



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 Korteski, Director

June 27, 2007

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

Mr. Mark Potochnik
Senior Environmental Engineer
Solvay Advanced Polymers, L.L.C.
P.O. Box 446
Marietta, Ohio 45750

Dear Mr. Potochnik:

On March 1, 2007, the Ohio EPA SEDO received Solvay Advanced Polymers' (Solvay) 2006 Annual Report on Ground Water Monitoring Activities at the Waste Water Treatment Plant (WWTP). With one exception, Ohio EPA has completed a review of the Annual Report for compliance with the requirements of Ohio EPA Part B permit condition F.8. and OAC Rules 3745-54-75 and OAC Rules 3745-54-75, 54-77(C), and 54-97(J). This review has identified the need for additional information from Solvay and one violation of the OAC Rules.

Ohio EPA is still in the process of reviewing the statistical analysis of the supplemental FEQB well sampling results, which relate to the vacuum dewatering system. Ohio EPA will address these sampling results in future correspondence.

Violation

- (1) OAC Rule 3745-54-97 (A)(2), General Ground Water Monitoring Requirements:**
The ground water monitoring system must consist of a sufficient number of wells, installed at appropriate locations and depths to yield ground water samples from the uppermost aquifer that represent the quality of ground water passing the point of compliance.

Samples collected from monitoring well TW-58 do not represent the quality of ground water passing the point of compliance. Ground water analytical results and yield data from TW-58 suggest that the well screen is not in good communication with the

uppermost aquifer. Field measurements of pH are consistently above 12, indicating that the cement grout seal has been compromised and is affecting ground water quality. The alkalinity (bicarbonate) measured in the well is less than 10 mg/L which is atypically low for shallow ground water at this site, while the Alkalinity (carbonate) level is high. Magnesium (total and dissolved) was measured well below other monitoring wells on site indicating a different water type.

TW-58 was bailed dry during both sampling events in 2006 producing less than 2.5 gallons of water. The well is screened in fine sand to sandy gravel below the water table which should yield sufficient water to purge three well volumes and sample. Incrustation of the screen has likely limited flow of water into the well.

In order to resolve this violation, repairs of TW-58 are necessary. However, considering the grout seal and well screen are likely compromised, the well should be replaced. Please provide a response detailing what action Solvay has or will take to come into comply with the ground water requirements of OAC Rule 3745-54-97 (A)(2).

Comments

- (a) When the owner or operator is performing an Appendix IX analysis under OAC Rule 3745-54-98, estimated values need to be submitted with the data in order to determine the presence of hazardous constituents. OAC Rule 3745-54-99(G) reads in part that "The owner or operator must analyze samplesto determine whether additional hazardous constituents are present in the uppermost aquifer and, if so, at what concentration".

It does not appear that Solvay has instructed the laboratory to report estimated values (J qualified) that are above the method detection limit (MDL) but below the reporting limit.

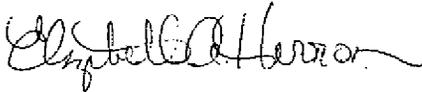
In order to determine compliance with this rule, estimated values need to be reported on the laboratory analytical data sheets and in the summary tables contained in the annual report. In the next semi-annual sampling event, and thereafter, Solvay must include estimated values on the lab data sheets.

- (b) The Parameters excel spread sheet submitted with the annual report contains outdated detection limits for the current ground water monitoring program at Solvay. Please up date this list for the next annual report.

Mr. Mark Potochnick:
Solvay Advanced Polymers, L.L.C.
June 27, 2007
Page 3

If you have any questions, please call me at (740) 380-5248.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth A. Herron".

Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EAH/mlm

cc: Steve Williams, DDAGW-SEDO