



State of Ohio Environmental Protection Agency

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MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

February 10, 2010

Re: **Envirosafe Services of Ohio, Inc.**
EPA ID No: OHD 045 243 706
Modified Hazardous Waste Permit

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

Dear Mr. Roberts:

On October 21, 2009, Ohio EPA received Envirosafe Services of Ohio, Inc.'s (Envirosafe) request to lower the final height of the authorized Cell M landfill disposal cell from 714 feet MSL to 700 feet MSL. The consequences of this change include a reduction of the available airspace for waste disposal in the landfill and a need to revise technical drawings and technical information in the Permit application. For this modification, Envirosafe submitted a Class 2 modification application¹. The Agency did not receive any comments concerning this Class 2 modification application. I have enclosed the final modified Ohio hazardous waste facility installation and operation permit (Permit) that was issued by the director today. Please note that the modified Permit remains in effect until it is renewed, withdrawn, suspended or revoked.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

¹ Ohio EPA assigned tracking # 091021-2-1 to this modification application.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer

Mr. Douglas Roberts
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Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Gary Deutschman of Ohio EPA's Northwest District Office at (419) 352-8461.

Sincerely,



Jeremy A. Carroll, P.E.
Manager, Regulatory and Information Services Section
Division of Hazardous Waste Management

cc: Edwin Lim, ERAS, DHWM, CO
Mike Allen, ERAS, DHWM, CO
John Pasquarette/Gary Deutschman/Michael Terpinski, DHWM, NWDO
Carol Hester, Ohio EPA, PIC

OHIO EPA ISSUES CLASS 2 MODIFIED HAZARDOUS WASTE PERMIT

On February 10, 2010, Ohio EPA issued a modified Hazardous Waste Facility Installation and Operation Permit (Permit) to Envirosafe Services of Ohio, Inc. for its facility at 876 Otter Creek Road, Oregon, Ohio 43616. The EPA Identification Number for this facility is OHD045243706.

Why is Envirosafe Services of Ohio, Inc. modifying its Permit?

Envirosafe Services of Ohio, Inc. (Envirosafe) is permitted to operate a hazardous waste landfill and other related hazardous waste management units at its facility. Envirosafe wishes to lower the final height of the authorized Cell M landfill disposal cell from 714 feet MSL to 700 feet MSL. The consequences of this change include a reduction of the available airspace for waste disposal in the landfill and a need to revise technical drawings and technical information in the Permit application. This final modified permit will allow Envirosafe to make the requested changes. To issue this final modified Permit, Ohio EPA determined that the modification application is complete and meets appropriate standards.

Can I appeal this final modified Permit?

Yes, if you are an officer of an agency of the state or of a political subdivision, acting in a representative capacity, or any person who would be aggrieved or adversely affected by this modified Permit, you have the right to appeal this Permit decision to the Environmental Review Appeals Commission (ERAC).

If I decide to appeal this final modified Permit, how and when must I make the appeal?

If you file an appeal, you must put it in writing no later than **March 15, 2010**. Your appeal must explain why you are appealing the action and the grounds you are using for your appeal. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. You must file your appeal, according to Ohio Revised Code § 3745.04 with ERAC at the following address: ***Environmental Review Appeals Commission***, 309 South Fourth Street, Room 222, Columbus, Ohio 43215. You must send a copy of the appeal to the director of Ohio EPA at the following address no later than three (3) days after you file it with ERAC: ***Chris Korleski, Director of Ohio EPA***, P.O. Box 1049, Columbus, Ohio 43216-1049.

OHIO E.P.A.

OHIO ENVIRONMENTAL PROTECTION AGENCY

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**MODIFIED OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT**

ENTERED DIRECTOR'S JOURNAL

Date of Issuance: February 10, 2010
Effective Date: February 10, 2010

U.S. EPA ID No.: OHD 045 243 706
Ohio Permit No.: 03-48-0092

Name of Permittee: EnviroSAFE Services of Ohio, Inc.
Mailing Address: 876 Otter Creek Road
Oregon, Ohio 43616
Facility Location: 876 Otter Creek Road
Oregon, Ohio 43616
Person to Contact: Douglas E. Roberts, President

This Modified Ohio Hazardous Waste Facility Installation and Operation Permit is issued pursuant and subject to Section 3734.05(I) of the Ohio Revised Code and Rule 3745-50-51(D) of the Ohio Administrative Code.

The Ohio Hazardous Waste Facility Installation and Operation Permit with the above-referenced permit number as issued by the Ohio Environmental Protection Agency and journalized on December 29, 2005, is hereby incorporated by reference in its entirety, except as it may be modified herein.

This modification of the permit shall remain in effect until such time as the Ohio Hazardous Waste Facility Installation and Operation Permit is renewed, modified, withdrawn, suspended or revoked.

The Permittee shall comply with all requirements of the modified Part B permit application as amended or supplemented on October 21, 2009. The information contained in the modified Part B permit application is incorporated herein by reference. Specifically, all written statements regarding the specifications, locations or capabilities of the processes, equipment, containment devices, safety devices or programs or other matters made by the applicant in the permit modification application are hereby incorporated as express, binding terms and conditions of this modified permit.

The modified Terms and Conditions of this permit are attached hereto and are incorporated herein by reference. The modified Terms and Conditions supersede and replace the corresponding pages found in the December 29, 2005 renewal permit.

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: D. Lassiter Date: 2-10-10

Chris Korleski
Chris Korleski, Director

**OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF HAZARDOUS WASTE MANAGEMENT**

**SUMMARY OF MODIFICATIONS TO HAZARDOUS WASTE
INSTALLATION AND OPERATION PERMIT**

Envirosafe Services of Ohio, Inc.
U.S. EPA ID #: OHD 045 243 706
Ohio ID #: 03-48-0092

Modification of the Hazardous Waste Facility Installation and Operation Permit will authorize Envirosafe Services of Ohio, Inc. (ESOI) to make the following change:

Class 2 Modification:

- 1) Reduce the final finished height (from 714 MSL to 700 MSL) and landfill capacity (from 3.247 to 3.194 million cubic yards) of Cell M.
- 2) Update ESOI's Part A Permit Application (EPA Form 8700-23) to reflect the change in Process Design Capacity for Cell M.
- 3) Update the Permit Module J – Module Highlights to reduce the capacity of Cell M and to update Permit Condition J.2(o)(iii) to reflect the new maximum above-grade elevation.
- 4) Update Section D of the Permit Application to revise Table D-5 (showing the capacity of Cell M) and to update the Slope Stability Analysis (Appendix D.10, Tab VI), the Stormwater Drainage Calculations (Appendix D.10, Tab IX), the Capacity and Volume Analysis (Appendix D.10, Tab XXVI), and the Cell M Landfill Operational Plan and Construction Details (Appendix D.31).
- 5) Replace Drawings PRMO-L06, PRMO-L12, and PRMO-L12A with new revisions.

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MODULE J – CELL M LANDFILL

J. MODULE HIGHLIGHTS

The Permittee maintains and operates one active landfill known as Cell M and shown on Drawing PRMO-T04 in Volume 8 of the permit application. The scope of this permit module involves regulatory requirements for Cell M. Cell M, located south of York Street, was excavated and developed in a total of 3 phases. Cell M is approximately 25 acres at ground surface and extends approximately 45 feet below the original ground surface and is permitted for a maximum height of 120 feet (700 msl) above the ground surface. Cell M was constructed with a multi-component bottom liner system that consists of a minimum of 9 feet of recompacted, engineered clay and multiple synthetic liners which is discussed in more detail below. The components of the liner and leachate collection systems are described in the Construction Quality Assurance report for Cell M, Phases 1, 2 and 3 Below Grade Liner Construction. As-built details of Cell M excavation and the secondary clay liner are provided within the Cell M, Phases 1, 2 and 3 As-Built Drawings. The total capacity for Cell M is approximately 3.194 million cubic yards.

The bottom of Cell M was designed and constructed with a double liner system that includes the following components (listed from bottom to top):

- A secondary composite liner consisting of a minimum of 9 feet (and a maximum of 21 feet) of recompacted clay layer covered by a 60-mil High Density Polyethylene (HDPE) geomembrane liner.
- A leak detection and collection system above the secondary liner consisting of a geotextile covering a 12-inch aggregate drainage layer covering another geotextile and a HDPE geonet.
- A primary composite liner consisting of 2 feet of recompacted clay support layer covered by an 80-mil HDPE geomembrane liner.
- A leachate collection system (LCS) above the primary liner consisting of a geotextile, a 12-inch aggregate drainage layer, another geotextile and an HDPE geonet.

The internal sideslopes of Cell M were designed and constructed with a double liner system that includes the following:

- A secondary liner consisting of a minimum of 6.5 feet of recompacted clay

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- (ii) the slope of the final cover top surface must range from 3% to 5%;
and,
 - (iii) the maximum above-grade elevation must not exceed 106 feet (i.e.,
700 feet above mean sea level) including the final cap thickness.
 - (iv) all above grade side slopes must be designed to achieve a
minimum deep-seated static slope stability factor of safety of 1.5
and a corresponding seismic factor of safety of 1.0.
- (p) The landfill must maintain both a lead detection/collection system and
primary leachate collection and removal system in accordance with the
plans contained in the permit application, Ohio hazardous waste rules,
and the terms and conditions of this permit.
- (q) For each phase of landfill construction, the Permittee must have an
independent, qualified, registered professional engineer monitor and
examine the construction and certify, in accordance with OAC Rule 3745-
50-42(D)(1), that construction is in accordance with the document,
statements, designs, and plans contained in the permit application and the
terms and conditions of this permit. Said engineer must be selected and
paid for the Permittee and approved by Ohio EPA.
- (r) Within 30 days of the effective date of this permit and prior to beginning
construction activities related to the vertical expansion modification, the
Permittee shall submit revised plan drawings, cross sections and related
details in accordance with the compound slope specifications as outlined
in their February 10, 2005 revised slope stability calculations. The revised
drawings and design specification must be consistent with the slope factor
of safety requirements specified in Permit Condition J.2(o)(iv) above.
Within this same period the Permittee must also submit revised application
pages for all other sections of the vertical expansion modification
(received by Ohio EPA on January 22, 2004) that are affected by the
February 10, 2005 submission (e.g., settlement calculations, surface
drainage, etc.).

The information required by this condition must be submitted as a Class 1
permit modification requiring director's approval (Class 1A) in accordance
with OAC Rule 3745-50-51.