



Environmental
Protection Agency

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

January 27, 2011

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

Subject: Notice of Violation and Comments on Envirosafe's Preliminary Report of Groundwater Quality for the October 2010 Sampling Event OHD 045 243 706 / 03-48-0092 RCRA Hazardous Waste / Lucas County

Dear Mr. Humphrey:

On January 3, 2011, Ohio EPA received from Envirosafe Services of Ohio, Inc. (ESOI) the *Preliminary Report of Groundwater Quality October 2010 Sampling Event*, dated January 3, 2011. The Division of Drinking and Ground Waters (DDAGW) reviewed the document for compliance with ground water monitoring requirements of Ohio Administrative Code (OAC) Chapter 3745-54 and Envirosafe's Permit number 03-48-0092. Below are Ohio EPA's findings from the review.

1. **Permit condition K.6(e)(iv)(d) and OAC Rule 3745-54-98(G)(4).** The facility owner/operator, ESOI, is in violation of permit condition K.6(e)(iv)(d) and OAC Rule 3745-54-98(G)(4), requiring ESOI to submit a permit modification request to add elevated constituents to the constituent list for affected wells and the wells monitoring the vertical and horizontal extent of elevated constituents (adjacent wells in the same horizon and wells in the same cluster monitoring the zone above or below), by November 30, 2010.

During the April 2010 sampling event, comparison standards were exceeded for cyanide at monitoring wells R-06 and R-22 and for total phenols at monitoring well R-06. In the Final Report of Groundwater Quality April 2010 Sampling Event, dated September 1, 2010, ESOI stated that they intend to conduct an Alternate Source Demonstration for these wells in response to the confirmed exceedances. At the time of this writing Ohio EPA has not received the Alternate Source Demonstration.

To return to compliance, ESOI must submit a permit modification request or submit an alternate source demonstration in accordance with permit condition K.6(i) and OAC Rule 3745-54-98(G)(6). **Please submit the permit modification request or alternate source demonstration by March 15, 2011.**

Well ID	Constituent	Date Sampled	Analysis Result (ug/l)	Comparison Standard (ug/l)
R-06	Cyanide	4/7/2010	48	20.7
		6/24/2010	3.9J	
		6/24/2010	48.6	
	Total Phenols	4/7/2010	12	5
		6/24/2010	20	
		6/24/2010	<5	
R-22	Cyanide	4/6/2010	14.4	10
		6/24/2010	<10	
		6/24/2010	23.9	

Comments

- Compliance with OAC Rule 3745-9-03, requiring that a monitoring well that is damaged or deteriorated be either repaired or abandoned, cannot be determined at this time. For Ohio EPA to determine compliance, ESOI needs to submit documentation that investigation well maintenance issues discussed below have been addressed.

The following well maintenance, noted during the well inspection on April 1, 2010, needs to be conducted to protect ground water quality, ensure ground water data is representative, ensure data is associated with the correct location, and to allow for an accurate evaluation of the data.

- Repair cracked cement seal around the casing at wells H-8S and T-43S.
- The following wells need relabeled: T-19W; T-21S; T-31S; T-56S; and T-208.

It is Ohio EPA's understanding that ESOI intends to document the completion of the above well maintenance in the Final Report of Groundwater Quality for the October 2010 Sampling Event.

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If you have any questions, please contact me at (419)373-4113.

Sincerely,



Lynn Ackerson
Division of Hazardous Waste Management

/cs

pc: DHWM, NWDO File – ESOI Ground Water File
Cindy Lohrbach, DHWM, NWDO

ec: Lynn Ackerson, DHWM, NWDO
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Gary Deutschman, DHWM, NWDO
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Chris Maslo, DHWM, NWDO
Sue Richards, ESOI
Stephen DeLussa, ETI

NOTICE: 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.