



**Environmental  
Protection Agency**

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

*IKK - file copy*

March 2, 2011

*RTC of ~~Ohio~~ 10/27/09 &  
9/8/2010 NOV'S*

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. (OHR000014043)**  
**Final Closure Letter**  
**Financial Record Review**

*20-24*

Dear Ms. Bachour-Chahda:

On March 2, 2011, 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.

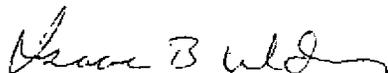
On April 4, 2007, J. H. & H. entered into Director's Final Findings and Orders (Orders) with Ohio EPA. That order required J. H. & H. to provide financial assurance for closure at your facility. A modified closure plan containing a closure cost estimate of \$49,568.20 was approved by Ohio EPA on August 12, 2009. On September 4, 2009, Ohio EPA received Letter of Credit No. OSB.006973 for \$50,000.00 from Huntington National Bank. On October 14, 2009, Ohio EPA received a stand by trust agreement with Huntington National Bank. J. H. & H. has failed to provide liability coverage. Your insurance broker, Hoffman Group, indicated that it was unable to find liability coverage for this closure.

On July 8, 2010, the Ohio EPA approved an amended closure plan. Final certification documentation was received on December 15, 2010. On January 12, 2011, Ohio EPA notified J. H. & H. that it had closed the facility according to the approved closure plan and OAC 3745-55-11 through 3745-55-15. Therefore, J. H. & H. no longer needs to maintain financial assurance to meet its closure obligations. With certification of closure, no further action is required by J. H. & H. to abate the violation of OAC rule 3745-55-47(A) cited in my September 8, 2010 notice of violation letter.

**To have your Letter of Credit released please make a request in writing to the director of the Ohio EPA.**

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: Suzanne Prusnek, DHWM, NEDO  
Mitch Mathews, CAS, CO  
Tom Kmiec, T.D. Kmiec & Associates