



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Chris Korleski, Director

February 1, 2010

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

**Subject: Hazardous Waste Permit Modification  
Class 1A Approval and Classification  
Envirosafe Services of Ohio, Inc.  
U.S. EPA ID# OHD 045 243 706 / Ohio Permit #03-48-0092**

Dear Mr. Roberts:

On December 29, 2009, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number – OHD045243706-091229-1A-1) from Envirosafe Services of Ohio, Inc. (ESOI).

Ohio EPA has evaluated the permit modification classification using the criteria found in paragraph (E)(2) of OAC Rule 3745-50-51 and in accordance with OAC Rule 3745-50-51(E)(1)(b) has determined that the permit modification meets the criteria of a Class 1 modification requiring prior approval of the director. In addition, with this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51.

The following modifications revise Module G (Waterline Trench Monitoring Program) to clarify the inspection, record keeping, and reporting requirements as agreed upon by ESOI and Ohio EPA during negotiation of the October 2008 Proposed Director's Final Findings and Orders (DFFOs). This modification also revises inspection form WL-100 in Appendix F.11 of ESOI's Part B Permit Application. These modifications were assigned the permit information tracking system (PITS) ID number of OHD045243706-091229-1A-1:

- Replace Module G permit pages 99 through 103 with revised pages having the same page number (identified as Modification No. 041 dated December 18, 2009).
- Replace the existing Appendix F.11 Cover Page (Additional Inspection Forms) with the revised page (identified as Modification No. 041 dated December 18, 2009).
- Replace the existing Appendix F.11 page F.11-1 (Additional Inspection Forms) with the revised page (identified as Modification No. 041 dated December 18, 2009).
- Replace the existing one page WL-100 inspection form with the revised two page WL-100 inspection form (identified as Revision No.: 8 dated December 18, 2009).

Enclosed is a copy of the revised permit terms and conditions and permit application pages. This has been included to ensure that all involved parties have written confirmation of the changes.\*

Mr. Douglas E. Roberts  
February 1, 2010  
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DIV. OF HAZARDOUS  
WASTE MGT.

If you have any questions concerning this action, please contact Chris Maslo at the Ohio EPA, Northwest District Office, at (419)698-3130.

Sincerely,



Shannon M. Nabors  
District Chief

\*In accordance with OAC Rule 3745-50-51(D)(1)(a)(ii), ESOI shall send a notice within 90 days of an approved Class 1A modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Jeremy A. Carroll, P.E., Manager, Regulatory and Information Services Section at (614)644-2917, or by email at [jeremy.carroll@epa.state.oh.us](mailto:jeremy.carroll@epa.state.oh.us).

CM/cs

Enclosure

pc: Jeremy Carroll, Manager, RISS, DHWM, CO  
Mike Allen, Supervisor, ERAS, DHWM, CO (w/enclosure)  
Tammy Heffelfinger, DHWM, CO (w/enclosure)  
Cindy Lohrbach, DHWM, NWDO (w/enclosure)  
Gary Deutschman, DHWM, NWDO (w/enclosure)  
Mayor Michael J. Seferian, City of Oregon  
DHWM, NWDO - ESOI File: Permit, (w/enclosure)  
DHWM, NWDO File: ESOI Permit Application (enclosure only)

ec: Michael Terpinski, Supervisor, DHWM, NWDO  
Gary Deutschman, DHWM, NWDO  
Chris Maslo, DHWM, NWDO  
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Mary Setnicar, U.S. EPA Region V  
Jae Lee, U.S. EPA, Region V

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## MODULE G – WATERLINE TRENCH MONITORING PROGRAM

### G. MODULE HIGHLIGHTS

Two City of Toledo low pressure raw water transmission lines transect the Permittee's property. These water transmission lines carry untreated water from Lake Erie to the City of Toledo Collins Park Water Treatment Plant located at 600 Collins Park, Toledo, Ohio, 43605. The Permittee installed monitoring and dewatering trenches on either side of these water transmission lines.

One of the two transmission lines is a 78 inch, bituminous-coated, steel pipe constructed in 1939 to 1940. This pipe was installed at a depth ranging from 11 to 21 feet below ground surface (bgs). Backfill consisted of "selected clay" that was compacted to 24 inches above the top of the pipe. In 1967, the second line, a 60 inch steel encased pre-stressed concrete pipe, was installed to the north and parallel to the original line at a depth ranging from 9 to 18 feet bgs. In 1973 to 1974, the first line was improved by adding a ½ inch thick cement grout lining to the inner-core of the pipe. The interior of the first line was inspected in 1984 and determined to be in good condition.

For the purpose of protecting the two waterlines, the Permittee installed waterline monitoring and dewatering trenches between the waste cells and the waterlines. These trenches were installed in various phases from 1984 to 1987 in conjunction with the facility's waste disposal area development. Each trench was installed at least one foot below the depth of the adjacent waterline. The trenches are approximately 2.5 feet wide and are sloped at one percent grade with collection sumps located at each end and the middle of trenches 1 and 2, each end of trenches 3, 4 and 5 and the middle of trench 6. According to the 1986 Hazardous Waste Groundwater Task Force Evaluation of Fondessy Enterprises, Inc. Oregon, Ohio, the trenches along the north side of the waterlines were backfilled with gravel to a level of two feet bgs and then sealed with recompacted blue clay as a means to prevent storm water infiltration. To enhance the collection of liquids in the trenches, a four inch slotted polyethylene flex hose is located at the bottom of each trench.

Waterline trenches 1, 2 and 6 have been historically clean and are designated waterline monitoring trenches by the Permittee. Trench 1 is located between Cell H and the waterlines and discharges to the Cell H surface water retention pond; Trench 2 is located between Cell I and the waterlines and discharges to the Cell I surface water retention pond; and, Trench 6 is located between Cell M and the waterlines and discharges to the Cell M storm water retention pond. The surface water from the retention ponds is discharged off-site through National Pollutant Discharge Elimination System (NPDES) outfalls. Waterline trenches 3, 4 and 5 are known to be contaminated and are designated by the Permittee as waterline dewatering trenches. Trench 3 is located between the New Oil Pond and the

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waterlines; Trench 4 is located between the Old Oil Pond and the waterlines; and, Trench 5 is located between Cell G and the waterlines. The liquids removed from dewatering Trenches 3, 4 and 5 are pumped to an on-site vacuum truck, tank or tanker truck and are recycled, shipped off-site for treatment or handled with F039 (multi-source landfill leachate). Trench locations can be found on drawing number F20D2A.

The purpose of this permit module is to detect if the liquids accumulated in waterline monitoring trenches 1, 2 and 6 become contaminated and to ensure that contaminated liquids accumulated in waterline dewatering trenches 3, 4 and 5 are removed and managed properly. Corrective action for the contaminated trenches is discussed in Module E of this permit.

#### G.1 Low Pressure Raw Waterline Security Agreement

- (a) The Permittee must continue to be a party to the Waterline Security Agreement with the City of Toledo as found in Appendix B.2 of the permit application.
- (b) The Permittee must remove and dispose of liquids in accordance with the Waterline Security Agreement and applicable regulations.
- (c) The Permittee must allow access to the waterline easement to the City of Toledo, Division of Environmental Services, to conduct appropriate testing and monitoring to determine compliance with the Waterline Security Agreement during all normal and customary facility operating hours.

#### G.2 Waterline Monitoring Trench Constituents List

A listing of the various analytical methods utilized to evaluate the constituents listed in Table G-1 below is located in Appendix B.3 of the permit application.

Table G-1: Monitoring Constituent List

Constituent	Limit
Volatile Organic Compounds	PQL
Semivolatile Organic Compounds	PQL
PCBs	PQL
Lead (Dissolved)	0.01 mg/L
Cadmium (Dissolved)	0.005 mg/L
Chromium (Dissolved)	0.05 mg/L

#### G.3 Waterline Trench Monitoring and Data Evaluation

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For the purposes of this module, waterline monitoring trenches are defined as those trenches which have not exceeded limits for any of the constituents listed in Table G-1 above. Likewise, waterline dewatering trenches are defined as those trenches which have historically exhibited constituent levels at or above the limits defined in Table G-1.

- (a) For waterline monitoring trenches, the Permittee must withdraw a sample from each waterline monitoring trench on a semi-annual basis and analyze the samples for the constituents listed in Table G-1.
  - (i) If the analysis shows any constituent in Table G-1 at or above the Limit specified for that constituent, then the Permittee must either designate the trench as a waterline dewatering trench or withdraw a confirmation sample from the affected waterline monitoring trench within 30 days of receipt of the original analytical results by the Permittee.
  - (ii) If the analysis and the confirmation analysis, confirmed in accordance with OAC 3745-54-98(G)(3), shows any constituent in Table G-1 at or above the Limit specified for that constituent, then the Permittee must designate the waterline monitoring trench as a waterline dewatering trench.
- (b) The Permittee must notify the director in writing within 14 days of determining that a waterline monitoring trench must be designated a waterline dewatering trench.

#### G.4 Inspection Schedules and Procedures

- (a) The Permittee must inspect the following at least one time per week:
  - (i) the waterline easement boundaries for potential degradation and/or damage to the cover systems of nearby waste management units;
  - (ii) the waterline monitoring and dewatering trench caps for erosion and/or damage;
  - (iii) the waterline monitoring and dewatering trench collection sumps for damage;
  - (iv) the City of Toledo waterline easement for evidence of leakage from the waterlines; and,
  - (v) the presence of pumpable liquids in the waterline monitoring trenches.

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- (b) In the event that degradation and/or damage to the cover systems of nearby waste management units along the waterline easement boundaries, erosion or damage to the waterline monitoring and dewatering trench caps, or damage to the monitoring and dewatering trench collection sumps, is observed during the weekly inspections required by Permit Condition G.4(a)(i) through G.4(a)(iii), the Permittee must notify Ohio EPA within 24 hours, document the problem on the inspection form and make necessary repairs within 30 days.
- (c) In the event that evidence of leakage from the waterlines is observed during the once per week inspections required by Permit Condition G.4(a)(iv), the Permittee must contact the City of Toledo and Ohio EPA within 24 hours.
- (d) The Permittee must inspect the liquid elevation levels in the waterline dewatering trench sumps every Monday, Wednesday and Friday. If one of these days is a holiday, the Permittee must conduct the inspection on that holiday or the following work day. If the liquid elevation in any waterline dewatering trench sump is at or above a point twelve (12) inches below the invert elevation of the adjacent waterline, the Permittee must:
  - (i) Record the date and time that the inspection of the waterline trenches for that day (e.g., Monday, Wednesday or Friday) is completed.
  - (ii) Commence pumping from at least one sump in each of the affected waterline dewatering trenches within 24 hours of the date and time recorded in Permit Condition G.4(d)(i).
  - (iii) Record the date and time that pumping commences at each of the waterline dewatering trenches required to be pumped by Permit Condition G.4(d)(ii).
  - (iv) Continue pumping the affected waterline dewatering trench(es) during the following work days until pump cavitation occurs or liquid flow ceases and the liquid elevation in all waterline dewatering trenches is below a point twelve (12) inches below the invert elevation of the adjacent waterline.

#### G.5 Recordkeeping and Reporting

- (a) For waterline monitoring trenches, the Permittee must submit a waterline monitoring trench report (due 30 days after receipt of all analytical data and data evaluation required by Permit Condition G.3(a)) to Ohio EPA and the City of Toledo. The report must contain the analytical results from the constituents listed in Table G-1.

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- (b) The Permittee must submit to Ohio EPA, on a monthly basis, a report detailing the date and amount of liquids removed from each waterline monitoring and dewatering trench.
- (c) In accordance with OAC Rule 3745-54-73, the Permittee must maintain a copy of the Toledo Waterline Elevation Weekly Summary Record (or an equivalent record) as part of the facility operating record.
- (d) In accordance with OAC Rule 3745-54-73(B)(5), the Permittee must maintain a copy of the inspection records required by Permit Condition G.4 as part of the facility operating record. The inspection records required by Permit Condition G.4 must include the date and time that the inspections are conducted, including any dates and times required by Permit Conditions G.4(d)(i) and G.4(d)(iii), and the observed liquid elevations.

Envirosafe Part B Permit Application  
Date: December 18, 2009  
Modification No.: 041

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## **APPENDIX F.11**

### **ADDITIONAL INSPECTION FORMS**

(Consisting of a Cover Sheet & Inspection Forms - See page F.11-1)

**ADDITIONAL INSPECTION FORMS**

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Name of Inspection Form	Form No.	Use Cycle	Rev No.	Rev. Date
Black Tank Area Weekly Inspection	BLK	Weekly	4	12-15-04
Safety and Fire Equipment Weekly Inspection	MF-11	Weekly	2	12-15-04
Miscellaneous Weekly Inspection	MF-12	Weekly	3	12-15-04
Wells Monthly Inspection	MF-13	Monthly	5	12-06-06
Sanitary Landfill Monthly Inspection	MF-14	Monthly	2	12-15-04
Waterline Easement & Trenches	WL-100	Weekly	8	12-18-09

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Date: December 18, 2009

Revision No.: 8

OHIO EPA\* / CITY OF TOLEDO RAW WATERLINE SECURITY AGREEMENT  
ESOI WEEKLY INSPECTION FORM WL-100

DATE: \_\_\_/\_\_\_/\_\_\_ WEEKDAY \_\_\_\_\_ NAME: \_\_\_\_\_

TIME: \_\_\_\_\_ AM / PM (Inspection Completed Time) SIGNATURE: \_\_\_\_\_

Each Item Listed Shall Be Inspected For Presence of a Potential Problem Which May Affect the Operation of the Unit, Or Which May Lead to an Event Which Would Cause a Threat to Human Health or The Environment. Record the Outcome of the Inspection in the Space Provided and Provide any Observations as Appropriate. Any Deficient Items Shall be Marked, Reported and the Date and Nature of the Correction Noted. If an Item is not Inspected, Check NI (Not Inspected). If You Correct a Problem (or Have it Corrected) During Your Inspection, Mark it "OK", But Make a Note of it on the Form. Observation and Follow-Up is Required if the Outlined ("Problem Found") Box is Marked. Inspections with \* are required by Ohio EPA Permit Module G. Waterline Elevation Levels must be Checked Mon-Wed-Fri (Footnote 2).

INSPECTION ITEMS	YES	NO	NI	COMMENTS/OBSERVATIONS
<b>1) ADJACENT DISPOSAL CELL BOUNDARIES</b>				
A) Degradation of Landfill Dike*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B) Physical Damage To Landfill Dike*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
C) Damage / Erosion of Landfill Cap*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
D) Exposed Landfill Liner*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
<b>2) MONITORING AND DEWATERING TRENCH CAP</b>				
A) Erosion of Cap*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B) Damage / Degradation of Cap*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
<b>3) WATERLINE EASEMENT AREA</b>				
A) Evidence of Leakage*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B) Surface Water Buildup	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
C) Visible Contamination / Spillage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
D) Roadways / Cover Degraded	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
E) Poor Housekeeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
<b>4) EASEMENT MARKERS IN PLACE</b>				
A) Center Iron Pins / Markers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B) Boundary Monuments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
C) Fluorescent Markers / Laths	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
<b>5) MONITORING TRENCH (1, 2, 6) COLLECTION SUMPS</b>				
A) Pumpable Liquids In Sumps Today*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B) Damage To Sumps*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
C) Visible Contamination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
D) Obstructions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
E) Levels Are Below Invert Elevation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
F) Levels Are Below 6-Inch Trigger Elevation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
G) 2 <sup>nd</sup> Wkly Level Check < 6-Inch Trigger Elev.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
H) 3 <sup>rd</sup> Wkly Level Check < 6-Inch Trigger Elev.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
<b>6) DEWATERING TRENCH (3, 4, 5) COLLECTION SUMPS</b>				
A) Pumpable Liquids In Sumps Today*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B) Damage To Sumps*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
C) Visible Contamination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
D) Obstructions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
E) Levels Are Below Invert Elevation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
F) Levels Are Below 1-Foot Trigger Elevation*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
G) 2 <sup>nd</sup> Wkly Level Check < 1-Foot Trigger Elev.*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
H) 3 <sup>rd</sup> Wkly Level Check < 1-Foot Trigger Elev.*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

If "NO", Record Data on Page 2  
If "NO", Record Data on Page 2  
If "NO", Record Data on Page 2

Summary of the Inspection Area / Date and Nature of Corrective Action Taken<sup>1</sup>:

\_\_\_\_\_  
\_\_\_\_\_

<sup>1</sup> Record 6F, 6G, 6H Dewatering Trench Inspection and Pumping Start / End Times\* on Page 2 If Over Trigger. Monitoring Trench Inspection and Pumping Data is Documented on City of Toledo Elevation Weekly Summary Record and Waterline Monthly Volume Report.

**OHIO EPA\* / CITY OF TOLEDO RAW WATERLINE SECURITY AGREEMENT**  
**ESOI WEEKLY INSPECTION FORM WL-100**  
Water Elevation Inspection Weekly Summary for **Dewatering\*** Trenches 3, 4 and 5

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Inspect Dewatering Trenches Monday, Wednesday and Friday<sup>2</sup>. If Water Elevation<sup>3</sup> is At or Above the 12" Below Invert Trigger Level or Above the Invert Elevation, Start Pumping Affected Trench Within 24-Hours of Inspection Completed. Date and Time of the Initial Inspection for This Week is Recorded on Page 1. Record Date and Time of Any Subsequent Inspections Below. Complete the Date and/or Time that an Affected Trench is Pumped, Pumping is Completed (i.e., Pump Cavitates) and the Lowered Elevation Level of the Affected Trench is Verified. If Liquid Elevations Are Below the Trigger Level When Inspected, This Section Does Not Need to be Completed; See Footnote 3.

Trench No.	Date Inspected	Time Inspected	Water Level 12" Below Invert or Higher ?	Water Level Above Invert ?	Date Pumping Started	Time Pumping Started	Date Pumping Completed	Date Elevation Verified
<i>1<sup>st</sup> Insp.</i>								
3								
4								
5								
<i>2<sup>nd</sup> Insp.</i>								
3								
4								
5								
<i>3<sup>rd</sup> Insp.</i>								
3								
4								
5								

**Water Elevation Inspection Weekly Summary for **Monitoring<sup>4</sup>** Trenches 1, 2 and 6**

Completion of This Table is Optional; See Footnotes 1 Through 4. The Once a Week 5A, 5B Inspection is documented on Page 1.

Trench No.	Date Inspected	Time Inspected	Water Level 6" Below Invert or Higher ?	Water Level Above Invert ?	Date Notice Sent to TDOES	Date Pumping Started	Date Pumping Completed	Date Elevation Verified
<i>1<sup>st</sup> Insp.</i>								
1								
2								
6								
<i>2<sup>nd</sup> Insp.</i>								
1								
2								
6								
<i>3<sup>rd</sup> Insp.</i>								
1								
2								
6								

<sup>2</sup> If the inspection date is a Holiday, the inspection must be performed on either the Holiday or on the next work day after the Holiday.

<sup>3</sup> Water elevation level and measurement date for each sump is recorded on the City of Toledo Elevation Weekly Summary Record.

<sup>4</sup> **Monitoring** Trench inspections are required once per week by Ohio EPA Permit Module G. TDOES requires Level Inspections M-W-F.