

**Environmental
Protection Agency**

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



October 5, 2011

Chris Ruff
Environmental Management Specialists, Inc.
15654 Foxglove Lane
Cleveland, Ohio 44130

Re: Former Kautex Textron Facility – NOTICE OF VIOLATION

Dear Mr. Ruff:

Ohio EPA's Underground Injection Control (UIC) Unit has completed its review of the September 9th, 2011 Monthly Operating Report (MOR) provided by Environmental Management Specialists, Inc. (EMS) on behalf of the City of Wilmington. The report for 494 South Nelson Avenue, Wilmington, Ohio site was submitted to meet the requirements of Ohio Administrative Code (OAC) Rule 3745-34-11(H)(3).

The initial work plan was provided on June 21st, 2011. On July 5th, 2011 Ohio EPA responded to the work plan submittal and notified EMS of the reporting requirements which included the inventory information requirements of OAC Rule 3745-34-11(H)(4). EMS has failed to include all the inventory information and thus is being cited in violation of said rule. In order to return to compliance, complete inventory information must be submitted to Ohio EPA's UIC Program as soon as possible.

In addition, upon cessation of injection activities, the owner/operator shall close the Class V well(s) in accordance with OAC Rule 3745-34-11(H)(5). The MOR states that 104 direct push points were used but there is no indication those push points (Class V wells) were closed. Please confirm closure.

The MOR also states that additional injections may be required. Should that be the case, a remediation work plan should be submitted in accordance with OAC Rule 3745-34-11 (H)(2).

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Should you have any questions, please contact Jess Stottsberry of my staff at (614) 644-2752 or via email at jess.stottsberry@epa.state.oh.us .

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsay C. Taliaferro III". The signature is written in a cursive style with a prominent "L" and "T".

Lindsay C. Taliaferro III
UIC Program Manager
Division of Drinking and Ground Waters

cc: Mike Profitt, Ground Water Supervisor, SWDO
City of Wilmington