

# Ohio

**Environmental  
Protection Agency**

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

CERTIFIED MAIL

*RTC of 5/20/11 NOV  
by director's approval*

Michael McAdams  
Robbins & Myers, Inc.  
51 Plum Street, Suite 260  
Dayton, Ohio 45440

**RE: REDUCTION OF CLOSURE INSURANCE AND WARNING LETTER:  
ROBBINS & MYERS, INC.: MOYNO, INC., SPRINGFIELD, OH  
OHD079435897**

Dear Mr. McAdams:

I want to bring to your attention the concerns I have regarding Robbins & Myers, Inc.'s (Robbins & Myers) compliance with the state's hazardous waste financial assurance requirements.

As you have been previously informed, the hazardous waste management rules require approval from the Director of the Ohio EPA before changes are made to financial assurance mechanisms. Financial assurance mechanisms are required by the hazardous waste rules to ensure there are adequate resources available to clean up areas where hazardous wastes were managed should the responsible entity either fail or be unable to conduct the cleanup. Current and adequately funded hazardous waste financial assurance mechanisms are essential to preventing threats to human health and the environment. It is my understanding that Robbins & Myers maintains financial assurance and liability coverage in the form of insurance policies from Steadfast Insurance Company for purposes of closure of a hazardous waste management unit. My staff in the Division of Materials and Waste Management has informed me that previously Robbins & Myers has changed the amount of the coverage under the closure insurance policy without obtaining prior approval from the Ohio Environmental Protection Agency (Ohio EPA).

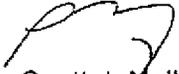
I understand Robbins & Myers has submitted for my approval a reduced closure cost estimate so that Robbins & Myers can reduce the coverage under its insurance policy with Steadfast Insurance Company. Pursuant to Ohio Administrative Code rule 3745-55-43(E)(9), whenever the closure cost estimate decreases, the amount of the insurance policy may be reduced to the amount of the current closure cost estimate.

My staff in the Division of Materials and Waste Management has reviewed the cost estimate and I have determined that the amount of Robbins & Myers' insurance policy with Steadfast Insurance Company (Policy No. ENC 5222759-09) may be reduced from \$1,000,000 to \$500,000.

While I have decided to approve your requested reduction, I want to emphasize that I am concerned with your past noncompliance and Ohio EPA will monitor your future compliance carefully. If Robbins & Myers fails to comply with the hazardous waste requirements in the future, I will consider more serious escalated enforcement, including the imposition of civil penalties.

Should you have any questions or need technical assistance, please contact Shawn Sellers of Ohio EPA's Division of Materials and Waste Management. Mr. Sellers can be reached at (614) 644-2933 or [shawn.sellers@epa.ohio.gov](mailto:shawn.sellers@epa.ohio.gov).

Sincerely,



Scott J. Nally  
Director

ec: Bruce McCoy, Manager, CAS, DMWM  
Tammy Heffelfinger, CAS, DMWM  
Jeremy Carroll, Manager, ERAS, DMWM  
Shawn Sellers, ERAS, DMWM  
Harold O'Connell, DERR, SWDO  
Pam Hull, DMWM, SWDO  
Todd Anderson, Legal