



State of Ohio Environmental Protection Agency

Southeast District Office

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

September 2, 2009

**PIKE COUNTY
PARKER HANNIFIN
RCRA
OHD046426409**

Mr. Rick Taylor
Parker Hannifin Corp.
6035 Parkland Blvd.
Cleveland, Ohio 44124-4141

Dear Mr. Taylor:

On August 26, 2009, 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. Sampling results submitted by PHC do not yet show any significant decline in VOC content down gradient of the RW-series pumping wells. Ohio acknowledges the steps that PHC has taken to study and improve the effectiveness of the remediation system in the past year and anticipates that PHC will achieve compliance in the near future. However, this violation will remain outstanding until it has been demonstrated by PHC that corrective measures have brought on-site and off-site ground water contamination under full hydraulic control.

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.ohio.gov/dhwm>.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/dh

cc: Martha Connell, Parker Hannifin Corporation
Steve Saines, DDAGW, 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: 11197 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 Extension:				
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: 6035 Parkland Blvd								
	City, Town or Village: Cleveland,				Country: USA		Zip Code: 44124-4141		
	State: OH								
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.	
Containers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Company is conducting post-closure treatment of a groundwater plume.	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Donna Goodman			8/26/2009 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)