



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

JANUARY 2, 2019

Dave Renfrew
EMC Ashtabula LP
P.O. Box 266
Pittsburgh, PA 15230-0266

Elkem Metals, Inc.
Airport Office Park Building 2
400 Rouser Road
Corapolis, PA 15108

EMC Metals c/o Sapa Extrusions
400 Rouser Road, Suite 300
Moon Township, PA 15108

**Re: Elkem Metals Company - Ashtabula
Director's Authorization
Approval
Industrial Solid Waste Landfills
Ashtabula County
ISWL018847**

Ohio EPA JAN 2 '19
Entered Directors Journal

**Subject: Elkem Metals Company, Ashtabula County
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(2) & (D)(3)
Approval**

Dear Mr. Renfrew:

On December 17, 2018, the Ohio Environmental Protection Agency (Ohio EPA) received the facility's *OAC 3745-27-10(D)(2) & (D)(3) Request*.

The request was prepared by Eagon & Associates, Inc. (Eagon) for Elkem Metals Company (EMC) - Ashtabula. The EMC Landfill facility ground water monitoring program is regulated under the June 1, 1994, version of Ohio EPA's rules pursuant to the July 25, 2018, Director's Final Findings and Orders (DFFOs).

All of the monitoring wells within the facility's ground water monitoring system are screened within the two significant zones of saturation (SZS), and are required by the rules to be monitored for Ohio Administrative Code (OAC) 3745-27-10 Appendix I (1994 version) Parameters: 63 (ammonia), 64 (chloride), 65 (sodium), and 66 (chemical oxygen demand – COD) semiannually and parameters 1 through 79 annually in accordance with OAC Rules 3745-27-10(D)(5)(b)(i) and (D)(5)(c), respectively.

In accordance with OAC Rule 3745-27-10(D)(2), the facility is requesting Director's approval for removing COD (Parameter 63) from the ground water monitoring list and replacing it with potassium (Parameter 76) in accordance with OAC Rule

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3745-27-10(D)(3). COD is not considered a reliable indicator parameter for detecting a release of waste-derived constituents from the facility.

Ohio EPA has reviewed the facility's request and has determined that it is adequate to meet the intent of the rules. Therefore, pursuant to OAC Rules 3745-27-10(D)(2) and (D)(3), the owner/operator is hereby authorized to alter the facility's ground water parameters sampling lists as described above.

You are hereby notified that this action of the Director of the Ohio Environmental Agency (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code Section 3745.04. 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 thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated 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 (3) 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
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Katharina Snyder, DMWM, NEDO at (330) 963-1257.

Sincerely,



Kurt M. Princic
Chief, Northeast District Office
for Craig W. Butler
Director, Ohio EPA

KMP:AM

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