



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

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

October 20, 2009

Mr. William Sommer, Project Manager  
Glenn Springs Holdings, Inc.  
5005 LBJ Freeway, Suite 1350  
Dallas, Texas 75244

**Subject: Durez Corporation Facility Return to Compliance  
OHD 990 747 859  
Hardin County**

Dear Mr. Sommer:

On August 11, 2009, the Ohio Environmental Protection Agency (Ohio EPA) received from Glenn Springs Holdings, Inc. (Glenn Springs)<sup>1</sup>, a response to Ohio EPA's July 7, 2009, notice of violation and comments on Glenn Springs' May 22, 2009, letter regarding the 2008 ground water monitoring report. The Division of Hazardous Waste Management (DHWM) requested that the Division of Drinking and Ground Waters (DDAGW) review this document for compliance with Ohio Administrative Code (OAC) Rules 3745-54-75, 54-98 and the facility's Baseline Monitoring Post-Closure Plans (BMPCP).

Thank you for submitting a schedule for abandoning and replacing well P-18R and notifying Ohio EPA of the field work schedule. On August 13, 2009, Ohio EPA observed Glenn Springs abandoning monitoring well P-18R due to well integrity issues documented by elevated pH readings. Also, beginning on August 13, 2009, and completed August 15, 2009, Glenn Springs installed well P-18R3 to replace abandoned well P-18R. Development of monitoring well P-18R3 occurred on August 18, 2009. A total of 24 gallons were developed from well P-18R3 with periodic readings of pH, specific conductance and temperature recorded. The pH reading for P-18R3 ranged from 7.49 Standard Units (S.U.) at the beginning of the development to 7.24 S.U. at the end. These pH measurements appear consistent with other readings across the facility, and P-18R3 appears to have been properly constructed. Replacement of well P-18R with properly constructed P-18R3 abates the violation listed below:

07/07/09 NOV. Citation	Rule Citation
1	OAC Rule 3745-54-97(C) requiring all monitoring wells be cased in a manner that maintains the integrity of the monitoring well borehole and that the annular space above the sampling depth be sealed to prevent contamination of the samples and ground water.

<sup>1</sup> Ohio EPA understands that Durez Corporation acquired the facility at 13717 State Route 68 South, Kenton, Ohio, from OxyChem in November 2000. Ohio EPA further understands that Glenn Springs Holdings, Inc., is a subsidiary of Occidental Petroleum Corporation, which retained responsibility for the closure/post-closure program at the landfill-closed former surface impoundments.



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**Comments**

Glenn Springs reported that wells P-31 and P-33 were installed by RMT, Inc., in 1987, and that water level measurements were not recorded on the well construction logs. Glenn Springs stated that the earliest water level data for P-31 and P-33 in Brown and Caldwell's records was March 16, 1993. Glenn Springs requested Ohio EPA's guidance as to whether to include the March 16, 1993, recorded water level measurements as the water level on installation because they are the oldest values in Glenn Springs' archives, or to mark the value in the Supplementary Annual Reports as "N/A – not available."

Ohio EPA recommends that Glenn Springs include an "N/A – not available" in the field requiring ground water levels at installation for wells P-31 and P-33 in the Wells.xls database file in future Supplementary Annual Reports.

If you have any questions, please contact me at (419) 373-4113. Any written correspondence should be sent to my attention at Ohio EPA, Northwest District Office, Division of Hazardous Waste Management, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Lynn Ackerson  
Environmental Specialist  
Division of Hazardous Waste Management

/cs

cc: ~~DHWM, NWDO, File - Durez, Ground Water~~

cc: Michael Terpinski, DHWM, NWDO  
Chad Zajkowski, DDAGW, NWDO  
Lynn Ackerson, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
Bill Sommer, Glenn Springs

NOTE: 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.