



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

~~March~~ 11, 2009

May

**MONROE COUNTY
ORMET PRIMARY ALUMINUM
OPERATIONS
DHWM/SEDO
OHD004379970**

Mr. John Reggi
Ormet Primary Aluminum Operations
Route 7
Hannibal, Ohio 43931

Dear Mr. Reggi:

On March 23, 2007, Ohio EPA issued a notice of violation letter to Ormet Primary Aluminum Operations (Ormet) which cited a violation for the closure of the former spent potliner (K088) containment building.

On April 15, 2009, I received the closure report for the containment building which included the results for the additional soil confirmation sampling. This report summarized closure activities that Ormet and their contractor conducted to decontaminate this building. The report also contains the results of additional soil confirmation sampling which was performed to determine extent of contamination and to determine whether additional soil removal would be required to meet appropriate risk levels.

Based on my review of data from the eighteen samples that were collected on March 23, 2008, it appears that the total cyanide levels are all below the direct contact soil risk value of 1540mg/kg and the weak acid dissociable (WAD) cyanide levels are all below the residential risk value that is protective of groundwater, 1.77 mg/kg. Although low levels of total cyanide was found in a majority of the samples collected, they do indicate that cyanide levels decrease as distance from the building increases. Further, as the WAD cyanide results indicate, this constituent has relatively low solubility, limiting its ability to be transported through soils. Based on the decontamination activities and these soil sampling results, Ohio EPA has determined that the former potliner containment building has been closed in a manner that is consistent with the closure performance standards of OAC Rules 3745-66-11 and 3745-55-11. Therefore, Ormet has returned to compliance with the following regulation:

- i) Closure and post-closure care of containment buildings, OAC rule 3745-256-102(a).

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Ormet has now abated all violations cited by Ohio EPA in the March 23, 2007 letter.

If you have any questions, please call me at (740) 380-5278.

Sincerely,



Richard Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

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.