



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 21, 2007

Mr. Frank J. Marino
Safety Manager
RTI Alloys
1550 Marietta Avenue SE
Canton, OH 44707

**RE: RTI INTERNATIONAL METALS, INC., (F.K.A. GALT ALLOYS, INC.)
OHD 004-497-267, GUYAHOGA COUNTY, NOTICE OF VIOLATION
089 256 739 STARIS**

Dear Mr. Marino:

On April 4 and 9, 2007, I, representing the Division of Hazardous Waste Management (DHWM) of the Ohio Environmental Protection Agency (Ohio EPA), conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at RTI Alloys (formally known as Galt Alloys, Inc.), located at 1550 Marietta Avenue SE, Canton, Ohio. RTI Alloys was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code (OAC). During the inspection we also talked about possible ways to prevent pollution by reducing waste. You represented the facility during the inspection.

RTI Alloys bought out Galt Alloys, Inc. in 1998. RTI receives scrap metal from vendors and produce feral alloys (i.e. feral titanium, feral zinc, feral aluminum, feral silicon, etc...). The scrap metal comes in and, depending on the type of material, is sent to different processes. Iron-Titanium or Specialty material go to the Ti/specialty material Building B or designated storage. It is then sent to Heat Formulation, then sent to the Melting Fe-Ti & Specialties process, then to Building A. It is sent to the lab (if it conforms to customer specification, it goes to crushing and then back to Building A. If it doesn't conform it may be sent back to the Melting Fe-Ti Specialties area). Iron or aluminum may be sent to the Fe-Al Melt Shop Designated Storage > Charges Prepared > Melting Fe-Al > to the lab (if it conforms to customer specification, then it is sent to Building A). The alloys are then sent to their customers. Waste generated at RTI Alloys include: Baghouse dust from the furnace induction melting. The baghouse dust is sent to Envirote of Ohio, Inc. as a non-hazardous waste. In the past it was evaluated as a D006, D008. It was re-evaluated and determined to be non-hazardous. The baghouse dust became non-hazardous because RTI Alloys stopped receiving lead-painted scrap from their vendors, and some of the vendors have also changed their process (to remove the lead and/or barium prior to sending the scrap to RTI Alloys). Another wastestream generated at RTI Alloys is used oil, which is generated from tow motors, Bobcats, etc. The used oil is stored in a tote in the Maintenance Area. Akron Canton Waste Oil takes the used oil. Another wastestream that is generated is fluorescent bulbs (which are stored in the Safety Trailer). Crystal Clean takes the bulbs. Spent batteries are also generated (small ones, as well as car/marine batteries. H&H Napa takes the batteries. Spent solvent from parts washers are generated. They are non-hazardous, and Crystal Clean takes it. Old computer equipment is also generated.

A copy of our checklist is enclosed for your information. At the time of the inspection, RTI Alloys was evaluated for compliance with applicable Hazardous Waste Regulations. The inspection revealed that RTI Alloys is in violation of the following regulations:

VIOLATIONS:

1. **OAC rule 3745-279-22, Used Oil Storage Requirements for Generators:**

Used oil generators shall store used oil in containers and tanks which must be in good condition and not leaking. The containers and aboveground tanks must be labeled with the words "USED OIL". Fill pipes utilized to transfer used oil into underground storage tanks must be labeled with the words "USED OIL". If used oil is released to the environment, the generator shall stop the release, contain the used oil, and clean-up and properly manage the released oil and other materials.

It was noted during the inspection that RTI Alloys labeled the tote used to store used oil with the words "Waste Oil" instead of "Used Oil". To abate this violation, RTI Alloys shall label the container with the words "Used Oil". To document compliance, RTI Alloys shall submit a photograph of the properly labeled container to the Ohio EPA's Northeast District Office (NEDO).

2. **OAC rule 3745-273-13(D)(1), Lamp Management:**

Small Quantity Generators of Universal Waste Handlers (SQGUWH) shall contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. All containers or packages shall be closed and lack evidence of leakage, spillage or damage that could cause leakage.

It was noted during the inspection that there were two fluorescent bulbs thrown in the dumpster next to the Used Oil tote. It was also noted that there were fifteen bulbs in the Safety Trailer, none of which were contained nor labeled. It was noted during the inspection that the two bulbs in the dumpster were removed and placed in the Safety Trailer.

To abate this violation, RTI Alloys shall place all of the fluorescent bulbs (that will be managed as a "Universal Waste" into the cardboard box or another container/package that is structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. The container/package shall also be closed to prevent spillage or damage of the lamps. RTI Alloys shall document compliance by submitting a photograph(s) of the closed container of universal waste fluorescent bulbs to the Ohio EPA's Northeast District Office (NEDO).

3. **OAC rule 3745-273-14(E), Lamp labeling for SQGUWH:**
Lamps or containers or packages of lamps shall be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)".

It was noted during the inspection that RTI Alloys failed to label the lamps or lamp containers, in Violation #2, with the above nomenclature. To abate this violation, RTI Alloys shall label all spent fluorescent lamps with the words "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)". To document compliance, RTI Alloys shall submit photographs of the labeled lamps or container of lamps to the Ohio EPA's NEDO.

4. **OAC rule 3745-273-15(A), Accumulation Time for SQGUW:**
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated or received from another handler.

It was noted during the inspection that the fluorescent lamps and batteries mentioned in Violation #'s 2 and 3 all lacked an accumulation date.

RTI Alloys shall be able to demonstrate the length of time that the universal waste (including both fluorescent bulb and spent batteries) has been accumulated from the date it becomes a waste. RTI Alloys may make this demonstration by:

- a. Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
- b. Marking or labeling each individual item of universal waste with the date it became a waste or was received;
- c. Maintaining an inventory system on-site that identifies the date each universal waste became waste or was received;
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste became a waste or was received;
- e. Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or
- f. Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Please inform me which method RTI Alloys will use to demonstrate the length of time that universal waste is accumulated.

The following website contains a list of fluorescent bulb recyclers: <http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>. Ohio EPA does not endorse any company, and it is suggested that you evaluate their compliance with all applicable agencies prior to shipping your material.

Along with the abovementioned violations, the following comments were noted during the inspection.

COMMENT:

1. It was noted during the inspection that RTI Alloys generates spent batteries which are managed as a Universal Waste. There were no spent batteries generated at the time of the inspection, however please be advised that RTI Alloys must comply with the rules that pertain to the management of spent batteries. Please see OAC rules 3745-273-14(A), and 3745-273-15(A).
2. It was noted during the inspection that since RTI Alloys no longer generates the Baghouse dust from induction melting as a hazardous waste, their generator status has changed from a large quantity generator (LQG) to a conditionally exempt small quantity generator (CESQG). You are advised to re-notify the Ohio EPA of your current generator status and name change. Please fill out the RCRA Subtitle C Site Identification Form <http://www.epa.state.oh.us/dhwm/notiform.pdf> and return to the Ohio EPA.

POLLUTION PREVENTION:

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. During the inspection, we talked about pollution prevention (P2) opportunities associated with your facility.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you have not already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

Enclosed you will find a copy of the checklists that we completed during the inspection. You can find copies of the rules and other information on the division's web page at www.epa.state.oh.us/dhwm.

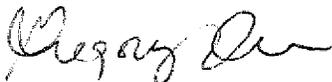
RTI INTERNATIONAL METALS, INC.
JUNE 21, 2007
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The abovementioned violations and concern must be corrected, and documentation of the correction must be sent to this office, to my attention within thirty (30) days of the date of this letter.

Failure to list specific deficiencies in this communication does not relieve RTI Alloys from the responsibility of complying with all applicable regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1189.

Sincerely,



Gregory Orr
Environmental Specialist
Division of Hazardous Waste Management

GO:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce < 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A

b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A

c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A

d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

Name: RTI Alloys
ID number: OHD 089-256-739
Inspection date: 4/9/07

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___

Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A ___ RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___ RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A ___ RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# ___

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A RMK#
- b. Contained the release? Yes No N/A RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A RMK#

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Name: RTI Alloys
ID number: OHD 089-256-739
Inspection date: 4/5/07

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A RMK#
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
no batteries were generated at the time of the inspection.
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
 - a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#

- c. Discharge batteries to remove the electric charge? Yes___ No___ N/A X RMK#___
- d. Regenerated used batteries? Yes___ No___ N/A X RMK#___
- e. Disassemble them into individual batteries or cells? Yes___ No___ N/A X RMK#___
- f. Remove batteries from consumer products? Yes___ No___ N/A X RMK#___
- g. Remove the electrolyte from the battery? Yes___ NoX N/A X RMK#___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)?
 [3745-273-13(A)(2)] Yes No___ N/A X RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A X RMK#___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A X RMK#___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A X RMK#___

7. Are the battery(ies) or container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] Yes ___ No N/A ___ RMK#___

UNIVERSAL WASTE LAMPS

Yes ___ No N/A ___ RMK# ___

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No N/A RMK# ___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes ___ No N/A ___ RMK# ___

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not:

Yes ___ No N/A ___ RMK# ___

a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]

Yes ___ No N/A RMK# ___

NOTE: Accumulation is defined as date generated or date received from another handler.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes ___ No N/A ___ RMK# ___
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes ___ No N/A ___ RMK# ___
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes ___ No N/A ___ RMK# ___
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes ___ No N/A ___ RMK# ___
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes ___ No N/A ___ RMK# ___
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes ___ No N/A ___ RMK# ___
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes ___ No N/A ___ RMK# ___

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A ___ RMK# ___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes ___ No N/A RMK# ___
15. Is the material released characterized? [3745-273-17(B)] Yes ___ No N/A RMK# ___
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes ___ No N/A RMK# ___

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A ___ RMK# ___

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]
 Yes ___ No N/A ___ RMK# ___
 UNKNOWN
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]
 Yes ___ No N/A ___ RMK# ___
 UNKNOWN
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)]
 Yes ___ No ___ N/A ___ RMK# ___
 UNKNOWN
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]
 Yes ___ No ___ N/A ___ RMK# ___
 UNKNOWN
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
 Yes ___ No ___ N/A ___ RMK# ___
 UNKNOWN
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]
 Yes ___ No ___ N/A ___ RMK# ___
 UNKNOWN
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]
 Yes ___ No N/A ___ RMK# ___
 UNKNOWN
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]
 Yes ___ No N/A ___ RMK# ___
 UNKNOWN

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No N/A ___ RMK# ___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No N/A RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No N/A RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No N/A RMK# ___

REMARKS