



State of Ohio Environment



STREET ADDRESS:

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October 23, 2009

Mr. James Raber
President, Star Bronze Company
PO Box 2206
Alliance, Ohio 44601-0206

CERTIFIED MAIL
9171082133393109722939

Re: Star Bronze Facility – Alliance Ohio – Unauthorized Class V Injection Well
NOTICE OF VIOLATION

Dear Mr. Raber:

Ohio EPA's Underground Injection Control (UIC) Unit has become aware that Vadose Environmental is conducting remediation activities, including subsurface injection at the Star Bronze facility at 803 South Mahoning Ave. Alliance, Ohio without authorization pursuant to Ohio Administrative Code (OAC) Rule 3745-34-11(F) or (G). On October 2, 2009, Ohio EPA field personnel witnessed injection of peroxide through Class V injection wells (injection points) at the Star Bronze facility and later spoke with this office to confirm that this injection activity was authorized. No such activity was authorized.

In accordance with OAC Rule 3745-34-11(G), the injection of fluids into a Class V well for purposes of remediating ground water is authorized without a permit if the conditions of that rule are met. Neither Star Bronze, nor Vadose Environmental on behalf of Star Bronze have provided Ohio EPA's UIC Unit with any of the information required by OAC Rule 3745-34-11(G).

Therefore, with this Notice of Violation, Star Bronze must cease injection activities immediately. Per OAC Rule 3745-34-11(F), should Star Bronze wish to resume injection activities, it shall either have to apply for a Class V UIC well permit to operate or submit the information required by OAC Rule 3745-34-11(G). The inventory information required by OAC Rule 3745-34-11(L) shall be provided for all past, current and future injection wells at the Star Bronze property. Any future injection without UIC Unit authorization shall result in enforcement action.

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



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Should you have any questions, please contact Jess Stottsberry or Valerie Orr of my staff at (614) 644-2752.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsay C. Taliaferro III". The signature is fluid and cursive, with the last name being the most prominent part.

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

cc: Bill Skowronksi, Chief, NEDO
Ron Shadrach, DHWM, NEDO
Bill Ullom, Vadose Research & Development, LLC
Valerie Orr, Class V Coordinator
Jess Stottsberry, UIC Unit, DDAGW