



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

SEP 20 2019

**CERTIFIED MAIL: 7017 0530 0000 1268 1001**  
**RETURN RECEIPT REQUESTED**

Mr. Jeff Lenchak  
Environmental, Health, Safety, Security, and Regulatory Manager  
United Initiators, Inc.  
555 Garden Street  
Elyria, Ohio 44035

Re: Final Federal RCRA Permit, United Initiators, Inc.  
Elyria, Ohio, OHD 046 202 602

Dear Mr. Lenchak:

Enclosed is a copy of the federal portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit for the above-referenced facility. The complete RCRA Hazardous Waste permit contains both federal permit conditions (contained herein) and state permit conditions, which were issued separately by the State of Ohio RCRA program authorized under Title 40 of the Code of Federal Regulations (40 CFR) Part 271. Any hazardous waste activity not included in the federal portion of the RCRA permit or in the state portion of the RCRA permit is prohibited when such activity requires a RCRA Hazardous Waste permit.

The draft federal RCRA permit was publicly noticed in The Chronicle newspaper on January 4, 2019. A copy of the draft federal RCRA permit was available for review at the Elyria Public Library West River Branch, 1194 W. River Rd. N., Elyria, Ohio 44035. A public meeting was held on February 11, 2019 at 6:00 P.M. at Elyria Public Library West River Branch. The public comment period extended from January 4, 2019 to February 22, 2019.

The U.S. Environmental Protection Agency received no comments on the draft Federal RCRA permit during the public comment period. Therefore, no conditions of the draft permit were changed in the final permit, with the exception of changes necessary to identify that the permit has been finalized and the minor changes outlined in the attached response summary.

This federal permit is effective as of **30 Days After Issuance Date of the Final permit** and valid until September 25, 2029, unless the federal permit is revoked and reissued, or terminated pursuant to 40 CFR § 270.41 and § 270.43. Failure to comply with any conditions of the federal permit may result in civil and/or criminal Penalties.

You may appeal the issuance of this permit by filing a petition for review with the Environmental Appeals Board.

A petition for review of any condition of a RCRA permit decision must be filed with the Environmental Appeals Board within 30 days after EPA serves notice of the issuance of the final permit decision. 40 CFR § 124.19(a)(3). When EPA serves the notice by mail, service is deemed to be completed when the notice is placed in the mail, not when it is received. However, to compensate for the delay caused by mailing, the 30-day deadline for filing a petition is extended by three days if the final permit decision being appealed was served on the petitioner by mail. 40 CFR § 124.20(d). Petitions are deemed filed when they are received by the Clerk of the Board at the address specified for the appropriate method of delivery. 40 CFR § 124.19(a)(3) and 40 CFR § 124.19(i). Additional information regarding petitions for review may be found in the Environmental Appeals Board Practice Manual (January 2013) and A Citizen's Guide to EPA's Environmental Appeals Board, both of which are available at:

<https://www.epa.gov/hwpermitting/hazardous-waste-permits-facilities-great-lakes-region-region-5>

Eligibility to appeal the federal permit is discussed further in 40 CFR §124.19. General filing requirements are contained in the Practice Manual, The Environmental Appeals Board and A Citizens' Guide to EPA's Environmental Appeals Board.

All documents that are sent through the U.S. Postal Service (except by Express Mail) must be addressed as follows:

U.S. Environmental Protection Agency,  
Environmental Appeals Board  
1200 Pennsylvania Avenue NW  
Mail Code 1103M  
Washington, DC 20460-0001

Documents that are hand-carried in person, delivered via courier, mailed by Express Mail, or delivered by a non-U.S. Postal Service carrier (e.g., Federal Express or UPS) must be delivered to:

Clerk of the Board  
U.S. Environmental Protection Agency  
Environmental Appeals Board  
1201 Constitution Avenue, NW  
U.S. EPA East Building, Room 3334  
Washington, DC 20004

A copy of the petition should also be sent to:

RCRA Branch (LL-17J)  
Land and Chemicals Redevelopment Division  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

The procedures for filing an appeal are found in 40 CFR § 124.19. The administrative appeal procedures must be completed prior to any action seeking judicial review.

If you have any questions concerning this permit, please contact Mr. James Blough of my staff, at (312) 886-2967.

Sincerely,



Edward Nam  
Division Director  
Land, Chemicals and Redevelopment Division

Enclosures

cc: Bradley Mitchell, OEPA