



State of Ohio Environmental Protection Agency

Southeast District Office

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

February 23, 2007

**TUSCARAWAS COUNTY
GREER STEEL COMPANY
DHWM/SEDO
OHD 004 461 927**

Mr. Robert Costello
Vice President Operations
Greer Steel Company
624 Boulevard
Dover, Ohio 44622

Dear Mr. Costello:

I received your response to my January 17, 2007, Notice of Violation (NOV) letter on February 22, 2007. The documentation you submitted included copies of material safety data sheets and photographic documentation of properly labeled containers and tanks.

My review of this documentation reveals that Greer Steel Company has adequately demonstrated abatement of the following violations discovered during the January 10, 2007 inspection:

- (1) **Used oil storage requirements for generators, OAC rule 375-279-22(C)**
- (2) **Labeling/markings- standards for large quantity handlers of universal waste, OAC 3745-273-34(E)**

However, Greer Steel Company remains in violation of the following hazardous waste law:

1. **Hazardous waste determination, OAC rule 3745-52-11:** Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste.

During the inspection, a box of old lab chemicals in the universal waste cage and twelve 55-gallon containers in the Old Stock House were found. The contents of these containers were unknown. In the February 22, 2007 response, Greer Steel Company submitted copies of MSDS for the box of chemicals and stated that one bottle and a drum of soil would need to be analyzed. To demonstrate compliance with this rule, Greer Steel Company must submit, within thirty days of receiving this letter, analytical data for this bottle and for the drum of soil to Ohio EPA for review.

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

Sincerely,

A handwritten signature in black ink that reads "Melody Stewart". The signature is written in a cursive style with a large, stylized "M" and "S".

Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/mlm

Enclosures

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.