

Interoffice Memorandum



Environmental
Protection Agency

To: GraMac Financial Assurance File

From: Shawn Sellers, DHWM, Compliance Assurance Section

Date: July 23, 2010

Subject: **GraMac Enterprises, Financial Assurance Review, OHD 004 468 609**

NOV (PRTC)

On July 23, 2010, I conducted a financial assurance record review from the GraMac Enterprises Ltd. (GraMac) facility located at 7390 Middlebranch Road, Middlebranch, Ohio referenced above. I evaluated the facility for compliance with Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47; and the December 2, 1986 Consent Agreement and Final Order entered between U.S.EPA and the former Grady McCauley Creative Graphics Inc. These rules pertain to the cost estimates and financial assurance requirements for facility closure and post-closure care, in addition to liability coverage for both sudden and non-sudden accidental occurrences.

By letter dated July 15, 2010, GraMac was authorized by Ohio EPA to terminate its financial assurance mechanism, Irrevocable Letter of Credit (LOC) Number S300390 with KeyBank National Association. GraMac is no longer required to maintain financial assurance for closure or liability coverage for its facility. **Therefore, the violations of OAC 3745-66-42(E), 3745-66-43, and 3745-66-47 are abated.**

GraMac is still required to meet financial assurance for post-closure care. **Therefore, the facility remains in violation of the U.S. EPA December 2, 1986 CAFO and OAC rule 3745-66-44(E).**

Based on discussions with Ohio EPA Northeast District office, it is my understanding that GraMac will be requesting release from final groundwater monitoring in the next few months. **If Ohio EPA approves this request, the above violation will be abated.**