



010/005

State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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MAILING ADDRESS:

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Columbus, OH 43216-1049

October 3, 2007

MARILYN E BLADEL  
DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1  
4400 CHRYSLER DR  
TOLEDO, OH 43608

**Re: 2006 Hazardous Waste Annual Report Requirement  
DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1, TOLEDO - OHD048784862**

Dear MARILYN E BLADEL:

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 shipped by DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 to receiving facilities in Michigan during the 2006 calendar year. The total is approximately 106.9 tons as shown on the enclosed printout. This total indicates that DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 was a large quantity generator of hazardous waste in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 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, DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 must complete and submit to Ohio EPA a 2006 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. The reporting forms and instructions are on our Web site at [http://www.epa.state.oh.us/dhwm/ann\\_report.html](http://www.epa.state.oh.us/dhwm/ann_report.html).

DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 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 DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 was not a large quantity generator in 2006, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that DAIMLER CHRYSLER TOLEDO ASSEMBLY PLANT 1 did not generate more than the threshold quantity of hazardous waste in any month during 2006. 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) 644-2923. Your prompt attention to this matter is appreciated.

Sincerely,

*Paula Canter*

Paula Canter  
Environmental Specialist 3  
Regulatory and Information Services  
Division of Hazardous Waste Management  
paula.canter@epa.state.oh.us

cc: Central File  
DHWM, NWDO

**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.

Michigan DEQ 2006 Manifest Records for Ohio generators as of late August 2007

8.34 lbs/gal and 1 cubic yard = 1 ton assumed for conversion of volume to weight.

Manifest Date & Number	Receiver ID	Mgmt Method	Gallons	Cubic Yards	Pounds	Tons (Converted)
<b>OHD048784862</b>						
<b>02/21/2006</b>						
MI8729671	MID005338801		4000	0	0	16.68 D001
<b>04/13/2006</b>						
MI8729679	MID005338801		3900	0	0	16.26 D001
<b>06/05/2006</b>						
MI8729680	MID005338801		4000	0	0	16.68 D001
<b>07/05/2006</b>						
MI8729681	MID005338801		2579	0	0	10.75 D001
<b>07/06/2006</b>						
MI8729683	MID005338801		4200	0	0	17.51 D001
<b>07/07/2006</b>						
MI10108951	MID980991566		165	0	0	0.69 D002
MI10108951	MID980991566		50	0	0	0.21 D002
MI10333799	MID980615298		3840	0	0	16.01 D001
<b>12/26/2006</b>						
000314130FLE	MID980991566	H111	165	0	0	0.69 D002
000314130FLE	MID980991566	H141	165	0	0	0.69 D001
<b>12/28/2006</b>						
000314129FLE	MID074259565	H141	5	0	0	0.02 D001
000314129FLE	MID074259565	H141	1	0	0	0.00 D001 D002
000314129FLE	MID074259565	H077	9	0	0	0.04 D002
000314129FLE	MID074259565	H077	10	0	0	0.04 D002
000314129FLE	MID074259565	H141	3	0	0	0.01 D002
000314129FLE	MID074259565	H141	3	0	0	0.01 D040 029L
000314132FLE	MID980615298	H141	1000	0	0	4.17 F003 F005 D001 D035
000314132FLE	MID980615298	H141	825	0	0	3.44 F003 F005 D001 D035
<b>12/29/2006</b>						
000314131FLE	MID980991566	H111	110	0	0	0.46 D002
000314133FLE	MID980615298	H141	0	0	1800	0.90 D001
000314133FLE	MID980615298	H141	0	0	5	0.00 D001
000314133FLE	MID980615298	H141	330	0	0	1.38 F003 F005 D001 D035
000314133FLE	MID980615298	H141	0	0	500	0.25 D001
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<b>106.90 Total Tons for</b>			<b>OHD048784862</b>			

