



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

August 8, 2008

*2nd NOV never sent*

JEFFREY M DAVIS  
CONTAINER COMPLIANCE CORP  
5151 DENISON AVE  
CLEVELAND, OH 44102

*eral 031 (KJ)  
omF 030*

**Re: 2007 Hazardous Waste Annual Report Requirement  
CONTAINER COMPLIANCE CORP, CLEVELAND - OHD060431947**

Dear JEFFREY M DAVIS:

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 CONTAINER COMPLIANCE CORP during the 2007 calendar year. The amounts reported, 42.00 tons and 13.28 tons respectively for a total of 55.28 tons, indicate that CONTAINER COMPLIANCE CORP 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, CONTAINER COMPLIANCE CORP 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, CONTAINER COMPLIANCE CORP 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](http://www.epa.state.oh.us/dhwm/ann_report.html).

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

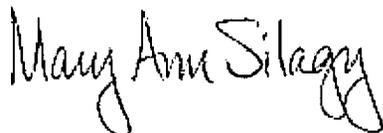


CONTAINER COMPLIANCE CORP should have on file the manifest records necessary for completion of the reports. OAC Rule 3745-52-40 requires generators to keep a signed copy of each manifest for a period of at least three years from the date the waste was accepted by the initial transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

If CONTAINER COMPLIANCE CORP 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 CONTAINER COMPLIANCE CORP 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

enclosures

cc: Central File ✓  
DHWM, CO – Tammy Heffelfinger  
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.

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**Generator Facility**

**Generator US EPA ID:** OHD060431947  
**Generator Name:** Container Compliance Corp  
**Address:** 5151 Denison Ave  
Cleveland, OH 44102-  
**Total Tons Shipped:** 42.00

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**Receiving Facility**

**US EPA ID:** OHD020273819  
**Name:** Vickery Environmental Inc  
**Customer Name:** CONTAINER COMPLIANCE CORP  
**Customer Address:** 5151 DENISON AVE  
CLEVELAND, OH 44102-

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**Waste Description:** CAUSTIC RINSE WATER

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**System Type:** H134    **Form:** W110    **Quantity:** 42.00 T    **Density:**  
D002

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2007 Michigan DEQ Manifest Data for Ohio Generators

Receiving Facility	Qty	Unit	Tons	Mgmt Method	Waste Code(s)
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8.34 lbs/gal density assumed

OHD060431947 CONTAINER COMPLIANCE CORP

06/06/2007

000081213WAS

MID980991566	26550	P	13.28	H141	D001
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Total Tons for Generator 13.28

