

# OhioEPA

State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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**MAILING ADDRESS:**

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

January 15, 2009

Mr. Michael E. Jeffries  
~~Jeffries Brothers Excavating & Paving, Inc.~~  
4634 Woodland Ave. NW  
Canton, OH 44641

IN RCRA as Republic  
Engineered  
Products Inc

RECEIVED  
OHIO EPA

JAN 15 2009

Re: ~~Jeffries Brothers Excavating And Paving~~  
USEPA ID#: ~~OH000110197~~ Republic Technologies Int.  
Notice of Violation **File** → OHD004 228003

DIV. OF HAZARDOUS  
WASTE MGT.

Dear Mr. Jeffries:

On May 19, 2008, I completed a review of the financial assurance documentation on file for your facility. I evaluated your facility for compliance with closure/post-closure/corrective action cost estimates, financial assurance for closure/post-closure/corrective action and liability coverage requirements. These requirements are set forth in the Ohio Administrative Code (OAC) rules 3745-55-42 through 3745-55-47, and rules 3745-54-100 and 3745-54-101 respectively. In addition, if applicable, I evaluated your facility for compliance with your Ohio Hazardous Waste Part B Permit Conditions.

<p><b><u>Closure Financial Assurance</u></b></p> <p>Cost Estimate: Mechanism: Not Required Mechanism Amt.: Provider: Anniversary Date:</p>	<p><b><u>Post-Closure Financial Assurance</u></b></p> <p>Cost Estimate: \$250,327.20 Mechanism: Insurance Mechanism Amt.: \$3,500,000.00 Provider: American Int. Spec. Anniversary Date: December 31</p>
<p><b><u>Corrective Actions Financial Assurance</u></b></p> <p>Cost Estimate: Mechanism: Not Required Mechanism Amt.: Provider: Anniversary Date:</p>	<p><b><u>Liability Coverage</u></b></p> <p>Liability Type: Mechanism: Not Required Provider: Effective Date:</p>

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

In a letter dated June 11, 2008, I notified you that your facility was in violation of Ohio Administrative Code rules 3745-55-44(B), 3745-55-44(E), and 3745-55-45.

On August 20, 2008, you submitted the following documentation:

- An updated post-closure cost estimate for \$250,327.20; and
- A Certificate of Insurance for policy #CPC 476-24-14.

With these submissions Jeffries Brothers Excavating & Paving, Inc. (Jeffries) has returned to compliance for the violations of Ohio Administrative Code rules 3745-55-44(B) and 3745-55-44(E). As of this date, Ohio EPA has not received any information regarding the differences in language between policy #CPC 476-24-14 and that required by Ohio Administrative Code rule 3745-55-45. Therefore Jeffries still remains in violation of Ohio Administrative Code rule 3745-55-45.

To abate this violation Jeffries must submit a new Certificate of Insurance for Policy No. CPC 476-24-14 with wording identical to that specified in OAC 3745-55-51(E) and consistent with the corrected insurance policy. Also please submit a corrected insurance policy which references only the current owner/operator Jeffries Brothers and the new EPA ID number issued for the SO3 unit: (OHR000110197), as well as the corrected amount of insurance.

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: Paul Dolensky, DHWM, NEDO  
Kristina Durnell, RISS, DHWM, CO