

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mark Potachnik
Senior Environmental Eng.
Solway Advanced Polymers, LLC
PO Box 446
State Route 7 South
Marietta, OH 45750

2. Article Number

(Transfer from service label)

7006 3450 0001 9056 0389

PS Form 3811, February 2004

Domestic Return Receipt

102505-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X


 Agent
 Addressee

B. Received by (Printed Name)

Scott Peterson

C. Date of Delivery

1/25/08

D. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

-
- Certified Mail
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- Express Mail
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- Return Receipt for Merchandise
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- Insured Mail
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- C.O.D.

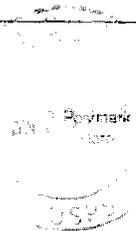
4. Restricted Delivery? (Extra Fee)

 Yes

7006 3450 0001 9056 0389

**U.S. Postal Service™
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| | |
|---|---------|
| Postage | \$ 41 |
| Cert. Mail Fee | 2.65 |
| Return Receipt Fee (Endorsement Required) | 2.15 |
| Restricted Delivery Fee (Endorsement Required) | |
| Total Postage & Fees | \$ 5.21 |



Sent To
 Mark Potachnik, Solway Adv. Polymers
 Street, Apt. No.
 PO Box No. PO B 446
 Marietta, OH 45750

PS Form 3800, August 2005

See Reverse for Instructions



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

CERTIFIED MAIL: 7006 3450 0001 9056 0389

January 22, 2008

Washington County
Solvay Advanced Polymers
DHWM/SEDO
OHD981529688
Permit # 04-84-0194

Mark Potochnik
Senior Environmental Engineer
Solvay Advanced Polymers, L.L.C.
P.O. Box 446
State Route 7 South
Marietta, OH 45750

Dear Mr. Potochnik:

This letter is in response to Solvay Advanced Polymers' (Solvay) letter dated October 10, 2007, which replied to Ohio EPA's June 27, 2007, review of Solvay's 2006 Annual Report on Ground Water Monitoring Activities at the Wastewater Treatment Plant. This letter will also address the request made by The RETEC Group, on behalf of Solvay, to seal monitoring wells PZ-007 and TW-25S.

Comments from June 27, 2007 Letter

Ohio EPA's June 27, 2007 letter commented on two data reporting issues. The first was on the matter of reporting estimated values about the method detection limit but below the reporting limit. The second was on the need to update the detection limits on the excel spread sheet. Solvay's October 10, 2007 responses to these two data reporting issues have adequately addressed Ohio EPA's comments.

Violation Cited in June 27, 2007 Letter

Ohio EPA's June 27, 2007 letter cited Solvay with a violation of OAC Rule 3745-54-97(A)(2) because Ohio EPA did not believe that ground water samples from monitoring well TW-58 were representing the quality of ground water passing the point of compliance, as required by the rule.

Solvay's October 10, 2007 response letter has proposed to abandon, but not replace, monitoring well TW-58. For the following reasons, Ohio EPA believes that to comply with OAC Rule 3745-54-97(A)(2), it is necessary to replace TW-58.

- Although chlorobenzene has not been detected at TW-58 since May 1998, there is some question as to the validity of the data since it is known that the water samples from the well are not representative of ground water quality in the aquifer. A properly constructed replacement well would verify water quality in the aquifer at this location.
- While several wells exist close to TW-58, preferential flow paths and variable lithology have been documented underlying the northern portion of the Emergency Basin (EB). Aquifer tests in 1991 identified the presence of a channel of more permeable material oriented parallel to the Ohio River beneath the northern portion of the EB. Also, the lack of a hard pan layer at TW-58, which was identified at TW-57, highlights the variable lithology.
- Hydrogeologic site investigations at the site in the early 1990s clearly identified impacted ground water in the northwest corner of the EB. This is the area monitored by TW-58.

At this time, Solvay remains in violation of OAC Rule 3745-54-97(A)(2). To return to compliance with this rule, Solvay must replace well TW-58 with an equivalent well. **Within 30 days** of your receipt of this letter, please submit a plan and schedule for replacing TW-58.

Well Abandonment

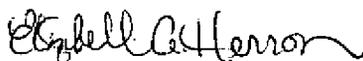
Solvay's October 10, 2007 letter proposes to abandon well TW-58 and RETEC's correspondence, also dated October 10, 2007, proposes to abandon wells TW-25S and PZ-007. The abandonment method proposed by Solvay includes pressure grouting the well, cutting off the casing three feet below the ground surface, followed by backfilling with clean soil mounded for drainage.

Ohio EPA agrees that due to integrity issues, these three wells should be abandoned. However, Ohio EPA strongly recommends that Solvay revise its well sealing procedures to include over drilling and complete removal of the well.

Over drilling and removal of the well casing, screen, filter pack and annular seal are especially important when the casing and annular seal may be compromised as is the case with wells TW-58, TW-25S, and PZ-007. In addition, these wells are located in an area that may be subject to spills of contaminated waste water; because of this, the wells should be abandoned in a way that eliminates the potential for vertical fluid movement to the aquifer.

Should you have any questions regarding this letter, please contact me at 740 380-5248

Sincerely,



Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EAH/mlm