



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 728-3778 FAX: (614) 728-3898
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

September 5, 2008

Mr. Paul Bedell
Tri-Palm International, LLC
222 E. Campus View Blvd.
Columbus, OH 43235

Re: **Tri-Palm International, LLC**
CRO (OHD004291100)
Franklin County

Dear Mr. Bedell:

On September 3, 2008, Ohio EPA received a follow up letter from Tri Palm International describing actions taken to resolve issues at the closed 265 North Hamilton Road facility in Columbus, Ohio, as previously identified in my letter to you dated June 12, 2008. I conducted a scheduled follow up on-site inspection visit with you and other Tri Palm representatives on September 4, 2008 to review efforts made to comply with the applicable regulatory requirements since my initial visit to the site for similar purposes on June 5, 2008. On September 4, 2008, Ohio EPA also received an updated certification of Regulated Substance and Equipment Removal (90-day final form) which supplemented an earlier certification dated May 19, 2008.

Based on my review, Tri Palm International, LLC has now completed its obligations for final cessation of regulated operations (CRO) at the 265 North Hamilton Road facility. The violations which were noted previously have been corrected:

| Letter Citation # | Rule Citation |
|-------------------|---|
| 1. | ORC 3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(d), Removal of regulated substances from stationary equipment. <i>Mercury float switches in a sump; waste residues in two ducts; contents of a 10-foot deep sump, and of a 3 foot by 5 foot pit in the e-coat process room, and of an e-coat process line tank were removed.</i> |
| 2. | ORC 3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(c), Removal of non-stationary regulated items. <i>Items of concern as previously noted were removed, including: a box of refractory tiles, waste residues under a duct, a pallet of mercury-bearing equipment, a forklift, a pile of waste debris under the trash compactor, floor residue in a spray booth, and floor residue in the former hazardous waste accumulation building.</i> |
| 3. | ORC 3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(d), Stationary regulated items that will remain. <i>Other necessary stationary items confirmed to be remaining on site have been listed on the declaration with the final certification of CRO.</i> |
| 4. | ORC 3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h), Certification of completion. <i>The certification has now been properly updated.</i> |

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Mr. Paul Bedell
Tri Palm International, LLC
Page 2 of 2

Two items of previous concern, namely a 20,000 gallon underground storage tank containing about 6,000 gallons of Number 2 diesel fuel oil (formerly serving generators which have been removed from the site); and a padlocked skid-mounted incinerator unit (approximately 15 feet by 15 feet by 10 feet, with a 3 segment metal stack approximately 24 feet high) with unknown contents; remain on the property under the separate ownership of Mr. Marcus Adams.

If you have any questions regarding this letter, please contact me at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

c: Ralph McGinnis
CDO File
Greg Smith, Ulmer & Berne LLP

JDH/nsm Tri Palm CRO RTC