



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

December 23, 2008

**RE: COMMONWEALTH ALUMINUM
CONCAST, INC.
CUYAHOGA COUNTY
OHD 131 733 248
NOTICE OF VIOLATION**

John Hirschfield
Aleris
7335 Newport Rd., SE
Uhruchsville, OH 44683

Dear Mr. Hirschfield:

On October 1, 2008 I met with you at the former Commonwealth Aluminum Concast facility located at 7130 Krick Road, Bedford, Ohio. I inspected this facility to determine its state of compliance with Ohio's Cessation of Regulated Operations (CRO) laws as found under Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC). The following violation was found:

1. OAC 3745-352-20(A)(2)(d) – CRO 90-day requirements
This rule requires the owner or operator (within 90 days of cessation of regulated operations) to drain or remove all regulated substances from each stationary vat, tank, electrical transformer, and vessel, and from all piping, that is to remain at the facility. It also requires the removal of all regulated substances and all debris, nonstationary equipment and furnishings, nonstationary containers, and motor vehicles and rolling stock that contain or are contaminated with regulated substances.

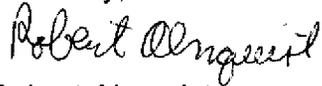
Commonwealth violated this rule by having about seven drums labeled as boiler treatment chemicals stored outside. Some of these were full and some were empty. Some were labeled "Do Not Freeze". One was labeled "Do Not Use" and had a 2005 date on it. You told me that you believed the agreement was to leave these boiler chemicals with the building's boiler and, if so, you would bring the drums inside and dispose of the one that was labeled "Do Not Use". You also said you would send me a letter explaining what has happened with these drums. Please send such a letter now.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

John Hirschfield
Aleris
December 23, 2008
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If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO

Notice:

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