

**Environmental
Protection Agency**

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



March 22, 2011

Stephen Kirschner
Advanced GeoServices
1055 Andrew Drive, Suite A
West Chester, PA 19380-4293

Re: Siemens Industry, Inc, Urbana, Ohio – Class V UIC Well Remediation Project –
NOTICE OF VIOLATION

Dear Mr. Kirschner:

On March 3rd 2011, Ohio EPA's Underground Injection Control (UIC) Unit received a work plan from Advanced GeoServices on behalf Siemens Industry Inc. and Gould Electronics. The UIC work plan for the 145 Dellinger Road, Urbana, Ohio property indicated that Class V UIC remediation wells have been in operation since 1997. Additional Class V wells were added in 2007 and thirteen additional UIC wells became operational as recently as December of 2010, for a total of 33 air sparge wells. In accordance with Ohio Administrative Code (OAC) Chapter 3745-34-11(G)(2), the owner or operator must submit a UIC work plan at least thirty days prior to commencement of injection activities. OAC Rule 3745-34-11(G)(3) requires UIC monthly operation reports while fluids are being injected. OAC Rule 3745-34-11(G)(4) requires the owner to provided inventory information with the first monthly operating report. Siemens failed to comply with all three of these requirements and thus were in violation prior to the March 3rd 2011 submittal.

However, the information provided with the March 3rd 2011 work plan and with the subsequent information provided on March 21, 2011 in the form of January and February 2011 UIC Monthly Operating Reports, Siemens is returned to compliance with the applicable UIC rules and regulations discussed above.

The March 3rd 2011 work plan proposes to inject ozone into 23 of the air sparge wells. The UIC Unit has determined that the work plan and supplemental information satisfies the requirements of OAC Rule 3745-34-11(G)(2).

In accordance with OAC Rule 3745-34-11(G)(3), authorized Class V well remediation projects shall include monthly operating reports with the following information:

- A description of the injected fluids;
- Volumes injected into the Class V remediation well(s);
- The rate of injection; and
- Any monitoring results.

This information shall be sent to the attention of the UIC Unit, Division of Drinking and Ground Waters, to the return address at the bottom of Page 1 of this notice.

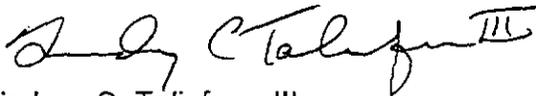
Upon cessation of injection activities, the owner/operator shall close the Class V well(s) in accordance with OAC Rule 3745-34-11(G)(5).

The authorization to install and operate a Class V UIC remediation well(s) in no way relieves the owner/operator from the obligations imposed by any state or local statutes, administrative rules, court order, or order of any administrative agency. All injection activity must comply with OAC Rule 3745-34-07 (A). No permit of any kind is granted or implied by this correspondence.

Any proposal to revise the UIC work plan should be in writing, to the attention of Ohio EPA's UIC Unit, thirty days prior to implementation.

If 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,



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

cc: Michael Eggert, Assistant Chief, DDAGW
Mike Proffitt, Ground Water Supervisor, SWDO
Stephanie McChesney, DERR - VAP, SDWO
Central Office, DDAGW - File