



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

Re: ESOI Otter Creek Road Facility
U.S. EPA ID# OHD 045 243 706
Lucas County
NOV/RTC

December 12, 2012

Mr. Kenneth Humphrey
Environmental Director
Envirosafe Services of Ohio, Inc.
876 Otter Creek Road
Oregon, Ohio 43616-1200

Dear Mr. Humphrey:

On November 6, 7 and 8, 2012, Robin Wiley, Mary Ann Miller and I inspected Envirosafe Services of Ohio, Inc.'s (ESOI's) hazardous waste treatment, storage and disposal facility (TSDF) located at 876 Otter Creek Road in Oregon, Ohio. ESOI was represented by Ms. Lisa Humphrey, Mr. Donald Steyer and you during various portions of this inspection. An exit interview for this inspection was held at ESOI on November 14, 2012.

The Ohio Environmental Protection Agency (Ohio EPA) conducted the above Compliance Evaluation Inspection (CEI) to determine ESOI's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC), ESOI's approved December 29, 2005, Ohio Hazardous Waste Facility Installation and Operation Permit (permit) and the April 24, 2000, Director's Consent Order and Final Judgment. Our inspection included observations of facility operations and a review of written documentation.

The following violation of Ohio's hazardous waste laws was found during this inspection:

1. **OAC Rule 3745-279-22(C)(1) Marking of Used Oil Containers** – Containers and above ground tanks used to store used oil must be labeled or marked with the words "Used Oil".

During the site tour conducted on November 6, 2012, Ohio EPA observed two 55 gallon drums of used oil in the maintenance shop in building C. The drums were placed next to the above ground used oil tank with a hose running from one of the drums to the tank. These two 55 gallon drums were not labeled to identify the contents of the drums as "Used Oil". Don Steyer was verbally notified of this violation later in the day on November 6, 2012.

On November 14, 2012, Ohio EPA observed that ESOI had marked the two drums with the words "Used Oil". Therefore, this violation has been abated and requires no further action.

In addition to the above violation, during the exit interview conducted on November 14, 2012, you were verbally notified of the following observations/concerns that were found during the CEI inspection:

1. Facility Fence

- During the site tour Ohio EPA observed three areas where it appears that either an animal or lawn mowing equipment has partially dislocated the facility security fence away from the ground possibly compromising the site security. These areas include: The bottom of the fence near M1; the bottom of the fence by Otter Creek Road near waterline marker #26; and the bottom of the fence by Otter Creek between the Cell G surface water drainage pond and the former facility entrance gate.
- During the site tour Ohio EPA observed that ESOI is doing improved maintenance of the facility fence keeping a majority of the vine and tree growth under control. ESOI should continue this practice paying particular attention to the area between Cell M and the railroad tracks and the North East Corner of the North Sanitary Landfill as non-native reed grasses appear to grow quickly in these areas and partially obscure the fence from visual observation.

2. Closed Cells Cap Maintenance

- During the site tour Ohio EPA walked around the cap on Cell I. Ohio EPA located three animal burrows in the Cap of closed Cell I. Two holes were observed on the North West Corner of the cell about eight feet from the top of the cell. One other hole was observed on the North side of closed Cell I across from waterline marker #7 about ten feet from the top of the cell.
- Ohio EPA observed that ESOI is doing improved maintenance of the closed cells and Cell M. Ohio EPA has observed ESOI mow the capped areas of Cell M and the closed cells on multiple occasions in 2012. Increase mowing helps reduce the need to excavate woody vegetation and improves visual observation of animal burrow holes.
- During the site tour Ohio EPA observed that the leachate riser extension on the South-West side of Cell G has become detached from the leachate riser. ESOI should re-attach this extension to prevent surface water liquids from entering the riser pipe.
- During the inspection Ohio EPA observed that ESOI repaired numerous erosion issues throughout the site including the area near M-5 and the piezometer pads on the closed cells. Areas were re-seeded where vegetation did not grow from the seeding in the spring 2012.

ESOI should continue to inspect for erosion issues and repair them as necessary. ESOI should continue to monitor these areas to determine if additional seeding is needed next spring to minimize erosion.

3. Leachate PCB Analysis

- ESOI submitted leachate analysis for Cell M in 2012. Along with the leachate analysis, ESOI provided PCB analysis for sub-cells M5 and M6 in 2012. Ohio EPA reviewed the 8-8-2012 topographic map for Cell M. It appears that in addition to filling waste in sub-cells M5 and M6, ESOI also placed waste in sub-cells M2 and M3 in 2012. ESOI should verify that no PCB waste was placed in sub-cells M2 and/or M3 in 2012. If PCB was placed in either of these sub-cells, ESOI must perform PCB analysis on the leachate from the sub-cells prior to the end of 2012.

4. Inspection Forms

- During the record review Ohio EPA observed the "ESOI STABILIZATION PLANT DOOR INSPECTION LOG". It appears on a few occasions that facility personnel are inaccurately marking the time of their inspections. On 10-05-12, ESOI indicates that door 138 was inspected on multiple occasions from 1:00 am through 3:15 am. It is not believed that ESOI operated the stabilization building during these hours. In addition, on multiple occasions one ESOI employee initials the inspection form but fails to mark what action was taken. The employee should mark either the "no traffic", "inspected" or "cleaned" box in addition to putting his initials on the form.

5. Cell M

- During the site tour Ohio EPA observed some rutting in the waste along the access road located within Cell M. It appears that over-the-road trucks are driving through waste either due to difficulty navigating the turn in Cell M or the lack of a clear distinction between the access road and waste. ESOI should clearly mark the edge of the access road within Cell M and increase the height and width of the access road to reduce the likelihood of vehicles driving through waste.
- ESOI continues to place waste in Cell M. At the time of the inspection ESOI was removing temporary cover from the Southern area of sub-cell M6 for placement of waste. As ESOI continues to fill Cell M the access road, unloading area and Area O are appearing to become the low point in the cell. In addition, with the decreasing footprint of fillable area, the unloading area and Area O are becoming pinched. ESOI should provide Ohio EPA with a logistics plan for Cell M for the remainder of 2012 and calendar year 2013.

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7. Cell M Sub-Cell Leachate Collection System Volume Readings

Ohio EPA has observed that the leachate pump totals within the subcells are unreliable. Open sub-cell M6 frequently displays a total of one to two gallons of leachate pumped each day. Capped sub-cell M1 frequently displayed no pumping. ESOI should continue to investigate alternatives to the current system. In addition, since the current measurements are unreliable ESOI must remain vigilant when monitoring the system to ensure that it is working properly.

Enclosed you will find a copy of the checklists that we completed as a result of the June 2012 inspection. Should you have any questions, please feel free to call me at 419-373-3056. You can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

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Enclosure

pc: Robin Wiley, DMWM, NWDO
Colleen Weaver, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
Mayor Michael J. Seferian, City of Oregon
DMWM-HW, NWDO File – ESOI Inspections File

ec: John Pasquarette, DMWM, NWDO
Gary Deutschman, DMWM, NWDO
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Colleen Weaver, DMWM, NWDO
Shannon Nabors, District Chief, NWDO
Mary Setnicar, U.S. EPA, Region 5
Jae Lee, U.S. EPA, Region 5

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.