



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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

July 22, 2008

David King
King – Ohio Forge
8250 Boyle Pkwy
Twinsburg, OH 44087-2200

Re: 2007 Hazardous Waste Annual Report Requirement
KING – OHIO FORGE, KENTON – OHD004558383

eval 007

enf 006

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Dear David King:

My review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) and manifest data from Michigan's Department of Environmental Quality has revealed that one or more shipments of hazardous waste were received from King – Ohio Forge during the 2007 calendar year. The amounts reported, 152.02 tons and 96.20 tons respectively for a total of 248.22 tons, indicate that this site was a large quantity generator in 2007. Enclosed are printouts of the shipment information. Because I have not received a Hazardous Waste Annual Report for 2007, King – Ohio Forge 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, King – Ohio Forge 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

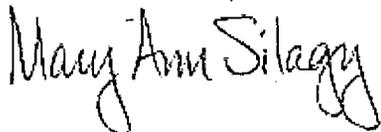
Assurance Section for consideration of escalated enforcement. The reporting forms and instructions are on our Web site at http://www.epa.state.oh.us/dhwm/ann_report.html.

King – Ohio Forge 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 King – Ohio Forge 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 King – Ohio Forge 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 TSDs or 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

enclosures

cc: Central File
DHWM, NWDO
Terrence S. Finn, Esq., Roetzel & Andress

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: OHD004558383

Generator Name: UNKNOWN

Address: UNKNOWN

Total Tons Shipped: 152.02

Receiving Facility

US EPA ID: OHD001926740

Name: Hukill Chemical Corporation

Customer Name: King Ohio Forge- Kenton

Customer Address: 820 Steiner Ave.
Kenton, OH 43326-

Waste Description: Waste Oil and water- fuelable	Page: 224	Subpage: 19738
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System Type: H061	Form: W206	Quantity: 88040.00 P	Density: 8	Lbs. / Gal.
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D012 D017 D023 D025 D027 D031 D040 D043 D006 D015 D018 D019 D028 D029 D032 D034 D035 D004 D014 D020 D022 D033 D041 D001 D024
D026 D042 D005 D021 D039 D007 D011 D013 D008 D009 D016 D030 D036 D037 D038

Waste Description: Waste Oil and water-Hazwater	Page: 224	Subpage: 19910
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System Type: H141	Form: W206	Quantity: 216000.00 P	Density: 8	Lbs. / Gal.
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D012 D017 D023 D025 D027 D031 D040 D043 D006 D015 D018 D019 D028 D029 D032 D034 D035 D004 D014 D020 D022 D033 D041 D001 D024
D026 D042 D005 D021 D039 D007 D011 D013 D008 D009 D016 D030 D036 D037 D038



2007 Michigan DEQ Manifest Data for Ohio Generators

8.34 lbs/gal density assumed

Receiving Facility	Qty	Unit	Tons	Mgmt Method	Waste Code(s)					
OHD004558383 KING - OHIO FORGE										
<i>11/29/2007</i>										
000290785FLE										
MID980991566	26320	P	13.16	H111	D001 D004 D005 D006 D007 D008					
000290786FLE										
MID980991566	32000	P	16.00	H111	D001 D004 D005 D006 D007 D008					
000290787FLE										
MID980991566	32000	P	16.00	H111	D001 D004 D005 D006 D007 D008					
000290788FLE										
MID980991566	32000	P	16.00	H111	D001 D004 D005 D006 D007 D008					
000290789FLE										
MID980991566	32000	P	16.00	H111	D001 D004 D005 D006 D007 D008					
<i>12/27/2007</i>										
000290728FLE										
MID980991566	19040	P	9.52	H111	D001 D004 D005 D006 D007 D008					
000290729FLE										
MID980991566	19040	P	9.52	H111	D001 D004 D005 D006 D007 D008					
<i>Total Tons for Generator</i>					96.20					

