



State of Ohio Environmental Protection Agency

Northwest District Office

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Lee Fisher, Lieutenant Governor
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March 20, 2008.

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

Subject: Cell M Leachate Violation - March 2008
ESOI Otter Creek Road Facility
OHD 045 243 706
RCRA Hazardous Waste
Lucas County

Dear Mr. Humphrey:

On March 11th, 2008, an inspection of the Cell M primary and secondary leachate levels at the M6 sub-cell was conducted at Envirosafe Services of Ohio, Inc., (ESOI) a treatment, storage and disposal facility (TSDF) located at 876 Otter Creek Road, Oregon, Ohio. I conducted this inspection 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.

Ohio EPA has determined that ESOI is in violation of Permit Condition J.3(a) and OAC Rule 3745-57-03(A)(2) as described below:

1. Permit Condition J.3(a) and OAC Rule 3745-57-03(A)(2)

Permit Condition J.3(a) states that, "The Permittee must monitor, operate, and maintain the primary leachate collection system (PLCS) and secondary leachate collection system (SLCS), as applicable, of Cell M.

The level of leachate accumulation on the primary synthetic liner, excluding the sumps, must not exceed the height of one foot, as required by OAC Rule 3745-57-03(A)(2), except for temporary excursions following a precipitation event. To minimize the potential for excursions, the Permittee must activate primary system pumps whenever the leachate levels on the liner exceed 10 inches.

The Permittee must return to a leachate level of less than 10 inches in Cell M after the precipitation event that triggered the temporary excursion by operating the pumps in the affected landfill collection sumps 24 hours per day, 7 days per week."

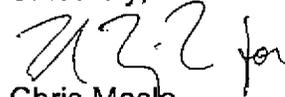
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On March 11, 2008, Ohio EPA observed that ESOI had failed to operate the pump in the primary leachate collection system (PLCS) sump in sub-cell M6 as outlined in Permit Condition J.3(a) for an extended period of time. Based upon the transducer reading that I observed on the morning of March 11, 2008, ESOI allowed the leachate level in the primary sump at the M6 sub-cell to reach at least 129.4" over the floor of the sump (118.4" above the primary liner in the M6 sub-cell).

Additional violations related to this inspection along with return to compliance criteria for these violations may follow under a separate cover.

If you have any questions, please contact me at (419) 373-3135 or via e-mail at chris.maslo@epa.state.oh.us.

Sincerely,



Chris Maslo
Division of Hazardous Waste Management

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pc: ~~☐DHWM;NWDO;Inspections/NOVs;File☐~~
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NOTE:

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.