



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

March 12, 2012

**TUSCARAWAS COUNTY  
SIMONDS INDUSTRIES, INC.  
RCRA-LQG  
OHD 018 221 853**

David P. Witman, Esquire  
Simonds International  
P.O. Box 500  
Fitchburg, MA 01420

Dear Mr. Witman:

Ohio EPA has reviewed the 2011 Annual Groundwater Monitoring Report received January 9, 2012 for Simonds Industries' Newcomerstown facility. The ground water sampling and analysis performed during 2011 is consistent with the ongoing requirements of the *State of Ohio v. Simonds Industries* Case No. 2001, CV 120732 Consent Order. Based on our review Simonds is in violation of the following hazardous waste rules. In order to correct these violations you must do the following and send me the required information ***within 30 days*** of your receipt of this letter:

- 1) **Annual Report, Ohio Administrative Code (OAC) Rule 3745-54-75(J)**: This rule requires that the submission of an annual report include a certification statement signed by the owner or operator of the facility or his authorized representative. The exact wording of the statement required by Ohio EPA is specified in Section 6 of the Form and Instructions for Supplementary Annual Report for 2011 Final Standards Ground Water Monitoring Information, and reads as follows:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I'm aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." This certification statement must be signed and submitted on paper to Ohio EPA.

- 2) **Annual report, OAC rule 3745-54-75**: This rule requires that the reporting forms and instructions supplied by the Director shall be used for the annual report. Among other requirements, these instructions specify that all portions of the annual report be complete and accurate. The following three paragraphs regard inaccuracies, or

Incompleteness within the data reported. Therefore, in order to be in compliance with OAC Rule 3745-54-75, Simonds must correct and resubmit the information discussed below. Also, to allow for proper tracking, please label the CD with the information specified on the first page of the instructions, starting with facility name and the 12 digit EPA ID number.

- a. The database file Sampling.dbf must contain a row for every sampling event that occurred during the past calendar year (2011). The file in this report only contains information for the sampling that occurred in October 2011. Please revise this file to also include entries for each of the three other sampling events of well P-16, and submit this file to Ohio EPA.
  - b. The database file GWData.dbf contains the analytical ground water results for every parameter at every well that was sampled. During spot checking of data it was found that six rows regarding the February 21, 2011 sampling of well P-16 had incorrect chemical results. The numerical values listed in the affected rows were actual values obtained by the laboratory but were not matched to the correct chemicals. The rows of GWData.dbf involved in the mix-up are 565, 566, 567, 568, 570, and 573. When corrected, the file will list 260 ug/L for 111Tri (1,1,1-TCA), 630 ug/L for 11DCE (1,1-DCA), and 31 ug/L for 11-DCEE (1,1-DCE). Please submit a corrected GWData.dbf file to Ohio EPA.
  - c. The graphs of Figure 8 are missing the data points from the February 21, 2011 sampling of well P-16. The missing data values are: 260 ug/L for 1,1,1-TCA, 630 ug/L for 1,1-DCA, 31 ug/L for 1,1-DCE, and 650 ug/L for Chloroethane. Please correct the graphs and submit them to Ohio EPA. Ohio EPA notes that the 2/21/11 values for well P-16 are correctly listed in Table 2 of the subject report.
- 3) **General ground water monitoring requirements, OAC Rule 3745-54-97(C):** As was the case in the 2010 report, Simonds noted that monitoring wells PZ-A and PZ-B were destroyed by the current owner's demolition activities. Simonds must properly abandon those wells since they can no longer be used for sampling. OAC Rule 3745-54-97(C) requires that all monitoring wells must be cased in a manner that maintains the integrity of the monitoring well bore hole. This rule also requires, in part, that the annular space (i.e., the space between the bore hole and well casing) above the sampling depth must be sealed to prevent contamination of the ground water. In the case of wells PZ-A and PZ-B, the well bores must be properly abandoned to prevent additional contamination of the ground water. Follow the procedures in Chapter 9 of the Technical Guidance Manual for Ground Water Investigations - Sealing Abandoned Monitoring Wells and Boreholes. This can be found through the following internet address:

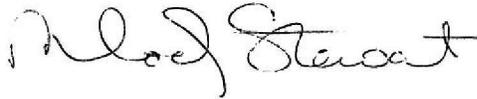
[http://www.epa.state.oh.us/portals/28/documents/TGM-09\\_1009.pdf](http://www.epa.state.oh.us/portals/28/documents/TGM-09_1009.pdf).

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Simonds must file a well sealing report with the Ohio Department of Natural Resources.

If you should have questions please feel free to contact me at 740.380.5256.

Sincerely,



Melody Stewart  
District Representative  
Division of Materials and Waste Management

MS/sb

cc: Shawn Ansbro, Lawhon & Associates, Inc.  
975 Eastwind Drive Suite 190  
Columbus, Ohio 43081

Doug Snyder, DDAGW-SEDO

**Notice:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all appropriate regulations