

September 25, 2009

Frank Simmons  
Invensys, Inc.  
C412G  
Foxboro, MA 02035

OHD 004 288 288

**RE: RANCO Incorporated  
Plain City, OHD 004 288 270  
Delaware, OHD 004 288 288  
Financial Record Review: Notice of Violation**

Dear Mr. Simmons:

On September 23, 2009, I completed a review of the financial assurance documentation on file for the RANCO Incorporated's (RANCO) Ohio facilities referenced above. I evaluated the facilities for compliance with post-closure requirements set forth in the Ohio Administrative Code (OAC) rules 3745-55-44 and 3745-55-45.

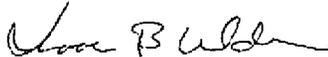
To demonstrate compliance with post-closure rules, RANCO uses a corporate guarantee. The most recent financial assurance documentation received by the Ohio EPA includes: 1) A corporate guarantee from Siebe Inc. for \$1,277,000 and 2) A post-closure cost estimate, dated September 13, 2002, for the Delaware facility and the Plain City facility for \$1,117,775.16.

**Upon review of the financial assurance documents currently on file, the following violation was found:**

**OAC 3745-55-44(B)** The post-closure cost estimate for your two facilities is six years old. This needs to be updated as soon as possible. Without an updated post-closure cost estimate it is impossible to determine if the corporate guarantee is correct.

If you have any questions, or need further clarification of any matter mentioned in this letter, please do not hesitate to call me at (614) 644-3067. I will be happy to assist you in any way possible.

Sincerely,



Isaac B. Wilder  
Compliance Assurance Section  
Division of Hazardous Waste Management

cc: Kristina Durnell, RIS, DHWM  
Chris Bulinski, DHWM CDO

**NOTICE:**

**Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.**