



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

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

September 24, 2009

Randy Parker
SHILOH INDUSTRIES, INC.
880 Steel Dr
VALLEY CITY, OH 44280

**Re: 2008 Hazardous Waste Annual Report Requirement – Notice of Violation
SHILOH INDUSTRIES, INC., PARMA - OHD059058263**

Dear Randy Parker:

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 SHILOH INDUSTRIES, INC. during the 2008 calendar year. The amounts reported, 51.76 tons and 0.96 tons respectively for a total of 52.72 tons, indicate that this site was a large quantity generator in 2008. Enclosed are printouts of the shipment information. Because I have not received a Hazardous Waste Annual Report for 2008, SHILOH INDUSTRIES, 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 or visiting our web site noted below 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, SHILOH INDUSTRIES, INC. must complete and submit to Ohio EPA a 2008 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.ohio.gov/dhwm/ann_report.aspx

SHILOH INDUSTRIES, INC. 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

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

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BKA
10/18/10
OHD 2570

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 SHILOH INDUSTRIES, INC. was not a large quantity generator in 2008, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that SHILOH INDUSTRIES, INC. did not generate more than the threshold quantity of hazardous waste in any month during 2008. 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

enclosures

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: OHD059058263
 Generator Name: Shiloh Industries Inc MTD Automotive Div *
 Address: 5389 W 130th St
 Cleveland, OH 44130-1094
 Total Tons Shipped: 51.76

Receiving Facility

US EPA ID: OHD066060609
 Name: CHEMTRON CORPORATION
 Customer Name: SHILOH AUTOMOTIVE, INC.
 Customer Address: 5389 W. 130TH
 CLEVELAND, OH 44130-

Waste Description:	WASTE LIQUID CHLORINATED SOLVENTS	Page:	3538	Subpage:	1
System Type:	H061 Form: W202 Quantity: 100.00 P Density:				
D040 U228 D002 U080 U226					
Waste Description:	WASTE KEROSENE	Page:	3538	Subpage:	1
System Type:	H061 Form: W219 Quantity: 413.00 P Density:				
D001					
Waste Description:	WASTE HARDENER ORGANIC BASE	Page:	3538	Subpage:	1
System Type:	H141 Form: W219 Quantity: 551.00 P Density:				
D002					
Waste Description:	CLEAN OUT OF LABELED UNUSED MATERIALS	Page:	3538	Subpage:	1
System Type:	H141 Form: W219 Quantity: 42.00 P Density:				
D002					
Waste Description:	FLOOR WOOD BLOCK	Page:	3538	Subpage:	1
System Type:	H141 Form: W002 Quantity: 50571.00 P Density:				
D008					
Waste Description:	WASTE OXIDIZING TEST KIT LABPACK	Page:	3539	Subpage:	1
System Type:	H141 Form: W001 Quantity: 2.00 P Density:				
D001 D007 D011					
Waste Description:	SODIUM PERSULFATE WASTE	Page:	3539	Subpage:	1
System Type:	H141 Form: W119 Quantity: 75.00 P Density:				
D001 D002					
Waste Description:	WASTE INORGANIC ACID	Page:	3539	Subpage:	1
System Type:	H141 Form: W103 Quantity: 3.00 P Density:				
D002					

DUPL.

Waste Description:	WASTE LIQUID CHLORINATED SOLVENTS	10 G	Page:	3538	Subpage:	1
System Type:	H061 Form: W202 Quantity: 100.00 P Density:	✓				
D040 U228 D002 U080 U226						
Waste Description:	WASTE KEROSENE	55 G	Page:	3538	Subpage:	1
System Type:	H061 Form: W219 Quantity: 413.00 P Density:	✓				
D001						
Waste Description:	WASTE HARDENER ORGANIC BASE		Page:	3538	Subpage:	1
System Type:	H141 Form: W219 Quantity: 551.00 P Density:	110 G				
D002						
Waste Description:	CLEAN OUT OF LABELED UNUSED MATERIALS		Page:	3538	Subpage:	1
System Type:	H141 Form: W219 Quantity: 42.00 P Density:	60 G				
D002						
Waste Description:	FLOOR WOOD BLOCK		Page:	3538	Subpage:	1
System Type:	H141 Form: W002 Quantity: 50571.00 P Density:	✓				
D008						

Chemt. weigh

Generator Facility

Generator US EPA ID: OHD059058263
 Generator Name: Shiloh Industries Inc MTD Automotive Div *
 Address: 5389 W 130th St
 Cleveland, OH 44130-1094

Total Tons Shipped: 51.76

Receiving Facility

US EPA ID: OHD066060609
 Name: CHEMTRON CORPORATION
 Customer Name: SHILOH INDUSTRIES/CLEVELAND
 Customer Address: 880 STEEL DRIVE
 VALLEY CITY, OH 44280-

Waste Description:	WASTE OXIDIZING TEST KIT LABPACK	Page:	3539	Subpage:	1
System Type:	H141 Form: W001 Quantity: 2.00 P Density:				
	D001 D007 D011				

Waste Description:	SODIUM PERSULFATE WASTE	Page:	3539	Subpage:	1
System Type:	H141 Form: W110 Quantity: 75.00 P Density:				
	D001 D002				

Waste Description:	WASTE INORGANIC ACID	Page:	3539	Subpage:	1
System Type:	H141 Form: W103 Quantity: 3.00 P Density:				
	D002				

2008 Michigan Manifest Data for Ohio Generators 09/10/2009

Handler names are from RCRAInfo

8.34 lbs/gal density assumed

Quantity and Unit	Tons	Mgmt Method	Waste Code(s)
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OHD059058263 SHILOH INDUSTRIES, INC.

01/23/2008

003460252JJK

MID980991566	100 P ✓	0.05	H111 D007 D008
MID980991566	800 P ✓	0.40	H111 D001
MID980991566	2 P ✓	0.00	H111 DQ09

003460253JJK

MID980991566	5 P ✓	0.00	H111 D001
MID980991566	50 P ✓	0.03	H111 D040 U226 U228
MID980991566	200 P ✓	0.10	H111 D001
MID980991566	55 G ✓	0.23	H111 D002

01/31/2008

000235116JJK

MID000724831	300 P ✓	0.15	H111 R001
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Total Tons for Generator 0.96