



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

December 24, 2013

Mr. Douglas E. Roberts  
President  
Envirosafe Services of Ohio, Inc.  
876 Otter Creek Road  
Oregon, Ohio 43616-1200

RE: Envirosafe Services of Ohio Inc  
Permit – Intermediate  
Correspondence  
RCRA C – Hazardous Waste  
Lucas  
OHD045243706

**Subject: HW Permit Modification - Class 1 Acknowledgment**

Dear Mr. Roberts:

On October 15, 2013, Ohio EPA received a notification for a Class 1 hazardous waste permit modification from Envirosafe Services of Ohio, Inc. With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility's Part B permit application and permit.

The following changes were assigned a modification tracking number of 131015-1-1.

- Update Permit Conditions B.25 and K.7 to correct rules citations and update to current language for biennial reporting, and
- Update Section E, Appendix E.9 and Section J of the Permit Application to correct rules citations and update for biennial reporting.

Attached is a copy of the affected permit terms and conditions and permit application revisions. This has been included to ensure that all involved parties have written confirmation of the changes. If you have any questions concerning this action, please contact Lynn Ackerson or Gary Deutschman at the Ohio EPA Northwest District Office..

Sincerely,

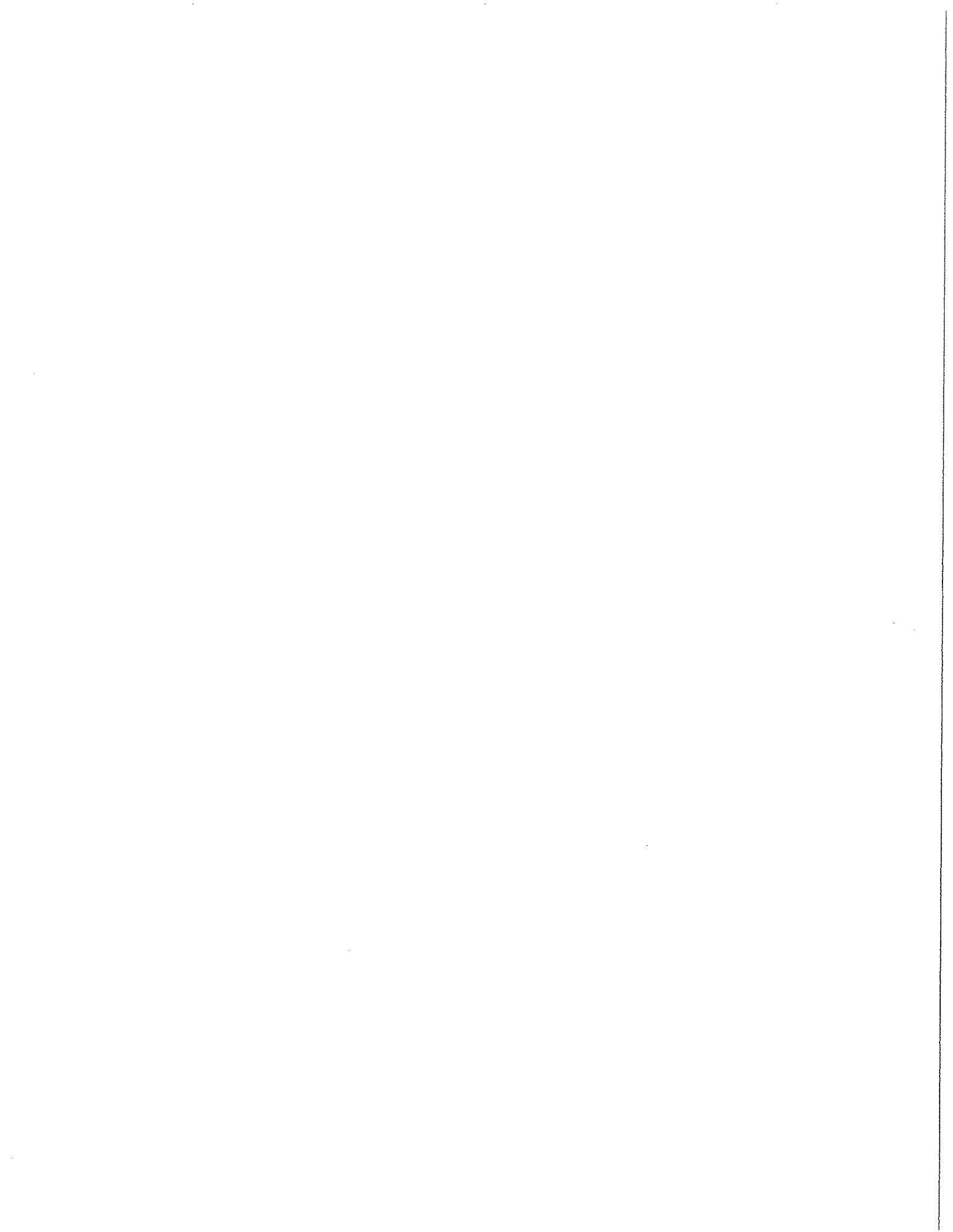
A handwritten signature in black ink, appearing to read "John Pasquarette".

John Pasquarette  
Manager, Northwest District Office  
Division of Materials and Waste Management

pc: ESOI Permit , DMWM-HW file, NWDO; ESOI Permit Application, DMWM-HW library, NWDO;  
Gary Deutschman, DMWM, NWDO and Robin Wiley, DMWM, NWDO

ec: Scott Hester, Supervisor, AAEU, DMWM, CO; Brad Mitchell, AAEU, DMWM, CO  
Gary Deutschman, DMWM, NWDO; John Pasquarette, DMWM, NWDO  
Robin Wiley, DMWM, NWDO; Michael Terpinski, DERR, NWDO; Lynn Ackerson, DERR,  
NWDO; Mike Beal, DDAGW, NWDO; and RCRAInfo Data Entry, DMWM, CO

/cg



- (a) In managing waste at the facility the Permittee must comply with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system.
- (b) Manifest discrepancy report.

If a significant discrepancy in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved within fifteen (15) days after receiving the waste, the Permittee must submit a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest, to the director in accordance with OAC Rule 3745-54-72.

- (c) Unmanifested waste report

If the Permittee receives unmanifested waste, which is not excluded from the manifest requirements of OAC Rule 3745-51-05, then the Permittee must submit an unmanifested waste report to the director within 15 days after receipt of the waste. The report must include the information required under OAC Rule 3745-54-76.

**B.25 Biennial Reports and Additional Reports**  
OAC Rules 3745-54-75 and 3745-54-77

The Permittee must comply with the report requirements set forth in OAC Rule 3745-54-75 and the additional report requirements set forth in OAC Rule 3745-54-77.

**B.26 Closure Performance Standard**  
OAC Rule 3745-55-11

During facility closure, the Permittee must implement the provisions of the closure plan found in Section I of the permit application in such a manner as to achieve compliance with OAC Rule 3745-55-11.

**B.27 Closure Plan**  
OAC Rules 3745-55-10, 3745-55-11 and 3745-55-13

The Permittee must implement those procedures detailed within Section I of the permit application, in accordance with OAC Rules 3745-55-10 through 3745-55-20.

In addition, the Permittee must submit to Ohio EPA within ninety (90) days after permit journalization, an updated Section I of the permit application which

(m) Applying the ACL Model

- (i) If the results of the ACL model indicate that the Permittee has not met the risk standards in Permit Condition K.6.(I)(i), then corrective action will apply, and must be conducted in accordance with Permit Condition K.3.
- (ii) Once the results of the ACL model have been evaluated for an area, and that area is determined to be subject to Corrective Action in accordance with Permit Condition K.3, it is not necessary to reevaluate the ACL for that area unless one or more of the following conditions apply:
  - (a) New constituents of concern or wells are added to the affected well listing,
  - (b) Significant changes in constituent concentrations are observed, or
  - (c) New information regarding model input becomes available (e.g., toxicity data, fate and transportation parameters).
- (iii) In addition to the risk standards for the ACL model, no concentrations in the uppermost aquifer in excess of maximum concentration levels (for constituents that have them) are permitted to leave the facility, including easements and rights-of-way. If such an exceedance occurs, then corrective action will apply, and must be conducted in accordance with Permit Condition K.3.
- (n) The Permittee must determine and report the ground water flow rate and direction in the uppermost aquifer semi-annually in accordance with Permit Condition K.7(b)(xvi).

K.7 Record Keeping and Reporting  
OAC Rule 3745-54-97(J)

- (a) The Permittee must submit semi-annually both a Preliminary Data Report and a Final Data Report and Evaluation for each semi-annual sampling and analysis event, conducted in April and October each year. Preliminary Data Reports must be submitted on or before July 1<sup>st</sup> for April

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## **SECTION E**

# **GROUNDWATER MONITORING INFORMATION**

(Consisting of Table of Contents and pages E-1 through E-102)

by case basis whether such constituents and wells must be considered elevated constituents and affected wells in accordance with Permit Condition K.6(d).

The statistical analysis required by this section will be reported in accordance with requirements of Section E-10. The preliminary report will include a list of all wells, and their respective parameters, for which a statistical exceedance has been observed, but not yet confirmed. The final report will include the results of the confirmation sampling. The reports shall contain the groundwater analysis data, statistical evaluation, and other reporting requirements listed in Section E-10 of this Part B Permit Application. The annual report will be submitted in accordance with OAC 3745-54-97(J) and Ohio EPA guidance.

#### **E-6b(1) Parameter Selection**

All of the indicator parameters selected in Subsection E-7 are intended to monitor the general water quality in the uppermost aquifer, i.e. the bedrock aquifer. They have been selected due to their mobility and detectability in groundwater, and based upon the types, quantities and concentrations of these constituents in wastes managed at the site. The "till" groundwater will be monitored for these same parameters, however, their primary purpose will be to act as an early indication of potential constituent migration into the aquifer. The parameters selected are listed in Subsection E-7b. Detection of any of these compounds in the groundwater could be either the result of laboratory error, misinterpretation of data results, a release from a regulated unit on-site, or a release from either a RCRA-regulated unit or unregulated unit off-site. Exposure pathways, other than migration to the bedrock aquifer, included:

- Shallow groundwater in trenches – Dermal Contact and Inhalation – Construction/Utility Exposure;

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- A report on, and schedule for, any permit modification requests to be submitted in accordance with Permit Condition K.7(c)(viii) and K.8.
- Discussion of any potential future action for wells with "J" flagged sample data (i.e., detections below a detection limit); and
- A discussion of the cumulative risks, if any, as determined through the ACL Model associated with potential constituents detected in multiple wells.

In accordance with OAC Rule 3745-54-77(C) and 3745-54-97(J), an annual report will be prepared and submitted to the Ohio EPA by March 1 of the following year.

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## **APPENDIX E.9**

# **GROUNDWATER MONITORING PROGRAM SAMPLING AND ANALYSIS PLAN**

(Consisting of TOC & Pages E.9-1 through E.9-111)

### **6.3 ANNUAL REPORTING**

In accordance with OAC 3745-54-77(C) and 3745-54-97(J) an annual report must be prepared and submitted to the Ohio EPA by March 1 of the following year. The content requirements of the report are stipulated in guidance documents prepared and distributed annually by the Ohio EPA, and may include items such as:

- A summary of facility information related to the groundwater monitoring program,
- Information on monitoring wells in the program network including copies of well-specific information for any new/replacement wells,
- A determination of the flow rate and direction of the uppermost aquifer (Bedrock aquifer),
- Summaries of the semi-annual sampling events including references to all groundwater reports submitted for that year,
- An electronic copy of groundwater and blank data in GRITS format or other format selected by Ohio EPA, and
- Summaries of statistical evaluations conducted on the semi-annual sampling data.

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## **SECTION J**

### **RECORD-KEEPING REQUIREMENTS**

(Consisting of TOC and Pages J-1 to J-21)

**J-6g**                    **Container Storage Record**

ESOI utilizes a comprehensive storage record which includes the date and time, the quantity of containers stored, the generators name, the waste description, the waste codes, the accumulation date, the area the container is stored and the container sequence number (for on-site waste). This allows the ESOI management to control each container while on-site and to ensure that the material has been properly processed, treated and disposed. During the weekly inspection, container integrity is assessed [OAC 3745-54-73]. Storage container inspection forms are located in Section F.

**J-6h**                    **Biennial TSD Waste Acceptance Reports**

In accordance with OAC 3745-54-75, ESOI submits to the Ohio EPA on a biennial basis, a report detailing by generator and EPA ID number the quantity and types of waste processed at the ESOI facility. This information is retained in the operating record.

**J-6i**                    **Groundwater Monitoring Records**

ESOI submits reports semiannual groundwater monitoring data to the Agency as required by OAC 3745-54-73. These data are also retained at the facility as part of the groundwater monitoring records. Refer to Section E for a complete description of ESOI's Integrated Ground Water Monitoring Program (IGWMP).

**J-6j**                    **Groundwater Monitoring Report**

In accordance with OAC 3745-54-77(C) and 3745-54-97(J), ESOI submits a groundwater monitoring report that details annual groundwater monitoring activities for the previous calendar year.

