



State of Ohio Environmental Protection Agency

Southeast District Office

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

February 16, 2007

**TUSCARAWAS COUNTY
DOVER CHEMICAL CORPORATION
DHWM/SEDO
OHD 004 210 563**

Mr. David Rankin
Dover Chemical Corporation
3676 Davis Road NW
Dover, Ohio 44622

Dear Mr. Rankin:

I received your response to my January 19, 2007, Notice of Violation (NOV) letter on February 8, 2007. Dover remains in violation of the following:

- (1) **Personnel training, OAC rule 3745-65-16(C)**: Facility personnel must take part in an annual review of the initial training.

In the February 8, 2007 response, Dover submitted information regarding the upcoming personal training. Ohio EPA understands that the training will be conducted by the end of February. Once this training is completed, Dover must submit a copy of the employee signature sign-in sheet to demonstrate compliance with this rule.

- (2) **Amendment of contingency plan, OAC rule 3745-65-54(D)**: The contingency plan shall must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

In the February 8, 2007 submittal, Dover stated that Ohio EPA should have a copy of the ICP. I have checked Ohio EPA records and could not find a copy of Dover's ICP. Since a contingency plan could not be presented for review, Ohio EPA requested a copy of this plan in the December 12, 2006 and the January 19, 2007 NOV's.

Dover must submit a contingency plan to this office for review. Please be aware that additional violations may be cited as a result of the review.

Mr. David Rankin
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Please submit the above requested documentation to this office **within 7 days** of receipt of this letter demonstrating that the contingency plan violation has been abated.

Please note that Ohio EPA considers these violations serious in nature and the company's failure to comply with Ohio's laws and may result in referral of Dover's violations to our Central Office Enforcement Section for consideration of escalated enforcement.

If you have any questions regarding this letter, please call me at (740) 380-5256.

Sincerely,



Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/mlm

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 appropriate regulations.