



Environmental
Protection Agency

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

May 24, 2011

TUSCARAWAS COUNTY
SIMONDS INDUSTRIES, INC.
RCRA-LQG
OHD 018 221 853

David P. Witman, Esquire
Simonds International
P.O. Box 500
Fitchburg, MA 01420

Dear Mr. Witman:

Ohio EPA has reviewed the 2010 Annual Groundwater Monitoring Report, received January 5, 2011 from Simonds Industries. Ground water monitoring reports are required under the Consent Order and Final Judgment Entry (CO) that Simonds signed with the State of Ohio on March 25, 2004.

Based on the review, Ohio EPA has determined that Simonds is in violation of the following rules. In order to correct these violations, you must do the following and send me the required information **within 30 days** of your receipt of this letter:

- (1) **Annual Report, OAC rule 3745-54-75:** The owner or operator must prepare and submit a single copy of an annual report to the director by March first of each year. The report form and instructions will be supplied by the director upon request and must be used for this report.

Simonds did not send the annual report in the format required by the director per this rule. Simonds must resubmit the required information in the format required by the forms and instructions for annual reports supplied to them by Ohio EPA. Annual Report instructions and forms are available for download from <http://epa.ohio.gov/Default.aspx?tabid=4101> or by calling the Data Management Section of the Division of Materials and Waste Management at (614) 644-2977. Simonds should resubmit all the data collected since 2005 for the five required database files (DBF). In order to facilitate use of the correct format, Simonds may e-mail Doug Snyder at doug.snyder@epa.ohio.gov so a past Simonds' annual report (1998) which was in the correct Excel format can be sent electronically. No resubmittal of data in hardcopy is needed.

- (2) **General ground water monitoring requirements, OAC rule 3745-54-97(C):** All monitoring wells must be cased in a manner that maintains the integrity of the monitoring well bore hole. This casing must be screened or perforated and packed with gravel or sand, where necessary, to enable collection of ground water samples. The annular space (i.e., the space between the bore hole and well casing) above the sampling depth must be sealed to prevent contamination of samples and the ground water.

The ground water sampling field data sheets, supplied as Appendix A of the report, indicate that well P-25 has a broken concrete pad. The data sheet for well P-7 specifies "No cap/No cover" and possibly indicates a problem with the concrete pad. These problems are a violation of 3745-54-97(C) and must be corrected. To demonstrate compliance with this rule, Simonds must repair the concrete pad and submit photographic documentation of the repairs to Ohio EPA.

Recommendations

1. Simonds found that monitoring wells PZ-A and PZ-B were destroyed by the current owner's demolition activities. Simonds must properly abandon those wells since they can no longer be used for sampling. Follow the procedures in Chapter 9 of the Technical Guidance Manual for Ground Water Investigations - Sealing Abandoned Monitoring Wells and Boreholes. This can be found through the following internet address:

http://www.epa.state.oh.us/portals/28/documents/TGM-09_1009.pdf.

Simonds must be sure to file a well sealing report with the Ohio Department of Natural Resources.

2. The ground water sampling field data sheets, supplied as Appendix A of the report, indicate that three monitoring wells are not labeled. Ohio EPA recommends that wells P-13, D-8, and P-25 be labeled. The sampling field data sheet for P-25 indicated that the well was not locked. Ohio EPA recommends that a lock be installed on P-25.

If you should have questions please feel free to contact me at 740.380.5256.

Sincerely,



Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/mlm

cc: Gerald Myers, Lawhon & Associates, Inc.
Doug Snyder, 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 appropriate regulations.