



**Division of Environmental Response and  
Revitalization and Division  
Response to Comments**

**Re: AMG Vanadium LLC; Non-Permit Related Variance; Public  
Response; RCRA C – Hazardous Waste; Muskingum County;  
OHR 000 212 902**

**Project: AMG Vanadium LLC., Variance from a Classification as a Waste  
Ohio EPA ID #: OHR 000 212 902**

**Agency Contacts for this Project**

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Ohio EPA held a comment period beginning June 11, 2020, regarding the draft issuance of a variance from classification as a waste. A virtual public meeting was held on July 15, 2020. This document summarizes the comments and questions received during the associated comment period, which ended July 24, 2020.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

**From: AMG Vanadium LLC**

**Comment 1:** Section III.1.e - for clarity, change "for storing and processing Reclaimed Catalyst or storing Roasted Catalyst" to "for storing and processing Reclaimed Catalyst or Roasted Catalyst."

**Response 1:** Ohio EPA agrees with the change and the section now reads, "for storing and processing Reclaimed Catalyst or Roasted Catalyst."

**Comment 2:** Section III.1.f - (1) change "utilized" to "utilizes;" (2) delete

"hydrated" for consistency with the definition of LimeAdd™; and (3) delete the extra space between "primary" and "EAF."

- Response 2:** Ohio EPA agrees with the requested changes and have been incorporated into the variance.
- Comment 3:** Section III.1.i - for clarity, change "for storing and processing Reclaimed Catalyst, or storing Roasted Catalyst" to "for storing and processing Reclaimed Catalyst or Roasted Catalyst."
- Response 3:** Ohio EPA agrees with the requested changes and the section now reads, "for storing and processing Reclaimed Catalyst or Roasted Catalyst."
- Comment 4:** Section IV.3 - the word "roaster" should be capitalized as it is a defined term.
- Response 4:** The word "Roaster" has been capitalized.
- Comment 5:** Section V.3.q.i - capitalize "variance" for consistency with the acronym identified in Section I.
- Response 5:** The word "Variance" has been capitalized.
- Comment 6:** Section V.3.q.ii - first sentence change "shipment" to "shipment(s) and second sentence change "date" to "date(s)."
- Response 6:** The word "shipment" has been changed to "shipment(s)" and the word "date" has been changed to "date(s)"
- Comment 7:** Section XI.1.a - capitalize "variance" for consistency with the acronym identified in Section I.
- Response 7:** The word "Variance" has been capitalized.
- Comment 8:** Section XIV - delete the period after the reference to "Section XV" in the last sentence.
- Response 8:** The period has been deleted after Section XV in the last sentence.
- Comment 9:** Section XV - capitalize "variance" in the first sentence for

consistency with the acronym identified in Section I.

**Response 9:** The word “Variance” has been capitalized.

**End of Response to Comments**