



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

December 22, 2011

Mr. Glen McMillan  
Fraser Papers Limited  
P.O. Box 762  
Suite 200, Brookfield Place  
181 Bay Street  
Toronto, Canada M5J 2T3

**RE: Notice of Violation  
Fraser Papers Limited, Montgomery County**

Dear Mr. McMillan:

Fraser Papers Limited is required to conduct post-closure care activities in accordance with the solid waste rules and fund a financial assurance mechanism in accordance with Ohio Administrative Code ("OAC") Rule 3745-27-16. Although post-closure care activities are being performed, Fraser Papers Limited has failed to fund a financial assurance mechanism in the amount of the current post-closure care cost estimate.

The burden and obligation for maintaining this facility and its financial assurance is with the owner and/or operator. The financial assurance mechanism for post-closure care must be established and maintained throughout the post-closure care period in an amount sufficient to pay for post-closure care activities. Fraser Papers Limited has failed to maintain a financial assurance instrument to cover the cost of post-closure care; therefore, Fraser Papers Limited is in violation of the post-closure care financial assurance rule, OAC Rule 3745-27-16.

Fraser Papers Limited remains in violation of OAC Rule 3745-27-16 until a financial assurance mechanism meeting the requirements of OAC Rule 3745-27-16 has been established. Please respond to this letter within 15 days after receipt and indicate how Fraser Papers Limited will resolve these ongoing violations of Ohio law.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the owner or operator of the Fraser Papers Limited, or others from responsibility under Chapters 3704., 3714., 3734., or 6111. of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts remedying conditions resulting from any release of contaminants to the environment.

Mr. Glen McMillan  
Fraser Papers Limited  
Page 2

If you have any questions, I may be reached at (614) 728-5343.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fanny Haritos".

Fanny Haritos  
Compliance Monitoring and Enforcement Unit  
Division of Solid and Infectious Waste Management

FH/jms

cc: Robert Welsh, AST Environmental, Inc.  
Betty Arthungal, DMWM, SWDO