



State of Ohio Environmental Protection Agency

Northwest District Office

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

December 17, 2009

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 & Classification
Envirosafe Services of Ohio, Inc.
U.S. EPA ID# OHD 045 243 706 / Ohio Permit #03-48-0092**

Dear Mr. Roberts:

On November 30, 2009, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number – OHD045243706-091130-1A-1) from Envirosafe Services of Ohio, Inc. (ESOI). On December 3, 2009, Ohio EPA received via email, revisions to the original request. Ohio EPA has evaluated the permit modification classification using the criteria found in paragraph (E)(2) of Ohio Administrative Code (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 OAC Rule 3745-50-51.

The following modification has been made to Appendix E.7, *Statistical Method and Calculated Groundwater Prediction Limits for Sodium, Chloride, Fluoride, Dissolved Barium and Total Metals*, of your December 29, 2005, Ohio Hazardous Waste Facility Installation and Operation Permit. Total metals prediction limits for monitoring wells I-3D, I-4S, I-5SA, M-12D, M-16S, and M-17S and total cyanide prediction limit for R-6 have been added to Appendix E.7 and the following pages in Ohio EPA's records have been changed accordingly:

- Replaced existing Appendix E.7 Cover Page;
- Replaced page E.7-i, Table of Contents;
- Added Appendix E.7 text pages E.7-460 through E.7-517 after page E.7-459; and
- Replaced Page 138 of 165 of ESOI's Permit Terms and Conditions.

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

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DIV. OF HAZARDOUS
WASTE MGT.

If you have any questions concerning this action, please contact Lynn Ackerson at the Ohio EPA, Northwest District Office, at (419)373-4112.

Sincerely,



Shannon Nabors
District Chief

*Also, 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 e-mail at jeremy.carroll@epa.state.oh.us.

LA/cs

Enclosure

pc: Jeremy Carroll, RISS, DHWM, CO
~~Mike Allen, RISS, DHWM, CO (w/enc.)~~
Cindy Lohrbach, DHWM, NWDO (w/o enc.)
Gary Deutschman, DHWM, NWDO (w/enc.)
Chris Maslo, DHWM, NWDO (w/enc.)
DHWM, NWDO File: ESOI Permit App. (enc. only)
DHWM, File: Permit (w/enc.)

ec: Lynn Ackerson, DHWM, NWDO
Michael Terpinski, Supervisor, DHWM, NWDO
Gary Deutschman, DHWM, NWDO
Mike Beal, DDAGW, NWDO
Mary Setnicar, U.S. EPA, Region V
Jae Lee, U.S. EPA, Region V

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- (ii) Table K-2. Constituents With Comparison Standards listed in Appendix E.7 of the approved Part B permit application:

Constituent
Barium (dissolved)
Cyanide at R-6

- (iii) For constituents without comparison standards listed in Appendix E.7 of the approved Part B permit application (e.g., new or replacement wells or Appendix to OAC Rule 3745-54-98 constituents where comparison standards are required as a result of a well being identified as affected), comparison standards must be developed in accordance with the following requirements and submitted as a permit modification to Appendix E.7 of the approved Part B permit application.

- (a) The Permittee must evaluate currently available analytical results and determine, based on historical data at the site, regional data, geologic information and other relevant information, whether the constituent concentration at each well has been affected by past or current operations at the facility per Permit Condition K.6(c). The determination and justification supporting the determination must be submitted with the first semi-annual final data.
- (b) In the case that the Permittee finds, in accordance with Permit Condition K.2(b)(iii)(a), that the concentration of a constituent at a well has been affected by past or current operations at the facility or the director does not concur with the Permittee's findings that it is not elevated, then that constituent at that well will be considered elevated until demonstrated, to the director's satisfaction, that it is not elevated due to past or current operations of the facility.