



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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www.epa.state.oh.us

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

May 7, 2007

**MUSKINGUM COUNTY
GREIF INC.
DHWM/SEDO
OHD987040763**

Mr. Jim Zemak
Greif Inc.
425 Winter Road
Delaware, Ohio 43015

Dear Mr. Zemak:

On May 3, 2007, Melody Stewart and I inspected Greif Inc.'s Zanesville facility, located at 2225 Greif Road, Zanesville, Ohio, to determine the facility's compliance with Ohio's Cessation of Regulated Operation (CRO) laws, found in Revised Code (ORC) §3752 and Chapter 3745 of the Ohio Administrative Code (OAC). The inspection was conducted after Ohio EPA's receipt and review of Greif Inc.'s 90-day CRO certification form and supporting documentation, to verify that the required CRO activities were completed at the facility.

Based upon our review of the submitted documentation and the inspection conducted at the facility on May 3, 2007, Ohio EPA has determined that Greif Inc.'s Zanesville facility has completed CRO activities in accordance with Ohio's rules and laws.

You will find enclosed a copy of the CRO checklist that was completed as a result of the inspection. Should you have any questions, please feel free to call me at 740-380-5237.

Sincerely,

Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

cc: Ralph McGinnis, Ohio EPA, DHWM-CO-ISU
Tammy McConnell, Ohio EPA, DHWM-CO-ISU
John Niceswanger, Greif Inc., Zanesville
Dave Irvin, Heritage Stone

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.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to
Tammy McConnell, Central Office

Site EPA ID No.	EPA ID Number: OHD987040763								
Site Name	Name: Greif, Inc.				Website: (Optional) http://www.greif.com				
Site Location Information	Street Address: 2225 Greif Road								
	City, Town, or Village: Zanesville				State: OH				
	County Name: Muskingum				Zip Code: 43701				
Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) www.census.gov/epcd/www/naics.html									
Facility Representative Additional names can be recorded in "Comments" below Only provide address information if it is different than the site address	First Name: Jim			MI:	Last Name: Zemak				
	Phone Number: 740-549-6104				Phone Number Extension:				
	E-Mail Address: jim.zemak@greif.com								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: 425 Winter Road								
	City, Town or Village: Delaware				State: OH		Country: USA		Zip Code: 43015
	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
State:				Country: USA		Zip Code:			
Violations Cited?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No								
Type of Generator:									
<input checked="" type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste									

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply).				
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<input type="checkbox"/> Destination Facility for Universal Waste				
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Generated	Accumulated	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.				
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.				
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:	John Niceswanger
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CESSATION OF REGULATED OPERATIONS (CRO) FACILITY Final (90-Day) CRO Inspection of Greif, Inc.'s Zanesville facility.	
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		05-03-2007 09:30 a.m.
OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that 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 are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.				
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)

CESSATION OF REGULATED OPERATIONS CHECKLIST

Permanent Cessation
 Temporary Discontinuation
 Requesting Waiver for Temporary Discontinuation

Company: Greif, Inc.		EPA ID#: OHD987040763	
Street: 2225 Greif Road		City: Zanesville	
County: Muskingum	State: Ohio	Zip: 43701	

Mailing Address: P.O. Box 2550 Zanesville, Ohio - 43702 <i>(if different from above)</i>	
Telephone Number: 740-452-9947 or 1-800-282-9864	Fax Number: 740-454-1787

Owner/Operator: Greif, Inc.	
Street: 425 Winter Road	
County:	State: Ohio
Telephone Number: 740-549-6000	
Contact Person: Jim Zemak	
Street: 425 Winter Road	
County: Delaware	State: Ohio
Telephone Number: 740-549-6104	

If the following applies, check the appropriate box and provide information:

Holder of First Mortgage
 Fiduciary
 Receiver
 Indenture Trustee

Inspection Date(s): February 8, 2007 (30-Day Site Visit) May 3, 2007 (90-Day Inspection)
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	Name	Affiliation	Telephone Number
Inspectors:	Vicky German Melody Stewart	Ohio EPA, DHWM-SEDO Ohio EPA, DHWM-SEDO	740-380-5237 740-380-5256
Facility Rep(s):	Jim Zemak John Niceswanger Dave Irvin	Greif, Inc. Greif, Inc. Heritage Stone (current owner)	740-549-6104 740-452-9947 740-450-4236

30-DAY REQUIREMENTS

1. Within 30 days of CRO, did the owner/operator of the reporting facility submit on a form prescribed by the Director, a notice of the cessation of all regulated operations (CRO) to the following: [ORC 3752.04 and OAC rule 3745-352-20(A)(1)(a)]
 - a. Director of Ohio EPA Yes No N/A
 - b. Local Emergency Planning Committee Yes No N/A
 - c. Local Fire Department Yes No N/A
2. Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c)] Yes No N/A
3. Did the owner/operator include the following information about the contact person? [ORC §3752.05(B) and OAC rule 3745-352-35(B)]
 - a. Address of principal office of the owner/operator Yes No N/A
 - b. Business or residence address Yes No N/A
 - c. Telephone number of contact person Yes No N/A
4. Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)] Yes No N/A
5. If the contact person changed his/her address or telephone numbers, did the owner/operator or contact person provide the Director with the new address or telephone number? [ORC §3752.05(D) and OAC rule 3745-352-35(D)] Yes No N/A

NOTE: The owner/operator is also required to secure the facility and post warning signs within 30 days of CRO. See page 4 of this checklist.

90-DAY REQUIREMENTS

1. Did the owner/operator make a written certification to Ohio EPA's Director concerning the completion of the removal action within 90 days after CRO? [ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h)] Yes No N/A
Greif, Inc. notified Ohio EPA that cessation of operations began on 11/21/2006. The facility's 90-day CRO certification form was due to be submitted on 2/19/2007. Greif, Inc. submitted an incomplete 90-day CRO certification form to Ohio EPA on 3/5/2007. The facility submitted a request to the Director of Ohio EPA for an extension to the 90-day time period for completion of CRO activities. Greif, Inc.'s revised 90-day CRO certification form and supporting documentation was received by Ohio EPA on 4/18/2007.
2. Does the owner/operator hold a **valid** hazardous waste facility installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program? [ORC §3752.06(C) and OAC rule 3745-352-20(A)(2)(g)] Yes No N/A
Greif, Inc. notified Ohio EPA of their hazardous waste activities as a SQG on 4/13/1992 and received ID # OHD 987 040 763. The facility does not have any hazardous waste management units, but is subject to CRO requirements for regulated substances that were on-site.

NOTE: If so, the owner/operator is not subject to CRO for its hazardous waste and must instead comply with the hazardous waste requirements.

3. Did the owner/operator submit to the Director a copy of the most recent emergency and hazardous chemical inventory form that was submitted to the State Emergency Response Commission (SERC), including a statement indicating whether any asbestos-containing materials are present at the facility? [ORC §3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)] Yes No N/A
4. Did the owner/operator submit to the Director a copy of the current hazardous chemical list or each material safety data sheet that the owner/operator is required to have on file with the SERC? [ORC §3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)] Yes No N/A
5. Did the owner/operator drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessel and from all piping, that is to remain at the facility? [ORC §3752.06(A)(4) and OAC rule 3745-352-20(A)(2)(c)] Yes No N/A
6. Did the owner/operator submit a list of every stationary tank, vat, electrical transformer, and vessel of any type that contains or is contaminated with regulated substances and that is to remain at the facility? [ORC §3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(d)] Yes No N/A
7. Did the owner/operator do the following?
- a. Transfer the regulated substances to another facility owned or operated by the owner/operator? [ORC §3752.06(A)(4)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes No N/A
OR
- b. Transfer ownership of the regulated substances to another person through sale or otherwise? [ORC §3752.06(A)(4)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes No N/A
OR
- c. Transfer the regulated substances off-site in compliance with applicable and appropriate waste management laws? [ORC §3752.06(A)(4)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes No N/A
8. Did the owner/operator remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance? [ORC §3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(c)] Yes No N/A
9. Did the owner/operator do the following:
- a. Transfer the debris, equipment, furnishings, containers, and motor vehicles and rolling stock to another facility owned and operated by the owner/operator? [ORC §3752.06(A)(5)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes No N/A
OR
- b. Transfer ownership of the debris, equipment, furnishings, containers, and motor vehicles, and rolling stock to another person through sale or otherwise? [ORC §3752.06(A)(5)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes No N/A
OR
- c. Cause the debris, equipment, furnishings, and containers to be transported off-site in compliance with applicable and appropriate waste management laws and regulations? [ORC §3752.06(A)(5)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes No N/A

SECURITY & WARNING SIGNS REQUIREMENTS OF OWNER/OPERATOR

1. Did the owner/operator secure the facility against unauthorized entry **using one or more of the following** as provided in OAC rule 3745-352-30(A)(1)-(5) within 30 days of CRO?
- a. Boarded, locked or used other means to secure all windows, doors and other potential means of entry? Yes No N/A
 - b. Fencing? Yes No N/A
 - c. Lighting and a surveillance system? Yes No N/A
 - d. Guard or security service? Yes No N/A
 - e. Notarized statement from the county sheriff's department or the local police stating that the security measures secure against unauthorized entry? Yes No N/A
 - f. Demonstrated to the satisfaction of the Director or his/her designee that the proposed security measures secure against unauthorized entry? Yes No N/A
Throughout most of the CRO period, facility representatives and Greif, Inc.'s consultant, ERM, was on-site conducting CRO removal activities as well as a Phase I, Phase II, and VAP remediation.
2. Did the owner/operator post the appropriate warning signs in the following fashion **within 30 days of CRO?** [ORC §3752.07(A) and OAC rule 3745-352-20(A)(1)(b)]: Yes No N/A
Greif, Inc. notified Ohio EPA that cessation of operations began on 11/21/06. By 12/21/06 the above signage and security measures should have been in place. A site visit was conducted on 2/8/07 and the required warning signs were not in place. A Notice of Violation was sent to the facility on 2/16/07, and Greif, Inc. submitted photographic documentation on 3/5/07 that the signs were in place. The signs remained in place until the final 90-Day CRO inspection was conducted by Ohio EPA.
- a. Prohibit trespassing and state: "The building, structure, or outdoor location of operations contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." [OAC rule 3745-352-30(B)] Yes No N/A
 - b. Are warning signs posted on, or reasonably proximate to, the building, structure or outdoor location in sufficient number to alert people? [OAC rule 3745-352-30(B)] Yes No N/A
 - c. Posted on, or reasonably proximate to, locations that contain ignitable regulated substances and include the language, "No Smoking?" [OAC rule 3745-352-30(B)(2)] Yes No N/A
 - d. Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)] Yes No N/A
 - e. Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)] Yes No N/A
3. Are entry barrier and warning signs maintained to secure against unauthorized entry by the following measures listed below: [OAC rule 3745-352-30(C)]
- a. Inspected weekly or as agreed by the Director or his/her designee, county sheriff's department or local police department? [OAC rule 3745-352-30(C)(1)] Yes No N/A
 - b. The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)] Yes No N/A

- c. Prompt repair or replacement after discovery of damage, lost or removed?
[OAC rule 3745-352-30(C)(3)]

Yes No N/A

ADDITIONAL MULTI-MEDIA QUESTIONS

If the owner/operator holds a valid hazardous waste installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program, the following four questions may apply.

1. If the facility has an U.S. EPA I.D. number, has the facility submitted a *Notification of Regulated Waste Activity* form? Yes No N/A

In lieu of the facility now submitting a form, the inspector should submit a copy of the final CRO letter to Central Office's Regulatory and Information Services for I.D. deactivation.

2. Were there any < 90 day accumulation units for hazardous waste? Yes No N/A
List where unit(s) were/are:
The facility did not have any < 90 day hazardous waste accumulation areas while in operation; the facility operated one parts washer.

3. Did the owner/operator close his facility in a manner that: [OAC 3745-66-11] Yes No N/A

- a. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the groundwater, or surface waters, or to the atmosphere? Yes No N/A

- b. Complies with the closure requirements of OAC rules 3745-66-10 to 3745-66-20, 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80, 3745-68-10, 3745-68-51, 3745-68-81 and 3745-69-04? Yes No N/A

Supply the facility with the requirements for generator closure and inform them they must close the unit and have documentation that closure was completed (LQGs only).

4. During the partial and final closure periods, were all contaminated equipment, structures, and soil properly disposed of or decontaminated unless otherwise specified in OAC rules 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80 or 3745-68-10? Yes No N/A

- a. Were generated hazardous wastes handled in accordance with all applicable requirements of Chapter 3745-52 of the Administrative Code? Yes No N/A

Every demolition of a facility requires notification to Ohio EPA or local air agency regardless of whether asbestos is involved as required by the National Emission Standard for Hazardous Air Pollutants (NESHAPS) Standard for Asbestos. Notification requirements are found in OAC 3745-20-03 and 40 CFR §61.145(b). The notification form is available from Ohio EPA's web page at <http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos>.

5. Will any buildings be demolished? If yes: Yes No N/A

Has a *Notification of Demolition and Renovation* form been submitted? Yes No N/A

The facility submitted an Asbestos-Containing Materials Survey Report dated October 2000, and a Asbestos Closeout Report containing the regulated asbestos material waste shipment record associated with removal of this material. Asbestos-containing materials at the site included boiler pipe insulation and floor tile/mastic.

If Yes, Check with the appropriate agency to determine if a form has been received.

If No, Supply the facility with a form and contact the appropriate agency stating that demolition will occur.

6. Are there any wells on the property?

Yes No N/A

If yes, where are the wells?

What are the wells used for?

If used for drinking water, notify DDAGW about the well.

7. Is there open dumping of solid waste on the property?

Yes No N/A

Notify DSIWM about open dumping of solid waste.

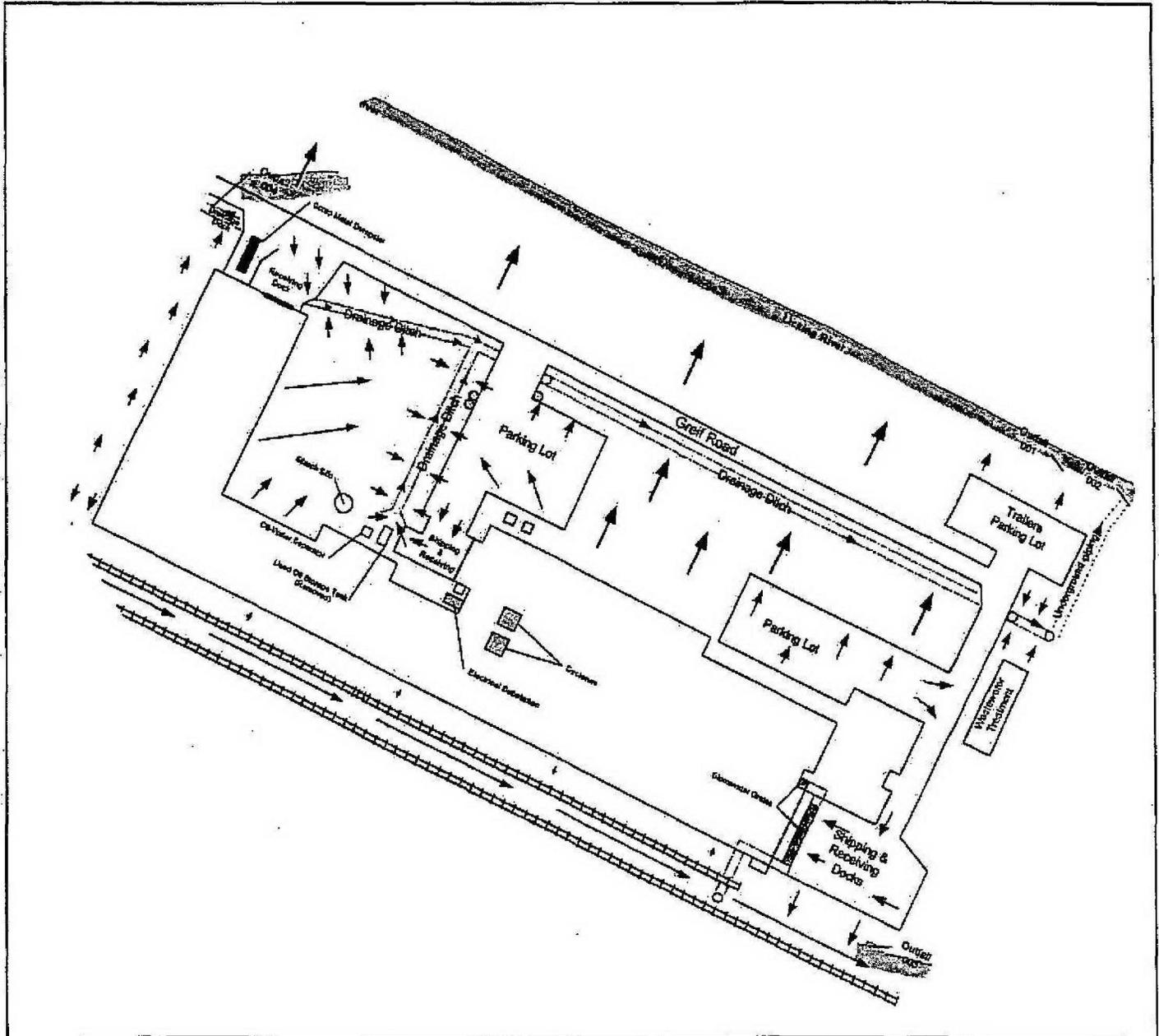
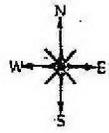
ADDITIONAL REMARKS

The facility was required to address the following regulated substances as part of CRO activities:

- ① 500-gallon used Oil Tank
- ② Cornstarch Settling Basin
- ③ Parts Washer (non-hazardous)
- ④ Water/Glycol-based Printing Inks
- ⑤ Tanks beneath Presses (oil/water)
- ⑥ Oil/Water Separator

Facility layout map is attached.

Figure 2 - Site Plan
 2225 Greif Road
 Zanesville, Ohio



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- Legend
- - General trash dumpsters
 - - Storm water drainage flow
 - - Pole mounted transformers

"Drawing Not to Scale"

