



Environmental Coordination Services and Recycling

*Comprehensive Environmental & Waste Management Services*

July 2, 2014

Ms. Beth Pratt  
Ohio Department of Natural Resources  
Division of Oil and Gas Resources Management  
2045 Morse Road, Building F-2  
Columbus, OH 43229-6693  
(614) 265-6922

**RE: Revised Application to Operate a Facility**

Dear Ms. Pratt:

Enclosed are two hard copies of the revised Application to Operate a Facility under the Guidelines for Waste Substance Facilities for our facility located in Martins Ferry, Ohio.

Included within this package, you will find the following information in duplicate:

- Process Flow Schematic
- Process Description
- Waste Sampling and Analysis, Profiling, and Tracking
- Secondary Containment
- Aerial Photograph indicating property boundary

If you have any questions or concerns regarding the information submitted within this package, please feel free to contact me at 814-425-7773

Sincerely,  
ECS&R

Katie DeMaison  
Regulatory Specialist

Enclosures

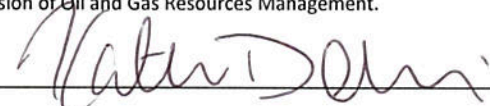
**APPLICATION TO OPERATE A FACILITY**  
OHIO DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL AND GAS RESOURCES MANAGEMENT  
2045 MORSE ROAD, BUILDING F-2  
COLUMBUS, OHIO 43229-6693  
(614) 265-6922

<b>1.</b>	Name of Applicant: <u>Environmental Coordination Services &amp; Recycling, Inc.</u>	Phone #: <u>814-425-7773</u>
	Address: <u>3237 US Highway 19, Cochran, PA 16314</u>	
	Date: <u>7/2/2014</u>	eMail Address: <u>katiedemaison@ecsr.net</u>
	For an Order or a Permit to Operate: <input checked="" type="checkbox"/> Existing Facility <input type="checkbox"/> New Facility	
<b>2.</b>	<b>PURPOSE OF FACILITY:</b> <input checked="" type="checkbox"/> Storage <input type="checkbox"/> Recycling <input type="checkbox"/> Treatment (Check all that Apply) <input type="checkbox"/> Processing <input type="checkbox"/> Disposal	
<b>3.</b>	<b>TYPE OF MATERIAL:</b> <input checked="" type="checkbox"/> Brine <input checked="" type="checkbox"/> Drill Cuttings <input checked="" type="checkbox"/> Drilling Mud <input checked="" type="checkbox"/> Other Waste Substance (explain) <u>Fracking fluid waste; Petroleum contaminated soils</u>	
<b>4.</b>	<b>If a Business Entity, list the statutory agent and include a certified copy of their appointment:</b> Name: _____ Address: _____	
<b>5.</b>	<b>Engineer of Record:</b> Name: _____ Address: _____ Ohio Professional Engineering License Number: _____	
<b>6.</b>	<b>Address of Facility:</b> Address: <u>604 South 1<sup>st</sup> Street, Martins Ferry, OH 43935</u> County: <u>Belmont</u> Township: <u>City of Martins Ferry</u> Municipal Corporation: _____ Latitude: <u>40.090614</u> Longitude: <u>80.725763</u>	
<b>7.</b>	<b>Write a brief description of the facility and operations:</b> <u>SEE ATTACHMENTS</u> _____ _____ _____ _____	
<b>8.</b>	<b>Include all information as set forth in the "Guidelines for Application for Chief's Order". Attach Additional Documents</b>	

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



Name (Type or Print) Katie DeMaison

Title

Regulatory Manager

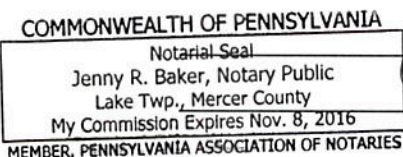
Sworn to and subscribed before me this the

2

day of

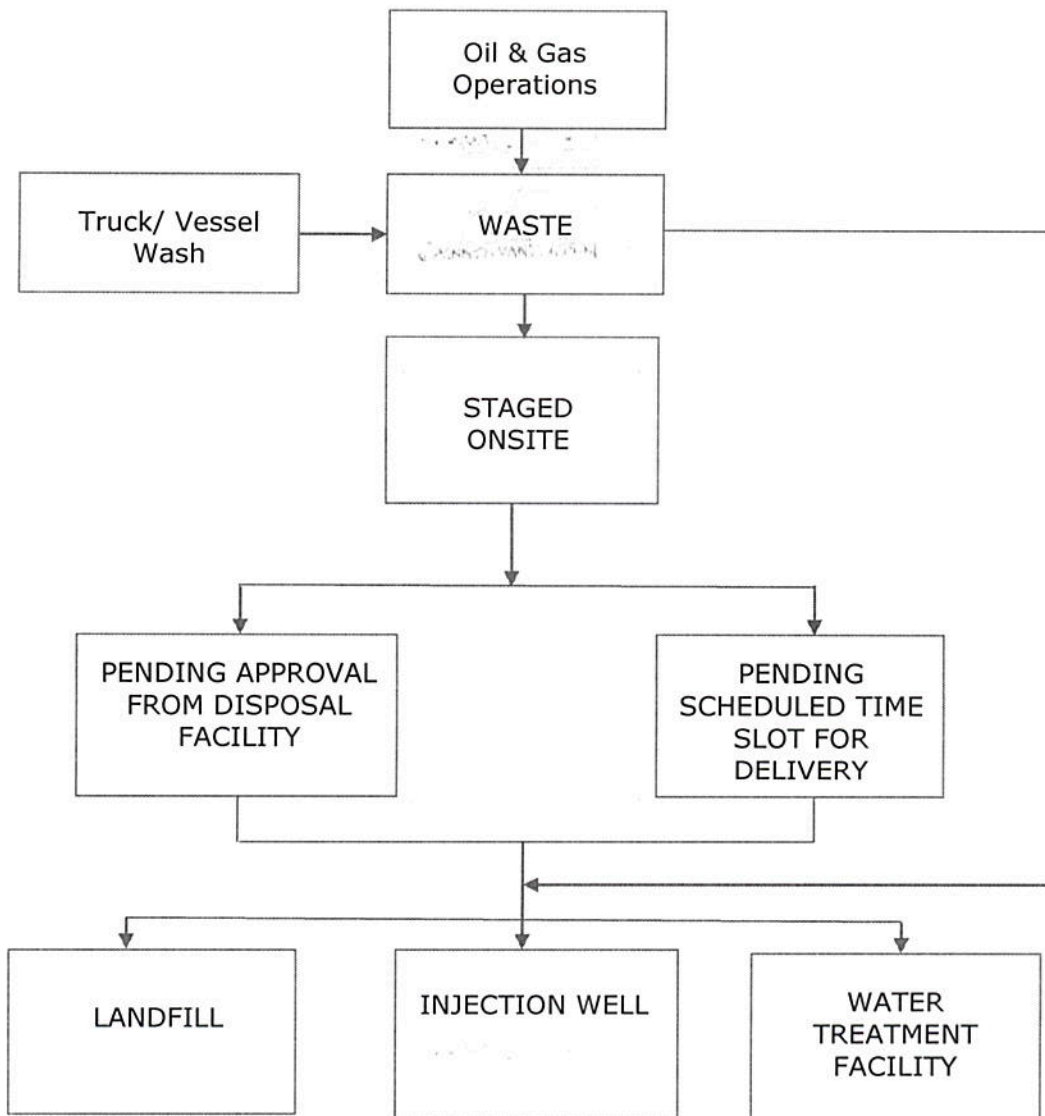
July, 2014.

(Notary Public)



(Date Commission Expires)

## PROCESS FLOW SCHEMATIC



## PROCESS DESCRIPTION

ECS&R's Martins Ferry, Ohio location is a field office providing services to oil and gas companies. The facility is comprised of offices and truck bays with approximately 25 employees and 10 trucks. Activities onsite include truck and vessel wash outs, temporary storage of oil and gas related wastes, sampling of wastes, and truck maintenance. Waste generated from oil and gas sites may be temporarily stored in roll-off containers or vacuum boxes at the facility pending approval from the disposal facility or scheduled time slot for delivery. ECS&R will have the capability of storing as many as 12 full boxes onsite for approximately 10 – 15 days. ECS&R estimates the Martins Ferry facility will handle approximately 20,000 Ton of waste annually. Of note, this facility only supports the oil and gas industry and does not co-mingle brine or other waste substances from oil and gas with other industrial wastes.



## WASTE SAMPLING AND ANALYSIS, PROFILING, AND TRACKING

The approval process for wastes transported by ECS&R varies depending on the customer. In many instances, the generator has performed the physical and chemical characterization of the waste according to the disposal facility's list of parameters and has received approval prior to ECS&R transporting. However, there are instances where ECS&R handles and coordinates the characterizing of wastes received including sampling, profiling, and obtaining approval from the intended disposal facility. In these situations, boxes or drums of waste generated by oil and gas sites will be transported to the ECS&R facility and staged onsite. Composite or grab samples will be collected and sent to an approved laboratory for analysis. Analytical results are submitted in conjunction with a waste profile including a detailed description of the process generating the waste and materials involved. A proper chain of custody form is used to track sample handling from time of collection through laboratory analysis and data reporting. Waste will be temporarily stored onsite pending approval from the disposal facility, which can take up to 15 days.

ECS&R currently follows the Ohio Department of Health's testing requirements for wastes identified as technologically enhanced naturally occurring radioactive material (TENORM). Sample analysis of the waste received will meet the exemption requirement of less than five picocuries per gram above background for combined radium 226 and 228 for disposal. ECS&R will begin drafting a Radiation Protection Plan to further address the handling of wastes where radioactivity is known or suspected. ECS&R uses the waste manifest system to track waste from the time it leaves the generator's site until it reaches the off-site disposal facility. Copies of all waste manifests are filed onsite at the ECS&R Martins Ferry facility.

## SECONDARY CONTAINMENT

In following with established protocols for our Pennsylvania locations, the Martins Ferry facility will maintain daily records of the weight or volume of waste that is in storage in conjunction with inspections of the storage areas. Additionally, ECS&R will provide containment for 20 cubic yard roll-off containers and vacuum boxes that are periodically stored onsite. This temporary containment will consist of high density polyethylene and felt liner with 8 inch foam berming. ECS&R will construct up to 12 containment units for temporary storage of waste during the interim period. Any rainwater accumulating in the containment will be regularly vacuumed up and properly disposed of. ECS&R will begin researching permanent secondary containment systems and construction of these systems in preparation for the final facilities rules. A significant leak or catastrophic spill is not foreseeable due to the design of the containers. All drums containing waste will be stored under roof with proper secondary containment in place. ECS&R will ensure secondary containment is provided during daily inspections of waste storage areas.



# AERIAL PHOTOGRAPH



ECS&R  
604 South 1<sup>st</sup> Street  
Martins Ferry, OH 43935  
Belmont County