



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

August 20, 2007

**PIKE COUNTY
PARKER HANNIFIN
RCRA
OHD046426409**

Mr. Rick Taylor
Parker Hannifin Corporation
6035 Parkland Boulevard
Cleveland, OH 44124-4141

Dear Mr. Taylor:

On August 13, 2007, Steve Saines and I inspected Parker Hannifin Corporation's (PHC) Waverly, Ohio facility to determine PHC's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC) and the December 27, 2000, Director's Final Findings and Orders (DFF&Os).

We found the following violations of Ohio's hazardous waste laws and the DFF&Os. In order to correct those violations, you must do the following and send me the following **within thirty days** of the date of this letter:

- (1) **OAC Rule 3745-54-100(E)(1) and (E)(2) and section V. 2. of the December 27, 2000 Director's Final Findings and Orders (DFFOs)** (E)1)The owner or operator must conduct a corrective action program to remove, or treat in place, any hazardous constituents in groundwater that exceed specified concentration limits between the compliance point under rule 3745-54-95 of the Administrative Code and the down gradient property boundary; (E)(2) The owner or operator must conduct a corrective action program to remove or treat in place any hazardous constituents under rule 3745-54-93 of the Administrative Code that exceed concentration limits under rule 3745-54-94 of the Administrative Code in ground water beyond the facility boundary, where necessary to protect human health and the environment, unless the owner or operator demonstrates to the director that, despite the owner's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action. The owner/operator is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis.

(E)(1) PHC has failed to control and capture the release of VOC-laden ground water along its facility boundary with Pee Pee Creek; (E)(2) PHC has failed to control and capture the release of VOC-laden ground water beyond the facility boundary.

It was Ohio EPA's expectation that significant control of the VOC plume in the vicinity of Pee Pee Creek would have taken place by the end of 2006, more than a year after the installation of new corrective action remedies on site. This has not yet occurred. Sampling results submitted by PHC do not yet show any significant decline in VOC content down gradient of the RW-series pumping wells. This violation will not be resolved until corrective measures have brought on-site and off-site ground water contamination under full hydraulic control. PHC must take immediate steps to control and capture the VOC plume. Within 30 days of the date of this letter, PHC must submit a written plan and timetable to Ohio EPA for the re-evaluation of, modification to and implementation of an updated remediation system which will be capable of capturing and controlling the plume. The plan must also include the submittal of monthly progress reports to Ohio EPA. Ohio EPA will review and comment on the plan. Upon approval of the plan, it must immediately be implemented. **Failure to satisfy the requirements of the December 27, 2007 Director's Final Findings and Orders (DFFOs), and violations of Ohio's hazardous waste laws and rules may result in escalated enforcement action for contempt of the DFFOs and/or and for violations of laws and regulations, which may subject you to fines and penalties.**

GENERAL COMMENTS

- (a) During the inspection, a valve on the air sparging equipment was malfunctioning. This was evident by an alarm which was ringing in the air sparging equipment room. At the time, Martha Connell was unable to identify the exact problem and reason for this malfunction. Please submit a written description of the problem, as well as dates and steps taken to repair the equipment and put it back online, and any impact the malfunction may have had on the effectiveness of the corrective action remedy.
- (b) During the inspection, we observed that the "swale" located north of the PHC property, adjacent to property now owned by Tim Francis, has evidently been impacted by tree cutting and filling. PHC is under orders to protect the swale and prevent such occurrences. In order to determine the exact boundaries of the swale and fully assess the impacts of disturbances, Martha Connell stated that PHC would survey the swale and attempt to determine who is conducting the fill and cut operation. Please submit to this office any information regarding who is responsible for disturbing the swale and a copy of the survey.
- (c) As discussed during the inspection, we will have a bi-weekly conference call with Martha Connell beginning on August 27, 2007 at 9:00 to further discuss the status of the remediation system.

Mr. Rick Taylor
Parker Hannifin Corporation
August 20, 2007
Page 3

Enclosed, you will find a copy of the checklist that was completed during the inspection. Should you have any questions, please feel free to call me at 740-380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mlm

cc: Martha Connell, Parker Hannifin Corporation
Steve Saines, DDAGW/SEDO
Maria Galanti, DERR/SEDO

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD046426409										
3. Site Name	Name: Parker Hannifin Corporation					Website: (Optional)					
4. Site Location Information	Street Address: 11927 US Route 23										
	City, Town, or Village: Waverly					State: OH					
	County Name: Pike					Zip Code: 45690					
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>			
6. NAICS code(s) www.census.gov/epcd/www/naics.html	NA (not operating)										
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Martha				MI:	Last Name: Connell					
	Phone Number: 216-896-2710					Phone Number Extension:					
	E-Mail Address:										
	Fax Number:					Fax Number Extension:					
	Street or P.O. Box: 6035 Parkland Blvd										
	City, Town or Village: Cleveland,					State: OH					Country: USA
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Parker Hannifin Corporation					Date Became Owner (mm/dd/yyyy):					
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
	Street or P.O. Box: 6035 Parkland Blvd										
	City, Town or Village: Cleveland					Owner Phone #: 216-896-2710					
	State: OH					Country: USA					Zip Code: 44124-4141
	Name of Site's Operator: Parker Hannifin Corporation					Date Became Operator (mm/dd/yyyy):					
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
	Street or P.O. Box: 6035 Parkland Blvd										
	City, Town or Village: Cleveland					Operator Phone #: 216-896-2710					
	State: OH					Country:					Zip Code:
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No										
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)											
<input type="checkbox"/> Not Regulated					<input type="checkbox"/> Conditionally Exempt Small Quantity Generator						
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11					<input type="checkbox"/> United States Importer of Hazardous Waste						
<input type="checkbox"/> Large Quantity Generator (LQG)					<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator						
<input type="checkbox"/> Small Quantity Generator (SQG)											
<input type="checkbox"/> Hazardous Waste Transporter					<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace						
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste					<input type="checkbox"/> Small Quantity On-Site Burner Exemption						
<input type="checkbox"/> Recycler of Hazardous Waste					<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption						
<input type="checkbox"/> Underground Injection Control Facility											

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: Company is a closed and is a non generator of HW. Company is conducting post-closure treatment of a groundwater plume.
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Donna Goodman			8/13/2007 10:30 AM
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce < 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.
NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.
NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

Company ceased operations many years ago and is in post-closure/corrective action per December 27, 2000, Director's Final Findings and Orders. Per an approved Corrective Action Management Plan (CAMP) as required by December 27, 2000 DFFOs, PHC constructed a new air sparging/soil vapor extraction system (AS/SVES). The AS/SVES should have been operating by the end of 2004 however delays acquiring equipment problems with PHC's contractor occurred. The system was completed and placed online in November 2005.

Ohio EPA expected that significant control of the VOC plume in the vicinity of Pee Pee Creek would have taken place by the end of 2006, more than a year after the installation of new corrective action remedies on site. This has not yet occurred. Sampling results show no significant decline in VOC content in downgradient pumping wells. PHC is currently in violation of OAC Rule 3745-54-100 (E) (1) and (E) (2) and the DFFOs. These violations will not be resolved until the newly implemented corrective measures have brought on-site ground water contamination under full hydraulic control.