

# The New Face of RCRA in Ohio:

## Confidence in Operating, Permitting, and Agency Inspections, and Overview of Ohio's New Definition of Solid Waste Rules and RCRA Subparts AA, BB, and CC

Workshop D – July 19, 2023

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PLASKOLITE

VORYS

# Agenda

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Authority and Penalty for NonCompliance

Generators/Permits/Variances/Exclusions/Tips

Intro to Plaskolite and Case Studies

New DSW and AA, BB, CC

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# RCRA Trends



- Regulated entities can likely expect an uptick in both RCRA inspections and enforcement actions in 2023, as compared to 2022
- As more states adopt the new Definition of Solid Waste, regulated industries can anticipate new exemptions/restrictions to RCRA requirements in 2023

# What Has Changed?



• ~~Issuance of guidance documents in civil enforcement~~

~~2018 Assoc. AG memo~~

• Cooperative Federalism

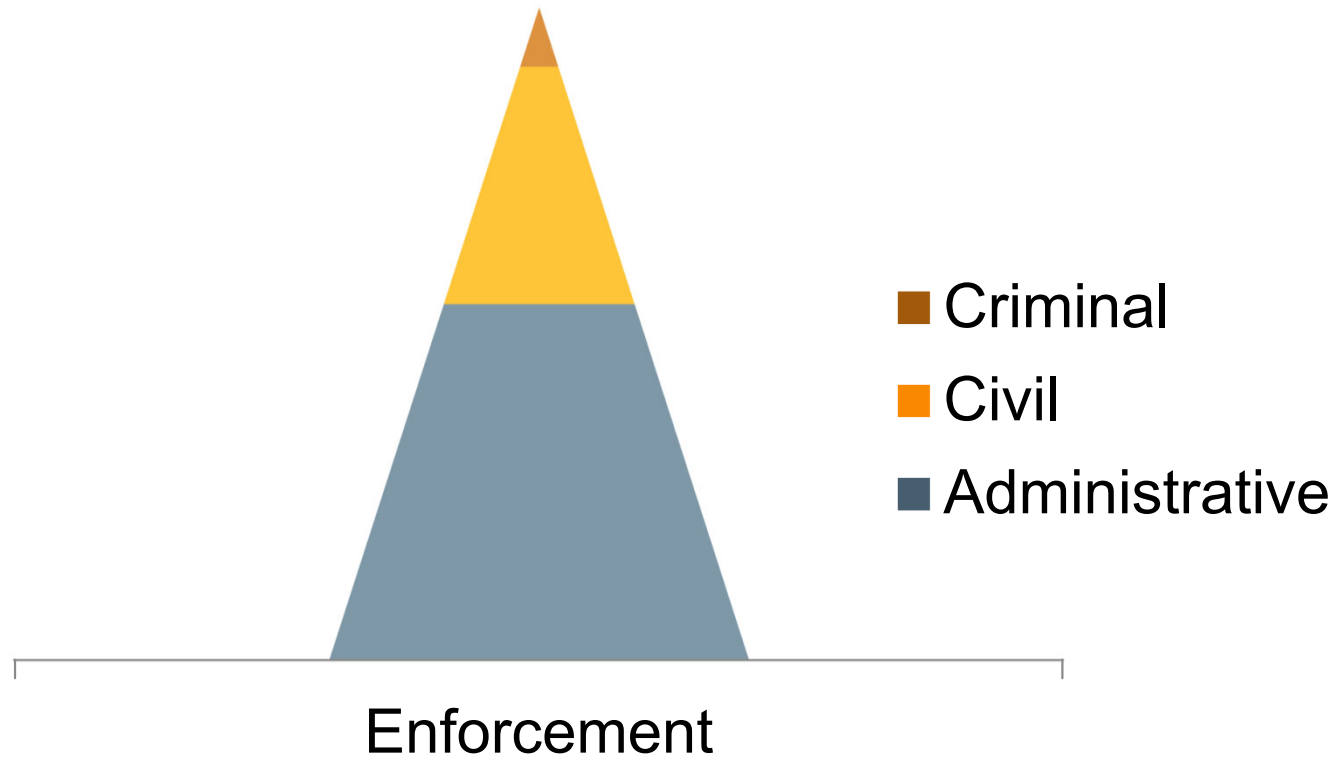
~~– Jan. 27, 2018 (LISEP) & Oct. 30, 2018~~

# Civil Enforcement Process

- Targeting
- Inspection (or information request)
- Enforcement (administrative, civil)
- Resolution (penalty, injunctive relief)



# Enforcement Triangle



# How Does EPA Target Facilities?

- Annual planning of a list of facilities
- Time since last inspection (schedule)
- Compliance history
- Orders, Consent Decrees, open NOVs





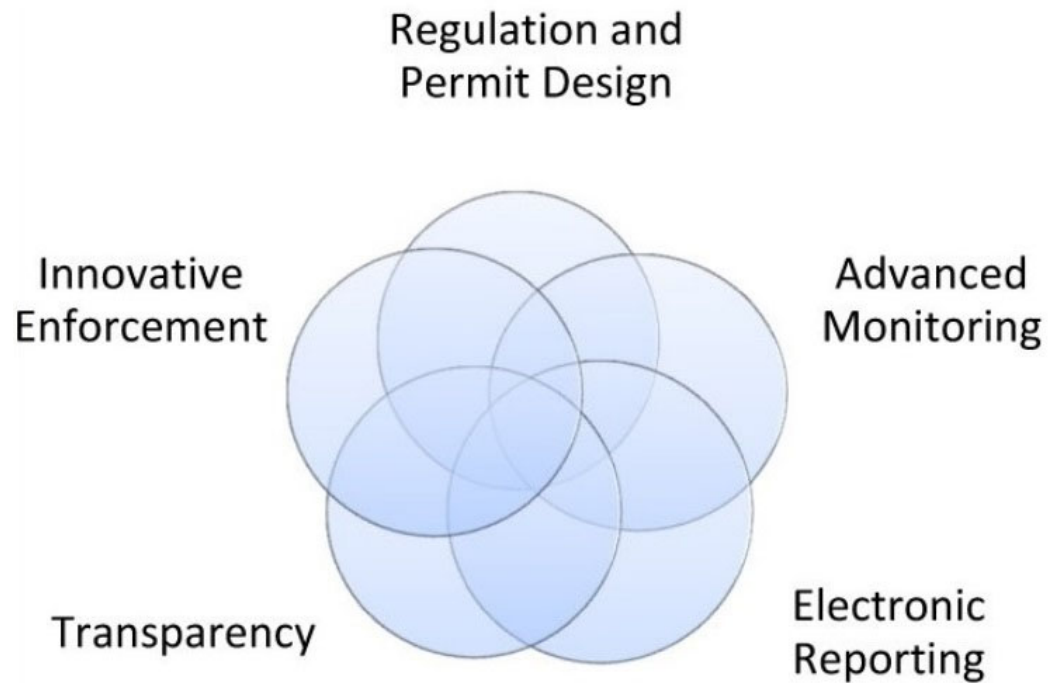
## How Does EPA Target Facilities? (cont'd)

- Pollution cross sections
  - *NESHAPS*
  - *RCRA waste impoundments*
- “Next Gen” enforcement strategies



# “Next Gen” Compliance/Enforcement

- <https://www.epa.gov/compliance/next-generation-compliance>



# Civil Inspectors' General Authority

- Administrative authority to inspect
- Normal business hours, at main gate
- Permission from site authority
- Present credentials & explain purpose



## Civil Inspectors' General Authority (cont'd)

- Never sign liability waivers, NDAs
- Advance notice is not required
- Fear, trickery or threat not to be used
- Civil inspector's "five senses"



# Exit Interviews

- Inspectors should conduct exit interviews & you can request one
- Take copious notes & request copies of documentation (**ALL “discoverable”**)
- Your observations & notes essential to Legal in any Agency follow-up



# Enforcement



- USEPA may respond to RCRA violations with **FORMAL** or **INFORMAL** enforcement

# Formal Enforcement



- Includes administrative or civil actions
- Results in an enforceable CAFO that imposes monetary penalties
  - Up to \$27,500\*\* per day for each violation

# Informal Enforcement



- Includes notification of violations and require compliance within 240\*\* days



# Understanding Penalties

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- USEPA penalty matrices (RCRA §3008)
  - Penalty calculations for RCRA violations
  - Violation's potential for harm & extent of deviation from requirement
  - Scale-up based on major/moderate/minor
  - USEPA discretion

2003

Potential  
for  
Harm

Extent of Deviation from Requirement

	MAJOR	MODERATE	MINOR
MAJOR	\$27,500 to 22,000	\$21,999 to 16,500	\$16,499 to 12,100
MODERATE	\$12,099 to 8800	\$8,799 to 5,500	\$5,499 to 3,300
MINOR	\$3,299 to 1,650	\$1,649 to 550	\$549 to 110

2022  
(est.)

	Major	Moderate	Minor
Major	\$47,423 - \$37,938	\$37,937 - \$28,454	\$28,452 - \$20,866
Moderate	\$20,864 - \$15,175	\$15,174 - \$9,485	\$9,483 - \$5,691
Minor	\$5,689 - \$2,845	\$2,844 - \$948	\$947 - \$190

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**Generators/Permits/Variations/Exclusions/Tips**

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# Generators & Inspections

- Generator status based on monthly generation
- RCRA Inspections
  - LQG (EPA >5yrs; Ohio EPA ~5yrs)
  - SQG (if near LQG threshold)
  - VSQG (“desktop”)
- EPA or Ohio EPA lead
- EPA audit of states’ RCRA programs



# What is a RCRA Permit and When is it Needed?

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- Allows generators of hazardous waste to:
  - Treat/Sore up to one year
  - Utilize additional forms of treatment and within additional types of units
  - Dispose on-site (beyond wastewater discharge)
- Allows destination (off-site) facilities to:
  - Accept generator hazardous waste
  - Treat/Sore up to one year within various types of units
  - Dispose on-site
  - Manage universal waste beyond the limitations of a handler
  - Support recycling of hazardous waste

# RCRA Permit Considerations

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- Application consists of numerous independent documents
- 10-year term; currently joint State and Federal\*
- Maintenance – living documents; Class 1 through 3 mods
- Public involvement – notifications, meetings, comment periods
- Increased agency oversight compared to LQG
- Financial assurance for RCRA Closure
  - Most expensive scenario; third party; no salvage value
  - Annual update for inflation
- Director .02(G) exemption [ORC 3734.02(G)]

## What is a Variance?

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- Variance from Classification as a Waste - exempts a material from classification as a solid waste *when recycled* for hazardous waste generators and offsite facilities
- Available for: 1) speculative accumulation, 2) further reclamation, and 3) reclaimed & reused in original process

Hazardous  
Waste



Not a  
Waste

# Variance Considerations

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- Application consists of numerous independent documents
- 1-year term for speculative accumulation Variance; 10-year term for other Variance types
- Maintenance – living documents; similar to Class 1A mod
- Public involvement – notifications, comment period, possible meeting
- Less regulatory burden compared to RCRA permit but increased agency oversight compared to LQG
- Financial assurance for Removal and Decontamination (fairly new)
  - Most expensive scenario; third party; no salvage value
  - Annual update for inflation



# RCRA Permit vs Variance

	<b>RCRA Permit</b>	<b>Variance</b>
Applicability	Treatment, Storage, Disposal	Recycling-Related
Application Content	Substantial and Very Prescriptive	Moderate and Prescriptive
Overall Operational Flexibility	Limited without Mod	Greater without Needing Update
Financial Assurance	Required; Mod for Adjustment	Required; Can Incorporate Flexibility
Post Closure/RDP Care	Yes if Waste Remains	Yes if Waste Remains
Subpart AA, BB, CC	Must Address	Not Applicable to Variance Materials
CBI/Trade Secret	Allowed	Allowed
100-Year Floodplain	Significant Consideration	Possibly Not Relevant
Site-Wide RCRA Corrective Action	Ohio EPA Reserves Requirement	Ohio EPA Reserves Requirement
Public Involvement	Greater	Lesser
Environmental Justice	Consideration	Consideration
Agency Oversight	Increased from LQG	Increased from LQG; Less than Permit
Cost to Prepare and Maintain	Greater	Lesser
Term	10-Year Renewal Cycle	1- or 10-Year Renewal Cycle

# New DSW Exclusions

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- Generator-controlled exclusion\*
- Transfer-based exclusion\*
- Remanufacturing exclusion (specific solvents)\*

\*Legitimate recycling criteria must be met



## Will You Need a RCRA Permit or Variance with the NEW DSW?

<b>If...</b>	<b>You will need...</b>
Operation cannot meet requirements of “legitimate recycling”	RCRA Permit
Operation cannot meet the speculative accumulation requirements prior to recycling	Variance
Generator, intermediate facility, and/or reclaimer/remanufacturer are in different states	Multiple entities may need RCRA Permit or Variance if new DSW is not adopted in each subject state
Follow one of the new DSW exclusions within the same state(s)	Neither RCRA Permit or Variance

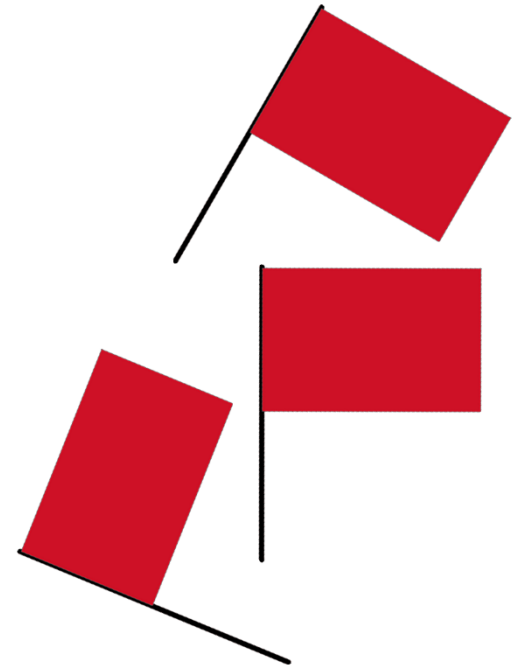
# RCRA Generator Tips – Consider Status

- Keep out of RCRA if possible or minimize regulatory requirements
  - Substitution (e.g., parts washer fluid)
  - Waste reduction – become a SQG or VSQG
  - Continued use or reuse
  - Rely on universal waste rules
  - Rely on new DSW exclusions (when available)
  - Other exclusions



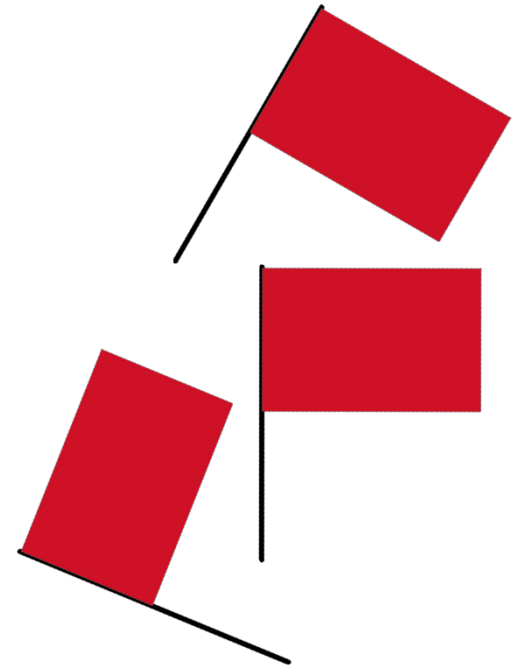
# RCRA Generator Tips – Reduce Red Flags

- Maintain near-perfect RCRA paperwork
  - Waste determinations/profiles
  - Manifests
  - Inspection and training logs
  - Labeling in CAAs and SAAs
  - Contingency Plan up to date, including (QRG)
  - BB and CC requirements



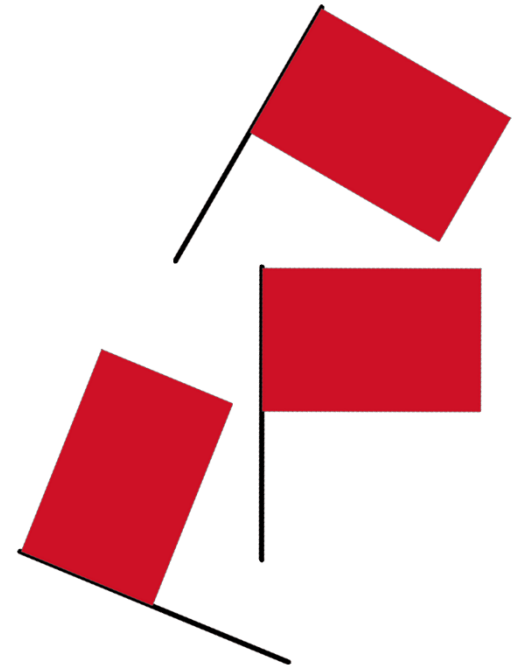
## Reduce Red Flags (cont'd)

- SQG manage as if a LQG
  - 90-day accumulation
  - Contingency Plan
  - Annual RCRA training (+record)



## Reduce Red Flags (cont'd)

- Robust RCRA exemption documentation
  - Continued use or reuse
  - Universal wastes
  - Hazardous secondary materials (new DSW)
  - Recyclable materials



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New DSW and AA, BB, CC



# PLASKOLITE, LLC.

- Plastic pellets, sheets, profiles, molded products
- 12 NA & 4 EMEA sites



# RCRA CEI Case Study

- Unannounced U.S. EPA Compliance Evaluation Inspection of Columbus, OH site
- Opening Conference
- Walkthrough
- Requested documents
- Closing Conference





# RCRA-Compliant Container (SAA)

- Partially full drum
- Closed drum
- “Hazardous Waste”
- Descriptive label
- DOT label



**HAZARDOUS WASTE METHYL METHACRYLATE**

**DANGER**

**Hazard Statements**  
H225: Highly flammable liquid and vapor.  
H315: Causes skin irritation.  
H317: May cause an allergic skin reaction.  
H335: May cause respiratory irritation.  
H402: Harmful to aquatic life.

**Precautionary Statements**  
P210: Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. P261: Avoid breathing vapors. P280: Wear protective gloves/protective clothing/eye protection/face protection. P302+P352: IF ON SKIN: Wash with plenty of water. P501: Dispose of contents/container to hazardous waste in accordance with local, state or national legislation.

Date: \_\_\_\_\_ Initial \_\_\_\_\_

**PLASKOLITE**

Emergency: Infotrac (800-535-5053)  
Refer to the SDS for more information

# RCRA-Compliant Container (CAA)

- Full drum
- Sealed drum – tip test
- RCRA hazardous waste label
- Accumulation date
- DOT label



## Document Request (3 years)

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- Weekly inspection logs
- Biennial hazardous waste report
- Signed hazardous waste manifests
- Land Disposal Restrictions (LDR) documentation
- Employee RCRA training log (+ job titles and descriptions)
- RCRA training curriculum

Plaskolite, LLC. - Columbus, OH

Hazardous Waste Accumulation Area  
2023 Inspection Summary (OAC 3745-66-74)  
[Retention Time: 3 years minimum]

Date of Inspection	Time of Inspection	Inspector Name	Observations	Date of Repairs (if applicable)	Nature of Repairs (if applicable)
4/17/2023	11:15 AM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA
4/24/2023	3:00 PM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA
5/1/2023	2:00 PM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA
5/8/2023	11:00 AM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA
5/15/2023	2:35 PM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA
5/22/2023	9:15 AM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA
5/30/2023	11:50 AM	Mickey Croxton	No leaks, all drums labeled, good condition, spill kit OK	NA	NA



## EMPLOYEE TRAINING LOG

First Name	Last Name	Job Title	Requirement	Last Completion Date
Alex	Busby	Environmental Engineer	Hazardous Waste Management	8/3/2021
xxx	xxxx	Material Handler A	Hazardous Waste Management	7/8/2022
xxx	xxxx	Safety & Environ Mgr	Hazardous Waste Management	7/6/2022
xxx	xxxx	Operations Supervisor	Hazardous Waste Management	1/27/2022
xxx	xxxx	Operator 12 hr	Hazardous Waste Management	7/7/2022
xxx	xxxx	Assistant Operator 12 hr	Hazardous Waste Management	7/6/2022

## **Hazardous Waste Management Training**

**Description:** Define a hazardous waste, recognize standards that regulate hazardous waste, and identify requirements of hazardous waste management.

**Lesson Length (minutes):** 20

### **Outline:**

1. Introduction to Hazardous Waste
2. Handling Hazardous Waste
3. Special Instructions for Common Wastes
4. Emergency Response

### **Objectives:**

1. Define hazardous waste, explain the importance of managing it properly, and list the categories of hazardous waste generators.
2. List some actions industrial facilities use to manage hazardous waste and explain how you can assist your company with its hazardous waste management efforts.
3. Describe how to handle common types of hazardous waste.
4. Describe how you, and other individuals with various roles and responsibilities, should respond to an unintended release of hazardous waste.

### **References:**

1. Resource Conservation and Recovery Act (RCRA), 40 CFR part 260-265
2. 40 CFR 261 Subpart D
3. 40 CFR 261 Subpart C



## Document Request (cont'd)

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- RCRA contingency plan
  - Includes Quick Reference Guide (QRG)
- Shipments of used oil, universal waste, beneficial reuse
- Hazardous waste reduction plan
- DOT hazmat certificate

# Closing Conference

- List of issues/citations
  - **CRITICAL** to address these ASAP
  - Send pictures and description of resolution to U.S. EPA



## Post-Visit Fallout

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- CEI report
- No enforcement action

VS.

- Involved legal counsel
- >\$10,000 compliance efforts
- 10 written submittals
- Showcause meeting
- Consent Agreement & Final Order (CAFO)

# Lessons Learned

- Heightened RCRA awareness
- Ensure labels, etc. are organized
- Weekly compliance inspections
- Online training logs into RCRA format
- **NOTHING** is minor (e.g., labeling, logs)



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# Definition of Solid Waste (DSW) Overview

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- Pursuant to RCRA, EPA promulgated a rule defining solid waste as “discarded material” not otherwise excluded from the agency’s regulations
  - Materials destined for recycling are included within this definition of solid waste
- Hazardous waste is a subset of solid waste that is either
  - Listed as a type of hazardous waste or
  - Meets one or more of the four characteristics (ignitability, corrosivity, reactivity, and toxicity)
- Materials can fall outside the regulation of the EPA when established exceptions are met

## EPA Intent for New DSW



“To ensure that the hazardous secondary materials recycling regulations, as implemented, encourage reclamation in a way that does not result in increased risk to human health and the environment from discarded hazardous secondary material.”

## DSW: Exclusions for Hazardous Secondary Materials

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- There are 3 exclusions for reclamation of hazardous secondary materials (HSM)
  1. **Generator Controlled Exclusion:** reclamation onsite within the same company or through toll manufacturing agreements
  2. **Transfer-Based Exclusion:** transferred off-site for reclamation
  3. **Remanufacturing Exclusion:** higher-value solvents sent for remanufacturing
- There are specific conditions that must be met including notification, tracking, contingency planning, certain management conditions and, for the transfer-based exclusion, financial assurance.



## DSW: Exclusions for Hazardous Secondary Materials

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- There are currently two versions of the transfer-based exclusion being implemented by the states:
  - 2015 Verified Recycler Exclusion
    - More stringent
  - 2018 Transfer-Based Exclusion
    - Version Ohio EPA has adopted

# DSW: Interstate Transport of HSM

		Receiving State		
		No Exclusion	2015 Verified Recycler Exclusion	2018 Transfer-Based Exclusion
Generating State	No Exclusion	Shipments are Hazardous Waste	Shipments are Hazardous Waste	Shipments are Hazardous Waste
	2015 Verified Recycler Exclusion	Shipments are Excluded in Generator State but Hazardous Waste in Receiving State	Shipments are Excluded	Shipments are Excluded if they go to RCRA Permitted Recycler
	2018 Transfer-Based Exclusion	Shipments are Excluded in Generator State but Hazardous Waste in Receiving State	Shipments are Excluded if they go to RCRA Permitted Recycler <u>or</u> to a Verified Recycler on which the Generator Performs a Reasonable Efforts Audit	Shipments are Excluded

# DSW: Legitimate Recycling Factors

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- All recycling must be legitimate- OAC rule 3745-50-17
- Four Factors
  - 1) useful contribution of hazardous secondary material
  - 2) recycling process must produce a valuable product or intermediate
  - 3) parties involved must manage the hazardous secondary material as a valuable commodity when within their control
  - 4) product of the process must be comparable to a legitimate product or intermediate
    - Only needs to be considered

# DSW: Generator-Controlled Exclusion

- The generator-controlled exclusion (OAC rule 3745-51-04(A)(23)) excludes certain HSM from the definition of solid waste if they are generated and legitimately reclaimed under the control of the generator
- Requirements:
  - 1) reclamation process meets the definition of legitimate recycling under OAC rule 3745-50-17;
  - 2) the materials are not speculatively accumulated as defined in OAC rule 3745-51-01;
    - including a recordkeeping requirement
  - 3) meet notification requirement (OAC rule 3745-50-16);
  - 4) the materials are managed in a unit that meets the new definition of “contained” in OAC rule 3745-50-10; and
  - 5) generator satisfies certain emergency preparedness and response conditions found in OAC rules 3745-41-400 to 3745-41-420

# DSW: Transfer-Based Exclusion

- The Transfer-Based Exclusion(OAC rule 3745-51-04(A)(24)) applies when the generator sends the materials to an off-site recycler for reclamation
- Spent catalyst qualifies for exclusion
- Requirements:
  - 1) the materials are not speculatively accumulated as defined in OAC rule 3745-51-01
  - 2) parties must meet the notification requirement (OAC rule 3745-50-16);
  - 3) the materials are managed in a unit that meets the new definition of "contained" in OAC rule 3745-50-10
  - 4) generator satisfies certain emergency preparedness and response conditions
  - 5) generator conducts a "Reasonable Efforts Audit" every 3 years if the reclamation facility isn't permitted
  - 6) parties must maintain certain records that document off-site shipments of hazardous secondary materials for a period of three years
  - 7) reclamation and intermediate facilities must manage the hazardous material
  - 8) any residuals that are generated from the reclamation processes must be managed in a manner that is protective of human health and environment
  - 9) financial assurance – reclaimer assures that it is financially sound enough to follow the recycling plan (and not discard) even though it may become costly
  - 10) additional requirements for exports in OAC rule 3745-51-04(A)(25)

# DSW: Remanufacturing Exclusion

- The Remanufacturing Exclusion (OAC rule 3745-51-04(A)(27)(f)) is for higher-value solvents transferred between manufacturers for the purpose of extending the useful life of the solvent through remanufacturing
- Eligibility for Exclusion requires (1) listed solvent, (2) listed chemical functions of solvents, and (3) manufacturing sector business
- Requirements:
  - 1) parties must meet the notification requirement (OAC rule 3745-50-16);
  - 2) Remanufacturing Plan
  - 3) maintain at the facility records of shipments of hazardous spent solvents for a period of three years
  - 4) solvents should be stored in tanks or containers that possess inherent controls to address the issues of volatile air emissions, leaks, and fires or explosions
  - 5) speculative accumulation is prohibited
  - 6) remanufacturers are subject to organic air requirements
- Petitions are available to add to the listed solvents or listed chemical functions

# AA/BB/CC

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- The RCRA organic air emission standards establish performance, design, operation, monitoring, and maintenance requirements for certain hazardous waste management units
- Subpart **AA** establishes controls associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or stream stripping operations
- Subpart **BB** establishes controls for equipment leaks. Types of equipment regulated by Subpart BB include pumps, compressors, and valves
- Subpart **CC** establishes controls associated with the treatment, storage, and deposit of hazardous waste in tanks, impoundments, and other containers

# AA/BB/CC

## Subpart BB:

- Applies to equipment leaks from valves, pumps, compressors, pressure relief devices, sampling systems, open-ended valves or lines, flanges and other connectors
  - Organic concentration is at least 10% by weight
- In contact less than 300 hours per year- exempt
- In vacuum service- exempt

OAC rules 3745-256-50 through 64 (LQG)

OAC rules 3745-205-50 through 65 (TSD)





# AA/BB/CC

## Subpart BB equipment leaks requirements:

- Mark equipment to distinguish it from non-applicable pieces of equipment
- Maintain records that include equipment IDs, locations, type of equipment, % by weight organics and physical state of HW
- Monitor equipment for leaks and keep records
  - Valves start at monthly (alternative for skip period)
  - Pumps in light liquid service: weekly visual/monthly monitoring
  - Pressure relief devices in gas/vapor service: 5 days after pressure release



# AA/BB/CC

## Subpart **BB equipment leaks** requirements:

- Monitor per Method 21
  - Flame ionization detector or photoionization detector are possible instruments
  - Calibrate before each use using zero gas and 10,000 ppm methane or n-hexane
- Threshold for a leak is 10,000 ppm reading from most equipment
  - Threshold for pressure relief devices is 500 ppm
- Repair must be attempted within 5 days and complete within 15 days
  - Unless a delay of repair is allowed as specified in the rules



# AA/BB/CC

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## Subpart CC:

- Applies to tanks, containers, and surface impoundments
  - Average organic concentration is 500 ppmw at the point of origination
- Various exemptions include (not limited to): containers less than 26.4 gallons, satellite accumulation areas, universal waste, recycling units at non-permitted facilities, wastewater treatment units, elementary neutralization units and units that are certified/equipped with and operating emission controls in accordance with the Clean Air Act

OAC rules 3745-256-80 through 90 (LQG)

OAC rules 3745-205-80 through 90 (TSD)

# AA/BB/CC

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## Subpart CC **tank requirements:**

- Determine level of control needed (Level 1 or Level 2)
  - Based on capacity and max organic vapor pressure
  - Level 1 requires a fixed roof
  - Level 2 has options: internal floating roof, external floating roof, venting through a closed-vent system to a control device, pressure tank, or locating inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device

# AA/BB/CC

Tank Capacity (gals)	Max Organic Vapor Pressure (psi)	Level of Control
<20,000	$\leq 11.1$	Level 1
<20,000	$> 11.1$	Level 2
$\geq 20,000 < 40,000$	$\leq 4$	Level 1
$\geq 20,000 < 40,000$	$> 4$	Level 2
$> 40,000$	$\leq 0.75$	Level 1
$> 40,000$	$> 0.75$	Level 2

**Note: If used for waste stabilization, Level 2 controls are required**

# AA/BB/CC

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## Subpart CC **tank requirements:**

- Designed to form a continuous barrier
- Transfer between tanks using a closed system/pipe
- Unique ID number
- Max organic vapor pressure (Level 1)
- Repair attempt 5 days, complete 45 days
- Annual inspections
- Control devices require performance tests or design analysis

# AA/BB/CC

## Subpart CC **container requirements:**

- Determine level of control needed (Level 1, 2 or 3)
  - Based on size, volatility of the waste, and if waste stabilization is occurring

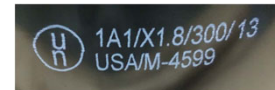
Capacity (gallons)	Level of Control
>26.4 and ≤ 121	Level 1
> 121 not in light material service	Level 1
> 121 in light material service	Level 2

**Note: If used for waste stabilization, Level 3 controls are required**

# AA/BB/CC

## Subpart CC container requirements:

- Level 1 controls:
  - Meet DOT standards, or
  - Use a cover and closure device – no visible gaps, or
  - Use vapor suppressing barrier (organic-vapor suppressing foam)
- Level 2 controls:
  - Must meet DOT specs – or
  - Operates with no detectable emissions (NDE) using Method 21 – or
  - Vapor tight within last 12 months using Method 27





# AA/BB/CC

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## Subpart CC **container requirements:**

- Covers, openings, and closure devices must be closed except during the following activities:
  - Transferring hazardous waste in and out of the containers
  - Between batch transfers not exceeding **15 minutes** between transfer
    - If the person transferring hazardous waste **leaves the area** or the process shuts down, the container must be closed
  - While performing sampling and equipment access
- Repair attempt 24 hours, complete 5 days

# AA/BB/CC

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## Subpart CC **container requirements:**

- Transfer in Level 2 containers needs to be conducted in a manner to minimize exposure of the hazardous waste to the atmosphere.

Examples: submerged fill pipe or other submerged-fill method, vapor-balancing system or recovery system, or a fitted opening with a line purge.

- **No splash loading allowed**

# AA/BB/CC

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## Key Takeaways

- Determine organic concentration of your waste.
- Identify equipment in hazardous waste service.
- Have an LDAR program for applicable equipment.
- Follow Method 21 and calibrate properly.
- Determine organic vapor pressure.
  - Tanks/level of control
  - Containers larger than 121 gallons/transfer requirements
- Conduct tank inspections.
- Keep records!

# QUESTIONS?

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**PLASKOLITE**

**VORYS**

## **Biographical Information**

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Nick Petruzzi is a Principal Engineer at Cox Colvin & Associates, Inc. He provides management and technical services on projects that pertain to RCRA Corrective Action, RCRA Closure, and air/water/waste permitting. He has also been involved with numerous projects that have required agency negotiation, regulatory interpretation, and the evaluation, design, and construction of remedies for contaminated soil and groundwater. Mr. Petruzzi holds a Bachelor's Degree in Geology and Environmental Science from Ashland University and a Master's Degree in Environmental Engineering from the University of Notre Dame. He is a Certified Professional Geologist and is a Registered Professional Engineer in the States of Ohio, Kentucky, and Pennsylvania.

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Mr. Edelstein is a Partner in the Vorys Cincinnati office and a member of the finance, energy and real estate group. His practice is focused on environmental enforcement, regulatory, and transactional matters. Prior to joining Vorys, David served as chief of the criminal enforcement unit for EPA Region VI in Dallas, Texas. He also served as a RCRA enforcement attorney for EPA Region VI. Mr. Edelstein has a Bachelor's Degree in Biology from Ohio Northern University, a Master's Degree in Environmental Science from Cleveland State University, and a Juris Doctorate from the Cleveland-Marshall College of Law.

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Mr. Croxton is an Environmental Manager at PLASKOLITE, LLC., a plastic sheet manufacturer founded in Columbus, Ohio. He has over six years of experience overseeing environmental compliance, including hazardous waste management under RCRA, at Plaskolite's two Ohio plants in Columbus and Zanesville. Mr. Croxton graduated from The Ohio State University in 2016, receiving a Bachelor of Science degree in Environmental Science.

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