

Application To Operate A Facility  
Ohio Department of Natural Resources  
Division of Oil & Gas Resources Management  
2045 Morse Road  
Columbus, OH 43229-6693

December, 2013  
Enviro Clean Services  
515 Industrial Blvd.  
Wooster, OH 44691

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## **EnviroClean Services**

A division of EnviroTank Clean, Inc.

515 Industrial Blvd. Wooster, OH 44691  
(330) 264-8080 Fax: (330) 264-4098

December 24, 2013

Blake Arthur, Engineer  
Ohio Department of Natural Resources  
Division of Oil & Gas Resources Management  
2045 Morse Road  
Columbus, Ohio 43229-6693

Re: Request for Temporary Authorization

Dear Mr. Arthur:

In accordance with the Ohio Division of Oil and Gas Resources Management's Revised Guidelines for Waste Substances Facilities dated December 18, 2013, Enviro Clean Services, (ECS) is submitting this request for temporary authorization to continue to store, recycle, treat, process or dispose brine and other waste substances generated by oil and natural gas exploration and production (E&P) operations. Among other documents, attached please find a completed and signed Application to Operate a Facility form, and a map of ECS's Wooster, Ohio, facility.

ECS owns and operates a centralized waste treatment facility in Wooster, OH. ECS is a division of Enviro Tank Clean Inc. of Belpre, OH. One of the many services ECS performs involves our acceptance of wastes from oil and natural gas E&P sites for treatment (solidification) and subsequent disposal in a permitted landfill. All E&P wastes brought into the Facility for solidification are unloaded into our solidification pit. ECS has three solidification pits; has a capacity of 30,000 gallons, and is present in a waste management unit that has a roof and containment. Saw dust and auto fluff and tire fluff is the primary material that is used for solidification. Currently ECS manages approximately 20 tons of E&P wastes per month. It can manage up to 90-100 tons per day with three pits.

ECS may also accept brine with high concentration of solids (tank bottoms) for treatment at our Wooster facility. The treatment would involve the gravity separation of suspended solids from the brine. This treatment would either be conducted in the tanks or in frack tanks. The tanks are positioned within containment. Injectionable brine will be removed from the tanks and transported to and disposed at a permitted brine injection facility. Sludge resulting from this process will be solidified in our solidification pit, and the solids will be disposed at a permitted landfill. Although this service is not currently being conducted by ECS, on average we would estimate that we could treat up to 25,000 gallons of brine in this fashion per week.



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ECS also rinses the interiors of empty tanks of over-the-road tanker trucks that transport materials generated at E&P sites. These trucks are empty before they enter at ECS wash bay. Any solids (heal) present in the tankers are placed in our solidification pit, and subsequently solidified and disposed in a permitted landfill. The rinseate from the cleaning activities is treated by our onsite wastewater treatment system which we operate in accordance with a permit we received from Ohio EPA. The cleaning involves hot and cold water flushes and/or steam.

ECS also plans to begin to accept TENORM wastes for down blending. Specifically, we are referring to the treatment of wastes generated at oil and natural gas E&P sites that are contaminated with radium 226 and 228 concentrations in excess of 5 picocuries per gram above background. It is our intent to begin to accept TENORM wastes that require down blending prior to being disposed in a landfill. The procedures ECS will follow while performing this service shall be:

- Prior to receipt of wastes generated at oil and natural gas E&P sites, the operators of the sites where the wastes are generated shall be required to complete the attached non-hazardous waste profile (please note that all wastes received by ECS must first be approved using this form) which shall require laboratory analysis of the wastes for the presence and concentration of radium 226 and 228. If the profile is approved by ECS, upon receipt of the waste, ECS shall conduct a “finger printing” test (this test shall be conducted even if the profile indicates that the material is not TENORM) on the waste with a Rad-Alert 100 radiation screening unit. Using the information acquired from the analyses conducted by the operators generating the waste and the Rad-Alert 100 unit, ECS shall calculate the amount of non-TENORM material required to down blend the concentrations of radium 226 and 228 to concentrations below 5 picocuries per gram above background.
- Upon receipt of E&P wastes contaminated with radium 226 and 228 in concentrations greater than 5 picocuries per gram, ECS shall inter mix the wastes with solid materials that are not contaminated with either radium 226 or 228. All down blending shall be conducted in the solidification pit which shall prevent any release of the elevated TENORM material into the environment. Representative samples of the down blended wastes shall be analyzed with the Rad-Alert 100 unit to confirm that concentrations of radium 226 and 228 are below 5 picocuries per gram above background.



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- Personal dosimeters are devices that are used to accumulate radiation and report radiation dose. ECS's facility staff members involved in the down blending of TENORM wastes shall be required to wear a dosimeter badge while performing this work.
- All down blended TENORM wastes shall be disposed at fully permitted solid waste landfills. ECS estimates that up to 250 tons of TENORM waste may be treated and disposed per week.

ECS shall maintain a log of all E&P wastes that are received including TENORM wastes received for down blending, and of the treated wastes that are sent to a landfill for disposal. The log shall record the generators name, dates when the materials were received, the quantity of material received and the quantity and date the treated wastes are disposed at a landfill. Records (including manifests or bill of ladings) of the E&P wastes shall be kept for a period of 3 years.

Enviro Clean Services, appreciates the opportunity to submit this request to the Division of Oil and Gas Resources Management, and we look forward to working with you and your staff in the future.

Please feel free to contact me at 304/549-2097 with questions or comments.

Sincerely  
ENVIRO CLEAN SERVICES  
A div. of Enviro Tank Clean Inc.

Bhajan S. Saluja P.E.  
President

**APPLICATION TO OPERATE A FACILITY**  
 OHIO DEPARTMENT OF NATURAL RESOURCES  
 DIVISION OF OIL AND GAS RESOURCES MANAGEMENT  
 2045 MORSE ROAD, BUILDING F-2  
 COLUMBUS, OHIO 43229-6693  
 (614) 265-6922

1. Name of Applicant: Enviro Clean Services Phone #: 330-284-8080(BUS) 304-549-2097 (M)  
 Address: 515 Industrial Blvd., Wooster, OH 44691  
 Date: 12-30-2013 eMail Address: bssaluja65@hotmail.com  
 For an Order or a Permit to Operate:  Existing Facility  New Facility

2. PURPOSE OF FACILITY:  Storage  Recycling  Treatment  
 (Check all that Apply)  Processing  Disposal

3. TYPE OF MATERIAL:  
 Brine  Drill Cuttings  
 Drilling Mud  Other Waste Substance (explain) \_\_\_\_\_

4. If a Business Entity, list the statutory agent and include a certified copy of their appointment:  
 Name: Robert Ellis  
 Address: Ellis & Ellis; 325 4<sup>th</sup> Street, Maietta, OH 45750

5. Engineer of Record:  
 Name: Bhajan S. Saluja, PE  
 Address: 1389 Charleston Road, Poca, WV 25159  
 Ohio Professional Engineering License Number: E-66741

6. Address of Facility:  
 Address: 515 Industrial Blvd., Wooster, OH 44691  
 County: Wayne  
 Township: Wooster, OH  
 Municipal Corporation: Wooster, OH  
 Latitude: \_\_\_\_\_  
 Longitude: \_\_\_\_\_

7. Write a brief description of the facility and operations: Enviro Clean Services ( ECS ) is a centralized waste treatment (CWT) treatment and disposal facility for nonhazardous waste. ECS accepts waste from oil and gas E & P sites. Waste includes drill cuttings, drilling mud, sand and other nonhazardous waste. It is solidified in a solidification pits which are located in a steel building with roof. Building has concrete floor with a 60 ml plastic liner under it.

8. Include all information as set forth in the "Guidelines for Application for Chief's Order". **Attach Additional Documents**

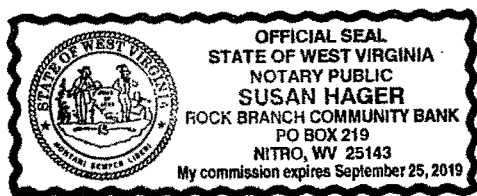
I, the undersigned, being first duly sworn, depose and state under penalties of law, that I am authorized to make this application, that this application was prepared by me or under my supervision and direction, and that the facts stated herein are true, correct, and complete, to the best of my knowledge.

I certify that the facility will comply with or is currently in compliance with all provisions of Chapter 1509 ORC, Chapter 1501 OAC, and all terms and conditions of orders and permits issued by the Chief, Division of Oil and Gas Resources Management.

Signature of Authorized Agent Bhajan S Saluja

Name (Type or Print) BHAJAN S. SALUJA Title President

Sworn to and subscribed before me this the 31st day of December, 2013.

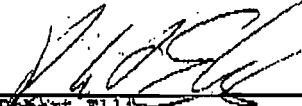


Susan Hager  
 (Notary Public)  
Susan Hager  
September 25, 2019  
 (Date Commission Expires)

G0867-1385

ORIGINAL APPOINTMENT OF AGENT

The undersigned, being at least a majority of the incorporators of Enviro-Tank Clean, Inc., hereby appoint Ellis & Ellis, A Legal Professional Association, a professional corporation authorized to act as agent and whose principal office is in the county in which the corporation has its principal office, as the statutory agent upon whom any process, notice, or demand required or permitted by statute to be served upon the corporation may be served. Its complete address is Ellis & Ellis, A Legal Professional Association, 328 Fourth Street, Marietta, Washington County, Ohio, 45750.

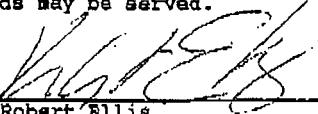
  
Robert Ellis

Dated: May 17, 1990

Enviro-Tank Clean, Inc..

Gentlemen:

I hereby accept appointment as agent of your corporation on behalf of Ellis & Ellis, A Legal Professional Association, upon whom process, tax notices, or demands may be served.

  
Robert Ellis

CORPUS



# EnviroClean Services

A division of EnviroTank Clean, Inc.

515 Industrial Blvd., Wooster, OH 44691

Office PH: (330) 264-8080

FAX: (330) 264-4098 EMAIL: Jenny.Slater@etcoh.com

Treatment of Non-Hazardous Wastewater and Sludge  
Oil and Gas Industry Waste Disposal and Recycling  
Underground Storage Tank Cleaning and Disposal  
Cleaning of Tank Trailers (Liquid And Dry)  
Tanker and Vacuum Truck Services  
Drummed Waste Disposal  
Roll-off Box Services

## NON-HAZARDOUS WASTE PROFILE

40 CFR 437 SUBCATEGORY:  "A" Metal Bearing  "B" Oily  "C" Organic

### SECTION I - GENERATOR INFORMATION

Company: \_\_\_\_\_ Broker/Billing: \_\_\_\_\_  
Contact: (First) \_\_\_\_\_ (Last) \_\_\_\_\_ Address: \_\_\_\_\_  
Job Title: \_\_\_\_\_ City, State, Zip: \_\_\_\_\_  
Address: \_\_\_\_\_ Contact: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_ Phone: \_\_\_\_\_  
Office Phone: \_\_\_\_\_ ext \_\_\_\_\_ Cell \_\_\_\_\_  
Email: \_\_\_\_\_ Fax: \_\_\_\_\_

### SECTION II - GENERAL WASTE DESCRIPTION

Name/Source of Waste: \_\_\_\_\_  
Process Generating Waste: \_\_\_\_\_

Type of Waste:  Soil  Sludge  Wastewater  Used Oil  Other Liquid  Other Solid  
 Bulk Tanker  Vacuum Truck  Drums  Other: \_\_\_\_\_

Estimated Quantity: \_\_\_\_\_

Frequency:  One Time  Weekly  Monthly  Quarterly  Annually  Other: \_\_\_\_\_

### SECTION III - WASTE CHARACTERISTICS

Physical State:  Solid  Liquid - One Layer  Liquid - Two Layers  Sludge  Other: \_\_\_\_\_

Color and Odor: \_\_\_\_\_

Total Solids:  <1%  1-5%  5-10%  10-20%  >20% Actual: \_\_\_\_\_

PH:  <2.5  2.5-4.0  4.0-6.0  6.0-8.0  8.0-10.0  10.0-12 Actual: \_\_\_\_\_

Total Benzene mg/l: \_\_\_\_\_ PCB's mg/l: \_\_\_\_\_ Flash Point (°F): \_\_\_\_\_

% Water: \_\_\_\_\_ Halogens mg/l: \_\_\_\_\_ BTU/Pound: \_\_\_\_\_

Chemical Oxygen Demand (COD) mg/l: \_\_\_\_\_ Total Oil & Grease mg/l: \_\_\_\_\_

Lab Analysis:  Yes  No ID: \_\_\_\_\_ MSDS:  Yes  No TENORM:  Yes  No If Yes, Radium 226/228 pCi/g: \_\_\_\_\_

Laboratory analysis of the following parameters must be provided for waste receipt classification:

Metals = Ag, As, Ba, Cd, Co, Cr, Cu, Hg, Mo, Ni, Pb, Sb, Se, Sn, Ti, V, Zn Oils = Total Oil & Grease

Organics = 2,3-Dichloroaniline, 2,4,6-Trichlorophenol, Bis(2-ethylhexyl) phthalate, Carbazole, Decane, Flouranthene, Cresol, Octadecane

### SECTION IV - CERTIFICATION

Based on representative sampling and laboratory analysis, and/or a thorough knowledge of this waste, I certify this waste to be non-hazardous and non-RCRA by listing and characterization. I further certify that this waste contains no polychlorinated biphenyls (PCB's), and is not a regulated radioactive material.

DATE: \_\_\_\_\_ COMPANY: \_\_\_\_\_ NAME: \_\_\_\_\_  
00/00/0000 type your name here

SIGNATURE  
REQUIRED



NAME: \_\_\_\_\_  
sign your name here

FOR OFFICE USE ONLY

ECS Approval Code: \_\_\_\_\_

PRINT, SIGN, & RETURN

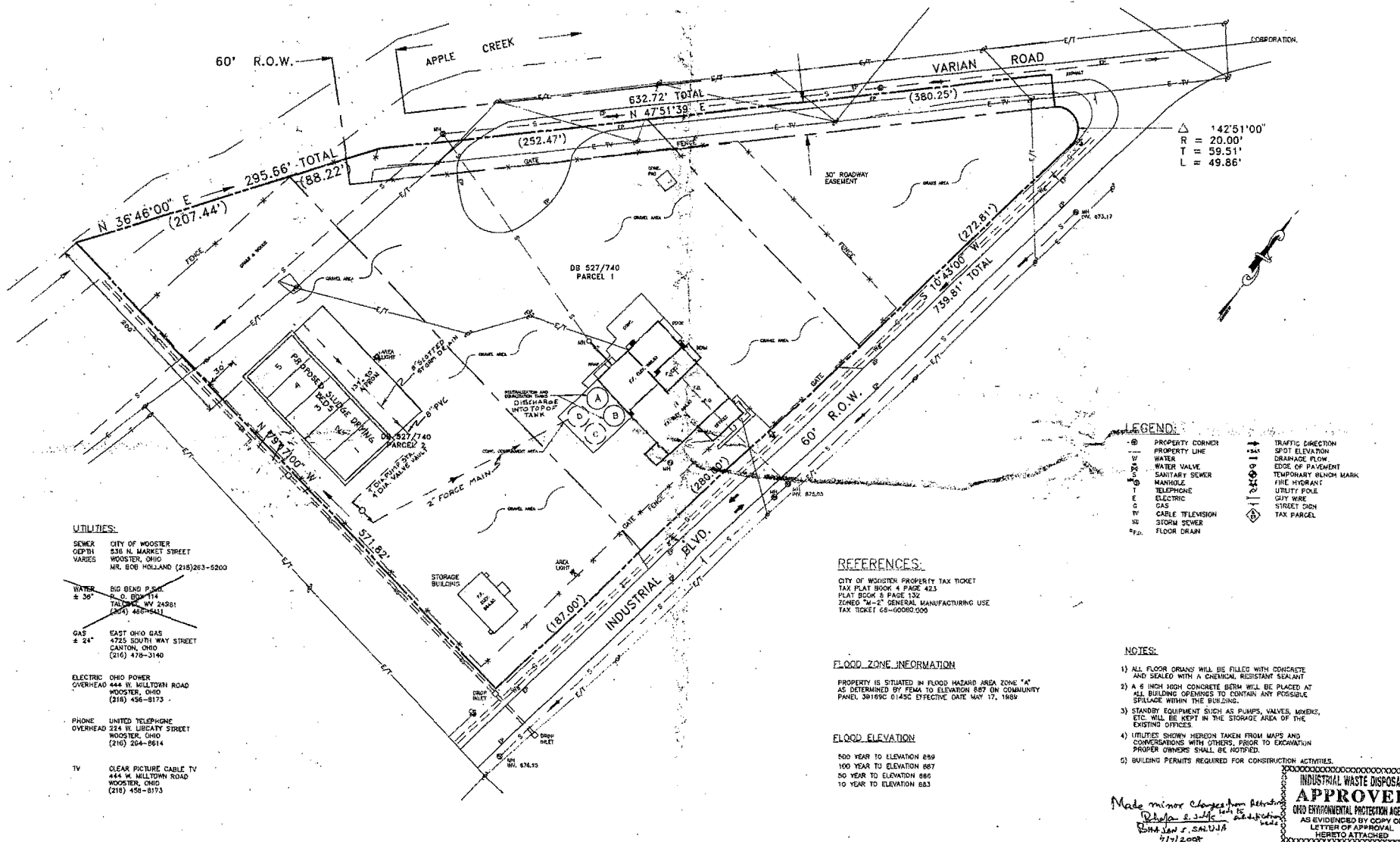


<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number		2. Page 1 of		3. Emergency Response Phone		4. Waste Tracking Number		
		5. Generator's Name and Mailing Address					Generator's Site Address (if different than mailing address)			
Generator's Phone:										
6. Transporter 1 Company Name							U.S. EPA ID Number			
7. Transporter 2 Company Name							U.S. EPA ID Number			
8. Designated Facility Name and Site Address							U.S. EPA ID Number			
Facility's Phone:										
9. Waste Shipping Name and Description		10. Containers		11. Total Quantity	12. Unit Wt./Vol.					
		No.	Type							
1.										
2.										
3.										
4.										
13. Special Handling Instructions and Additional Information										
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.										
Generator's/Offeror's Printed/Typed Name					Signature			Month	Day	Year
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____										
Transporter Signature (for exports only):					Date leaving U.S.: _____					
16. Transporter Acknowledgment of Receipt of Materials										
Transporter 1 Printed/Typed Name					Signature			Month	Day	Year
Transporter 2 Printed/Typed Name					Signature			Month	Day	Year
17. Discrepancy										
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
Manifest Reference Number: _____										
17b. Alternate Facility (or Generator)							U.S. EPA ID Number			
Facility's Phone:										
17c. Signature of Alternate Facility (or Generator)							Month	Day	Year	
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a										
Printed/Typed Name					Signature			Month	Day	Year

GENERATOR

TRANSPORTER INT'L

DESIGNATED FACILITY



$\Delta$  = 142'51"00"  
 R = 20.00'  
 T = 59.51'  
 L = 49.86'

- UTILITIES:**
- SEWER CITY OF WOOSTER  
DEPTH 538 N. MARKET STREET  
WOOSTER, OHIO  
MR. BOB HOLLAND (216) 263-5200
  - WATER BIG BEND P.S. # 36  
P.O. BOX 114  
TALAMON, WV 24981  
(204) 462-9641
  - GAS EAST OHIO GAS  
4725 SOUTH WAY STREET  
CANTON, OHIO  
(216) 478-3140
  - ELECTRIC OHIO POWER  
OVERHEAD 444 N. MILLTOWN ROAD  
WOOSTER, OHIO  
(216) 456-8173
  - PHONE UNITED TELEPHONE  
OVERHEAD 324 N. LIBERTY STREET  
WOOSTER, OHIO  
(216) 264-8814
  - TV CLEAR PICTURE CABLE TV  
444 N. MILLTOWN ROAD  
WOOSTER, OHIO  
(216) 456-8173

**REFERENCES:**

CITY OF WOOSTER PROPERTY TAX TICKET  
 TAX PLAT BOOK 4 PAGE 423  
 PLAT BOOK 5 PAGE 132  
 ZONES "A"-2" GENERAL MANUFACTURING USE  
 TAX TICKET 65-00000000

**FLOOD ZONE INFORMATION**

PROPERTY IS SITUATED IN FLOOD HAZARD AREA ZONE "A"  
 AS DETERMINED BY FEMA TO ELEVATION 867 ON COMMUNITY  
 PANEL 38169C 0145C EFFECTIVE DATE MAY 17, 1989

**FLOOD ELEVATION**

500 YEAR TO ELEVATION 859  
 100 YEAR TO ELEVATION 867  
 50 YEAR TO ELEVATION 866  
 10 YEAR TO ELEVATION 863

- LEGEND:**
- ⊙ PROPERTY CORNER
  - PROPERTY LINE
  - W WATER
  - WV WATER VALVE
  - SS SANITARY SEWER
  - M MANHOLE
  - T TELEPHONE
  - E ELECTRIC
  - G GAS
  - TV CABLE TELEVISION
  - SS STORM SEWER
  - FD FLOOR DRAIN
  - TRAFFIC DIRECTION
  - ▲ SPOT ELEVATION
  - DRAINAGE FLOW
  - EDGE OF PAVEMENT
  - TEMPORARY BENCH MARK
  - FIRE HYDRANT
  - UTILITY POLE
  - CITY WIRE
  - STREET SIGN
  - ⊠ TAX PARCEL

- NOTES:**
- 1) ALL FLOOR GRABNS WILL BE FILLED WITH CONCRETE AND SEALED WITH A CHEMICAL RESISTANT SEALANT
  - 2) A 8 INCH HIGH CONCRETE BENCH WILL BE PLACED AT ALL BUILDING OPENINGS TO CONTAIN ANY POSSIBLE SPILLAGE WITHIN THE BUILDING.
  - 3) STANDBY EQUIPMENT SUCH AS PUMPS, VALVES, MIXERS, ETC. WILL BE KEPT IN THE STORAGE AREA OF THE EXISTING OFFICES.
  - 4) UTILITIES SHOWN HEREIN TAKEN FROM MAPS AND COMPARED WITH OTHERS, PRIOR TO EXCAVATION PROPER OWNERS SHALL BE NOTIFIED.
  - 5) BUILDING PERMITS REQUIRED FOR CONSTRUCTION ACTIVITIES.

Made minor changes from standing  
 Review & seal 1/15/2008  
 S. S. SALUDA  
 1/17/2008

**INDUSTRIAL WASTE DISPOSAL**  
**APPROVED**  
 OHIO ENVIRONMENTAL PROTECTION AGENCY  
 AS EVIDENCED BY COPY OF  
 LETTER OF APPROVAL  
 HERETO ATTACHED

NO.	REVISIONS	DATE	BY	NO.	REVISIONS	DATE	BY
1	ADDED SLUDGE DRYING BEDS	3/4/16	JMD				

**S & S ENGINEERS, INC.**  
 CHARLESTON, WEST VIRGINIA

**ENVIRO-CLEAN SERVICES**  
 (A DIVISION OF ENVIRO-TANK CLEAN, INC.)  
 WOOSTER, OHIO  
**WASTEWATER TREATMENT FACILITIES**

**PROPERTY MAP & SITE PLAN**

DRAWN	CHECKED	APPROVED	DATE	SCALE
ELM	MM	AMS	DEC 1993	1" = 40'

DWG. NO. 224872LWG

SHEET NUMBER **17**