



**Environmental
Protection Agency**

John E. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Holby, **Director**

July 25, 2012

CERTIFIED MAIL
91 7108 2133 3937 1501 6255

Mr. Stephen C. Lonneman
General Manager
Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

Re: Notice of Violation - Loss of Mechanical Integrity at Well #5

Dear Mr. Lonneman:

On June 26, 2012 Vickery Environmental, Inc. (VEI) notified Ohio EPA that during preparation for the annual Well #5 Mechanical Integrity Test (MIT) demonstration, the well annulus experienced a partial loss of pressure. VEI shut-in Well #5 and monitored the annulus pressure; after several unsuccessful attempts to stabilize the annulus, VEI notified Ohio EPA that the MIT could not be performed and requested permission to "kill" the well with a brine solution. Ohio EPA gave field approval to these measures. VEI submitted written notification on June 29, 2012 describing the loss of mechanical integrity and the actions taken.

Based on the information provided by VEI, Well #5 has violated the mechanical integrity requirement of Chapter 3745-34-56 (D) of the Ohio Administrative Code (OAC) and Part I (H) (1) of the Class I Hazardous Underground Injection Control (UIC) Permit to Operate (PTO). VEI responded appropriately and reported the incident as required by rule and permit. Details of this violation are identified as follows:

Mechanical Integrity

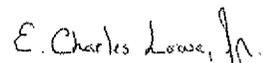
As specified in OAC Rule 3745-34-56 (D) and VEI's Class I Hazardous UIC PTO Part I (H) (1), a Class I Hazardous waste injection well is required to maintain mechanical integrity at all times. VEI was in the process of raising the annulus pressure for the scheduled annual MIT when a loss of seal pot fluid was observed. VEI shut-in the annulus and monitored the pressure. The pressure continued to decline and VEI determined that the MIT could not be successfully completed. Ohio EPA provided verbal approval for VEI to load the well with brine in preparation for a well workover. When VEI prepared to load the well with brine, annulus fluid (diesel fuel) was observed at the top of the injection tubing, indicating a tubing leak. Well #5 remains shut-in while VEI prepares a well workover plan to replace the injection tubing.

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Based on the fact that Well #5 could not maintain annulus pressure and that annulus fluid was present in the injection tubing, Ohio EPA is citing a Notice of Violation for failure to maintain mechanical integrity per OAC Rule 3745-34-56 (D). VEI must successfully demonstrate mechanical integrity prior to Well #5 being returned to compliance and the resumption of injection operations approved.

If you have any questions regarding this letter, please contact me at (614) 644-2752.

Sincerely,



E. Charles Lowe, Jr.
Geologist, UIC Section
Division of Drinking and Ground Waters

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cc: Shannon Nabors -- Chief, NWDO
Lindsay C. Taliaferro, III - UIC Manager, DDAGW
Central File -- Correspondence