



**Environmental
Protection Agency**

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

September 21, 2012

CERTIFIED MAIL
91 7108 2133 3937 1501 7238

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

**Re: Notice of Violation/Return to Compliance – July 28, 2012 Loss of Annulus
Differential Pressure at Well No. 2**

Dear Mr. Lonneman:

On July 30, 2012, Vickery Environmental, Inc. (VEI) notified Ohio EPA via telephone that a loss of annulus/injection differential pressure had occurred in Well No. 2 on July 28, 2012. VEI submitted written notification of the event on August 6, 2012. Based on the information provided, it appears that VEI violated the annulus/injection differential pressure (DP) requirement in Chapter 3745-34-38 (A) (3) of the Ohio Administrative Code (OAC) and VEI's Class I Hazardous Underground Injection Control (UIC) permits to operate, Part II (C) (5) and Attachment D. While this event caused a violation of the DP requirement, Ohio EPA has determined that it did not pose a threat to the environment.

Based on review of the data submitted, Ohio EPA is citing a violation for failure to maintain the required annulus/injection differential pressure for Well No. 2. VEI responded appropriately and in a timely manner to identify and repair the problem and to report the incident as required by rule and permit. With this Notice of Violation, VEI is considered **Returned to Compliance (RTC)** for the July 28, 2012, violation. Details of this violation are identified as follows:

Annulus/Injection Differential Pressure.

As specified in Ohio Administrative Code (OAC) Rule 3745-34-38 (A) (3) and VEI's Class I Hazardous UIC Permit to Operate (PTO), Part II (C) (5) and Attachment D, the pressure on the annulus is required to be at least fifty (50) psig higher than injection pressure at all times throughout the injection tubing length, for the purpose of leak detection.

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The cause of the annulus/injection differential pressure violation is attributed to the power outage and a faulty nitrogen bank gauge. VEI experienced a power outage at 07:00 on July 28, 2012. Around 09:06, during repair to the transformer that supplies power to Well #2, the control room observed that the differential pressure had fallen below the required 50 psi minimum value. VEI investigated and discovered a faulty gauge on the nitrogen bank, which prevented recharging the annulus. VEI switched the nitrogen bank and at 10:29 the annulus/injection differential pressure was restored. Review of the July, 2012 monthly operating report shows a minimum differential pressure reading of 23 psi.

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

DPNov07-12let

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