



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

August 15, 2007

RE: ASF-KEYSTONE INC.
SEBRING LANDFILL
NPDES PERMIT NO. 3IN00351
2008 CEI

Mr. Kerby Vulgamott
ASF-Keystone Inc.
1700 Walnut Street
Granite City, IL 62040

Dear Mr. Vulgamott:

On Thursday, August 9, 2007, this writer conducted a Compliance Evaluation Inspection (CEI) of the Sebring Landfill facility owned by ASF-Keystone Inc. The site is currently being remediated under an RCRA closure plan.

On December 26, 2006, a permit-to-install was approved for the installation of a sediment pond to control storm water and sediment runoff from the site during the closure activities. On April 30, 2007, a National Pollutant Discharge Elimination System (NPDES) permit was issued to ASF-Keystone for the discharge of treated storm water from the sediment pond. The NPDES permit contained pollutant limits and reporting requirements. In addition, the NPDES permit contained a construction schedule for the installation of the sediment pond. The schedule required that the pond construction be initiated no later than August 1, 2007, and be completed December 31, 2007.

In accordance with the NPDES permit schedule, construction of the sedimentation pond was initiated on August 1, 2007. During construction activities, material requiring special consideration was discovered in the area of the sediment pond. The activities necessary to properly characterize the material have caused a delay in pond construction. Characterization of any unidentifiable material is a requirement under the RCRA closure plan. It was anticipated that such procedures will not delay construction beyond the December 31, 2007 deadline for completing the sediment pond.

Even though the pond is not yet constructed, ASF-Keystone is required to submit monthly operating reports for the parameters identified on page 2 of the NPDES permit. The parameters having the monitoring months identified as "All" are to be reported each month to Ohio EPA in accordance with Part III, Item 4 of the permit. The parameters having monitoring months identified as "Semi-annual" are to be sampled in June and December of each year as stated in Part III, Item 1 of the permit. Results for those parameters are to be reported in July and January of each year.

Mr. Kerby Vulgamott
ASF-Keystone Inc.
August 15, 2007
Page 2

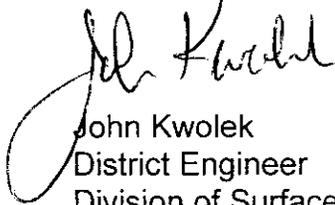
In the event there is no discharge, ASF-Keystone is still required to submit reports to Ohio EPA by including the code "AL" in the upper left-hand corner of the report. The "AL" code identifies to Ohio EPA that no discharge of wastewater occurred through the permitted outfall 001. This procedure is identified in the notes on page 2 of the NPDES permit.

A review of the reporting record for ASF-Keystone identified that no monthly reports have been submitted as required. Be advised that this places ASF-Keystone in violation of NPDES permit No. 3IN00351 and in violation of Ohio Revised Code 6111.07. ASF-Keystone must submit the required Monthly Operating Reports (MORs) for the months May 2007 through July 2007 and continue to submit the required reports in the future. Reports for months in which no discharge occurs can be completed by placing the "AL" code in the upper left hand corner. Reports for months in which a discharge does occur must be completed with the required analytical results and at the frequency identified in the NPDES permit.

Finally, we discussed the practice of spraying weed killer along the security fence surrounding the property. It was the understanding of this writer that the practice was considered necessary according to the RCRA program. However, as discussed during the meeting, the extent of spraying compromised the control of sediment runoff from the site. We agreed that the practice of spraying weeds along the fence line would be discontinued, and that trees and other vegetation that would potentially damage the security fence will be manually removed.

You may contact this writer at (330) 963-1251 to discuss any questions you may have regarding this letter.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Curtis Dowell, Safety Manager, Alliance Castings Company, LLC

ec: Ed Damato, Ohio EPA, DHWM, NEDO