



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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

August 6, 2008

WILLIAM G RICHARDSON
SIKA CORP (FORMER ICS GARLAND INC)
4500 WILLOW PARKWAY
CLEVELAND, OH 44125

env 003 (100)
enf 002

**Re: 2007 Hazardous Waste Annual Report Requirement
SIKA CORP (FORMER ICS GARLAND INC), CLEVELAND - OHD020631750**

Dear WILLIAM G RICHARDSON:

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 SIKA CORP (FORMER ICS GARLAND INC) during the 2007 calendar year. The total amount reported is approximately 13.66 tons as shown on the enclosed printout. This total indicates that SIKA CORP (FORMER ICS GARLAND INC) was a large quantity generator in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, SIKA CORP (FORMER ICS GARLAND INC) 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, SIKA CORP (FORMER ICS GARLAND INC) 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.

SIKA CORP (FORMER ICS GARLAND INC) should have on file the manifest records necessary for completion of the reports. OAC Rule 3745-52-40 requires generators to keep a

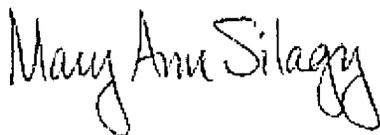
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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 SIKA CORP (FORMER ICS GARLAND INC) 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 SIKA CORP (FORMER ICS GARLAND INC) 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: OHD020631750
 Generator Name: Garland Floor Co
 Address: 4500 Willow Pkwy
 Cleveland, OH 44125-
 Total Tons Shipped: 13.66

Receiving Facility

US EPA ID: OHD980897656
 Name: Chemical Solvents Inc
 Customer Name: ICS GARLAND INC (now SIKA CORP)
 Customer Address: 4500 WILLOW PARKWAY
 CLEVELAND, OH 44125-

Waste Description: CATCH BASIN SLUDGE	Page: 371	Subpage: 1
System Type: H061 Form: W113 Quantity: 450.00 G Density: 8.33 Lbs. / Gal.		
F002 F005 D007 D008		
Waste Description: CATCH BASIN SLUDGE	Page: 371	Subpage: 1
System Type: H141 Form: W409 Quantity: 110.00 G Density: 8.33 Lbs. / Gal.		
F002 F005 D007 D008		
Waste Description: FLUSH SOLVENT	Page: 371	Subpage: 1
System Type: H020 Form: W203 Quantity: 110.00 G Density: 8.41 Lbs. / Gal.		
D001 D007 D008 F003		
Waste Description: OBSOLETE PRODUCT	Page: 371	Subpage: 1
System Type: H141 Form: W606 Quantity: 55.00 G Density: 8.41 Lbs. / Gal.		
D001 D008 F003		
Waste Description: FLUSH SOLVENT	Page: 371	Subpage: 1
System Type: H141 Form: W609 Quantity: 55.00 G Density: 8.41 Lbs. / Gal.		
D001 D007 D008 F003		
Waste Description: OBSOLETE PRODUCT	Page: 371	Subpage: 1
System Type: H061 Form: W203 Quantity: 275.00 G Density: 8.41 Lbs. / Gal.		
D001 D008 F003		
Waste Description: FLUSH SOLVENT	Page: 371	Subpage: 1
System Type: H061 Form: W203 Quantity: 2200.00 G Density: 8.41 Lbs. / Gal.		
D001 D007 D008 F003		

