



**Environmental
Protection Agency**

Tim Strickland, Governor
Lee Fisher, Lt. Governor
Dana DeBevoise, Director

November 12, 2010

RE: SEVERSTAL WARREN, INC.
OHD060409521
CESQG
TRUMBULL COUNTY
NOV/PRTC

Mr. Mark Clark
Severstal Warren, Inc.
999 Pine Avenue SE
Warren, Ohio 44483

Dear Mr. Clark:

I received your response to my August 3 and October 4, 2010 Notice of Violation (NOV) letters on October 26, 2010. I have reviewed your letter and documentation and this letter identifies those violations for which Severstal Warren has returned to compliance. The other violations remain until further documentation is received. The numbers referenced in this letter correspond to the violation numbers in my original NOV.

The following violations have been abated:

1. **OAC 3745-52-11; Waste evaluation.** Any person who generates a waste must determine if that waste is a hazardous waste.
 - A. The material in the totes has been identified. No further action is required by you.
 - B. The five gallon container and one gallon paint cans have been over-packed and properly disposed. No further action is required by you.
9. **OAC 3745-279-22(C)(1); Containers and above ground tanks that are used to store used oil must be labeled with the words, "Used Oil".**

The photographs showed a properly labeled tank. No further action is required

The following violations will remain unabated until all the documentation needed to return Severstal Warren has been submitted.

2. **OAC 3745-273-14(A); Universal Waste Batteries must be labeled.**
3. **OAC 3745-273-13(D) (1); Universal Waste Lamp Management Standards.**
4. **OAC 3745-273-13(D) (2); Universal Waste Lamp Management. Failure to clean up broken lamps.**
5. **OAC 3745-273-14(E); Standards for universal waste lamps, failure to label lamps or container of lamps.**

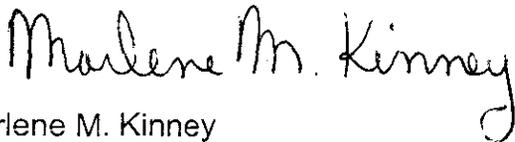
6. **OAC 3745-273-15(C); Accumulation time limits-standards for small quantity handlers of universal waste.**
7. **OAC 3745-273-16; Employee training for Small Quantity handlers of Universal Waste.**
8. **OAC 3745-273-17(A); Response to releases-standards for small quantity handlers of universal waste.**

The concern regarding used oil and oily waste water contained in pond number 5 has been addressed. The used oil is considered off-specification used oil due to the chromium level of 19.1 ppm.

Failure to list specific deficiencies and or violations in this communication does not relieve you from the responsibility of complying with all applicable laws, rules and regulations.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,



Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

ec: Natalie Oryshkewych, DHWM, NEDO
Nyall McKenna, DHWM, NEDO