



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

February 28, 2011

RTC OF 02/11/10 NOV

Martha Connell
Parker Hannifin Corporation
6035 Parkland Boulevard
Cleveland, Ohio 44140-4141

**RE: Parker-Hannifin Corporation, Waverly, Ohio (OHD046426409)
Financial Record Review**

051-057

Dear Ms. Connell:

On February 24, 2011, I completed a review of the financial assurance documentation on file for your facility. I evaluated your facility for compliance with closure/post-closure/corrective action cost estimates, financial assurance for closure/post-closure/corrective action and liability coverage requirements. These requirements are set forth in the Ohio Administrative Code (OAC) rules 3745-55-42 through 3745-55-47, as well as rules 3745-54-100 and 3745-54-101. In addition, if applicable, I evaluated your facility for compliance with your Ohio Hazardous Waste Part B Permit Conditions. The most recently submitted financial assurance information includes the following;

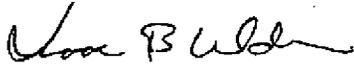
- An alternative II financial test for closure and/or post-closure and liability coverage which included an independent auditor's report. Parker-Hannifin has a current Moody's bond rating of A2; and
- A post-closure cost estimate for the Waverly facility of \$1,181,056

In a February 11, 2010 Notice of Violation letter Parker-Hannifin Corporation was cited for the following violations: OAC 3745-55-44(A)(2); OAC 3745-55-44(B); and OAC 3745-44(F)(9). Based upon review of the documentation noted above, Parker-Hannifin Corporation has returned to compliance for the above violations, and is in compliance with Ohio's financial assurance requirements.

Area of Concern: Previous financial tests for closure and/or post-closure and liability coverage submitted by your company had an \$8,000,000 amount for aggregate liability. The financial tests submitted on September 30, 2010 and September 30, 2011 had a \$0 amount for aggregate liability. Your Waverly facility does not require liability coverage but at least one of your other facilities covered by the financial test is in closure and presumably would require liability coverage. If none of your facilities require liability coverage, please use the financial test for closure and/or post-closure.

If you have any questions, or need further clarification of any matter mentioned in this letter, please do not hesitate to contact me at (614) 644-3067 or at isaac.wilder@epa.state.oh.us.

Sincerely,



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

cc: Donna Goodman, DHWM, SEDO

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.



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

April 16, 2008

Martha Connell
Parker Hannifin Corporation
6035 Parkland Boulevard
Cleveland, Ohio 44140-4141

RE: Parker Hannifin Corporation, Waverly (OHD046426409)
Financial Assurance
Return to Compliance

RTC of 5/14/07

Dear Ms. Connell:

On April 14, 2008, I completed a review of the financial assurance documentation on file for the Parker Hannifin Corporation (PHC) facility referenced above. I evaluated the Waverly facility for compliance with post-closure requirements as set forth in Ohio Administrative Code (OAC) rules 3745-55-44 and 3745-55-45.

On September 26, 2007, PHC submitted documentation to demonstrate compliance with the financial assurance requirements. A financial test was submitted which included the 2007 Annual Report to Shareholders, an independent auditor's report and a post-closure cost estimate.

Upon review of the financial assurance documentation, no violations were found:

In a May 1, 2007 notice of violation letter, I had cited PHC for violating OAC 3745-55-44(A) and (B). **With the submissions noted above, PHC has returned to compliance for the OAC 3745-55-44(A) and (B) violation.**

If you have any questions regarding this letter or financial assurance regulations, please feel free to call me at (614) 644-3067.

Sincerely,

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

cc: Donna Goodman, DHWM, SEDO
Tammy McConnell, RIS, DHWM

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