



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

July 5, 2011

Jamie Schiff
Textron Inc
40 Westminster St
Providence, RI 44280

**Re: 2009 Hazardous Waste Annual Report Requirement – Notice of Violation
Kautex Textron, Wilmington – OHD004254983**

Dear Jamie Schiff:

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 Kautex Textron in Wilmington, OH during the 2009 calendar year. The total amount reported is approximately 17.12 tons as shown on the enclosed printout. This total indicates that Kautex Textron was a large quantity generator in 2009. Because I have not received a Hazardous Waste Annual Report for 2009, Kautex Textron may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC).

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. Generating hazardous waste above the threshold quantity for only one month will subject a site to the Annual Report requirement. 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.

To abate the violation of OAC Rule 3745-52-41, Kautex Textron must complete and submit to Ohio EPA a 2009 Hazardous Waste Annual 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. The 2009 forms and instructions can be found in Adobe Acrobat PDF format at

http://www.epa.ohio.gov/dhwm/ann_report/ann_report_2009.aspx. This same web site contains detailed information about filing electronically using the eDRUMS service in Ohio EPA's eBusiness Center (eBiz) at <https://ebiz.epa.ohio.gov/login.jsp>. The Responsible Official who will sign the report must have an eBiz account and PIN before they can apply for the service. Obtaining a PIN requires mailing to Ohio EPA a notarized signature and receiving

the PIN by return US mail. I encourage you to file electronically because it is efficient, easy to use, and prevents many common errors due to built-in error checking and validation.

Kautex Textron 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 Kautex Textron was not a large quantity generator in 2009, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that Kautex Textron did not generate more than the threshold quantity of hazardous waste in any month during 2009. 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 or eBiz at (614) 644-2891 or maryann.silagy@epa.state.oh.us. Your prompt attention to this matter is appreciated.

Sincerely,



Mary Ann Silagy, Environmental Specialist 2
Environmental Research and Information Services
Ohio EPA - Division of Materials and Waste Management
maryann.silagy@epa.state.oh.us
614-644-2891

enclosures

cc: Central File
DMWM, 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.

Generator Facility

Generator US EPA ID: OHD004254983
 Generator Name: Kautex Textron
 Address: 474 S Nelson Avenue
 Wilmington, OH 45177-0592
 Total Tons Shipped: 17.12

Receiving Facility

US EPA ID: OHD000816629
 Name: Spring Grove Resource Recovery Inc *
 Customer Name: Textron
 Customer Address: 474 South Nelson Ave
 Wilmington, OH 45177-

Waste Description: WASTE SODIUM HYDROXIDE SOLID Page: 1291 Subpage: 3136
 System Type: H141 Form: W002 Quantity: 25.00 P Density: 0
 D002

Waste Description: WASTE CORROSIVE LIQUID ACIDIC ORGANIC N.O.S. Page: 1291 Subpage: 3135
 System Type: H141 Form: W002 Quantity: 58.23 P Density: 0
 D002

Waste Description: WASTE FLAMMABLE LIQUIDS N.O.S. (PETROLEUM DISTILLATE) Page: 1291 Subpage: 3137
 System Type: H061 Form: W203 Quantity: 435.96 P Density: 0
 D001

Receiving Facility

US EPA ID: OHD980587364
 Name: Clean Harbors Recycling Services of Ohio LLC
 Customer Name: Textron
 Customer Address: 474 South Nelson Ave
 Wilmington, OH 45177-

Waste Description: WASTE METHYL ETHYL KETONE Page: 3120 Subpage: 8031
 System Type: H020 Form: W219 Quantity: 250.00 P Density: 0
 U158

Receiving Facility

US EPA ID: OHD000816629
 Name: Spring Grove Resource Recovery Inc *
 Customer Name: Textron
 Customer Address: 474 South Nelson Ave
 Wilmington, OH 45177-

Waste Description: WASTE SOLIDS CONTAINING FLAMMABLE LIQUID N.O.S. Page: 1291 Subpage: 3140
 System Type: H141 Form: W409 Quantity: 19330.00 P Density: 0
 D001 D005 D007

Waste Description: WASTE SOLIDS CONTAINING FLAMMABLE LIQUID N.O.S. Page: 1291 Subpage: 3139
 System Type: H061 Form: W409 Quantity: 14000.00 P Density: 0
 D001 D005 D007

Waste Description: WASTE FLAMMABLE LIQUIDS N.O.S. (N-BUTANOL NAPHTHA) Page: 1291 Subpage: 3138
 System Type: H061 Form: W209 Quantity: 150.00 P Density: 0
 D001 F003

Paula Canter - Re: Kautex Textron in Wilmington

Contact TSD?

From: Cathy Altman
To: Canter, Paula
Date: 9/23/2010 4:00 PM
Subject: Re: Kautex Textron in Wilmington

I have not dealt with them since the CRO and that letter went to their Wilmington facility. I never dealt with anyone beyond that plant - sorry!

>>> Paula Canter 9/23/2010 11:17 AM >>>

We need to send an annual report NOV to Kautex Textron in Wilmington (OHD004254983) because they shipped 17.12 tons in-state in 2009. They completed CRO so I assume they are closed - the ID was inactivated in November 2009 per their request. Do you know of a name and address we could send the NOV to?

*1-401-421-2800 Gen # in Prov RI
VM 6/29/11*

