



State of Ohio Environmental Protection Agency

Northwest District Office

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OHIO EPA

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DIV. OF HAZARDOUS
WASTE MGT. Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

November 10, 2006

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

**Re: 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 September 29, 2006, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number – OHD045243706-060929-1A-1) from Envirosafe Services of Ohio, Inc. (ESOI), located at 876 Otter Creek Road, Oregon, Ohio. 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 modification has been made to your December 29, 2005, Ohio Hazardous Waste Facility Installation and Operation Permit. Also, the records of Ohio EPA have been changed accordingly:

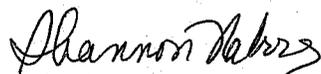
- Modification of ESOI Permit Condition K.6(b). This modification will allow the facility to utilize analysis of wells which are sampled in accordance with the facility's permit and in the calendar month preceding an April and/or October semi-annual sampling event to meet the requirements of Permit Condition K.6(b).

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

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If you have any questions concerning this action, please contact Lynn Ackerson at the Ohio EPA, Northwest District Office, (419)373-4113.

Sincerely,



Shannon Nabors
District Chief

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), EnviroSafe Services of Ohio, Inc. 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 Pamela Allen at (614)644-2917 or by email at pamela.allen@epa.state.oh.us.

/cs

Enclosure

pc: Pamela Allen, Manager, RIS, DHWM, CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO (w/enc.)
Gary Deutschman, DHWM, NWDO (w/enc.)
Mayor Marge Brown, City of Oregon
Oregon Document Depository – Permit Binder
DHWM, NWDO File: Ohio Permit (w/enc.)
DHWM, NWDO File: ESOI Term & Condition Permit Binder (enc. only)

ec: Lynn Ackerson, DHWM, NWDO
Michael Terpinski, Supervisor, DHWM, NWDO
John Pasquarette, Manager, DHWM, NWDO
Gary Deutschman, DHWM, NWDO
Mike Beal, DDAGW, NWDO

Carroll

K.5 Ground Water Surface Elevation
OAC Rule 3745-54-97(F)

- (a) The Permittee must determine the ground water surface elevation at each well, including chart recorder wells DUG-1, DUG-2, DDG-3, DDG-1 and CR-1, each time ground water is sampled, and submit the information in accordance with Permit Condition K.7(b)(xv).
- (b) The Permittee must report, in writing to the Ohio EPA, Northwest District Office, the surveyed elevation of the tops of casing, ground surface and/or aprons, and protective casings of any new or replacement monitoring wells specified in Permit Condition K.1(c) within 30 days of the date of installation.

K.6 Monitoring Program and Data Evaluation
OAC Rules 3745-54-96, 3745-54-98, 3745-54-99 and 3745-54-100

The Permittee must establish and implement an IGWMP as effective as the programs for detection monitoring under OAC Rule 3745-54-98 (ability to detect releases from the facility); compliance monitoring under OAC Rule 3745-54-99 (ability to determine if corrective action is required); and, where necessary, corrective action monitoring under OAC Rules 3745-54-100 and 3745-54-101 (ability to return the ground water to concentrations meeting the acceptable target risk levels using the ACL model). The Permittee must determine ground water quality as follows:

- (a) The Permittee must collect, preserve and analyze samples in accordance with Permit Condition K.4.
- (b) The Permittee must semi-annually determine the concentrations of the constituents specified in Tables K-1, K-2 and K-3 in Permit Condition K.2(b) throughout the compliance period and any extensions due to corrective action implementation, to demonstrate conformance with the ground water protection standard. Sampling for this determination must occur in April and October of each year. The Permittee may utilize analysis of wells which are sampled in accordance with this permit and in the calendar month prior to an April or October semi-annual sampling event to meet the requirements of this condition. Analysis results for the samples must be submitted to Ohio EPA Northwest District Office and entered into the operating record in accordance with OAC Rule 3745-54-73 and Permit Condition K.7.