



October 22, 2009

Scott A. Foreman
Progressive Foam Technologies, Inc.
6753 Chestnut Ridge Road
Beach City, Ohio 44608

RE: September 2009 Monthly and Quarterly Operating Report and October 19, 2009 Correspondence

Dear Mr. Foreman:

Ohio EPA has reviewed the September monthly and quarterly operating report (MQOR) for the four injection wells at the Progressive Foam facility. This report was submitted on October 14, 2009 in compliance with Orders 7 and 9 of the April 2, 2009 Findings and Orders issued to Progressive Foam. In reviewing the MQOR, Ohio EPA also reviewed the October 19, 2009 correspondence addressing the outstanding notice of violation from the August MOR and explaining the anomalous readings from the September MQOR. In reviewing these documents, Ohio EPA has determined:

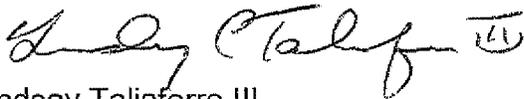
1. **Progressive Foam is in compliance with Orders 7, 8 and 9 of the April 2, 2009 Findings and Orders.**
2. **Progressive Foam is returned to compliance with Order 8 of the April 2, 2009 Findings and Orders. Progressive Foam has taken steps to ensure the sample preservation protocols described within the Injectate Sampling and Analysis Plan (SAP) as approved by the Director of Ohio EPA on July 22, 2009 are followed.** The injectate samples retrieved September 23, 2009 for Sulfate, Acidity, Total Alkalinity, Total Solids and Total Dissolved Solids were cooled to 2 degrees centigrade during transportation and prior to analysis at the laboratory per the approved injectate SAP (page 7). Progressive Foam has instructed their contract laboratory to ensure that all coolers are packed with sufficient ice to arrive at the laboratory at the proper temperature.
3. **Progressive Foam's October 19, 2009 correspondence adequately explains the increase in concentrations for certain parameters in the injectate for the sample taken September 23, 2009.** The increases in concentrations for 13 of the parameters analyzed for in Progressive Foam's injectate samples appears to

be due to an unusually high amount of generator blowdown fluid in the injectate that day. There was no error in the sampling or analytical methods.

4. **The results in the September MQOR for arsenic concentration in the public water supply well sample were 11 parts per billion which is above the drinking water maximum contaminate level of 10 parts per billion for arsenic. This elevated level for arsenic does not appear at this time to be due to the injection of industrial waste into the four Class V wells. The reasons for this conclusion are:**
- a. Analysis of the injectate for the last two months has indicated arsenic levels less than 10 parts per billion; and
 - b. The concentrations of chloride and sodium in the public water supply wells are fairly consistent around 10 parts per million since June. The chloride and sodium content of the injectate range from 1000 part per million to 5000 parts per million. If the injectate was responsible for the arsenic concentrations in the public water supply well, there should also be an increase in the chloride and sodium concentration in the public water supply well samples.

If you should have any questions concerning this letter, please contact me or Val Orr at (614) 644-2752.

Sincerely,



Lindsay Taliaferro III
Manager
Underground Injection Control Program
Division of Drinking and Ground Waters

Bill Fischbein, Legal
Val Orr, DDAGW-UIC
Jennifer Witte, DSW-SEDO