

FA



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

September 8, 2010

Ms. Helun Bachour-Chahda, President  
J. H. & H. Management, Inc.  
3811 West 150<sup>th</sup> Street  
Cleveland, Ohio 44111

Re: **J. H. & H. Management, Inc. OHR 000 014 043** -017  
**Notice of Violation** -023

Dear Ms. Bachour-Chahda:

On September 8, 2010, I completed a review of the financial assurance documentation file for the former Novacoate facility owned by J. H. & H. Management, Inc. (J. H. & H.) referenced above. I evaluated your facility for compliance with hazardous waste financial assurance and liability requirements set forth in Ohio Administrative Code (OAC) rules 3745-55-42, 3745-55-43 and 3745-55-47.

On April 4, 2007, J. H. & H. entered into Director's Final Findings and Orders (Orders) with Ohio EPA. Ohio EPA has received the following documentation of financial assurance:

- A modified closure plan containing a closure cost estimate of \$49,568.20 was received by Ohio EPA on July 16, 2009. The closure plan was approved on August 12, 2009;
- On September 4, 2009, Ohio EPA received a \$50,000.00 Letter of Credit (LOC), No. OSB.006973, issued by Huntington National Bank (Huntington);
- On October 14, 2009, Ohio EPA received a stand by trust agreement with Huntington;
- On April 26, 2010, Ohio received notice of non-extension from Huntington for LOC No. OSB.006973 beyond its August 31, 2010 expiration date; and
- On August 25, 2010, Ohio EPA received notice that Huntington had elected to rescind their notice of non-extension.

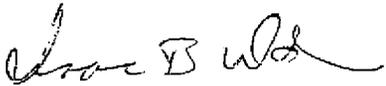
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



J. H. & H. has failed to provide liability coverage at this time. Your insurance broker, Hoffman Group, has indicated that it has been unable to find liability coverage for this closure. Until liability coverage is established or closure is certified, J. H. & H. will remain in violation of **OAC rule 3745-55-47(A)**.

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](mailto:isaac.wilder@epa.state.oh.us).

Sincerely,



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

cc: Tammy McConnell, RISS, DHWM  
Suzanne Prusnek, DHWM, NEDO  
Mitch Mathews, CAS, CO  
Pam McCoy, ERAS, CO  
Tom Kmiec, T.D. Kmiec & Associates  
1520 Commodore Rd, Lyndhurst, OH 44124

**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.