



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3320 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

August 22, 2007

FACILITY MANAGER
UNIVERSAL COOPERATIVES INC
PO BOX 471
NAPOLEON, OH 43545

**Re: 2006 Hazardous Waste Annual Report Requirement
UNIVERSAL COOPERATIVES INC - OHD000647131**

Dear FACILITY MANAGER:

My review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) has revealed that one or more shipments of hazardous waste were received from UNIVERSAL COOPERATIVES INC during the 2006 calendar year. The total amount reported indicates that UNIVERSAL COOPERATIVES INC was a large quantity generator in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, UNIVERSAL COOPERATIVES INC may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC). Please see the enclosed printout detailing the hazardous wastes received from UNIVERSAL COOPERATIVES INC during 2006.

A large quantity generator is defined as a site which generates in any single month more than 1000 kg (2200 lbs) of non-acute hazardous waste or more than 1 kg (2.2 lb) of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. It may take only one month of generating above the threshold quantity to subject a site to the Annual Report requirement. The generator is responsible for contacting Ohio EPA in order to obtain the reporting forms.

OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA an **Annual Hazardous Waste Report** and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each year and contain information about the activities of the previous calendar year. Only small quantity generators (between 220 and 2200 lb/mo of non-acutely hazardous wastes) and conditionally exempt small quantity generators (less than 220 lb/mo of non-acutely hazardous wastes) are exempt from the Annual Report requirement as described in OAC Rule 3745-52-44.

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

Ohio EPA is an Equal Opportunity Employer

To abate the violation of OAC Rule 3745-52-41, UNIVERSAL COOPERATIVES INC must complete and submit to Ohio EPA a 2006 Annual Hazardous Waste Report within 30 days of receipt of this letter. Failure to respond to this Notice of Violation may result in referral to the Compliance Assurance Section for consideration of escalated enforcement. You may access the reporting forms and instructions on our website at http://www.epa.state.oh.us/dhwm/ann_report.html.

UNIVERSAL COOPERATIVES INC should have on file the manifest records necessary for completion of the reports. OAC Rule 3745-52-40 requires generators to keep a signed copy of each manifest for a period of at least three years from the date the waste was accepted by the initial transporter. Receiving facilities and transporters are under a similar requirement; if you need copies of the original manifest(s), contact them for assistance.

If UNIVERSAL COOPERATIVES INC was not a large quantity generator in 2006, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that UNIVERSAL COOPERATIVES INC did not generate more than the threshold quantity of hazardous waste in any month during 2006. If you believe that the information supplied by Ohio TSDFs is in error, please call me to discuss the discrepancy.

A letter that acknowledges receipt of the report will be sent to you after it is processed. I can answer questions concerning the Annual Report at (614) 644-2923. Your prompt attention to this matter is appreciated.

Sincerely,



Paula Canter
Environmental Specialist 3
Regulatory and Information Services
Division of Hazardous Waste Management
paula.canter@epa.state.oh.us

cc: Central File
ec: DHWM, NWDO

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.

Generator Facility

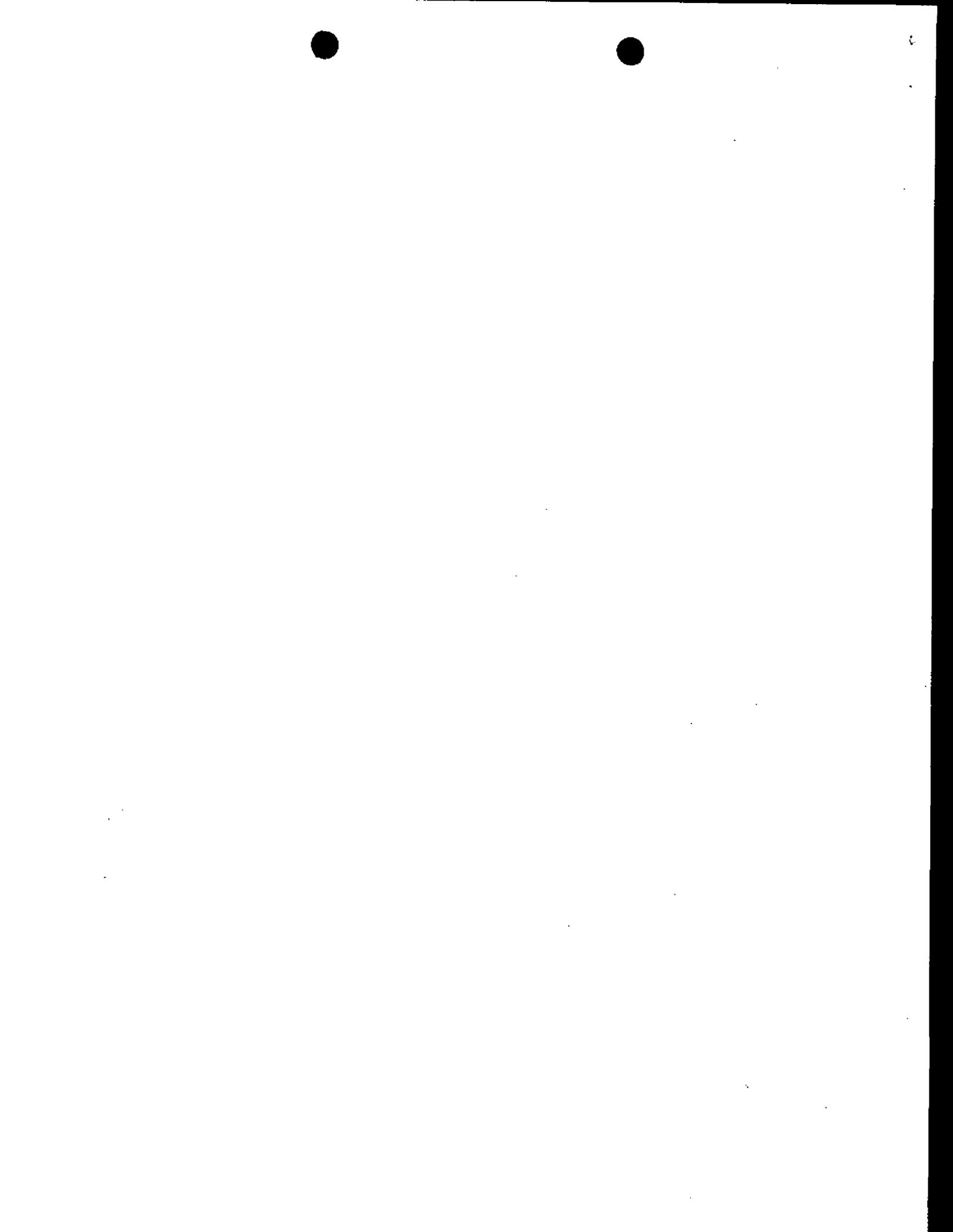
Generator US EPA ID: OHD000647131
 Generator Name: Universal Cooperatives Inc
 Address: 1253 Independence Dr
 Napoleon, OH 43545-

Total Tons Shipped: 24.68

Receiving Facility

US EPA ID: OHD093945293
 Name: Veolia ES Technical Solutions LLC
 Customer Name: UNIVERSAL COOPERATIVES INC.
 Customer Address: 1253 INDEPENDENCE DRIVE
 NAPOLEON, OH 43545-

Waste Description: DEPACK	Page: 3183	Subpage: 1
System Type: H061 Form: W001 Quantity: 300.00 P Density:		
D001		
Waste Description: DEPACK	Page: 3183	Subpage: 2
System Type: H141 Form: W001 Quantity: 178.00 P Density:		
D022 D001		
Waste Description: ELEMENTAL MERCURY	Page: 3183	Subpage: 3
System Type: H141 Form: W117 Quantity: 3.00 P Density:		
D009		
Waste Description: LIQUID WASTE	Page: 3183	Subpage: 4
System Type: H141 Form: W119 Quantity: 36130.00 P Density:		
D001		
Waste Description: SPENT BLEACH SOLUTION	Page: 3183	Subpage: 5
System Type: H141 Form: W119 Quantity: 353.00 P Density:		
D002		
Waste Description: 2, 4-D SOLUTION	Page: 3183	Subpage: 6
System Type: H141 Form: W401 Quantity: 12400.00 P Density:		
U240 D001		



Department: *DMWM*
DMWM

Subdepartment: *HAZARDOUS_WASTE*
DMWM-Hazardous Waste

Office Location: *CO*
CO

Media: *LAND*
LAND

Doc Type: *NOV*
NOV

Doc Subtype: *NULL*
<NONE>

Program: *NULL*
<NONE>

County: *35*
35 - HENRY

Facility ID: *OHD000647131*
OHD000647131

Facility Name: *UNIVERSAL_COOPERATIVES_INC*
(Optional) UNIVERSAL COOPERATIVES INC (Auto Load)

Date: *20071011*
10/11/2007

Record ID: *11*
(Optional) 11



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P.O. Box 1049
Columbus, OH 43216-1049

October 11, 2007

FACILITY MANAGER
UNIVERSAL COOPERATIVES INC
PO BOX 471
NAPOLEON, OH 43545

**Re: Second Notice of Violation of the 2006 Hazardous Waste Annual Report Requirement
(UNIVERSAL COOPERATIVES INC - OHD000647131)**

Dear FACILITY MANAGER:

On August 22, 2007, I sent a letter to you stating that my review of customer data from Ohio Treatment, Storage and Disposal Facilities (TSDFs) had revealed that hazardous waste was shipped off-site by UNIVERSAL COOPERATIVES INC during the 2006 calendar year. The total amount reported indicates that UNIVERSAL COOPERATIVES INC may have been a large quantity generator in 2006. A printout of the shipment information was attached to the August 22 letter. As of today, I still have not received a response to my letter, and UNIVERSAL COOPERATIVES INC may still be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC).

OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA a **Hazardous Waste Annual Report** and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each year and contain information about the activities of the previous calendar year. Only small quantity generators (between 220 and 2200 lb/mo of non-acutely hazardous wastes) and conditionally exempt small quantity generators (less than 220 lb/mo of non-acutely hazardous wastes) are exempt from the Annual Report requirement as described in OAC Rule 3745-52-44.

A large quantity generator is defined as a site which generates in any single month more than 1000 kg (2200 lbs) of non-acute hazardous waste or more than 1 kg (2.2 lb) of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. It may take only one month of generating above the threshold quantity to subject a site to the Annual Report requirement. The generator is responsible for contacting Ohio EPA in order to obtain the reporting forms.

If UNIVERSAL COOPERATIVES INC was in fact a large quantity generator during 2006, in order to abate the violation of OAC Rule 3745-52-41, UNIVERSAL COOPERATIVES INC must complete and submit to Ohio EPA a 2005 Hazardous Waste Annual Report within 15 days of receipt of this letter. The reporting forms and instructions can be found on our Web site at http://www.epa.state.oh.us/dhwm/ann_report.html.

If UNIVERSAL COOPERATIVES INC was not a large quantity generator in 2006, documentation must be submitted to this office within 15 days of receipt of this letter. This documentation must show that UNIVERSAL COOPERATIVES INC did not generate more than the threshold quantity of hazardous waste in any month during 2006. If you believe that the information supplied by the Ohio TSDf is in error, please call me to discuss the discrepancy.

A lack of response on your part may initiate a referral to the Compliance Assurance Section for consideration of enforcement action against UNIVERSAL COOPERATIVES INC. Ohio EPA is entitled by law to seek a civil penalty of up to ten thousand dollars (\$10,000) per day for each violation of the state's hazardous waste laws.

Please return the completed forms or other documentation to my attention. A letter that acknowledges receipt of the report will be sent to you after it is processed. I can answer questions concerning the Annual Report at (614) 644-2923. Your prompt attention to this matter is appreciated.

Sincerely,

Paula Canter

Paula Canter
Environmental Specialist 3
Regulatory and Information Services
Division of Hazardous Waste Management
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cc: Central File
DHWM, NWDO

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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.