



Carry

State of Ohio Environmental Protection Agency

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 21, 2009

RE: CLEVELAND STEEL CONTAINER CORP
LARGE QUANTITY GENERATOR
OHR 000 023 861, PORTAGE COUNTY, NEDO
RETURN TO COMPLIANCE (RTC)

Mr. Peter Rao
Cleveland Steel Container Corporation
10048 Aurora-Hudson Road
Streetsboro, OH 44241

Dear Mr. Rao:

Thank you for your December 22, 2008 response to Ohio EPA's November 25, 2008 Notice of Violation (NOV) letter. In Ohio EPA's November 25, 2008 NOV, the following violation was described:

Inspections, OAC 3745-66-74: The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and deterioration caused by corrosion or other factors. The inspections must be recorded in a log or summary.

You were unable to locate inspection records for the time period of early March through early June 2008. Since you had inspection records for the waste storage area for both prior to and after this time period, it appeared to be a record management issue rather than an actual inspection issue. To abate the violation, you were requested to provide a description of how you would manage the completed inspection forms at your facility in the future.

In your response dated December 22, 2008, you indicated that a new procedure for managing the completed inspection forms was adopted for your facility, effective November 1, 2008. The procedure requires the operator to manage the form until it is filled out completely, after which time the form is stored with other required documents and maintained in the office. You also indicated that the process has been audited internally to ensure the procedure is effective.

My review of this documentation reveals that Cleveland Steel Container Corporation has now abated the violation discovered during the October 8, 2009 inspection. The date of the Return to Compliance (RTC) for the violation cited above is December 22, 2008, the date of your response letter.

If you should have any questions, please contact me at (330) 385-8421. You can find copies of the laws and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,

Michelle Tarka
Environmental Specialist II
Division of Hazardous Waste Management

MT:ddw

ec: Harry Sarvis, DHWM, CO
Frank Popotnik, DHWM, NEDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.