



November 14, 2008

CERTIFIED MAIL

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Mr. Michael D. Weinstein
SRW Environmental Services, Inc.
55 West TechneCenter Drive, Suite C
Milford, Ohio 45150

Re: Notice of Violation for the Neyer's former GM/Globe Lot

Dear Mr. Weinstein:

This letter is to inform you that SRW Environmental Services, Inc. is in violation of the following Underground Injection Control (UIC) Rules: Ohio Administrative Code (OAC) 3745-34-13 (D), (E) and (F)(1).

On October 17, 2005, SRW Environmental Services, Inc. submitted a work plan for the installation of 36 Class V injection wells (injection points) to inject potassium permanganate for the purpose of in-situ remediation at the Neyer's Former GM/Globe Lot located at 5025 Carthage Avenue in Norwood, Ohio. A letter was sent to Michael May of your company stating that Ohio EPA's Division of Drinking and Ground Waters, UIC Unit had reviewed and approved the proposal to install and operate the injection wells however, pursuant to OAC 3745-34-13(E), to demonstrate compliance with UIC regulations, SRW was to submit monthly operating reports that were to include:

- *A description of the injected fluids;*
- *The injection rate and volume;*
- *A description of any injection well maintenance and rehabilitation procedures;*
and,
- *Any monitoring results.*

No monthly operating reports were ever submitted, nor was any inventory data provided for the additional 32 injection wells as required by OAC 3745-34-13(D). On October 24, 2008, the UIC Unit received a report providing notification of termination of the injection project. The report also included information pertaining to the installation and operation of an additional 50 injection wells located in Restricted Area No. 3 where injection took place from February 2006 to July 2006. Inventory data and monthly reports should have been submitted for these wells also.

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Rule 3745-34-13(F)(1) states that the owner or operator of a Class V well shall notify the Director of the intent to close the Class V well at least 30 days prior to commencing closure of the wells. Notification of intent to close the wells was never submitted.

You must submit a report within 30 days of receipt of this letter that includes all ground water monitoring data from the site including any residual potassium permanganate levels to demonstrate that there was no violation of OAC Rule 3745-34-07(A). Per OAC Rule 3745-34-17(D), any person signing a document under paragraph (A) or (B) of this rule shall make the following certification:

"I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

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

Sincerely,

Valerie J. Orr
Class V Coordinator
UIC Unit
Division of Drinking and Ground Waters

gmglobelot.doc

cc: Lindsay C. Taliaferro III
Mike Proffit, DDAGW-SWDO
Stephanie McChesney, DERR-SWDO