

CERTIFIED MAIL

January 23, 2012

Ms. Patricia Lawson
Government Affairs Manager
Ross Incineration Services, Inc.
150 Innovation Drive
Elyria, Ohio 44035-1672

**Re: Ross Incineration Services, Inc.
OHD 048 415 665
Financial Assurance**

Dear Ms. Lawson:

On November 30, 2007, I completed a review of updated liability coverage documentation on file for the Grafton, Ohio facility. I evaluated liability coverage for sudden and non-sudden accidental occurrences. On November 29, 2007, Ohio EPA received a Permit Modification Request to the Application concerning the Certificate of Liability Insurance and Pollution Legal Liability Insurance.

On August 23, 2007 I evaluated your facility for compliance with financial assurance for closure/post-closure cost estimate and closure/post-closure care financial assurance as well as third party liability coverage. These financial assurance requirements are set forth in the Ross Incineration Services Inc. (RIS) Hazardous Waste Installation & Operation Permit Renewal, Permit Conditions B.35, B.36, B.37, B.38 and Ohio Administrative Code (OAC) rules 3745-55-42 through 3745-55-43 and 3745-55-47, respectively.

RIS uses insurance for closure/post-closure care and third party liability coverage. To demonstrate compliance with the financial assurance requirements for closure/post-closure care, RIS uses an insurance mechanism through Northeast Indemnity Company, Policy No. CPC93, effective July 1, 2007 through July 1, 2008.

To demonstrate compliance with the liability requirements, RIS continues to use an insurance mechanism through Greenwich Insurance Company, Policy No. PEC 1294104. The November 29, 2007 PMR updated the Certificate of Insurance on file with the Ohio EPA. However, the effective dates of the policy need to clearly be identified on the Hazardous Waste Facility Certificate of Liability Insurance. *To identify*

the effective dates of the policy revise the Hazardous Waste Facility Certificate of Liability Insurance to reflect the effective dates of coverage.

Also, as previously indicated in my November 8, 2007 letter for future submittals, i.e. annual updates effective 2008, of financial assurance and third party liability coverage should include updated certificates of insurance and duplicate original insurance policies for closure/post-closure care and third party liability coverage. Submit the Northeast Indemnity Company Policy No. CPC93 and the Greenwich Insurance Company Policy No. 1294104 with updated certificates of insurance due in 2008.

Please submit the revised Hazardous Waste Certificates of Liability Insurance to note the effective dates of coverage to me within thirty of receipt of this letter.

If you have any questions do not hesitate to contact me at (614) 644-2951.

Sincerely,

Electronically signed by Jeri Main Savelle 1/23/2012

Tina Jennings
Compliance Assurance Section
Division of Hazardous Waste Management

Keyword: JMS_JENNINGS; ross 08.doc

cc: Neil Wasilk, NEDO, DHWM
Tammy McConnell, RIS, DHWM
Pam McCoy, ERAS, DHWM

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.