



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Laura H. Powell, Acting Director

January 19, 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:

On November 28, 2006, Jennifer Witte, Division of Surface Water, and I inspected Dover Chemical Corporation's (Dover) facility in Dover, Ohio to determine Dover's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). I sent you a Notice of Violation (NOV) letter on December 12, 2006, specifying the violations observed during the inspection. Dover submitted personnel training documentation and an updated emergency coordinator list to Ohio EPA on January 12, 2006; however, 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.

The information provided to Ohio EPA does not demonstrate compliance with this rule. OAC rule 3745-65-16 states that the initial training must include waste management procedures, including contingency plan implementation, relevant to the facility. The training documentation that Dover submitted documents that facility personnel were trained to meet the requirements of Subpart H, Part 172, 49 CFR. This type of training does not meet the requirements of the aforementioned rule. Dover must develop a training program which is specific to the hazardous waste operations at the facility and immediately schedule an annual refresher training as required by this rule. Please provide the date this training is scheduled **within thirty days** of receipt of this letter. 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.

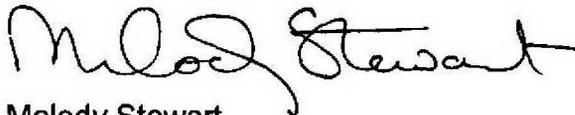
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Dover submitted an updated emergency coordinator list in the January 12, 2006 submittal. Since a contingency plan could not be presented for review, Ohio EPA requested a copy of this plan in the December 12, 2006 NOV. Dover must submit a contingency plan to this office for review. Please be aware that additional violations may be cited as a result of the review.

Please submit the above requested documentation to this office **within 15 days** of receipt of this letter demonstrating that all violations have been abated.

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.