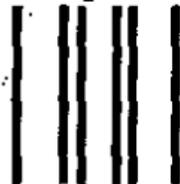




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**MR STEVE BLEY  
FACILITY COMPLIANCE MANAGER  
CLEAN HARBORS ENV SERVICES INC  
4879 SPRING GROVE AVE  
CINCINNATI OH 45232**

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**Southwest District Office**

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www.epa.state.oh.us

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

107  
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CA  
File

November 25, 2008

**Certified Mail**

Mr. Steve Bley  
Facility Compliance Manager  
Clean Harbors Environmental Services, Inc.  
4879 Spring Grove Avenue  
Cincinnati, Ohio 45232

**RE: October 6, 2008, Response Letter  
Spring Grove Resource Recovery – OHD000816629**

Dear Mr. Bley:

On October 14, 2008, Ohio EPA received Spring Grove Resource Recovery's (SGRR) response to the September 2, 2008, notice of violation letter. SGRR is contending the permit application is vague on who is responsible for contacting a generator and resolving waste discrepancies.

The WAP details what actions SGRR shall take during the Waste Prequalification Procedures (2.2), Waste Receiving Procedures (2.3), Conformance Testing (2.4), General Waste Acceptance Criteria (2.5), Process Operation and Compatibility Testing (2.6), Analytical Considerations (2.7), and Waste Analysis Requirements for the Land Disposal Restrictions (2.10).

In those Sections, the WAP details the instances when someone other than SGRR will be conducting a specific activity or has an impact on the WAP:

In Section 2.2, Waste Prequalification Procedures, the WAP details how the Central Profile Group (CPG) located in Braintree, Massachusetts, not SGRR, handles the review and approval of generator profiles. The WAP allows SGRR to override any CPG profile acceptance into SGRR.

In Section 2.3.3.1, Waste Receiving Procedures for Lab Packs, the WAP makes a distinction for lab packs "which were not packaged by SGRR/Clean Harbors personnel or other qualified individuals. . ."

In Section 2.7.1, Test Methods, the WAP states, "Analysis shall be performed by SGRR, other Clean Harbors' analytical laboratories, or qualified independent laboratories."

Mr. Steve Bley  
November 25, 2008

In Section 2.10.2.1, Incoming Waste Streams, the WAP states, "To aid in consistency, SGRR/Clean Harbors has developed standardized forms for use of incoming hazardous waste shipments."

At no point in Section 2.5, General Waste Acceptance Criteria, does SGRR's WAP suggest that anyone other than SGRR will be accepting waste shipments at the site, verifying the contents of the waste shipments and resolving the waste discrepancies.

In Section 2.5.1, Non-Conformance and Rejection, the WAP states, "In the event SGRR discovers a discrepancy between the prequalification description of the waste and the waste conformance testing, SGRR will contact the generator and attempt to resolve the discrepancy."

Therefore, the two (2) violations cited in the September 2, 2008, remain applicable to SGRR. Within 14 days of receipt of this letter, please provide Ohio EPA with information regarding the steps SGRR has taken to abate the violations. If you have any questions, please call me at (937) 285-6093.

Sincerely,



Cathy L. Altman  
Division of Hazardous Waste Management

cc: Dinah Crawford, SWDO-DHWM/DHWM File

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.