



State of Ohio Environmental Protection Agency

**Southeast District Office**

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February 2, 2007

**PIKE COUNTY  
PARKER HANNIFIN  
RCRA-CESQG-TSD  
OHD046426409**

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

Dear Mr. Taylor:

Ohio EPA has completed a review of the 2006 Semi Annual Report (Ground Water Monitoring Data for 1<sup>st</sup> and 2<sup>nd</sup> Quarters, 2006) for the Parker Hannifin Corporation (PHC) Waverly Facility in Pike County, Ohio. The report was prepared by Advanced GeoServices Corp. (AGC) of West Chester, PA and was received by the Ohio Environmental Protection Agency (Ohio EPA) on November 30, 2006.

PHC is required to submit semi-annual reports to Ohio EPA as per OAC 3745-54-100(G). As per the revised Corrective Action Monitoring Plan (CAMP) for the Parker site (August 2006), the ground water sampling consists of the analytical results for fifteen VOCs and two metal site specific parameters at each of PHC's thirty-nine monitoring wells and two surface water locations. PHC is currently responsible for fulfilling the terms of a Director's Final Findings and Orders (DFFOs), dated December 27, 2000. With respect to ground water monitoring, the site is controlled by its CAMP and the Corrective Action rules found in OAC 3745-54-90 through 3745-54-100.

The 2006 Semi-Annual Report discusses the operation of the new corrective action systems, which became operational at PHC in November of 2005. The new corrective action remedies consist of air sparging and soil vapor extraction (AS/SVE) in the former source area, and a newly installed line of four wells (RW-3 through RW-6 for pumping & treating contaminated ground water) in the plume management area. The new systems were designed to prevent further releases of VOCs to Pee Pee Creek and other off-site locations. Ohio EPA expected to see significant decreases in ground water VOC content down gradient of the four extraction wells sometime in 2006. The sampling results for the first half of 2006 do not yet show any significant decline in VOC content down gradient of the pumping wells. AGC states that:

*"Some of the ground water is captured by the recovery wells while some appears to pass the recovery wells and continue on towards Pee Pee Creek. This is likely due to the extraction wells not operating at the design extraction rates. [i.e., the two interior recovery wells (RW-4 and RW-5) are operating at approximately 50% of the design rate of 60 gpm, while the exterior wells (RW-3 and RW-6) are at or above the design rate of 30 gpm.] AGC is currently working on adjustments to the system which would optimize recovery in the shallow & intermediate zones." (page 3-12 & 3-15)*

The average surface water concentration of TCE in Pee Pee Creek during the first quarter sampling event was 0.44 ppb. During the second quarter sampling event, average TCE levels were 2 ppb. In the Recommendations section of the Semi-Annual Report, AGC offers the following suggested remedy regarding continued leakage of VOCs into Pee Pee Creek:

*"The extraction pumps in RW-3 through RW-6 will be cleaned to improve the pump extraction rates. After cleaning, a water level measurement event will be performed to assess if the improved extraction rates are sufficient to achieve capture. If capture is not successful, Parker will consider other methods of system improvements to ensure capture."* (page 4-1)

Based on Ohio EPA's review, we found the following violation of Ohio's hazardous waste laws and the DFF&Os. In order to correct this violation, you must do the following and send me the following **within the time frames specified** in this letter:

- (1) **OAC Rule 3745-54-100(E)(2) and section V. 2. of the December 27, 2000 DFF&O's:**  
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: ...**(E)(2)** 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.

Amendment 1 to the PHC Amended Post-Closure Plan (Ohio EPA letter, dated October 4, 2001) states that: "PHC shall achieve access to the Bowling property to determine the full extent and concentration of VOC contamination along the terminal edge of the contaminant plume. The plume must be defined in order to assure that the upcoming corrective action program will be fully effective."

PHC has been in violation of the above referenced rule and DFFO's, and the October 4, 2001, post-closure plan amendment since the post-closure plan approval in October, 2001. However, Ohio EPA has observed the good faith efforts of PHC to obtain a "reasonably priced" access agreement to the Bowling property, without success. Ohio EPA's position had been to allow the violation to remain but to focus on the completion of the remaining corrective action items listed in the October 4, 2001, amended post-closure plan.

The new corrective action measures were implemented by PHC in November 2005, when the new systems went online. Since then, they have experienced numerous operational problems and failures. Currently, only two of the four extraction wells are operating at full capacity while the other two are only operating at 50% of design

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extraction rate, in violation of the above referenced rule and orders. PHC has thus far failed to control the groundwater plume, which is going offsite. PHC will remain in violation until the corrective measures (the new remedial systems referenced above) have brought the ground water plume under full hydraulic control. In the last week, Ohio EPA has contacted PHC by telephone and email in an attempt to arrange a meeting to discuss this situation. PHC has failed to respond. **Within one week of the date of this letter, PHC must contact me to arrange a conference call in which we will discuss the actions and timing of steps PHC will take to abate this violation.**

### General Comments

- (a) The August 2006 Corrective Action Monitoring Plan does not specify a date for submittal of the semi-annual report for the PHC Waverly site. However, Ohio EPA typically requires submittal of semi-annual results within 45 to 90 days following the receipt of analytical results from the laboratory. It appears that approximately 180 days separate PHC's receipt of analytical results from the submission of its semi-annual report. Please submit next year's semi-annual report using the above deadlines as guidance.

Should you have any questions, please feel free to call me at 740-380-5293 or Mr. Steve Saines at 740-380-5445.

Sincerely,



Donna Goodman  
District Representative  
Division of Hazardous Waste Management

DG/mlm

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

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.