



Environmental  
Protection Agency

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

FILE COPY

December 06, 2011

Mr. Frank Simmons  
Invensys Inc.  
33 Commercial Street, C42-2G  
Foxboro, MA 02035

Re: **Ranco North America**  
**OHD004288270**  
**Union County**  
**Notice of Violation**

Dear Mr. Simmons:

The Ohio Environmental Protection Agency (Ohio EPA), Central District Office (CDO), Division of Environmental Response and Revitalization (DERR) and the Division of Drinking and Ground Water (DDAGW) reviewed the following reports: *Year 2010 Supplementary Annual Report Ground Water Monitoring Information, Ranco North America, Plain City, Ohio; Second Semi-Annual 2010 RCRA Groundwater Monitoring Results; Letter Report: First Quarter Groundwater Sampling, January 2011; First Semi-Annual 2011 RCRA Groundwater Monitoring Results; and Third Quarter 2011 RCRA Groundwater Monitoring Results.* The reports were reviewed to determine compliance with the 2003 Amended Ground Water Plan for Post-Closure Care (post-closure plan) and Ohio Administrative Code (OAC) 3745-54-90 through 3745-54-100. These reports documented ground water monitoring in the area of surface impoundments closed as a landfill in Plain City, Ohio.

The following violation of Ohio's hazardous waste laws was noted.

**OAC 3745-54-100(H): If the owner or operator determines that the corrective action program no longer satisfies the requirements of this rule, he must, within 90 days, submit an application for a permit modification [i.e., for a post-closure plan modification] to make any appropriate changes to the program.**

The ground water contaminant plume in the deepest ground water zone at the site has expanded to or beyond the facility boundary. A concentration of vinyl chloride of 2.35 micrograms per liter ( $\mu\text{g/L}$ ), which exceeds the maximum contaminant limit (MCL) of 2  $\mu\text{g/L}$ , was detected in a ground water sample from Monitoring Well PC-12D during the October 2010 ground water monitoring. Monitoring Well PC-12D is screened in the bedrock (Unit D) ground water zone (Figure 1). Since then, the vinyl chloride concentration in PC-12D has varied from 1.5  $\mu\text{g/L}$  in January 2011 to 1.68  $\mu\text{g/L}$  in July 2011. Additionally, vinyl chloride has been periodically observed in PC-13D and PC-14D at concentrations less than the MCL but greater than the detection limit of 1  $\mu\text{g/L}$ .

This indicates that the current corrective action program remedies of a shallow downgradient interception trench in Unit A and monitored natural attenuation in all ground water zones (including Unit D) have not been completely effective. In addition, statistically increasing trends of the vinyl chloride concentrations in ground water at PC-8Sa and PC-8Sb confirm the vertical and horizontal expansion of the vinyl chloride plume. However, a post-closure plan modification has been not submitted to address the following:

- a. How the corrective action program will be modified to comply with OAC 3745-54-100(B), which requires the owner or operator to implement a corrective action program that prevents hazardous constituents from exceeding their respective concentration limits at the compliance point.
- b. How the corrective action program will be modified to comply with OAC 3745-54-100(E)(1), which requires a corrective action program to remove or treat in place any hazardous constituents that exceed concentration limits between the point of compliance and the downgradient property boundary.
- c. How the ground water monitoring network will be modified to be capable of demonstrating compliance with OAC 3745-54-100(D), which requires implementation of a ground water monitoring program to demonstrate the effectiveness of the corrective action program.
- d. How the ground water monitoring program will be modified to demonstrate the effectiveness of the corrective action program pursuant to OAC 3745-54-100(E)(2), which requires the owner/operator to conduct the corrective action program beyond the facility boundary where necessary to protect human health and the environment.

The above comments must be addressed by Ranco and a response must be submitted to this office within 30 days of receipt of this letter.

To return the site to compliance, Ranco must submit a request to the Director of the Ohio EPA to modify the current post-closure plan to address the above-referenced rule requirements. The post-closure plan must specify what corrective actions will be used to prevent the migration of hazardous constituents beyond the compliance point per OAC 3745-54-100 (B), and detail how the ground water monitoring program will be improved to demonstrate compliance with the requirements of OAC 3745-54-100 (D) and 3745-54-100 (E).

Failure to list specific deficiencies in this communication does not relieve Ranco from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve Ranco from liability for past or present violations of the state's hazardous waste laws.

If you have any questions or comments, please contact me at 614-728-5036.

Sincerely,

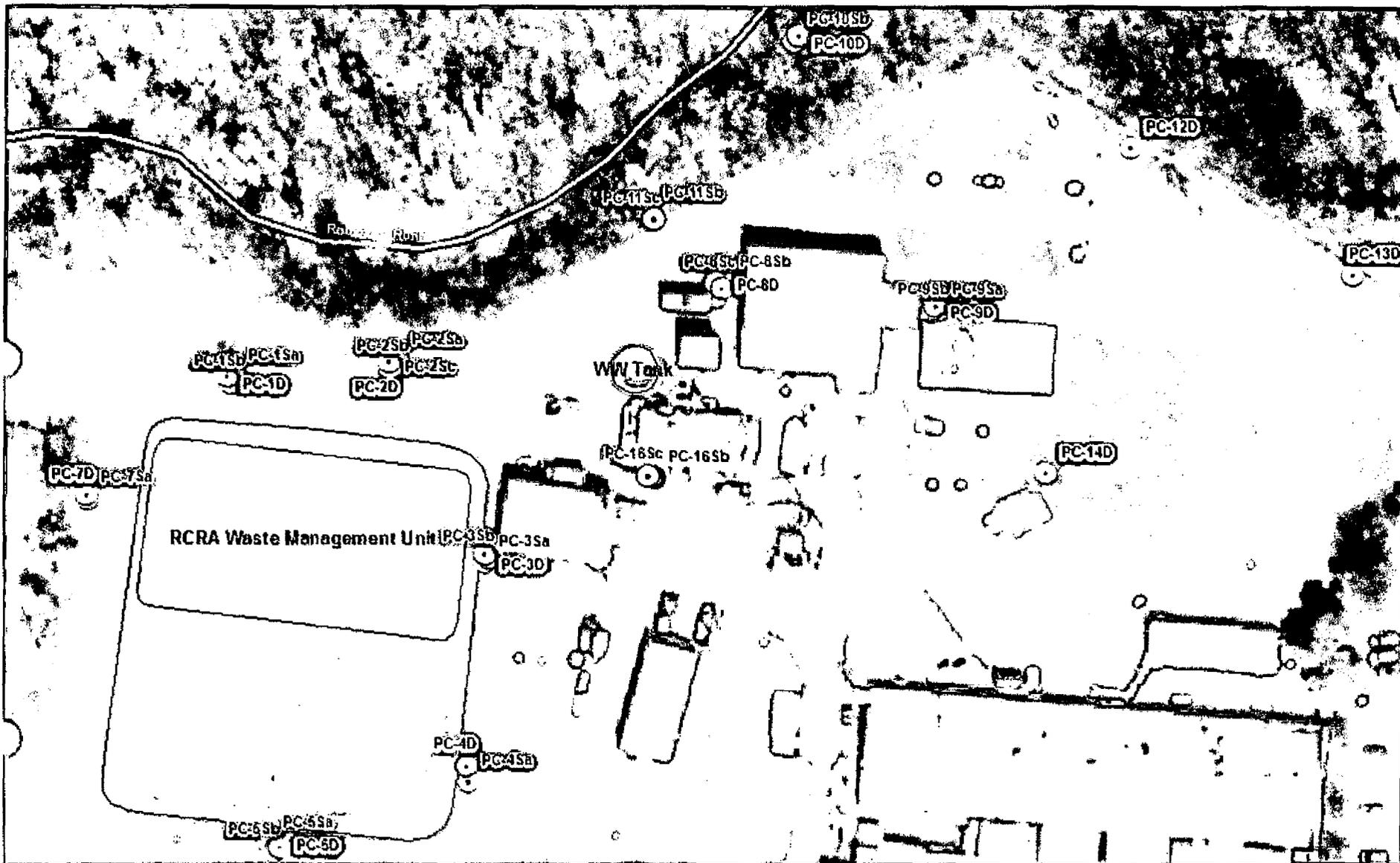


Chris Bulinski  
Environmental Specialist  
Division of Environmental Response and Revitalization  
Central District Office

Attachment

c: Kelly Smith, Terran Corporation  
CDO, DERR, File

ec: Jason Reed, DDAGW, CDO  
Deborah Strayton, DERR, CDO  
Leonard Powell, DERR, CDO  
Ed Lim, DERR, CO  
Brad Hauser, DMWM, CO



**Figure 1. Ranco Plain City  
Monitoring Well Locations**

**Legend**

- ⊙ Unit A Wells
- Unit B Wells
- ⊙ Unit C Wells
- Unit D Wells



Note.  
All feature locations are approximate.