



## Facility History

The Treatment Storage and Disposal Facility (TSDF) located at 300 Cherokee Drive, Dayton, Ohio 45417 (formerly 300 South West End Avenue with an EPA ID# OHD004274031), was founded in 1941 as Clark Oil Company, Inc., which is in no relation to Clark Brands. As part of the World War II effort, the Dayton facility collected and recycled used oil, tires and batteries. Used oils were blended with off specification virgin fuel oils on a small-scale basis and sold to asphalt plants as fuel. The Used Oil Fuel product that was made during that time is still produced and sold by the Dayton facility to this very day.

After World War II, the company expanded its operations to include the production of various asphalt materials for asphalt plants and asphalt contractors. During that era, the facility discontinued the collection and recycling of used tires.

During the 1950s and 1960s, plant operations diversified, and the company became a distributor of fuel oil for home heating. This new product opened a substantial market within the southwestern region of Ohio.

Between 1978 and 1980, the company was sold under an asset purchase. In 1980, the company changed its name to Clark Oil Products, Inc. The new corporation continued to produce asphalt products until 1984; thereafter, the used oil recycling program became the primary focus of the organization.

In 1986, Clark Oil Products was sold under an asset purchase and began operating under the name of Clark Processing, Inc. (CPI). Technological process improvements occurred during this time period, as well as facility upgrades and renovations to accommodate and properly manage larger used oil volumes.

As the demand for used oil increased, U.S. EPA was issuing new permits to fossil-fuel industries to burn used oil. Used oil was subsequently marketed per 40 CFR Part 279 requirements as either "specification" or "off-specification".

CPI's business region for the collection of used oils had grown to include the entire state of Ohio as well as Indiana, Illinois, Kentucky, Pennsylvania and West Virginia. During this time, CPI was also recognized by the U.S. EPA as qualifying for RCRA "interim status" to allow future hazardous waste fuels blending operations.

In 1987, the Ohio EPA issued a Permit to Install (PTI) for a wastewater pretreatment facility. As a result, a discharge permit was issued by the Montgomery County, Ohio Wastewater Division.

In 1989, the Ohio EPA acknowledged that the CPI facility qualified under the "permit-by-rule" legislation as a Fuel Blending and Storage Facility regulated by 40 CFR Part 266. Consequently, in June 1989, CPI began accepting hazardous waste streams for energy recovery (aka Fuels Blending). A RCRA Part B facility permit application was submitted to the U.S. EPA and Ohio EPA for the Fuels Blending activity.

After 1989, CPI expanded its operations to include a fully equipped analytical testing laboratory, an improved hazardous waste drum storage facility, and a comprehensive transportation service.

CPI was also approved to manage waste from CERCLA (Superfund) clean-up activities in EPA Region V. This is a distinction that the facility has maintained since achieving this status. As a permitted facility, the facility undergoes regular inspections to maintain its permit and status as approved.

In 1992, CPI was acquired by Quadrex Corporation. During this time the facility expanded, and its wastewater treatment capabilities were upgraded. The company designed a treatment plant around two ultrafiltration units, a system designed to manage 3 million gallons of wastewater per month.

In 1994, the facility received approval to accept and treat RCRA characteristic hazardous wastewater contaminated with heavy metals (RCRA D004-D011).

Also, in 1994, the facility and the fixed-base operations of Quadrex Environmental Company were acquired by Perma-Fix Environmental Services, Inc., and Perma-Fix of Dayton, Inc. was founded.

In December 1995, Perma-Fix of Dayton was issued its Ohio Hazardous Waste Facility Installation and Operation Permit (Part B Permit). In February 1996, Perma-Fix of Dayton was issued the federal portion of the Hazardous Waste Facility Installation and Operation Permit. At that time, the company stopped blending hazardous waste as a fuel and simply became a consolidator of hazardous waste in containers, still treating hazardous waste water in bulk however, under the jurisdiction of the Clean Water Act.

Treatment and plant expansions in November 1996 increased the capabilities for characteristically hazardous wastewater (RCRA D002–D011) and other characteristic wastes, bearing water, that could be treated and stabilized under the permitted Clean Water Act system. Also, a set of three large batch tanks were permitted and installed in the name of treating wastewaters that required a unique, specialty treatment matrix to manage. These new treatment tanks complimented the continuous throughput of the ultrafiltration (UF), picking up the hard-to-treat streams the UF's couldn't manage.

In 2000, a second major wastewater expansion saw a biological treatment system installed, improving effluent quality through a technologically advanced process to remove dissolved organic contaminants (RCRA D001 & D012-D043). This reduced the loading the plant put on the Publicly Owned Treatment Works (POTW) to whom it has always discharged.

In March 2008, OGM Ltd. dba Clean Water Ltd. (CWL) made an asset purchase of the facility from Perma-Fix Environmental Services. Clean Water Limited discarded the ultrafiltration units in exchange for a Dissolved Air Filtration (DAF) based treatment system in Dayton. CWL also brought new technology with its own two facilities- one in Columbus, Ohio and one in Mansfield, Ohio. CWL technology included the use of Niro Thin Film Evaporators to treat industrial wastewaters. These units, while not being nearly as robust as the operation in Dayton, are considered Best Available Technology (BAT) by the EPA.

Because of a struggling management group and identity in the marketplace, in June of 2015 OGM Ltd. DbA Clean Water Ltd. (CWL) filed for and was granted receivership status and protections.

On September 19<sup>th</sup>, 2017 the assets of CWL, minus the original CWL facility in Columbus, Ohio, were sold to HD Special Solutions LLC and Clean Water Environmental (CWE) was born. CWE has kept the CWL Mansfield operation with intent to grow its capabilities and throughput. This move puts the Dayton Facility back in to the hands of folks who operated it during the Quadrex and Perma-Fix era. Much work needs to be done to remedy some of the losses resulting from the CWL time. This effort is well underway, which when complete, will lead to the return of our leadership in the industry as a company with the culture and technology in place to manage and recycling industrial residuals in a way that is ecological and effective.