



**Environmental
Protection Agency**

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

RTC of 6/24/10 NOV

July 1, 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: Bessemer Avenue, Cleveland, OH - OHD980569438
Financial Assurance Records Review**

Dear Mr. Jones:

On June 30, 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, 2010; 2) cost estimates received via your February 23, 2011 email. Although the insurance certificate also carries coverage for the GSX facility located on Train Avenue in Cleveland, Ohio, this evaluation does not cover the Train Avenue facility because of a pending Closure Plan revision. Following is a summary of my evaluation.

Post-Closure Cost Estimate:

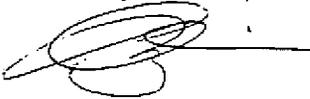
Clean Harbors is currently conducting post-closure of a hazardous waste landfill at the Bessemer Avenue facility. On February 23, 2011, Clean Harbors submitted updated cost estimates for post-closure via your email. Total cost for post-closure was estimated to be \$2,215,588.10.

The cost estimates did not include cost contingencies. You indicated in your February 23, 2011 email that the contingencies are usually addressed together with the estimate as approved in the associated plan. Because Clean Harbors is currently in the process

Mr. Geoffrey Jones
Clean Harbors, Inc.
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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

cc: Tom Roth, NEDO, DMWM
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.