



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

August 6, 2008

TERRY HUNTER
STAHL CORPORATION
201 CUNNARD ST
CARDINGTON, OH 43315

eval 008
enf 009
KD

Re: 2007 Hazardous Waste Annual Report Requirement
STAHL CORPORATION, CARDINGTON - OHD004287355

Dear TERRY HUNTER:

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 STAHL CORPORATION during the 2007 calendar year. The total amount reported is approximately 13.66 tons as shown on the enclosed printout. This total indicates that STAHL CORPORATION was a large quantity generator in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, STAHL CORPORATION 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. 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, STAHL CORPORATION 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 may access the reporting forms and instructions on our website at http://www.epa.state.oh.us/dhwm/ann_report.html.

STAHL CORPORATION 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

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

transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

If STAHL CORPORATION 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 STAHL CORPORATION 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, CDO

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: OHD004287355

Generator Name: Stahl Corporation

Address: 201 Cunard St
Cardington, OH 43315-

Total Tons Shipped: 13.66

Receiving Facility

US EPA ID: OHD001926740

Name: Hukill Chemical Corporation

Customer Name: Stahl Manufacturing

Customer Address: 201 Cunard Street
Cardington, OH 43315-

Waste Description: Waste Diesel Fuel & Water	Page: 598	Subpage: 18850
System Type: H061 Form: W211 Quantity: 440.00 P Density: 8 Lbs. / Gal.		
D001		

Waste Description: Waste Thinner and Paint Sludge	Page: 598	Subpage: 16911
System Type: H061 Form: W211 Quantity: 26400.00 P Density: 8 Lbs. / Gal.		
F005 D001 F003		

Waste Description: Fremont 223 Coil Cleaner	Page: 598	Subpage: 19425
System Type: H141 Form: W103 Quantity: 480.00 P Density: 8 Lbs. / Gal.		
D002		

