



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

May 15, 2007

MONROE COUNTY
ORMET ALUMINUM MILL PRODUCTS
RCRA/SQG
OHD ~~080-640-565~~

004 379 970

Mr. John Reggi
Ormet Primary Aluminum Corporation
P.O. Box 176
Hannibal, Ohio 43931

Dear Mr. Reggi:

I received your response to my March 23, 2007 Notice of Violation (NOV) letter on April 27, 2007. The documentation you submitted included a copy of the contingency plan equipment testing log and photographic documentation of properly labeled containers, universal waste packages and the clean-up of the used oil contaminated soil.

My review of this documentation reveals that the Ormet Primary Aluminum Corporation has adequately demonstrated abatement of the following violations discovered during the March 22, 2007 inspection:

- (1) **Used oil storage requirements for generators, OAC rule 375-279-22(D);**
- (2) **Labeling/markings- standards for small quantity handlers of universal waste, OAC 3745-273-14(E);**
- (3) **Accumulation time limits- limits for small quantity handlers of universal waste, OAC rule 3745-273-15(C); and**
- (4) **Accumulation time of hazardous waste, OAC rule 3745-52-34(2).**

However, the Ormet Primary Aluminum Corporation remains in violation of the following hazardous waste law:

- (1) **Closure and post-closure care of containment buildings, OAC rule 3745-256-102(A)**: At closure of a containment building, the owner or operator must remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated subsoils, and structures and equipment contaminated with waste and leachate, and manage them as hazardous waste unless paragraph (D) of rule 3745-51-03 of the Administrative Code applies. The closure plan, closure activities, cost estimates for closure, and financial responsibility for containment buildings must meet all of the requirements specified in rules 3745-66-10 to 3745-66-21 and 3745-66-40 to 3745-66-48 of the Administrative Code.

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Ormet does not have a closure plan for the containment building. Ormet must submit a closure plan which incorporates all of the required elements to the director of Ohio EPA **within thirty days** of receipt of this letter.

If you have any questions regarding this letter, please call me at (740) 380-5256.

Sincerely,



Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/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 appropriate regulations.