



State of Ohio Environment



## STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215  
October 11, 2007

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

P.O. Box 1049  
Columbus, OH 43216-1049

Mr. Dennis Coe  
R & J Trucking, Inc.  
14530 State Route 7  
Marietta, Ohio 45750

Certified MailRe: Notice of Violation

91 7108 2133 3931 0973 3591

Dear Mr. Coe:

This letter is to inform you that R & J Trucking, Inc. is in violation of Ohio EPA's Underground Injection Control (UIC) Rule 3745-34-(13)(A) and must immediately cease injection of any and all fluids through floor drains and shop sinks. In addition, a detailed plan for permanently plugging the Class V Motor Vehicle Disposal Well(s) must be submitted within fourteen (14) days of receipt of this letter.

On March 30, 2007, R & J Trucking was sent a notification letter that according to Ohio EPA's Underground Injection Control (UIC) records, R & J Trucking was operating an illegal Class V MVWD Well that must be permanently plugged and abandoned.

The letter stated that R & J Trucking, Inc. had thirty (30) days in which to submit a plan for permanently plugging and abandoning the well(s) as required by Ohio Administrative Code (OAC) Rule 3745-34-13(F). The mandatory closure plan was required to include procedures for the removal of any solids or sludges from the well being closed as well as detailed procedures for plugging the well. Any soil, gravel, sludge, liquids, or other materials removed from, or adjacent to the well being closed shall be disposed of or managed in accordance with all applicable federal, state, or local regulations or requirements.

Mr. Carl Zook of R & J Trucking contacted me on April 23, 2007 to say that R & J would submit a closure plan as required. On July 31, 2007, Mr. Jeff Rober of M & S Consultants contacted me to ask about preparing R & J's closure plan. Mr. Rober indicated that although no one from his company had actually visited the R & J facility, Mr. Rober stated that R & J was simply a midway station where trucks were pressure washed and polished after bulk hauling such materials as coal, rock or possibly garbage. Mr. Rober said that no truck maintenance took place at R & J but that approximately 10,000 gallons of wash water was discharged to the septic system per week.

I told Mr. Rober that Ohio EPA's records gave no indication that the facility was in the business of washing trucks but that the closure plan should include analyses of the contents of the septic tank and leach field to determine if injected wastes exceeded primary drinking water standards as required by OAC Rule 3745-34-07. I also indicated that UIC staff would be inspecting the site.

On August 29, 2007 Jess Stottsberry and I inspected your facility but we did not observe any truck washing procedures. Please be aware that a Class V Permit to Operate is required to discharge wash waters to a septic system and that these fluids must meet Primary Drinking Water Standards

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Mr. Dennis Coe  
Page Two

per OAC Rule 3745-34-07. We did, however, observe truck maintenance being performed and a black oily substance was observed on the surface of the fluid in the floor drains. Spray cans were lying on the trench drains as well. Near the entrance to the repair bays were barrels of Stoddard Solvent and grease. These barrels were located in the immediate vicinity of storm water drainage wells and posed a serious threat to ground water.

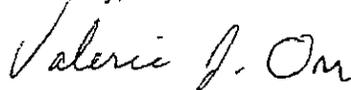
Although not confirmed, it appeared that the leach field was located beneath the gravel parking lot and subject to truck traffic. Please confirm the exact locations of all septic tanks, piping and leach fields in the closure plan.

In conclusion, you must cease use of the floor drains and shop sinks immediately and within fourteen (14) days of receipt of this letter, submit a detailed closure plan with a schedule of events including sampling and analyses of both the septic tank and leach field. If the leach field sampling and analyses indicate that primary drinking water standards have been exceeded, the leach field and all visibly contaminated soils and materials must be excavated and removed from the site in accordance with all applicable federal, state, or local regulations and requirements.

If a closure plan is not submitted within the required time frame, R & J Trucking, Inc. will be subject to enforcement action and may carry maximum civil penalties of up to \$10,000 per day per violation, as well as maximum criminal penalties of up to one year in jail and/or \$25,000 per day per violation.

If you should have any questions concerning these requirements please contact me or Jess Stottsberry at (614) 644-2752.

Sincerely,



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

cc: Lindsay Taliaferro III, UIC Manager  
Beth Messer, Manager, Compliance Assurance Section  
Jess Stottsberry, UIC Unit  
Bruce Goff, SEDO-DSW