



State of Ohio Environmental Protection Agency

Northwest District Office

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

November 6, 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 and Classification  
Envirosafe Services of Ohio, Inc.  
U.S. EPA ID# OHD 045 243 706 / Ohio Permit #03-48-0092**

Dear Mr. Roberts:

On October 20, 2009, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number – OHD045243706-091020-1A-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 to allow for the management of mixed RCRA and TSCA remediation waste with a total polychlorinated biphenyls (PCBs) concentration of 50 parts per million (ppm) to 100 ppm was assigned the permit information tracking system (PITS) ID number of OHD045243706-091020-1A-1:

- Modify page 119, Permit Condition J.1(d)(v) to allow for disposal of mixed RCRA/TSCA remediation waste in compliance with OAC Rule 3745-270-48 & 49.
- Modify page 127, Permit Condition J.4(e) to require daily cover of mixed RCRA-TSCA waste.
- Modify page 129, Permit Condition J.7(e)(i) to require annual testing of landfill leachate for PCBs.
- Replace the existing Appendix G.1 cover page with the revised page Appendix G.1 Description of Hazardous Wastes (identified as Modification No. 036 dated October 15, 2009).

Mr. Douglas E. Roberts  
November 6, 2009  
Page 2

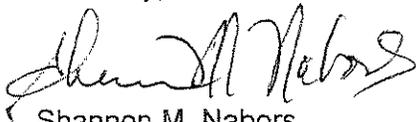
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- Replace the existing Appendix G.1 pages G.1-1 through G.1-4 (identified as Modification No. 036 dated October 15, 2009).

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.\*

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 Marge Brown, City of Oregon  
DHWM, NWDO - ESOI File: Permit, (w/enclosure)  
DHWM, NWDO File, ESOI Permit Terms and Conditions (enclosure only)  
DHWM, NWDO File: ESOI Permit Application (enclosure only)

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

NOV 06 2009

from the facility boundary, and 40 feet from the City of Toledo's water lines.

- (d) The following wastes are prohibited from disposal in landfill cells:
- (i) any wastes containing free liquids as determined in accordance with OAC Rule 3745-57-14, except lab packs;
  - (ii) water reactive or pyrophoric wastes, except as specified in OAC Rule 3745-57-12;
  - (iii) Class 1 explosives, as defined in 49 CFR 173.50(b)(1) and (2);
  - (iv) shock sensitive wastes;
  - (v) polychlorinated biphenyls (PCBs) regulated by the Toxic Substances Control Act (TSCA) (greater than or equal to 50 ppm), except waste that may be disposed in a RCRA facility in accordance with 40 CFR 761.61 that is also;
    - (i) a mixed RCRA-TSCA waste that complies with applicable Land Disposal Restriction (LDR) standards in OAC Rules 3745-270-48 and 3745-270-49.
  - (vi) radioactive wastes regulated by the Nuclear Regulatory Commission;
  - (vii) infectious wastes;
  - (viii) any waste in gaseous form;
  - (ix) any waste that under standard temperature and pressure, is capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard, as specified in OAC Rules 3745-51-21(B) and 3745-57-12(A);
  - (x) any lab pack container that is found either to be incorrectly packaged, incorrectly sealed, leaking, or which does not otherwise meet the requirements specified in OAC Rule 3745-57-16;
  - (xi) any ignitable, reactive, or incompatible wastes unless those wastes are containerized and physically separated by inert material to protect them from conditions that may cause them to ignite or react; and,

NOV 06 2009

- (c) the Permittee is authorized to conduct treatment within Cell M in accordance with the procedures outlined in Section D-4 and D-5 of the permit application. Authorized treatment of waste within the cell will be prohibited when there is a potential to generate fugitive dusts that could migrate beyond the landfill's perimeter; and,
- (d) the Permittee must continue to monitor the temperature of incoming bulk waste loads. If such temperature is less than 20 degrees Fahrenheit below the waste's flashpoint, the load must either be rejected or not disposed in the landfill until the temperature reaches the desired range.
- (e) Wastes containing PCBs accepted in accordance with Permit Condition J.1(d)(v)(i) must be handled in the following manner:
  - (i) Treated by the Permittee in the Stabilization/Containment Building to meet LDR standards in OAC 3745-270-49 prior to disposal in the landfill, and;
  - (ii) Following placement of treated waste in the landfill, the Permittee must cover the exposed surface of the waste with a daily cover material by the end of the working day. Suitable cover materials include soil, synthetic materials such as tarps, or spray-applied cover systems in general use for landfill systems.

J.5 Inspection Schedules and Procedures  
OAC Rule 3745-57-05

- (a) The Permittee must inspect Cell M in accordance with the Inspection Schedule found in Section F of the permit application and must complete the items in Permit Conditions J.5(b) and J.5(c) as part of those inspections:
- (b) Inspections during construction of landfill components, including but not limited to subsoil foundations, clay and synthetic cover and liners, leachate collection and leachate detection systems must be conducted in accordance with OAC Rules 3745-54-15, 3745-54-31, 3745-57-01, quality assurance and the inspection plans contained in the permit application, and the terms and conditions of this permit.
- (c) The Permittee must inspect the following components of the landfill weekly and after storm events (2 inches or more of rain in 8 hours):
  - (i) deterioration, malfunctions, or improper operation of run-on and run-off control systems;
  - (ii) proper functioning of wind dispersal control system; and
  - (iii) the presence of leachate in and proper functioning of leachate collection and removal systems, where present.
- (d) The Permittee must document compliance with Permit Condition J.5 in the operating record of the facility.

NOV 06 2009

- (iii) the waste's identification cross referenced to the manifest document number.
- (b) For each operating day, the Permittee must record in the facility's operating record:
  - (i) measurements of wind direction;
  - (ii) average and maximum wind speed; and,
  - (iii) precipitation accumulated over the previous 24 hour period.
- (c) The Permittee must record leachate level readings in the Cell M subcells prior to the removal of leachate, and after completion of leachate removal activities at the end of the working day. Leachate level readings used to determine compliance with Permit Condition J.3(a)(i) or OAC Rule 3745-57-03(A)(2) must be taken and recorded at the end of the working day.
- (d) The Permittee must report to Ohio EPA on a monthly basis, the following information related to the primary and secondary leachate collection and removal systems of Cell M:
  - (i) daily on-site rainfall measurements;
  - (ii) as applicable, any daily operational problems associated with the systems (e.g., pumps inoperable, transducers inoperable, etc.);
  - (iii) daily leachate level readings before and after any leachate removal from the systems; and,
  - (iv) daily volumes of leachate removed from the systems.
- (e) The Permittee must provide to Ohio EPA analytical results of leachate from each sub-cell annually. Parameters to be tested are listed in Table K-1 (Constituents with Specified Comparison Standards), K-2 (Constituents with Comparison Standards) and K-3 (Ground Water Quality Parameters) of this permit.
  - (i) The Permittee must annually test leachate from each sub-cell used to dispose of waste containing PCBs in accordance with Permit Condition J.1(d)(v)(i) for total polychlorinated biphenols (PCBs).