

Interoffice Memorandum



Environmental
Protection Agency

To: GraMac Financial Assurance File

From: Shawn Sellers, DHWM, Compliance Assurance Section

Date: February 15, 2011 *RTC of 7-23-10 NOV*

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

On February 15, 2011, I conducted a financial assurance record review for 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.

Initial closure activities began in 1993 and closure certification was accepted by Ohio EPA on April 26, 2010. By letter dated July 15, 2010, Ohio EPA returned to GraMac 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.

On November 22, 2010, GraMac petitioned to terminate post-closure ground water monitoring for the hazardous waste dry well units. DHWM staff reviewed the Petition in accordance with OAC rule 3745-66-18(G)(1)(b) and determined that the proposal complies with Ohio EPA's hazardous waste rules. On February 15, 2011, the director of Ohio EPA granted GraMac's petition to terminate post-closure groundwater monitoring. Requirements for inspection and maintenance of the closed unit contained in the currently effective post-closure plan are unaffected and will continue. Since the semi-annual inspection of the concrete pad would be of minimal cost, it was determined by Ohio EPA that financial assurance for post closure care will no longer be required. Therefore, this financial assurance review file is closed. If at any time during the post-closure care period it is determined by Ohio EPA staff that the cost of post-closure care has substantially changed, the file will be reopened for review.

ec: Paul Dolensky, DHWM, NEDO