



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

August 15, 2008

**Re:** Tuscarawas County  
Greer Steel Company  
Notice of Violation  
01D00003, OH0005606  
Correspondence (IWW)

Mr. Dan Carman  
Greer Steel Company  
624 Boulevard Street  
Dover, Ohio 44622

Dear Mr. Carman:

We have received your self-monitoring reports covering the months of May 2004 through May 2008 for the referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Outfall	Date	Parameter	Reported	Units	Permit Limitation
<b>May 2004:</b>					
006	15 Days	pH, Minimum	AB & AH	S.U.	Reporting required 1/day
006	15 Days	pH, Maximum	AB & AH	S.U.	Reporting required 1/day
006	15 Days	Flow Rate	AB & AH	MGD	Reporting required 1/day
<b>June 2004:</b>					
006	6/14	pH, Minimum	6.27	S.U.	6.5 Minimum
006	6/14	pH, Maximum	9.17	S.U.	9.0 Maximum
<b>July 2004:</b>					
001	Weeks 1-4	Water Temperature	None	°C	Reporting required 1/week
<b>August 2004:</b>					
006	31 Days	pH, Minimum	None	S.U.	Reporting required 1/day
006	31 Days	pH, Maximum	None	S.U.	Reporting required 1/day
006	Weeks 1-4	Oil and Grease	None	mg/l	Monitoring required 1/week
<b>October 2004:</b>					
006	Average	Suspended Solids	9.99	kg/day	9.34
006	Week 4	Suspended Solids	32.3	kg/day	21.8
006	Week 3	Lead, Total	None	ug/l	Monitoring required 1/week
006	2 Days	pH, Maximum	11.11- 11.66	S.U.	9.0 Maximum
006	6 Days	pH, Minimum	5.24-6.47	S.U.	6.5 Minimum
<b>January 2005:</b>					
006	Average	Suspended Solids	14.2	kg/day	9.34
006	Week 4	Suspended Solids	23.1	kg/day	21.8

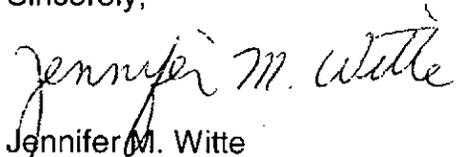
Outfall	Date	Parameter	Reported	Units	Permit Limitation
<b>March 2005:</b>					
001	Weeks 1-3	pH	None	S.U.	Reporting required 1/week
001	Weeks 1-3	Water Temperature	None	°C	Reporting required 1/week
<b>June 2005:</b>					
006	6/16	pH, Minimum	6.4	S.U.	6.5 Minimum
006	6/25	pH, Maximum	9.32	S.U.	9.0 Maximum
<b>September 2005:</b>					
006	9/15	Zinc, Total	0.139	kg/day	0.135
006	9/24	pH, Minimum	4.18	S.U.	6.5 Minimum
<b>November 2005:</b>					
001	5 Days	Flow rate	AD	GPD	Reporting required 1/day
006	26 Days	Flow Rate	AD	MGD	Reporting required 1/day
006	26 Days	pH, Minimum	AD	S.U.	Reporting required 1/day
006	26 Days	pH, Maximum	AD	S.U.	Reporting required 1/day
<b>December 2005:</b>					
006	3 Days	Flow Rate	AB	MGD	Reporting required 1/day
006	3 Days	pH, Minimum	AB	S.U.	Reporting required 1/day
006	3 Days	pH, Maximum	AB	S.U.	Reporting required 1/day
006	12/7	pH, Minimum	6.22	S.U.	6.5 Minimum
<b>January 2006:</b>					
006	2 Days	pH, Minimum	3.84-3.94	S.U.	6.5 Minimum
006	2 Days	pH, Maximum	10.3	S.U.	9.0 Maximum
<b>February 2006:</b>					
006	2/15	pH, Maximum	9.38	S.U.	9.0 Maximum
<b>March 2006:</b>					
006	6 Days	pH, Minimum	1.27-6.25	S.U.	6.5 Minimum
006	3/30	pH, Maximum	10.41	S.U.	9.0 Maximum
<b>October 2006:</b>					
006	3 Days	pH, Minimum	6.19-6.29	S.U.	6.5 Minimum
<b>February 2007:</b>					
006	2/20	pH, Minimum	6.38	S.U.	6.5 Minimum
006	2/22	Suspended Solids	69	mg/l	61
<b>March 2007:</b>					
006	Average	Suspended Solids	27	mg/l	26.1
006	3/1	Suspended Solids	71	mg/l	61
006	2 Days	pH, Minimum	6.35-6.41	S.U.	6.5 Minimum
<b>April 2007:</b>					
006	4/3	pH, Minimum	6.38	S.U.	6.5 Minimum
<b>May 2007:</b>					
006	5/10	Suspended Solids	62	mg/l	61
006	5/10	Suspended Solids	29	kg/day	21.8
006	5/13	pH, Minimum	6.03	S.U.	6.5 Minimum
<b>June 2007:</b>					
006	Average	Suspended Solids	33.5	mg/l	26.1
006	Average	Suspended Solids	15.5	kg/day	9.34
006	6/14	Suspended Solids	79	mg/l	61
006	6/14	Suspended Solids	36.5	kg/day	21.8
<b>July 2007:</b>					
006	Average	Suspended Solids	33.5	mg/l	26.1
006	Average	Suspended Solids	12.4	kg/day	9.34

Outfall	Date	Parameter	Reported	Units	Permit Limitation
006	7/12	Suspended Solids	71	mg/l	61
006	7/12	Suspended Solids	27	kg/day	21.8
<b>August 2007:</b>					
006	8/2	Suspended Solids	88	mg/l	61
006	8/2	Suspended Solids	30.1	kg/day	21.8
<b>September 2007:</b>					
006	Average	Suspended Solids	54.3	mg/l	26.1
006	Average	Suspended Solids	18.7	kg/day	9.34
006	9/27	Suspended Solids	175	mg/l	61
006	9/27	Suspended Solids	59.9	kg/day	21.8
<b>October 2007:</b>					
006	Average	Suspended Solids	60.8	mg/l	26.1
006	Average	Suspended Solids	20.6	kg/day	9.34
006	2 Days	Suspended Solids	84-89	mg/l	61
006	2 Days	Suspended Solids	27.9-30.1	kg/day	21.8
006	10/4	pH, Minimum	3.93	S.U.	6.5 Minimum
<b>November 2007:</b>					
006	Average	Suspended Solids	41.2	mg/l	26.1
006	Average	Suspended Solids	13.8	kg/day	9.34
006	11/1	Suspended Solids	131	mg/l	61
006	11/1	Suspended Solids	47	kg/day	21.8
<b>January 2008:</b>					
006	Average	Suspended Solids	30.2	mg/l	26.1
006	1/10	Suspended Solids	65	mg/l	61

Please be advised that failure to comply with the effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

If there are any questions, please contact me at (740) 380-5206.

Sincerely,



Jennifer M. Witte  
Chemical Engineer - Environmental Specialist 2  
Division of Surface Water

JMW/dh