



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Marion County
Compliance Evaluation Inspection
Nucor Steel Marion, Inc.
f.k.a. Marion Steel
OHD 032 271 975
Return to Compliance

December 21, 2007

Ms. Rebecca M. Kabat, Environmental Engineer
Nucor Steel Marion, Inc., f.k.a. Marion Steel
912 Cheney Avenue
Marion, Ohio 43302

Dear Ms. Kabat:

Thank you for your December 14, 2007, response to Ohio EPA's Notice of Violation (NOV) letter dated November 14, 2007. This NOV was issued to address violations found during Ohio EPA's compliance evaluation inspection (CEI) conducted at your facility located at 912 Cheney Avenue, Marion, Ohio, on October 30, 2007.

The information you submitted has been reviewed and the status of the violations cited is as follows:

1. **OAC Rule 3745-52-34(A)(2): Accumulation of Hazardous Waste – Labeling/Date**

A large quantity generator of hazardous waste may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste provided that while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the date upon which each period of accumulation and/or treatment begins and it is visible for inspection on each container.

Nucor Steel Marion, Inc. (NSMI) failed to label the date upon which the period of accumulation began on a trailer accumulating hazardous waste (K061).

NSMI correctly dated the container at the time of the inspection. ***This violation has been abated.***

2. **OAC Rule 3745-273-13(D)(1): Universal Waste Lamps – Labeling**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

NSMI failed to keep the 8-foot spent lamps storage containers closed.

On November 1, 2007, NSMI emailed me a digital photograph of the closed containers (with new lids). ***This violation has been abated.***

Ms. Rebecca Kabat
December 21, 2007
Page Two

3. **OAC Rule 3745-279-22(C)(1): Used Oil Generators -- Labeling**

Used oil generators must label containers and aboveground tanks used to store used oil with the words "Used Oil."

NSMI failed to properly label several containers storing used oil.

At least one of the containers identified as storing used oil was labeled during the inspection. However, several containers remained at the site that must be properly labeled with the words "Used Oil." Please keep in mind that additional information on the label to facilitate segregation of the different types of used oil is permitted.

On December 14, 2007, you submitted photographic documentation that verified that the remaining used oil storage containers were properly labeled. ***This violation has been abated.***

Should you have any questions, please feel free to contact me at (419)373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

pc: Colleen Weaver, Supervisor, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
~~DHWM, NWDO File: Nucor Steel Marion, Inc.~~, f.k.a. Marion Steel, Marion County

ec: Ed Pulido, DHWM, NWDO

<p>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.</p>
--