



State of Ohio Environmental Protection Agency

*Gemnings
Financial
Assurance*

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June 4, 2009

Mr. Leonard D. Boyd
Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike
Fairfield, Connecticut 06828

**RE: General Electric Company, Jefferson, Ohio - OHD 048 111 090
Financial Assurance**

Dear Mr. Boyd:

On May 27, 2009, Ohio EPA conducted a review of the financial assurance and liability coverage on file for the General Electric Company (GE) facility referenced above. I evaluated the facility for compliance with the closure cost estimate, and financial assurance for closure care and liability coverage requirements for sudden accidental occurrences as set forth in Ohio Administrative Code (OAC) rules 3745-66-42 through 3745-66-47.

To demonstrate financial assurance for closure care and liability coverage for GE's Jefferson, Ohio facility, GE submitted a 2009 financial assurance documentation in the form of a March 19, 2009 Chief Financial Officer's (CFO) letter/Financial Test, Auditor's Report and special auditor's report.

In a previous correspondence to you, I requested that documentation such as vender quotes be provided to clarify the decreased cost estimates. The 2007 and 2008 financial assurance submittal, noted the cost estimate for the Jefferson, Ohio facility decreased from \$1,407,125.00 to \$726,370.00, respectively. In the 2009 financial test the cost estimate decreased again to 476,000.00.

Upon review of the above, **General Electric is in violation of OAC rule 3745-66-42 (E)** because a copy of the facility's current, detailed closure cost estimate has not been submitted annually to the director of Ohio EPA. To date, GE has not provided a detailed cost estimate for their facility.

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To abate the above violation GE must submit a detailed cost estimate to document the current cost. The cost estimate must be a third-party estimate; therefore, the submittal of vender quotes from a third-party for the remaining closure activities would help clarify the estimate. Also, please explain the decreased cost estimate listed in the financial test.

If you have any questions or need further clarification of any matter mentioned in this letter, do not hesitate to call me at (614) 644-2951. I will be happy to assist you.

Sincerely,



Tina Jennings
Compliance Assurance Section
Division of Hazardous Waste Management

TJ:js
ge.doc

cc: Shannon Ryan, NEDO, DHWM
Kristine Durnell, RISS, DHWM