

**Environmental
Protection Agency**

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

Pike Co
PHC

April 20, 2012

**PIKE COUNTY
PARKER HANNIFIN CORP
DERR CORRESPONDENCE
OHD046426409**

Mr. Rick Taylor
Parker Hannifin Corporation
6035 Parkland Boulevard
Cleveland, OH 44124-4141

Dear Mr. Taylor:

Ohio EPA has completed a review of the 2011 Annual Corrective Action Monitoring Program (CAMP) and the Wal-Mart Vapor Intrusion Model completed for the Parker Hannifin Corporation (PHC) site in Waverly, Pike County, Ohio received by Ohio EPA on March 1, 2012 and January 5, 2012 respectively.

The 2011 Annual CAMP Report contains information on Site History, Ground Water Monitoring Activities, Monitoring Data & Results, Corrective Action Activities and Conclusions. The Wal-Mart Vapor Intrusion Modeling report contains some abbreviated information on the site's geology and hydrogeology, along with recorded ground water impacts. The report's focus is the study of vapor intrusion potential into the Wal-Mart store in Waverly, which is located adjacent to Parker's documented ground water plume contaminated with chlorinated solvents. The Vapor Intrusion Model uses the Johnson and Ettinger (1991) model and (J&E) spreadsheets (version 3.1).

Please find below Ohio EPA Comments on the CAMP and the Vapor Intrusion Model. Please provide a response to these comments within 30 days of receipt.

2011 Corrective Action Monitoring Plan Annual Report (CAMP)

- (1) Ohio EPA appreciates PHC's efforts to increase the groundwater capture volume from the pumping wells adjacent to Pee Pee Creek. However, the current pumping rate remains below the identified minimum average of 140 gallons per minute determined to be the target rate for capture of the VOC plume. Additionally, VOCs were detected in Pee Pee Creek surface water samples collected and analyzed during 2011.

Therefore, Parker Hannifin Corporation remains in violation of **OAC Rule 3745-54-100(E)(1) and (E)(2) and section V. 2. of the December 27, 2000 Director's Final Findings and Orders (DFFOs)**: (E)1) The owner or operator must conduct a corrective action program to remove, or treat in place, any hazardous constituents in groundwater that exceed specified concentration limits between the compliance point under rule 3745-54-95 of the Administrative Code and the down gradient property boundary; (E)(2) The owner or operator must conduct a corrective action program to remove or treat in place any hazardous constituents under rule 3745-54-93 of the Administrative Code that exceed concentration limits under rule 3745-54-94 of the Administrative Code in ground water beyond the facility boundary, where necessary to protect human health and the environment, unless the owner or operator demonstrates to the director that, despite the owner's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action. The owner/operator is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis.

In order to abate this violation PHC must continue to take steps necessary to achieve a pumping rate of 140 gpm or greater consistent with the AECOM-Parker groundwater model (identifying a minimum of 140 gpm needed for plume capture).

2011 Vapor Intrusion Modeling Report, Wal-Mart Property

- (1) Please use the new TCE toxicity data recently established by USEPA to assess risk from the J&E model. The new toxicity data for TCE can be found at: U.S. EPA's Integrated Risk Information System (IRIS, <http://www.epa.gov/iris/>).
- (2) Ohio EPA noted that PHC derived sub-slab VOC concentrations from extrapolated groundwater isoconcentration maps. In the absence of site specific subsurface data at the edge of / beneath the Wal-Mart building, Ohio EPA requests that PHC back-calculate the hypothetical VOC groundwater concentrations necessary to exceed Ohio EPA's acceptable target excess cancer risk for indoor air (1×10^{-5}) or Hazard Quotient (1). This will allow Ohio EPA to judge the margin of safety using the extrapolated data.
- (3) Please submit the data from the J&E model spreadsheet reruns, as requested above, in a similar report format.
- (4) Please include a short discussion on the impact of Wal-Mart's reported "positive" HVAC system operating at its Waverly store and how this information was obtained and used as an input for the J&E model.

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Should you have any questions, please feel free to call me at (740) 380-5253.

Sincerely,



Laura Hughes
Site Coordinator
Division of Environmental Response and Revitalization

LH/cb

cc: Martha Connell, Parker Hannifin Corporation
Steve Saines, DDAGW, SEDO
Donna Goodman, DMWM, 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 applicable regulations.