



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

September 11, 2013

RE: **REPUBLIC SPECIAL METALS
OHD004447322
STARK COUNTY
RETURN TO COMPLIANCE**

Bill Boggs
Republic Special Metals, Inc.
2201 Harrison Ave., SW
Canton, OH 44706

Dear Mr. Boggs:

On July 23, 2013, I did an inspection at Republic Special Metals at 2201 Harrison Avenue, SW, Canton, Ohio as a follow up to my May 15, 2013 inspection. Also, I have received the June 19, 2013 and August 14, 2013 letters and attachments from Gust Gallas which responded to the violations and concerns found during the May 15, 2013 inspection and concerns I mentioned on July 23, 2013. As outlined below, you have documented a correction of all the violations cited.

1. **OAC Rule 3745-52-11 – Hazardous waste determination.**

Your June 19, 2013 letter included waste analysis data for the furnace refractory and ESR furnace slag. This data shows that those two wastes are not hazardous wastes. On July 18, 2013, Ron Drozdowski of Chemtron sent me the data from an analysis of the sand blast grit which was done in July 2012. This showed that this waste is not a hazardous waste which documents the correction of this violation. I have updated and included as an attachment the waste summary chart reflecting this.

Your letters and the follow-up inspection also document the correction of this violation regarding the containers mentioned in my June 5, 2013 letter.

2. **OAC Rule 3745-279-22(B) - Condition of used oil storage units.**

The June 19 letter included a statement and photo indicating that used oil containers will be kept closed. This documents your correction of this violation.

3. **OAC Rule 3745-279-22(C) - Used oil labels.**

The June 19 letter documents a correction of this violation.

4. **OAC Rule 3745-279-22(D) - Response to releases of used oil.**

The August 14, 2013 letter documented the correction of this violation.

Bill Boggs
Republic Special Metals, Inc.
September 11, 2013
Page 2

5. **OAC Rule 3745-273-13(D)(2) – Universal waste lamps.**

The August 14, 2013 letter documented the correction of this violation.

Additional concerns were found at the inspection and listed in the June 5, 2013 letter. These were addressed by the June 19 and August 14 letters.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.ohio.gov.

Sincerely,



Robert Almquist
Division of Materials and Waste Management

RA:cl
Enclosure

ec: Frank Popotnik, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Marlene Kinney, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
Gust Callas, Black, McCuskey, Souers & Arbaugh

