



OHD001722529-004-08/07/2008

Hazardous Waste

NOV

KOKI LABORATORIES

SUMMIT

08/07/2008



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

August 7, 2008

JOSEPH J EPNER
KOKI LABS (FORMER TRADCO CHEMICAL CORP)
1081 ROSEMARY BLVD
AKRON, OH 44306

eval (066)

(K)

Re: 2007 Hazardous Waste Annual Report Requirement
KOKI LABS (FORMER TRADCO CHEMICAL CORP INC, AKRON -
OHD001722529)

enF 004

Dear JOSEPH J EPNER:

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 KOKI LABS (FORMER TRADCO CHEMICAL CORP) during the 2007 calendar year. The total amount reported is approximately 25.02 tons as shown on the enclosed printout. This total indicates that KOKI LABS (FORMER TRADCO CHEMICAL CORP) was a large quantity generator in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, KOKI LABS (FORMER TRADCO CHEMICAL CORP) may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC). Additionally, it appears Koki Labs has used the EPA ID number currently assigned to Tradco Chemical Corporation in USEPA's database, but has not notified us of a change in the name and perhaps ownership or operators for this facility. Information submitted on the Site ID form of the Annual Report will fulfill this obligation to notify as well.

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.

To abate the violation of OAC Rule 3745-52-41, KOKI LABS (FORMER TRADCO CHEMICAL CORP) must complete and submit to Ohio EPA a 2007 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

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

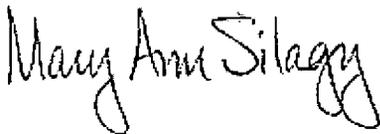
may access the reporting forms and instructions on our website at
http://www.epa.state.oh.us/dhwm/ann_report.html.

KOKI LABS (FORMER TRADCO CHEMICAL CORP) 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 KOKI LABS (FORMER TRADCO CHEMICAL CORP) was not a large quantity generator in 2007, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that KOKI LABS (FORMER TRADCO CHEMICAL CORP) did not generate more than the threshold quantity of hazardous waste in any month during 2007. 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) 644-2891. Your prompt attention to this matter is appreciated.

Sincerely,



Mary Ann Silagy
Environmental Specialist 2
Regulatory and Information Services
Division of Hazardous Waste Management
maryann.silagy@epa.state.oh.us

enclosure

cc: Central File ✓
DHWM, NEDO

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:** OHD001722529**Generator Name:** Tradco Chemical Corporation Inc ***Address:** 1081 Rosemary Blvd

Akron, OH 44306-

Total Tons Shipped: 25.02**Receiving Facility****US EPA ID:** OHD066060609**Name:** Chemtron Corp**Customer Name:** KOKI LABS**Customer Address:** 1081 ROSEMARY BLVD.

AKRON, OH 44306-

Waste Description: TANK CLEAN OUT**Page:** 3507**Subpage:** 1**System Type:** H061 **Form:** W219 **Quantity:** 1751.88 G **Density:** 1 S.G.

D001

Waste Description: TANK CLEAN OUT**Page:** 3508**Subpage:** 1**System Type:** H141 **Form:** W219 **Quantity:** 4248.13 G **Density:** 1 S.G.

D001

