



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 14, 2013

GUERNSEY COUNTY
AMG VANADIUM CORP
DMWM/SEDO
OHD042319244

Ms. Laura Macpherson
AMG Vanadium Inc.
60790 Southgate Road
Cambridge, Ohio 43725

Dear Ms. Macpherson:

I received AMG's responses to Ohio EPA's December 6, 2012 Notice of Violation letter on January 25, 2012 and March 15, 2013. In addition, Ohio EPA and AMG met to discuss the conditions at RMSB #1 and #2 on December 18, 2012 and May 2, 2013. The written documentation that AMG submitted included a sampling and analysis report conducted by August Mack detailing that oil-contaminated soils had been adequately removed from the exterior of RMSB #2 and that no hazardous constituents remained in soils adjacent to the exterior of the building; AMG's explanation of the suspected cause of the oil stains; and limited TCLP analyses of process residual oils. Also, at both meetings with Ohio EPA, AMG provided information regarding the cause of and the removal of process residual oils from the primary and secondary containment system at RMSB #2. My review of this documentation and information reveals that AMG has adequately demonstrated abatement of all violations cited in the December 6, 2012 letter. Please note, however, that AMG must continue to carefully monitor the primary and secondary containment systems of RMSB #2 to ensure that residual oils do not accumulate in the containment systems and to report those findings to Ohio EPA. In addition, AMG should continue to monitor stains on exterior of RMSB # 2 to ensure that stains are not active. Note that oil staining on the exterior of RMSB #1 is being dealt with outside of this return to compliance letter.

If you have any questions, please contact me by telephone at (740) 380-5293 or by e-mail at donna.goodman@epa.state.oh.us.

Sincerely,

Donna Goodman
Inspector
Division of Materials and Waste Management

DG/mr

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 applicable regulations.