



State of Ohio Environmental Protection Agency

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February 5, 2009

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OHIO EPA

FEB 06 2009

Joe W. Harden, President
Columbus Steel Castings Co.
2211 Parsons Avenue
Columbus, Ohio, 43207

eval 014 (KD)
ENF 015 (KD)

DIV. OF HAZARDOUS
WASTE MGT.

Re: Columbus Steel Castings Co. (OHD000816801) Columbus, Ohio
Financial Assurance
Notice of Violation

Dear Mr. Holman:

On February 3, 2009, I completed a review of the financial assurance documentation on file for the Columbus Steel Castings Co. (CSCC) facility referenced above. I evaluated your facility for compliance with financial assurance for closure and liability coverage for sudden accidental occurrences. These requirements are set forth in the Ohio Administrative Code (OAC) rules 3745-55-42, 3745-55-43 and 3745-55-47, respectively.

CSCC was issued an administrative consent order on August 29, 2007. That order required CSCC to provide financial assurance for closure at the facility referenced above. To date, Ohio EPA has received a Letter of Credit with Canadian Imperial Bank of Commerce for \$413,000.00 (SYN-2007-10027) dated December 31, 2007, a Standby Trust Agreement with Huntington National Bank and a Hazardous Waste Facility Certificate of Liability Insurance for policy PLS 4555994 with American Specialty Lines Insurance Company effective April 21, 2008.

Upon review of the financial assurance documentation, the following violations were noted:

OAC 3745-55-42(B) requires that the owner or operator of a facility must adjust the closure cost estimate annually for inflation 60 days prior to the anniversary date of the establishment of the financial mechanism. The annual update was due 60 days prior to December 31, 2008; To date, CSCC has not submitted an updated closure cost estimate in violation of OAC 3745-55-42; and

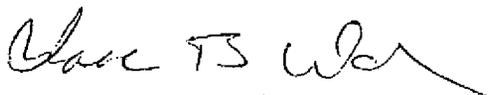
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

OAC 3745-55-43(D)(7) requires that when the closure cost estimate increases that within 60 days of the increase that the owner or operator increase the financial mechanism to equal the current closure cost estimate and submit evidence of that increase to the director. To date, CSCC has not submitted updated financial assurance for closure in violation of OAC 3745-55-43(D)(7).

Please provide the above financial assurance documentation as soon as possible.

If you have any questions regarding this letter or financial assurance regulations, please feel free to call me at (614) 644-3067.

Sincerely,



Isaac B. Wilder
Compliance Assurance Section
Division of Hazardous Waste Management

cc: Peter Maneff, DHWM, CDO
Erik Hagen, ERAS, DHWM
Elissa Miller, Legal
~~Kristina Durnell, RIS, DHWM~~ →