JUN 23 2015

Mr. Mike Kovalski
Ohio Cold Rolling Company, LLC
219 Public Road
Yorkville, Ohio 43971

Re: Ohio Cold Rolling Company, LLC
Director’s Authorization
Approval
RCRA C - Hazardous Waste
Jefferson County
OHD082964313

Subject: Amended Closure Plan Approval
RISK ASSESSMENT
Ohio Cold Rolling Company, LLC
OHD082964313

Dear Mr. Kovalski:

On March 30, 2015, Ohio Cold Rolling, LLC submitted to Ohio Environmental Protection Agency (Ohio EPA) an amended closure plan for the Former Scrubber Fume Duct Release Area located at 219 Public Road, Yorkville, Ohio. The amended closure plan was submitted pursuant to the November 20, 2014 Director’s Final Findings and Orders in order to demonstrate that Ohio Cold Rolling, LLC’s proposal for closure complies with the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11 and 3745-55-12.

The owner or operator and the public were given the opportunity to submit written comments regarding the amended closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of Ohio Cold Rolling, LLC’s submittal, I conclude that the amended closure plan for the hazardous waste facility at 219 Public Road, Yorkville, Ohio, meets the performance standard contained in OAC rule 3745-55-11, and complies with the pertinent parts of OAC rule 3745-55-12.

The amended closure plan submitted to Ohio EPA on March 30, 2015 by Ohio Cold Rolling, LLC is hereby approved.

Compliance with the approved amended closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the
Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan. Please be advised that approval of this amended closure plan does not release Ohio Cold Rolling, LLC from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00 (made payable to "Ohio Treasurer of State") which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, Ohio 43215

When closure is completed, OAC rule 3745-55-15 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
Attn: ERAS

A copy should also be sent to:

Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
Southeast District Office  
2195 Front Street  
Logan, Ohio 43138  
Attn: Melody Stewart
If you have any questions about implementing this closure plan, contact Melody Stewart at 740.380.5256.

Sincerely,

Craig W. Butler
Director

cc: Esmark, Inc.
    100 Hazel Lane, Suite 300
    Pittsburgh, PA 15143
    Melody Stewart, DERR, Southeast District Office
    Don Vogel, DERR, CO
    Connie Livchak, FARU-DMWM, CO
    RCRAInfo Data Entry