



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

July 18, 2008

AARON P UGRAN
PARKER HANNIFIN HPD
30240 LAKELAND BLVD
WICKLIFFE, OH 44092

Re: 2007 Hazardous Waste Annual Report Requirement
PARKER HANNIFIN HPD, WICKLIFFE - OHD004448809

eval 007
enf 084 (FD)

Dear AARON P UGRAN:

My review of manifest data from the Michigan Department of Environmental Quality (MI DEQ) has revealed that one or more shipments of hazardous waste were sent by PARKER HANNIFIN HPD to receiving facilities in Michigan during the 2007 calendar year. The total is approximately 168.45 tons as shown on the enclosed printout. This total indicates that PARKER HANNIFIN HPD was a large quantity generator of hazardous waste in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, PARKER HANNIFIN HPD 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, PARKER HANNIFIN HPD 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

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

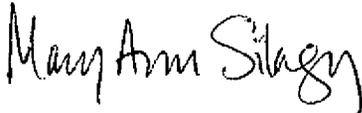
Assurance Section for consideration of escalated enforcement. The reporting forms and instructions are on our Web site at http://www.epa.state.oh.us/dhwm/ann_report.html.

PARKER HANNIFIN HPD 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 PARKER HANNIFIN HPD 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 PARKER HANNIFIN HPD did not generate more than the threshold quantity of hazardous waste in any month during 2007. If you believe that the manifest information supplied by MI DEQ 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
Ohio EPA - Division of Hazardous Waste Management
maryann.silagy@epa.state.oh.us

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.

2007 Michigan DEQ Manifest Data for Ohio Generators

8.34 lbs/gal density assumed

Receiving Facility	Qty	Unit	Tons	Mgmt Method	Waste Code(s)
OHD004448809 PARKER HANNIFIN HPD					
<i>10/04/2007</i>					
000361488JJK					
MID000724831	20	Y	16.84	H111	D006
000361489JJK					
MID000724831	20	Y	16.84	H111	D006
<i>10/05/2007</i>					
000361492JJK					
MID000724831	20	Y	16.84	H111	D006
000361493JJK					
MID000724831	20	Y	16.84	H111	D006
<i>10/08/2007</i>					
000361491JJK					
MID000724831	20	Y	16.84	H111	D006
000362503JJK					
MID000724831	20	Y	16.84	H111	D006
<i>10/09/2007</i>					
000361487JJK					
MID000724831	20	Y	16.84	H111	D006
000361490JJK					
MID000724831	20	Y	16.84	H111	D006
<i>10/10/2007</i>					
000361494JJK					
MID000724831	20	Y	16.84	H111	D006
000361495JJK					
MID000724831	20	Y	16.84	H111	D006

Total Tons for Generator 168.45

