

Environmental
Protection Agency

John E. Kasicki, Governor

Mark Taylor, Lt. Governor

Scott J. Hall, Director



December 9, 2011

RE: NOTICE OF VIOLATION

CERTIFIED MAIL 7011 0470 0002 3496 0415

Mark Malbin, President
Bencin Material Hauling & Disposal Services, Inc.
2636 Brecksville Road
Richfield, Ohio 44286

Dear Mr. Malbin:

This letter contains the results of two events conducted by Ohio Environmental Protection Agency (Ohio EPA). The first event was an attempted inspection of a semitrailer containing debris from Bencin Material Hauling & Disposal Services, Inc. (Bencin) on November 10, 2011, at American Landfill, Stark County. The second event was an inspection at Bencin in Richfield on November 23, 2011. This letter provides a notice of violations and comments identified during the November 23, 2011 inspection.

Attempted semitrailer inspection on November 10, 2011:

On November 10, 2011, several agencies, including Ohio EPA, attempted to inspect the contents of a semitrailer containing debris from Bencin. The inspection was initiated by Richfield Police related to an investigation into the ownership of the trailers. The investigation was due to the trailers not having vehicle identification numbers (VIN).

Present for the November 10, 2011 attempted inspection were Scott Shane, Ohio EPA, Office of Special Investigations; Chad Abell, American Landfill, Inc.; Don Bishop, DJM truck driver, Michael Russo, Ohio Bureau of Motor Vehicles-Investigations; Mike Swanson, Richfield Police Department; and I, representing Ohio EPA, Division of Materials and Waste Management.

Don Bishop, DJM, drove the truck and semitrailer from Bencin, Richfield, Summit County, to American Landfill, Waynesburg, Stark County. We planned to inspect the debris to verify that there was no hazardous waste and make sure that the debris was acceptable for disposal at American Landfill, a municipal solid waste landfill.

Mr. Bishop, the truck driver, opened the rear door of the trailer and the visible debris included wood, plastic sheeting, canvas or fabric, florescent light tube, and white powder. There was a hole in the bottom of the trailer where the front legs had been torn away. Looking in the hole, wood, plastic sheeting, and computer components were visible. It was unclear what other kinds of solid waste, and potentially hazardous waste, may be in the trailer.

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American Landfill personnel had planned to unload the trailer by placing it on the landfill's hydraulic tipper. However, that could not be done because the trailer was missing the front legs. Mr. Bishop contacted Don Matyi, the owner of DJM. They decided that since the trailer had to be unloaded by hand, the process would be too expensive and/or time consuming to do at the landfill. The truck and trailer were then driven back to Bencin, Richfield.

The emptying and hand-sorting of trailer debris was to be rescheduled and to take place at Bencin, Richfield. However, Bencin and/or DJM have not contacted Richfield Police to reschedule the trailer inspection. Ohio EPA now considers the debris in the trailer with the missing front legs to be open dumping of solid waste. Due to open dumping of solid waste, Bencin is in violation of:

1. **Ohio Administrative Code (OAC) 3745-27-05(C)**
This rule states in part, *"No person shall conduct, permit, or allow open dumping."*
2. **Ohio Revised Code (ORC) 3734.03**
This law states in part, *"No person shall dispose of solid wastes by open burning or open dumping...No person shall dispose of treated or untreated infectious waste by open burning or open dumping."*

To achieve compliance with the above rule and law, Bencin must contact Richfield Police to schedule the unloading and inspection of the trailer debris and then properly dispose solid waste at a licensed solid waste facility. Uncontaminated CDD can be separated for disposal at a licensed CDD facility. Copies of disposal receipts must be sent to Ohio EPA and Summit County Public Health.

Site Inspection on November 23, 2011:

Julie Brown, Summit County Public Health (SCHP), and I arrived at Bencin at approximately 1:00 p.m. We went to the small office building at the northeast side of the property in order to announce the inspection. The front door to the office had the key in the door lock. Looking in the office, we saw the furniture and office items had been removed. Richfield Police was called to report the situation. Several Richfield Police officers arrived at Bencin including Mike Swanson, Joe Davis, and Keith Morgan. Approximately 15 minutes later, Austin Herold, Bencin employee, arrived on site and gave us permission to conduct the inspection. Attending the inspection were Julie Brown, (SCHP); Keith Morgan, Richfield Police, and I, representing Ohio EPA. The results below are listed in sections titled Waste Transfer Area, Waste Disposal Area, Mulch Area, Miscellaneous Violations and Comments.

Waste Transfer Area

On the parking lot just south of the Bencin buildings, there was a pile of debris mostly surrounded on three sides by concrete barriers. Ohio EPA considers this area an illegal solid waste transfer facility. The pile included soil, concrete cinder blocks, plastic containers, material in plastic bags, carpet, plastic buckets, yard waste, appliance parts, pop bottles, furniture cushions, cardboard, and unidentifiable debris.

Operating an unlicensed, unpermitted solid waste transfer facility is a violation of Ohio's solid waste laws and rules, ORC 3734 and OAC 3745-27. The owner/operator is in violation of:

1. **OAC 3745-27-05(C)** Open dumping of solid wastes

This rule states in part, *"No person shall conduct, permit, or allow open dumping."*

The transfer area contained solid waste. Therefore, the owner/operator has violated OAC 3745-27-05(C) due to open dumping of solid wastes in the transfer area.

To achieve compliance, the owner/operator must:

- a. immediately stop all open dumping of solid wastes at Bencin's Richfield site and all other properties owned and operated by Bencin;
- b. immediately stop operating as an illegal solid waste transfer facility at Bencin's Richfield site and all other properties owned and operated by Bencin;
- c. at Bencin's Richfield site and all other properties owned and operated by Bencin, remove and properly dispose of all solid wastes at a licensed solid waste disposal facility and provide copies of the disposal receipts to Ohio EPA; and
- d. all unknown materials must be characterized to determine if they are hazardous wastes at Bencin's Richfield site and all other properties owned and operated by Bencin. All hazardous waste must be disposed of at a licensed hazardous waste facility.

2. ORC 3734.03 Open dumping of solid wastes

This law states in part, "No person shall dispose of solid wastes by open burning or open dumping...No person shall dispose of treated or untreated infectious waste by open burning or open dumping."

As stated in Item 1 above, there was solid waste in the transfer area. Therefore, the owner/operator has violated ORC 3734.03 due to open dumping of solid wastes.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

3. ORC 3734.05(A)(1) License for a solid waste facility

This law states in part, "Except as provided in divisions (A)(4), (8), and (9) of this section, no person shall operate or maintain a solid waste facility without a license issued under this division by the board of health of the health district in which the facility is located or by the director of environmental protection when the health district in which the facility is located is not on the approved list under section 3734.08 of the Revised Code."

The owner/operator has violated ORC 3734.05(A)(1) due to failure to obtain a license prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

4. OAC 3745-37-01(A) License for a solid waste facility

This rule states in part, "No person shall conduct municipal solid waste landfill, industrial solid waste landfill, residual solid waste landfill, compost facility, transfer facility, infectious waste treatment facility, or solid waste incineration facility operations without possessing a separate, valid license for each such operation, as required by Chapter 3734. of the Revised Code and the Administrative Code rules adopted thereunder. Each license shall be obtained from the board of health in the health district in which the facility is located, or by the director, if the director has assumed the licensing function for that health district."

The owner/operator has violated OAC 3745-37-01(A) due to failure to obtain a license prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

5. ORC 3734.05(A)(2) Permit for a solid waste facility

This law states in part, "Except as provided in divisions (A)(2)(b), (8), and (9) of this section, each person proposing to open a new solid waste facility or to modify an existing solid waste facility shall submit an application for a permit with accompanying detail plans and specifications to the environmental protection agency for required approval under the rules adopted by the director pursuant to division (A) of section 3734.02 of the Revised Code and applicable rules adopted under division (D) of section 3734.12 of the Revised Code at least two hundred seventy days before proposed operation of the facility and shall concurrently make application for the issuance of a license under division (A)(1) of this section with the board of health of the health district in which the proposed facility is to be located."

The owner/operator has violated ORC 3734.05(A)(2) due to failure to obtain a permit prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

6. ORC 3734.02(C) Permit for a solid waste facility

This law states in part, ". . . Except as provided in this division and divisions (N)(2) and (3) of this section, no person shall establish a new solid waste facility or infectious waste treatment facility, or modify an existing solid waste facility or infectious waste treatment facility, without submitting an application for a permit with accompanying detail plans, specifications, and information regarding the facility and method of operation and receiving a permit issued by the director.."

The owner/operator has violated ORC 3734.02(C) due to failure to obtain a permit prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

7. In addition, the establishment of a solid waste transfer station requires permits for leachate containment and potential site storm water management. Ohio EPA, Division of Surface Water (DSW) investigated the owner/operator to determine if the owner/operator maintained compliance with the following laws:

- **ORC 6111.44:** This law states: *"no municipal corporation, county, public institution, corporation, or officer or employee thereof or other person shall provide or install sewerage or treatment works for sewage, sludge, or sludge materials disposal or treatment or make a change in any sewerage or treatment works until the plans therefore have been submitted to and approved by the director of environmental protection."*
- **ORC 6111.04:** states in part, *"No person shall cause pollution or place or cause to be placed any sewage, industrial waste, or other wastes in a location where they cause pollution of any waters of the state, and any such action is hereby declared to be a public nuisance, except in such cases where the director of environmental protection has issued a valid and unexpired permit, or renewal thereof, as provided in sections 6111.01 to 6111.08 of the Revised Code, or an application for renewal is pending."* *"No visible particulate emissions except for 3 minutes during any 60 minute period."*

The owner/operator is in violation of both ORC 6111.44 and ORC 6111.04.

To achieve compliance, the owner/operator must:

- a. comply with the requirements stated in 1.a, 1b, 1.c and 1.d above;
- b. immediately cease discharging any leachate from the transfer area to waters of the state;
- c. collect and transport any leachate from the transfer area for treatment at a licensed waste water treatment plant; and
- d. comply with ORC 6111.04 and ORC 6111.44.

Waste Disposal Area

The disposal area included the west earth berm/soil stockpile south of the break in the west berm and continued south for approximately 450 feet to the southwest corner then east along the south berm/soil stockpile for approximately 190 feet. The width of the berm/soil stockpile ranged from approximately 40 feet to approximately 90 feet. During the June 1, 2011 investigation, test pits were excavated in various locations in the waste disposal area. Solid waste was found in most test pits. Only construction and demolition debris (CDD), mainly clean hard fill, was found in several test pits just south of the light pole located near the center of west berm of the investigation area. The disposal area looked nearly the same as during the last inspection on August 8, 2011. The investigation

involving test pits on June 1, 2011 confirmed that this area contains buried solid waste. Several piles of waste were visible that were excavated during the June 1, 2011 investigation. There was no evidence of waste removal.

Any solid waste disposed on the property is a violation of Ohio's solid waste laws and rules, ORC 3734 and OAC 3745-27. In addition, any CDD disposed on the property is a violation of Ohio's CDD laws and rules, ORC 3714 and OAC 3745-400. Ohio EPA is considering further action regarding this situation.

The owner/operator is in violation of:

1. OAC 3745-27-05(C) Open dumping of solid wastes

This rule states in part, *"No person shall conduct, permit, or allow open dumping."*

The June 1, 2011 investigation test pits revealed that the berm/soil stockpile contained the following: rubber waste including truck mud flaps, fiber, metal drum, plastic and metal debris, bottles, pop cans, plastic coolers, fabric bulk containers containing unknown gray powder, unknown white powder, furniture cushion, and bags of household garbage.

The buried materials are at least solid wastes and may include hazardous wastes. Further analysis is needed to determine the characteristics of the buried gray and white powders. Therefore, the owner/operator has violated OAC 3745-27-05(C) due to open dumping of solid wastes in the berm/soil stockpiles in the southwest area.

To achieve compliance, the owner/operator must:

- a. immediately stop all open dumping of solid wastes at Bencin's Richfield site and all other properties owned by Bencin;
- b. immediately stop operating as an illegal solid waste landfill at Bencin's Richfield site and all other properties owned by Bencin;
- c. remove and properly dispose of all solid wastes at a licensed solid waste disposal facility and provide copies of the disposal receipts to Ohio EPA; and
- d. all unknown materials like the gray and white powders must be characterized to determine if they are hazardous wastes. All hazardous waste must be disposed of at a licensed hazardous waste facility.

2. ORC 3734.03 Open dumping of solid wastes

This law states in part, "No person shall dispose of solid wastes by open burning or open dumping...No person shall dispose of treated or untreated infectious waste by open burning or open dumping."

As stated in Item 1 above, the berm/soil stockpile in the southwest area contains solid wastes. Therefore, the owner/operator has violated ORC 3734.03 due to open dumping of solid wastes.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

3. ORC 3734.05(A)(1) License for a solid waste facility

This law states in part, "Except as provided in divisions (A)(4), (8), and (9) of this section, no person shall operate or maintain a solid waste facility without a license issued under this division by the board of health of the health district in which the facility is located or by the director of environmental protection when the health district in which the facility is located is not on the approved list under section 3734.08 of the Revised Code."

The owner/operator has violated ORC 3734.05(A)(1) due to failure to obtain a license prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

4. OAC 3745-37-01(A) License for a solid waste facility

This rule states in part, "No person shall conduct municipal solid waste landfill, industrial solid waste landfill, residual solid waste landfill, compost facility, transfer facility, infectious waste treatment facility, or solid waste incineration facility operations without possessing a separate, valid license for each such operation, as required by Chapter 3734. of the Revised Code and the Administrative Code rules adopted thereunder. Each license shall be obtained from the board of health in the health district in which the facility is located, or by the director, if the director has assumed the licensing function for that health district."

The owner/operator has violated OAC 3745-37-01(A) due to failure to obtain a license prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

5. ORC 3734.05(A)(2) Permit and license for a solid waste facility

This law states in part, "Except as provided in divisions (A)(2)(b), (8), and (9) of this section, each person proposing to open a new solid waste facility or to modify an existing solid waste facility shall submit an application for a permit with accompanying detail plans and specifications to the environmental protection agency for required approval under the rules adopted by the director pursuant to division (A) of section 3734.02 of the Revised Code and applicable rules adopted under division (D) of section 3734.12 of the Revised Code at least two hundred seventy days before proposed operation of the facility and shall concurrently make application for the issuance of a license under division (A)(1) of this section with the board of health of the health district in which the proposed facility is to be located."

The owner/operator has violated ORC 3734.05(A)(2) due to failure to obtain a permit and license prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

6. ORC 3734.02(C) Permit for a solid waste facility

This law states in part, ". . . Except as provided in this division and divisions (N)(2) and (3) of this section, no person shall establish a new solid waste facility or infectious waste treatment facility, or modify an existing solid waste facility or infectious waste treatment facility, without submitting an application for a permit with accompanying detail plans, specifications, and information regarding the facility and method of operation and receiving a permit issued by the director.."

The owner/operator has violated ORC 3734.02(C) due to failure to obtain a permit prior to operating a solid waste facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 1.a, 1.b, 1.c and 1.d above.

7. ORC 3734.11(A) Prohibitions

This law states in part, "No person shall violate any section of this chapter, any rule adopted under it, or any order issued under section 3734.13 of the Revised Code."

The owner/operator is in violation of the above rules and laws and is therefore in violation of ORC 3734.11(A). To achieve compliance, The owner/operator must comply with all applicable Ohio laws and rules.

8. OAC 3745-400-04(B) Illegal disposal of CDD

This rule states in part, “. . . *No person shall conduct or allow illegal disposal of construction and demolition debris, as defined in rule 3745-400-01 of the Administrative Code . . .*”

CDD was observed in some of the test pits. The CDD included bricks, concrete and woody debris.

To achieve compliance, the owner/operator must:

- a. immediately stop all illegal disposal of CDD at Bencin’s Richfield site and all other properties owned and operated by Bencin;
- b. immediately stop operating as an illegal CDD landfill at Bencin’s Richfield site and all other properties owned and operated by Bencin;
- c. at Bencin’s Richfield site and all other properties owned and operated by Bencin, remove and properly dispose of all CDD at a licensed CDD disposal facility and provide copies of the disposal receipts to Ohio EPA; and
- d. at Bencin’s Richfield site and all other properties owned and operated by Bencin, dispose of mixtures of solid waste and CDD at a licensed solid waste facility.

9. OAC 3745-37-01(C) License for a CDD facility

This rule states in part, “*No person shall establish, modify, operate or maintain a construction and demolition debris facility without a construction and demolition debris facility license . . .*”

CDD was observed in some of the test pits. The CDD included bricks, concrete and woody debris. The owner/operator has violated OAC 3745-37-01(C) due to failure to obtain a license prior to operating a CDD facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 8.a, 8.b, 8.c and 8.d above.

10. ORC 3714.06(A) License for a CDD facility

This law states in part, *"No person shall operate or maintain a construction and demolition debris facility without an annual construction and demolition debris facility operation license issued by the board of health or the health district in which the facility is located . . ."*

The owner/operator has violated ORC 3714.06(A) due to failure to obtain a license prior to operating a CDD facility.

To achieve compliance, the owner/operator must comply with the requirements stated in 8.a, 8.b, 8.c and 8.d above.

11. ORC 6111.04 Leachate entering waters of the state

Leachate/runoff was draining from the buried waste covered by wood shavings, asphalt grindings pile, and parking lot area. The drainage was flowing west through the gap in the west berm. This is a violation of ORC 6111.04. To achieve compliance, the owner/operator must:

- a. immediately cease discharging leachate to waters of the state;
- b. collect and transport all leachate for treatment at a licensed waste water treatment plant; and
- c. comply with ORC 6111.04 described below.

Mulch Area

The mulch area includes piles of mulch and woody debris in the southwest corner of the property near the berm/soil stockpile. There are two leachate concerns that remain unchanged. These concerns were also seen during the April 14, June 1, and August 8, 2011 inspections.

First, surface water/leachate from the mulch area was ponding in and around the woody debris and mulch piles. Leachate from the pond was going directly to a small wetland containing trees. The wetland is located south of the leachate pond. The leachate was brown in color.

Second, leachate is being discharged through and/or along two black plastic pipes at the west side of the earth berm. The leachate discharging from the black plastic pipes in the southwest area has a dark color and rotten egg or septic odor. The inlet for at least one of the discharge pipes is near the west edge of the surface water/leachate pond. The inlet is surrounded by four

concrete slabs and appeared to be clogged because a dark leachate was pooling in the drain area.

The leachate discharged from the black plastic pipes in the west berm flows into a ditch that drains west to the North Fork which flows south to Yellow Creek and then flows into the Cuyahoga River.

The inspection included walking on the adjacent property west of the west berm in order to get a closer look at the leachate being discharged from the black plastic pipes. Access to the property was granted by the property owner. The leachate had a strong hydrogen sulfide (rotten egg) odor. A white coloring was also seen on the vegetation that was in contact with the leachate.

The owner/operator is in violation of:

ORC 6111.04 Leachate entering waters of the state

Because leachate was leaving the site and entering surface water, the leachate is considered a discharge of pollutants to "waters of the state." The owner/operator does not have a National Pollutant Discharge Elimination System (NPDES) permit to discharge leachate material into waters of the state. Therefore, the owner/operator is in violation of ORC Section 6111.04.

ORC Section 6111.04 states in part, *"No person shall cause pollution or place or cause to be placed any sewage, industrial waste, or other wastes in a location where they cause pollution of any waters of the state, and any such action is hereby declared to be a public nuisance, except in such cases where the director of environmental protection has issued a valid and unexpired permit, or renewal thereof, as provided in sections 6111.01 to 6111.08 of the Revised Code, or an application for renewal is pending."*

Our records show that your company has an effective General Industrial Storm Water Permit, 3GR001157*DG. This permit authorizes you to discharge clean uncontaminated storm water runoff. It does not authorize the discharge of pollutants such as leachate. An individual NPDES Permit would be necessary to discharge treated leachate. However, before this agency could issue this permit the proposed permit and treatment must go through Ohio's Antidegradation review in accordance with OAC 3745-1-05. The owner/operator would have to justify the proposed discharge and prove there is no alternative. Since there are several alternatives to this discharge an approval would be unlikely.

To be eligible to maintain your current General Permit, the owner/operator must immediately cease the discharge of pollutants to waters of the state of Ohio by

containing the leachate on-site and hauling it to an approved treatment facility such as a large municipal wastewater treatment plant. This will require pre-approval from this entity. Records proving the leachate is being properly disposed must be submitted to this office. Concurrently, steps must be taken to stop the production of this leachate at this site or any other location such as the Meech Avenue, Cleveland location. If the owner/operator does not comply with the aforementioned, then an Individual NPDES Permit will be required, written specifically for the site, for the discharge of clean uncontaminated storm water runoff. The General Permit will then be revoked. Should you have any questions concerning these permits you are directed to contact Philip Rhodes, DSW, NEDO at (330) 963-1136 or by e-mail at phil.rhodes@epa.state.oh.us.

Discharging leachate to waters of the state of Ohio without a proper NPDES Permit and installing a treatment device (oil/water separator) is a violation of Ohio Revised Code 6111. The owner/operator is subject to civil and monetary penalties as described in Ohio Revised Code 6111.99.

To achieve compliance, the owner/operator must:

- a. immediately cease discharging leachate to waters of the state;
- b. collect and transport all leachate for treatment at a licensed waste water treatment plant; and
- c. comply with ORC 6111.04.

Miscellaneous Violations

1. The following was observed at the Bencin, Richfield, property:
 - a. Pile of plastic sewage treatment components near the northwest berm.
 - b. Half of a cement mixer container from a cement truck. The section of container was full of hardened cement. This is located near the asphalt grindings piles.
 - c. Pile of rubber waste dumped on the parking lot near the three semitrailers and mulch area.

The above items are considered solid waste. Regarding the above, Bencin is in violation of **OAC 3745-27-05(C)** and **ORC 3734.03**. To achieve compliance, Bencin must properly dispose of the debris at a licensed solid waste facility.

Comments

1. There were six semitrailers in the parking lot. Three trailers were near the mulch area; two trailers contained debris that appeared to be mainly CDD and the third trailer had locked doors. There were two trailers near the transfer area; one was locked and the other contained tools. Finally, parked near the middle of the parking

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lot, is the semitrailer that is missing the front legs. This trailer had the attempted inspection on November 10, 2011.

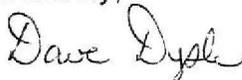
2. There was one empty red roll-off box near the transfer area.
3. There were at least 10 drums outside in the parking lot.
4. A truckload of tree branches was dumped at the wood pallet/yard waste pile during the inspection.

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/operator 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 for remedying conditions resulting from any release of contaminants to the environment.

Please respond in writing to the above violations and comments within 14 days of receipt of this letter. Please include a description and/or schedule for compliance. Please include descriptions of the transfer containers that were used in the attached summary.

If you should have any questions regarding this letter, please call me at (330) 963-1286.

Sincerely,



Dave Dysle
Environmental Specialist
Division of Materials and Waste Management

DD/cl

cc: Kelly Jeter, DMWM, CO
Marlene Kinney, DMWM, NEDO
Bart Ray, OSI, NEDO
Tom Kohl, U.S. EPA, CID
Mike Swanson, Richfield Police Department
Julie Brown, Summit County Public Health
File: [Sowers/COUN/Bencin/COR/77]
Sean Vadas, Akron Regional Air Quality Management District

Scott Shane, OSI, CO
Phil Rhodes, DSW, NEDO
John Wellman, AGO, BCI
David Dietz, Village of Richfield
Don Matyi, DJM