm Street
Salina, Kansas 67401
(785) 825-4624

The administrative record can also be accessed on the KDHE website at:

http://www.kdheks.gov/waste/p_pubnot_hw.html

Written comments related to this permit action can be submitted to Mostafa Kamal (KDHE) at the above address, beginning September 8, 2014 and postmarked no later than October 22, 2014. For more information about this permit renewal or to join the mailing list to receive further information, contact Mostafa Kamal of KDHE at the above address and phone number.

As specified in 40 CFR 124.11, during the public comment period any interested person may request a public hearing in writing which states the nature of the issues proposed to be raised in a public hearing. In the event that a hearing is scheduled, advance notice of the date will be given to the public. In accordance with 40 CFR 124.12, during a public hearing, any person may submit oral or written statements and data concerning the draft permit or Part B application.

IV. Procedures for Reaching a Final Decision

The Secretary of KDHE will make the decision regarding the issuance of a final permit after the close of the public comment period. The Secretary will consider all comments received during the public hearing and comment period.

When the final decision to issue or deny the permit is made, notice will be given to the applicant, all persons who submitted written comments, and those who requested notice of the final permit decision. If none of the comments received during the public comment period result in revision(s) to the draft permit, the permit will become effective immediately upon issuance of the final permit decision. If comments received during the public comment period result in revision(s), the permit will become effective 30 days after service of notice of the final decision to allow for public review of the revisions. Appeals of the final permit decision for permit must be filed within 15 days after service of notice in accordance with K.S.A 65-3440 and K.S.A. 77-601 *et.seq.*

V. Permit Organization

The permit is organized in the following manner:

Permit	Description
Cover Sheet	Sets forth basic legal authority.
Section I	General permit conditions which are the regulatory

Standard Permit Conditions	requirements specified in 40 CFR 270.
Section II General Facility Conditions	General facility permit conditions which are the regulatory requirements specified in 40 CFR 264.
Section III Post-Closure Care	Specific conditions, limitations, procedures and requirements which implement the regulatory requirements of 40 CFR 264 Subpart G (Closure and Post-Closure Care and Subpart N (Landfills)).
Section IV Groundwater Corrective Action	Specific conditions, limitations, procedures, and requirements which implement the regulatory requirements for addressing groundwater contamination pursuant to 40 CFR Subpart F.
Section V Corrective Action for SWMUs and AOCs	Specific conditions and framework for assessing the nature and extent of releases and, if necessary, implementing corrective measures to protect human health and the environment, pursuant to the regulatory requirements of 40 CFR 264.101