

1 Re-copy



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

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

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

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

March 4, 2009

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

RTC of 2/5/09 & 2/5/08 NOV'S

Re: Columbus Steel Castings Co., Columbus, Ohio (OHD000816801)
Financial Assurance
Return to Compliance

Dear Mr. Harden:

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 cited in a letter dated February 5, 2009.

OAC 3745-55-42(B): failure to provide an annual update of the closure cost estimate for inflation; and OAC 3745-55-43(D)(7) failure to increase the financial assurance mechanism to account for the increase in inflation.

On February 17, 2009, Ohio EPA received a letter from Christopher Ward of Calfee, Halter & Griswold LLP, representing your company. Attached to the letter was an updated closure cost estimate for your facility of \$149,000.00. With this submittal, CSCC has returned to compliance for the two violations cited in my February 5, 2009 Notice of Violation letter.

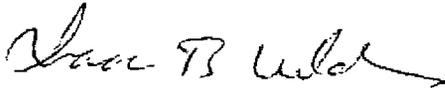
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director



Columbus Steel Castings Co., Columbus, Ohio (OHD000816801)
Financial Assurance: Return to Compliance
March 4, 2009
Page 2 of 2

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: Chris Ward, Calfee, Halter & Griswold LLP,
Peter Maneff, DHWM, CDO
Erik Hagen, ERAS, DHWM
Elissa Miller, Legal
Kristina Durnelli, RIS, DHWM