



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

June 22, 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 & Classification  
Envirosafe Services of Ohio, Inc.  
U.S. EPA ID# OHD 045 243 706 / Ohio Permit #03-48-0092**

Dear Mr. Roberts:

On May 13, 2010, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number – OHD045243706-100513-1A-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 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 modifications have been made to your December 29, 2005, Ohio Hazardous Waste Facility Installation and Operation Permit:

- Permit Conditions K.6(e)(ii), K.6(e)(iii), K.6(f), (g), and (h): Wording change to clarify when the detection of a constituent would trigger an action.
- Part B Permit Application, Section E, Appendix E.11: Wording change to specifically indicate that values of non-naturally occurring constituents above the Method Detection Limit (MDL) will be used in evaluation of cumulative risk when using the Alternate Concentration Model presented in Appendix E.11.
- Part B Permit Application, Section E, Appendix E.12: Text modified to clarify when Tentatively Identified Compounds (TICs) will be validated in data packages.

Ohio EPA posted the changes as follows: Replaced the Ohio Hazardous Waste Facility Installation and Operation Permit pages 147 and 148. Replaced Part B Permit Application pages E.11-14, E.12-30 and 31, E.12-176, E.12-182, E.12-255, E.12-261, and E.12-262, of the Permit Application.

Enclosed is a copy of the permit terms and conditions and application revisions. 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, at (419)373-4112.

Sincerely,



Shannon M. 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](mailto:jeremy.carroll@epa.state.oh.us).

LA/cs

Enclosure

pc: 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 Terms and Conditions (enc. Only)  
DHWM, NWDO File: ESOI Permit App. (enc. only)  
DHWM, File: Permit (w/enc.)

ec: Jeremy Carroll, RISS, DHWM, CO (w/enc.)  
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) The Permittee may confirm the initial results of Appendix to OAC Rule 3745-54-98 sampling conducted pursuant to Permit Condition K.6(e)(i) in the same manner as described in Permit Condition K.6(c); otherwise any constituents reported initially will be assumed to have been detected.
- (iii) All non-naturally occurring constituents reported to be detected at or above the practical quantitation limit (PQL) during the Appendix to OAC Rule 3745-54-98 sampling in accordance with Permit Condition K.6(e)(i) and (ii) must be considered elevated. For naturally occurring constituents the Permittee must determine if the constituents are elevated by developing comparison standards in accordance with the requirements of Permit Condition K.2(b)(iii).
- (iv) The Permittee must report to the director in writing, according to the schedule in Permit Condition K.7:
  - (a) The change in status from unaffected to affected for the wells found to have elevated constituents in accordance with Permit Conditions K.6(c) through (g);
  - (b) The concentrations of all constituents reported following the Appendix to OAC Rule 3745-54-98 sampling in Permit Conditions K.6(e)(i) and (ii), K.6(f) and K.6(g).
  - (c) A list of elevated constituents for each well; and
  - (d) A permit modification request to add the elevated constituents to the constituent list for the affected wells and the wells monitoring the vertical and horizontal extent of elevated constituents (adjacent wells in the same horizon and wells in the same cluster monitoring the zone above or below). The Permittee must begin sampling for the elevated constituents in the associated affected wells and adjacent (vertical and horizontal) wells during the next semi-annual sampling event.
- (f) If the results of Appendix to OAC Rule 3745-54-98 sampling in accordance with Permit Condition K.6(e) indicate constituents are detected exceeding comparison standards, in accordance with Permit

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Condition K.6(e)(iii), in any of the wells adjacent to the well with the initial exceedence of a comparison standard, determined in accordance with Permit Condition K.2.(b)(i), (ii) and (iii), then the Permittee must conduct additional Appendix to OAC Rule 3745-54-98 sampling using the well sampling strategy described in Permit Condition K.6(e) not later than the next regularly scheduled sampling event at these adjacent wells. A well need only be sampled once within a given sampling event, excluding resampling or confirmation considerations, to meet the requirements of this Permit Condition, even if it is identified for this sampling more than once due to overlap.

- (g) The Permittee must analyze samples from all affected monitoring wells for all constituents contained in the Appendix to OAC Rule 3745-54-98 annually to determine if there are any new elevated constituents. The Permittee may confirm the initial results of this sampling in the same manner as described in Permit Condition K.6(c); otherwise, any constituents initially detected at or above the practical quantitation limit (PQL) or above its comparison standard will be assumed to be elevated. The Permittee must identify the constituents that are elevated in accordance with the procedures in Permit Conditions K.2(b)(iii) and K.6(e)(iii). The Permittee must report the analysis results and identify any new elevated constituents to the director in writing as well as submit a modification request to add any newly identified elevated constituents to the constituent list for the affected wells and the adjacent wells (vertical and horizontal), according to the schedule in Permit Condition K.7(c)(iii). The Permittee must begin sampling and analyzing for the new constituents in the associated affected wells during the next semi-annual sampling event.
  
- (h) Affected well will revert to unaffected status when there have been no elevated constituents detected at the well for three consecutive sampling events. Non-naturally occurring constituents at the site listed in Permit Condition K.2(b)(i) or the Appendix to OAC Rule 3745-54-98 are no longer considered elevated when they have not been detected at or above the method detection limit (MDL) for three consecutive sampling events. Naturally occurring constituents listed in Permit Condition K.2(b)(i) or K.2(b)(ii) or the Appendix to OAC Rule 3745-54-98 are no longer considered elevated when they are less than the associated comparison standard for three consecutive sampling events. Constituents that were added to a well's sampling and analysis list must remain on the well's sampling and analysis list.