



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

January 20, 2010

**VIA FIRST CLASS MAIL**

Jay Cei, CFO  
Ulbrich Delta LLC  
57 Dodge Avenue  
North Haven, CT 06473

Phil Carey and Ted Davis  
Ulbrich Delta LLC  
121 Domorah Drive  
Montgomeryville, PA 18936

Steven A. Hann  
Hamburg, Rubin, Mullin,  
Maxwell & Lupin  
375 Morris Road  
PO Box 1479  
Lansdale, PA 19446-0773

**Re: Consent Agreement and Final Order – RCRA-02-2009-0237  
Copy of Check and Certification of Compliance Received**

Dear Jay, Phil, Ted and Steve:

We have received a copy of the wire transfer documentation from Ulbrich Stainless Steel and Special Metals, Inc., on behalf of Ulbrich Delta LLC ("Ulbrich"), for \$88,500, as well as notification that our Finance Center received the payment. We have also received Ulbrich's certification of compliance, dated November 23, 2009, and supporting documentation, which you sent to EPA in accordance with the terms of the Consent Agreement and Final Order for this matter. I am glad that we were able to bring this matter to a resolution, and will close this case file.

Sincerely,

A handwritten signature in black ink, appearing to read "Natalie", with a long, sweeping underline.

Natalie L. Katz  
Senior Assistant Regional Counsel

cc: Andrew Ma (3LC70)  
Regional Hearing Clerk



**We Deliver Precision™ DELTA ULBRICH PRECISION METALS**

121 DOMORAH DRIVE  
MONTGOMERYVILLE, PA. 18936  
PHONE: 1-215-540-9797  
FAX: 1-215-628-4576

November 23, 2009

Andrew Ma (3LC70)  
Environmental Scientist  
Office of land Enforcement  
United States Environmental Protection Agency – Region III  
1650 Arch Street  
Philadelphia, Pa 19103-2029

Natalie L. Katz (3RC30)  
Sr. Assistant regional Counsel  
United States Environmental Protection Agency – Region III  
1650 Arch Street  
Philadelphia, Pa 19103-2029

Re: Ulbrich Delta LLC  
Docket No: RCRA-03-2009-237

NOV 23 2009 10:04

**Certification of Compliance Order**

- (a) Cease storing hazardous waste at the Facility except in accordance with permit or interim status obtained pursuant to RCRA Section 3005, 42 U.S.C. §6925, and 25 Pa. Code § 270a., or in accordance with generator accumulation requirements of 25 Pa. Code § 262a., which incorporates by reference C.F.R. § 262.34.

Delta Ulbrich has complied with this provision including state and federal regulations accumulation requirements. Evidence: 2009 manifests

- (b) Keep containers holding hazardous waste closed during storage at the Facility while it is not necessary to add or remove waste, as required by 25 Pa. Code § 264a.1, which incorporates by reference 40 C.F.R. §264.173

Delta Ulbrich has complied with this provision including state and federal regulations for proper storage of hazardous waste. Evidence: Internal memo dated May 15, 2009 and WI 6.3.10 WI-6.3.13

- (c) Store containers of nonreactive, nonignitable hazardous waste in proper configuration, with aisle spacing that ensures access for inspection, as required by 25 Pa. Code § 264a.173(3)

Delta Ulbrich has complied with this provision including state and federal regulations for proper storage of hazardous waste. Evidence: Internal memo dated May 15, 2009 and WI 6.3.10 WI-6.3.13

- (d) Conduct weekly inspections of hazardous waste storage areas, as required by 25 Pa. Code § 264a.1, which incorporates by reference 40 C.F.R. § 264.174.

Delta Ulbrich has complied with this provision including state and federal regulations for proper storage of hazardous waste. Evidence: Weekly Drum inspection reports

- (e) Ensure that all Facility personnel with jobs relating to hazardous waste management receive initial or refresher training, as required by 25 Pa. Code § 264a.1, which incorporates by reference 40 C.F.R. § 264.16.

Delta Ulbrich has complied with this provision state and federal regulations for training of personnel whose jobs are related to hazardous waste. Evidence: Training certificates

Docket No: RCRA-03-2009-237

Certification of Compliance Order

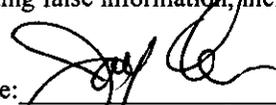
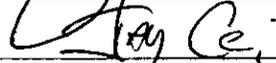
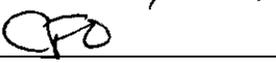
Certification Statement:

I certify that the information contained in or accompanying this Compliance Order for Consent Agreement Docket No. RCRA-03-2009-0237 is true, accurate and complete. As to the information required by paragraph 51 (a), (b), (c), (d) and (e) of this Compliance Order for Consent Agreement Docket No. RCRA-03-2009-0237 for which I cannot personally verify its accuracy, I certify under penalty of law that his Compliance Order for Consent Agreement Docket No. RCRA-03-2009-0237 and all attachments were prepared in accordance with a system designed to assure the qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there a significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Cc:

Steven Hamm esq. Hamburg, Rubin, Mullin, Maxwell and Lupin  
Ted Davis – Ulbrich Delta LLC

Encl:

Documents  
WI- 6.3.10  
WI-6.3.13  
Memo 5-15-09  
2009 manifests  
2009 weekly drum inspection  
2009 Training records/Certificates