



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

April 6, 2007

Mr. Stephen Bley
Spring Grove Resource Recovery
4879 Spring Grove
Cincinnati, Ohio 45232

Re: Notice of Violation / Return to Compliance
2006 Hazardous Waste Annual Report Requirement
Spring Grove Resource Recovery - OHD000816629

Dear Mr. Bley:

The Division of Hazardous Waste Management (DHWM) received Spring Grove Resource Recovery's (SGRR) 2006 Hazardous Waste Annual Report submittal electronically on March 2, 2007. Upon review of this report, I have discovered some items that are violations of the Ohio Administrative Code Chapter 3745-54-75, and other areas of concern that need to be addressed. I have listed these items below. Please review each one and send me a response addressing each item within 30 days of receipt of this letter. Additionally, Paula Canter and I would like to request a meeting with you at your facility to discuss the Annual Reports for the last couple of years. Please let me know when would be a good time for you. If Mike Crisenberry would like to participate, he is welcome.

Violation - OAC 3745-54-75(C) Customer ID Corrections

Please make these corrections to your records.

Page	WR Customer info	Correction	Comments
2	TNMC GHEETYSO	TN4570024196	LQG, address you provided is owner/operator address
302	MAR000001449	MAR000014449	
855	NHD510115963	NHD510155963	
960	TN0000035442	TN0000354423	
1012	WVD005005437	Not a valid ID no.	Need you to confirm the generator/address, because I see many similar IDs, and none at that exact address
2246	NJP000916060	Not valid ID	No ID assigned to this address
2505	VT5000002162	VTD002071736	At 62 Depot Lane

Page	WR Customer info	Correction	Comments
2902	CTD982710908	CTD982710998	
3107	VTD981889134	VTD981889348	In Hartford
3262	OHD122544536	OHD122544356	
3580	IND005797821	IND005797782	
3987	KYR00001365	KYR000013656	
4555	MAD002082482	MAD002082428	
4640	KYD000000099	Not a valid ID no.	I do not see an ID for this address
4716	NHD510190570	NHD510190507	
4956	MDI000051275	MD0000052175	
5172	OHD000724115	OHD000724153	Rockefeller Ave
5875	KYD581806508	KYD981806508	
6558	ILD964774927	ILD984774927	
7080	ILD721382046	IL7213820460	
7256	CTD000155159	CTD001155159	
7288	NHD066750400	NHD066750480	311 Kimble Hill Rd
7551	PAD980706673	PAD980706873	
7560	MAD001138868	MAD001138858	
8054	MAD000039294	MAD019394162	At 150 Lafayette Sq
8058	PAD982677620	PAD982577520	At 500 Tressler
8414	PAD052718992	PAD052918992	
8476	NJD986382153	NJD986582153	
8539	OHD071124791	OHD071124291	
8821	MAD000018277	Not a valid ID	No ID assigned to this address
9021	ILD000087857	ILD000870857	
9332	NHD501156532	NHD510156532	In Northumberland
11224	OH3308254449	OHR000135319	In Norton
10109	CTD005270864	CTD052708641	
10667	MDP000003924	Not a valid ID no.	No ID assigned to this address
11005	MID000720565	MID000720565	Should be zeros, not o's
12915	MOD193210548	MOD103210548	
13118	MAD978373166	MAD071948996?	At 187 Neck RD in Haverhill, this is the only Runthal NA in MA that has an ID number. Please verify the generator.
13128	IND066819501	IND056819501	
13510	MA5087618170	Not valid ID	No ID assigned to this address
15422	VT000501718		No ID assigned to this address
15510	ILD057437506	ILD052437506	
15707	NHD510189966	NHD510189996	
15732	WVR000056260	WV0000026260	2700 Mountaineer Blvd
15742	WVR000015738	WVR000016758	11 Wal-Mart Lane
15949	PAD987432854	PAD987342854	
15950	DER00502096	DER000502096	
16070	OHG000039252	OHCESQG	This OHG number should not be used.

The following customer corrections do not constitute a violation, but you should make these corrections to your database. The ID numbers I have added are those for sites with active ID numbers. Please remind your customers that if they have an active EPA RCRA ID number, they should be using it on hazardous waste manifests. Additionally, if Spring Grove is receiving quantities of hazardous waste from a generator in the SQG or larger quantity range, you should be inquiring about an ID number if the generator is not providing it on the manifest.

Page	WR Customer info	Correction	Comments
1227	Bax Global	OHR000126433	CESQG 2004. This generator is listed at Two Air Cargo Pkwy. One AC Pkwy is Pepsi Co with a separate ID #
1835	Bioflexis LLC	OHR000125567	CESQG 2004
2098	BRT Extrusions Inc	OHD987036233	SQG 2005
2249	Columbus Public Schools	OHD981092968	CESQG 1985
2866	Cincinnati, City of	OHD981780711	CESQG 1986
2867	Greater Cinci Water Works	OHD986968055	SQG 1989
3514	OH5136832194	OHCESQG	
3754	Dorsey's Reconditioning	OHR000014183	Was SQG for part of 2006
4286	OHCEG3297145	OHCESQG	
4964	Ganley Honda	OH0000334086	SQG 1994 Ganley Pontiac
6207	Hexion Specialty Chemicals	OHD068932011	SQG 2006
6486	Iams Company	OHD139646582	CESQG 1993
6740	International Paper Co	OHR000016824	OHR, not OHD
7137	Kaiser - Permanente	OHD074552340	SQG 1986
7340	Knox Community Hospital	OHD058841073	SQG 1989
8328	OH2169166000	OHCESQG	
9011	MTD Products Inc	OHD987046885	SQG 1992 Modern Tool & Die
10688	Pharmaforce	OHR000133223	SQG 2005
11068	OH4402777201	OHCESQG	
11224	OH3308254449	OHCESQG	
11227	Premcor Refining Group	OHR000032151	OHR not OHD
13913	Speedway Super America	OHD987005709	CESQG 2006
14301	TC Woodworking	OHR000022681	CESQG 1997
15177	United Titanium	OHR000031906	SQG 1998
15474	Frick and Gallagher USEPA	OHD081757783	CESQG 2003
16023	Woods Collision	OHR000107862	CESQG 2002
16025	L Wood & Son	OHR000107870	CESQG 2002

Customer Questions

WR Page 9917, Spring Grove lists Clean Harbors at 4879 Spring Grove Ave as a customer. If this waste was generated on-site, it should be listed on a GM form. If it was generated off-site, please identify the customer.

GM Form Questions

GM pages 19178 and 19511 are residuals from fuel blending, but Spring Grove has listed a quantity of zero generated. Was this waste left over from 2005?

GM pages 18733 and 19255 list a Source Code of G21, but with zero generated. GM page 18170 lists a Source Code of G22, also with zero generated. If this waste was generated during 2006, then the amount generated should be listed as such. If it was not generated in 2006, please provide a comment to explain where the waste came from (previous year, off-site, etc.).

OI Form Questions

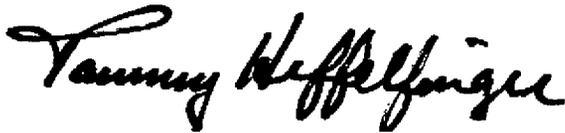
Spring Grove is listing transporters of hazardous waste in the report that are not identified as such in the federal system. Spring Grove should only list transporters of hazardous waste in the Annual Report. Please review the wastes shipped using the following ID numbers, and if the waste was not considered hazardous waste, then those transporters should not be listed. Include changes to the OI Form or comments about these with your response.

ILD005070495
ILR000116269
MAC300001617
MAD985269323
MAR000504928
OH0000072314

Spring Grove listed OHR000038513 as a receiving facility of hazardous waste on the OI Form, but they do not appear on any GM Form. It is my understanding that Toxco deactivated this ID number in August of 2006 because they have 2 ID numbers assigned to their facility. The ID that is still active is OHD101614907. Please check into this and include any amendments or comments with your response.

I will expect a response to the items above within 30 days of receipt of this letter. Please contact me at your earliest convenience to arrange a meeting at your facility as requested. I can answer any questions concerning the Annual Report at (614) 644-2954 or tammy.heffelfinger@epa.state.oh.us.

Sincerely,



Tammy Heffelfinger
Annual Report Coordinator
Regulatory and Information Services
Division of Hazardous Waste Management

cc: [Central File]
ec: DHWM, SWDO

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.