



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

July 16, 2008

**JEFFERSON COUNTY
JEFFERSON PROCESSING
DHWM/SEDO
OHD 010467538**

Mr. Gary Smith
c/o Argo Sales Company Inc.
42 Renee Drive
Wintersville, Ohio 43952

Estate of Catherine Glorious,
Mary Lucille Smith, Executrix
c/o John Mascio, Esq.
325 North Fourth Street
Steubenville, Ohio 43952-2019

Dear Mr. and Ms. Smith:

On June 25, 2008, I performed an inspection of the Jefferson Processing (formerly Satralloy) site in Cross Creek Township to determine compliance with Ohio's hazardous waste laws regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC), respectively.

Based on this inspection, the following violations of the hazardous waste rules were identified please provide the documentation requested below within 30 days of the date of this letter:

- 1) **Ohio Revised Code (ORC) 3734.02(E) and (F), Prohibitions:** ORC 3734.02(E) prohibits the establishment or operation of a hazardous waste facility without a permit and (F) prohibits the treatment, storage, disposal or transportation of hazardous waste to a facility that is not permitted or exempt from permitting requirements pursuant to rules adopted by the Director.

Based on sample results collected by the Division of Emergency and Remedial Response (DERR) in December 2003, wastes that are hazardous for chromium (D007) have been stored and/or disposed at this site in three areas: a) inside North Mill building; (b) in a pile beneath the baghouse for the North Mill building; and c) in a pile beneath the baghouse for the South Mill building (see attached photographs). During the inspection, Michael Sherron (DERR-SEDO) and I observed these wastes

that had been sampled were still present on-site. Abatement of this violation will be demonstrated once you provide a signed closure certification report demonstrating the attainment of the closure performance standards found in OAC rule 3745-55-11 and in accordance with a closure plan approved by the director of Ohio EPA.

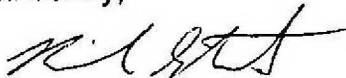
- (2) **OAC rule 3745-55-12(A), Closure Plan:** The owner or operator of a hazardous waste management facility shall have a written closure plan.

Since hazardous waste has been stored and/or disposed of in waste piles below the North and South Mill building baghouses and in the North Mill building, the owner and/or operator of the site is obligated to conduct closure of these unpermitted units pursuant to OAC rules 3745-55-10 through 3745-55-20. The Closure Plan Review Guidance (CPRG) should be used to draft the closure plan; it can be found on Ohio EPA's website at <http://www.epa.state.oh.us/dhwm/cprg.html>.

Compliance with this rule will be demonstrated once a copy of the closure plan has been submitted to the director and to this office for review.

If you have any questions regarding waste management or pollution prevention activities, please call me at (740) 380-5278.

Sincerely,



Richard Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

Enclosures

cc: Michael Sherron, DERR-SEDO
Todd Anderson, Legal
Michelle Sutter, Assistant Attorney General

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD 010467538								
Site Name	Name: Jefferson Processing FKA: Satralloy					Website: (Optional)			
Site Location Information	Street Address: CR 74.								
	City, Town, or Village: Cross Creek Township					State: OH			
	County Name: Jefferson					Zip Code: 43952			
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html									
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Gary			MI:	Last Name: Smith				
	Phone Number:				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: c/o Argo Sales Company, 42 Renee Drive								
	City, Town or Village: Wintersville								
	State: OH				Country: Jefferson		Zip Code: 43952		
	Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Estate of Catherine Glorious				Date Became Owner (mm/dd/yyyy):			
Owner Type:		Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
Street or P.O. Box:									
City, Town or Village:				Owner Phone #:					
State: OH				Country:		Zip Code:			
Name of Site's Operator: Same				Date Became Operator (mm/dd/yyyy):					
Owner Type:		Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
Street or P.O. Box:									
City, Town or Village:				Operator Phone #:					
State:				Country:		Zip Code:			
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))					
<input type="checkbox"/> Small Quantity Handler of Universal Waste			<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<input type="checkbox"/> Destination Facility for Universal Waste					
(Check all boxes below that apply for each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Generated	Accumulated	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor		
Lamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.					
D007					
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.					
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:		
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:		
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Rich Stewart				6/25/08 13:00	
OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.					
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)	

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Fig 1. North Mill baghouse dust pile.

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Fig 2 North Mill building waste on ground.



Figure 3 South Baghouse Wastepile.