

NOTICE OF MODIFICATIONS TO POST-CLOSURE PERMIT FOR YKK SNAP FASTENERS AMERICA INC.

This notice is to advise that YKK Snap Fasteners America Inc.'s Hazardous Waste Post-Closure Permit Number TNHW-151 has been modified by two permit modifications: a March 20, 2020 Class ¹1 and a May 20, 2020 Class 1. The facility (EPA ID TND069080513) is located at 200 Universal Drive in the city of Centerville, Hickman County, Tennessee. YKK Snap Fasteners America Inc. (YKK) ceased manufacturing operations at the facility on June 1, 2007.

The Class ¹1 modification parceled the property into two separate tracts. Tract 1 consists of 16.42 acres and includes a 50-foot Ingress-Egress Easement to Tract 2. Tract 1, which contains the plant and all developed infrastructure, is to be made available for purchase as an unencumbered property. All solid waste management units and areas of concern on Tract 1 have been determined to require no further action. Tract 2, which shall be retained by YKK, is an 11.85-acre tract that only contains one unit, the Hazardous Waste Impoundment Area. As part of the closure of the unit in 1989, the sludge was solidified and the surface impoundment was closed as a landfill with the sludge in place, which required a post-closure permit.

Other changes to the permit as part of the Class ¹1 modification included:

1. Identifying LBK Real Estate Corporation (YKK's real estate division of the corporation) as the recorded landowner of the YKK property;
2. Releasing Tract 1 from the recorded Hazardous Waste Deed Attachment Notice by recording a revised, DSWM-approved deed notice;
3. Recording the access easement to Tract 2. The easement shall ensure that YKK and the Tennessee Department of Environment and Conservation (TDEC) may access the remaining portion of the property (landfill) that continues to be subject to the hazardous waste post-closure landfill restrictions;
4. Noting in the permit that all the solid waste management units (SWMUs) on the Tract 1 parcel have been determined by DSWM to be no further action;
5. Requiring construction of a cross fence along the Tract 1 and Tract 2 property line to meet the permit's revised security requirements;
6. Changing the semi-annual groundwater sampling and analysis requirement to biennial.

The DSWM was unable to grant approval of YKK's request to reduce the frequency of inspections from semi-annual to annual as a Class ¹1 Permit Modification. TN Rule 0400-12-01-.07(10)4 requires a Class 2 Permit Modification to change the inspection schedule.

The Class 1 modification changed the name of the permittee (facility owner/operator) from YKK Snap Fasteners America Inc. to YKK (U.S.A.) Inc., Snap & Button Products and changed the facility name to YKK (U.S.A.) Inc.

For further information, contact Mr. Todd Baldwin, Director of Environmental Affairs, (502) 839-2222 or email at toddbaldwin@ykk-usa.com or contact Mr. Clayton Bullington at the DSWM's Central Office (615) 532-0859 or email Clayton.Bullington@tn.gov or fax (615) 532-0938.

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