

File copy



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

RTC of 6/24/10 NOV

September 26, 2011

Mr. B. Geoffrey Jones
Vice President of Remediation and Discontinued Operations
Clean Harbors Environmental Services, Inc.
400 Arbor Lake Drive, Suite B-900
Columbia, SC 29223

**RE: Clean Harbors Environmental Services, Inc.
GSX Disposal, LLC: Train Avenue, Cleveland, OH – OHD077786309
Financial Assurance Records Review**

Dear Mr. Jones:

On September 26, 2011, I completed evaluating the above listed Clean Harbors/GSX facility's compliance with hazardous waste financial assurance requirements contained in Ohio Administrative Code (OAC) rules 3745-54-101 and 3745-55-42 through 3745-55-47. GSX Disposal, LLC operates as a subsidiary of Clean Harbors Disposal Services, Inc.

My evaluation is based on: 1) the insurance certificate included in your financial assurance submittal dated December 22, 2011 and a revised insurance certificate attached to your September 12, 2011 email; 2) cost estimates received via your February 23, 2011 email. Although the insurance certificate also carries coverage for the GSX facility located on Bessemer Avenue in Cleveland, Ohio, this evaluation does not cover the Bessemer Avenue facility because of a review for the Bessemer facility was completed on July 1, 2011.

Following is a summary of my evaluation.

Cost Estimate for Closure:

Clean Harbors is closing a former hazardous waste storage area(s) at the Train Avenue facility. On February 23, 2011, Clean Harbors submitted updated cost estimates for closure via your email. Total cost for closure was estimated to be \$868,114.54. The total cost was estimated based on a 2006 cost estimate and the inflation factors for the period of 2006 through 2010.

Policy No. ENC 5254597-02. Coverage amounts are \$4,000,000 per occurrence and \$8,000,000 annual aggregate. The Liability Certificate appears to be in compliance with OAC rules 3745-55-47(A) and (B). For your next submittal please revise the title of this document to Hazardous Waste Facility Certificate of Liability Insurance pursuant to OAC rule 3745-55-51(J).

Corrective Action:

It is my understanding that Clean Harbors is not required to provide financial assurance to the State of Ohio for the Train Avenue facility for RCRA Corrective Action pursuant to OAC rule 3745-54-101 at this time.

If you have any questions or need further clarification of any matter mentioned in this letter, please feel free to contact me at (614) 728-8961 or julia.zhang@epa.state.oh.us.

Sincerely,



Julia Zhang, P.E.
Compliance Assurance Section
Division of Materials and Waste Management

ec: Shannon Ryan, NEDO, DERR
John Palmer, NEDO, DERR

NOTICE:

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