



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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www.epa.state.oh.us

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

March 14, 2007

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

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

Dear Mr. Zemak:

Thank you for your March 5, 2007 response to Ohio EPA's February 16, 2007 Notice of Violation letter. You submitted photographic documentation that the required warning signs have been posted at Greif Inc.'s Zanesville facility.

A review of the photographic documentation reveals that Greif Inc. has returned to compliance with the following violations discovered during the February 8, 2007 inspection:

- (1) ***OAC Rule 3745-352-20(A)(1)(b), Owner/Operator Responsibilities***
- (2) ***OAC Rule 3745-352-30(B)(1) through (B)(4), Providing Adequate Security***

GENERAL COMMENTS:

- a) In addition to the photographs, Greif also submitted the 90-Day Final CRO certification form. Pursuant to our telephone conversation on March 9, 2007, I sent an e-mail to you on March 12, 2007, outlining the information that Greif must submit in order to complete the 90-Day Final CRO certification. As we discussed, Ohio EPA will schedule an inspection at Greif's Zanesville facility once CRO activities have been completed at the site, and the corrected 90-Day form and all of the required information has been submitted and reviewed.
- b) As I mentioned in my March 12, 2007 e-mail, Greif's 90-Day CRO form and certification was due to be submitted to Ohio EPA on February 19, 2007 certifying that CRO activities have been completed at the site, per ORC 3752.06(A)(6) and OAC Rule 3745-352-20(A)(2)(h). To avoid being out of compliance with these laws, Greif should submit a written request for an extension to the 90-day CRO period to the Director of Ohio EPA, and send a courtesy copy of the request to me. The director may grant Greif more time to comply with CRO responsibilities if your extension request describes that (1) Greif cannot complete the required CRO activities within the prescribed time frame due to circumstances that are temporary and beyond your control; or that (2) Greif, exercising reasonable diligence, cannot complete the required CRO activities within the prescribed time frame due to facility size, operational complexity, or other such relevant factors (OAC Rule 3745-352-20(A)(3)). The extension request should be sent to:

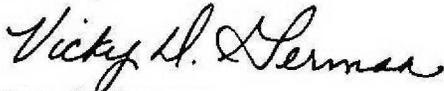
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Chris Korleski, Director
Ohio EPA
50 West Town Street, Suite 700
PO Box 1049
Columbus, OH 43216-1049

- c) As we have previously discussed, Greif must maintain security at the Zanesville facility until you have performed the measures required under OAC Rule 3745-352-20(A)(2)(c) and OAC Rule 3745-352-20(A)(2)(f), and Ohio EPA has verified your compliance and concurred with your certification.

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
John Niceswanger, Greif Inc., Zanesville

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.