



State of Ohio Environmental Protection Agency

*Jimmings
read file (1)*

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

July 14, 2009

Ms. Susan Strom
Calfee, Halter & Griswold LLP
1400 KeyBank Center
800 Superior Avenue
Cleveland, Ohio 44114-2688

RTC of 10/31/08 NOV

**RE: AMKO Service Company
Financial Assurance
OHD 017 998 022**

Dear Ms. Strom:

On July 7, 2009, I conducted a financial assurance review for the AMKO Service Company (AMKO) facility in Dover, Ohio. I evaluated the AMKO facility for compliance with the Consent Order entered February 24, 2006, State of Ohio, ex rel. Jim Petro, Attorney General, of Ohio vs. AMKO Service Company, Defendant, Case No. 92CV070317, Court of Common Pleas Tuscarawas County, Ohio. The facility was also evaluated for the Ohio Administrative Code (OAC) rules 3745-66-42, 3745-66-43 and 3745-66-47, closure cost estimate, closure care financial assurance and liability coverage.

To demonstrate compliance with the closure care cost estimate and financial assurance closure care, documentation submitted on March 26, 2006, included a cost estimate and Letter of Credit (LOC No. 68011947) with Bank of America. On February 25, 2009, Bank of America submitted Amendment No. 3 to Irrevocable Standby Letter of Credit No. 68011947. The aggregate amount of the LOC is now \$715,425.00.

On March 3, 2009, Amko submitted a copy of the AMKO facility's current closure cost estimate, and a Standby Trust Agreement (SBTA) executed on behalf of AMKO and Citibank, N.A., dated February 18, 2009, which replaced the June 21, 2006 SBTA. Also, copies of Certificates of Insurance documenting liability insurance coverage were submitted.

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



Upon review of the above no violations will be cited. Also, AMKO has abated the OAC rule violation 3745-55-43 cited in my October 31, 2008 letter, because an acceptable SBTA has been submitted.

If you have any questions or need further clarification of any matter mentioned in this letter, do not hesitate to call me at (614) 644-2951. I will be happy to assist you.

Sincerely,



Tina Jennings
Compliance Assurance Section
Division of Hazardous Waste Management

cc: Melody Stewart, SEDO, DHWM
Kristina Durnell, RISS, DHWM

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