



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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MAILING ADDRESS:

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

October 27, 2009

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

**Re: J. H. & H. Management, Inc. OHR 000 014 043
Partial Return to Compliance
Financial Record Review**

Dear Ms. Bachour-Chahda:

On October 23, 2009, 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. 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. The Orders required that you submit financial assurance documentation and liability coverage within 30 days of the submittal of the closure plan. On September 4, 2009, Ohio EPA received Huntington National Bank Letter of Credit No. OSB.006973 for the amount of \$50,000.00. On October 14, 2009, Ohio EPA received a stand by trust agreement with Huntington National Bank. With these submittals J. H. & H. has returned to compliance for violation **OAC rule 3745-55-43**.

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 J. H. & H. will remain in violation of **OAC rule 3745-55-47(A)**.

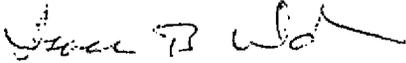
Please address these violations upon receipt of this letter. Failure to comply with the April 4, 2007 Orders may result in escalated enforcement action.

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

Ms. Helun Bachour-Chahda, President
J. H. & H. Management, Inc.
Notice of Violation/Partial Return to Compliance
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If you have any questions regarding this letter, or the financial assurance regulations, please feel free to contact me at (614) 644-3067.

Sincerely,



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

cc: Kristina Durnell, RISS, DHWM
Suzanne Prusnek, DHWM, NEDO
Mitch Mathews, CAS, CO
Pam McCoy, ERAS, CO
Tom Kmiec, T.D. Kmiec & Associates