



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

February 20, 2008

RE: **BESCAST, INC.  
LAKE COUNTY  
OHD 004 198 958  
RETURN TO COMPLIANCE**

Mr. Scott Sutch  
Bescast, Inc.  
4600 E 355<sup>th</sup> Street  
Willoughby, Ohio 44094

Dear Mr. Sutch:

On February 7, 2008, Ohio EPA received a letter with attachments dated February 5, 2008, from Bescast, Inc. This letter was in response to Ohio EPA's January 8, 2008 Partial Return to Compliance letter (PRTC). The response included the following:

- Exhibit 1 - Clean Harbors Waste Material Profile Sheet for Spent IPA.
- Exhibit 2 - Hazardous Waste Handling – Job Titles and Descriptions.

In addition, Ohio EPA received a fax on February 15, 2008, with the IPA test result.

Based on the information submitted, it appears that Bescast has adequately addressed the following outstanding violations:

1. **Waste Evaluation, OAC rule 3745-52-11.** You stated that Bescast can replace the IPA with water, eliminating this waste stream. Please submit the manifest, when it becomes available, demonstrating that the last of the IPA has been disposed.
5. **Personnel Training, OAC rule 3745-65-16.** As we discussed on the telephone on February 15, 2008 – the outline for the training is the cover sheets to the sign in sheets. During this conversation, you stated that you went over the pertinent parts of the contingency plan relative to each position. I asked you to update the cover sheets to specify that the contingency plan is reviewed in the training.

Finally, you responded to what was concern #20 in the original NOV. Based on this response, it appears that the generator closure obligation for the 1987 accumulation area has been met.

Mr. Scott Sutch  
Bescast Inc.  
February 20, 2008  
Page 2

Should you have any questions, please feel free to call me or my supervisor, Frank Popotnik at this office.

Sincerely,



Karen L. Nesbit  
Division of Hazardous Waste Management

KLN:cl

cc: Natalie Oryshkewych, DHWM, NEDO  
ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO