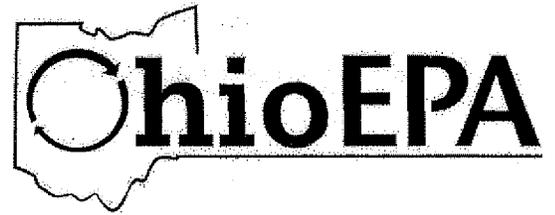


INTEROFFICE MEMO



To: Big Three Welding Financial Assurance File (Memo to File)

From: Melissa Cheung, DMWM, Financial Assurance & Remediation Unit

Date: August 16, 2013

Subject: Big Three Welding (OHD 986 977 601) Financial Record Review

On August 8, 2013, I completed a financial record review for the Big Three Welding facility referenced above. Big Three Welding is located at 9391 Welch Road, Orient, Pickaway County, Ohio. 7845 Hoover Road is an alternative address for this property. I evaluated the facility for compliance with the closure cost estimate, financial assurance, and liability requirements set forth in Ohio Administrative Code (OAC) rules 3745-66-42, 3745-66-43, and 3745-66-47. I also evaluated the facility for compliance with the financial assurance related requirements set forth in the November 12, 1991 Amended Consent Order, *State of Ohio, ex rel. Celebrezze v. George E. Stanton, dba Big Three Welding, Case No. 89-CI-000001*, filed with the Pickaway County Court of Common Pleas.

Ohio EPA issued a modified closure plan approval letter on March 26, 1991. US EPA completed an emergency removal of drums from the site on November 29, 1993. While the US EPA drum removal action addressed hazardous waste in containers and drums located throughout the site, it did not address soil sampling and remediation required in the modified closure plan.

In previous financial record reviews since January 13, 1989, Ohio EPA has found that Big Three Welding had failed to submit financial assurance documentation. As of this date, no financial assurance documentation has been received for this facility. **Therefore, Big Three Welding remains in violation of the following rules and the consent order:**

OAC rule 3745-66-42 and consent order section VI. G (Closure Cost Estimate)

OAC rule 3745-66-43 and consent order section VI. G. (Financial Assurance for Closure)

OAC rule 3745-66-47 and consent order section VI. H (Liability Coverage)

DMWM has not yet determined who the responsible parties are for this facility. The listed property owners are George E. Stanton and Sevilla L. Stanton. Both are deceased. Currently,

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over \$170,000 in back taxes are owed on the property. An effort needs to be made to determine if there is a responsible party or if filing a lien against the property is feasible.

MC/ljm

ec: Peter Maneff, DMWM, CDO
Melissa Storch, Manager, DMWM, CDO
Chris Bulinski, DERR, CDO
Todd Anderson, Legal
Kelly Crawford, CO, DMWM