



State of Ohio Environmental Protection Agency

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March 28, 2007

Mr. Ronald Guenther  
Chemtron Corporation  
35850 Schneider Court  
Avon, Ohio 44011

**Re: Notice of Violation of the 2006 Hazardous Waste Annual Report Requirement  
(Chemtron Corporation - OHD066060609)**

Dear Mr. Guenther:

The Division of Hazardous Waste Management (DHWM) received Chemtron's 2006 Hazardous Waste Annual Report electronically on March 1, 2007. Upon review of this report, I have discovered some items that are violations of the Ohio Administrative Code Chapter 3745-54-75, and other areas of concern that need to be addressed. I have listed these items below. Please review each one and send me a response addressing each item within 30 days of receipt of this letter.

**Violation - OAC 3745-54-75(E)**

Chemtron is not accurately reporting their wastes generated from on-site treatment. Residuals are being listed from methods that Chemtron does not use to manage hazardous wastes received from off-site. Specifically, GM pages 95 and 96 list residuals from underground injection (H134), which Chemtron does not do on-site; it's illogical to have residuals from underground injection. GM pages 221-2 list residuals from incineration (H040), also a method that Chemtron does not use. The Process Systems form and the Waste Receipts indicate that the management methods used during 2006 were Metal Recovery (H010), Solvent Recovery (H020), Fuel Blending (H061), and "DEACTIVATION OF FLAMMABLE AND/OR CORROSIVE CHARACTERISTICS" (H129). DHWM would only expect to see residuals from these processes being reported. The waste descriptions on the pages in question are 'F-listed water from fuel blending and stills,' and 'Still bottoms from fuel blending and stills.' Please review those four GM pages and make the necessary amendments to accurately reflect the management method for these residuals.

**Violation - OAC 3745-54-75(C)**

Chemtron lists hazardous waste received from Trail King in Pennsylvania under an invalid EPA RCRA ID number. Chemtron lists PAD987397170, and the correct ID number should be PAD987397171. Please make this correction to your records.

**Concern – GM page 104**

Chemtron lists residuals from fuel blending on this page, but with a quantity generated during 2006 of zero. Looking at the 2005 report, I don't see any fuel blended material being left on-site in > 90-day storage, so I'm concerned that the quantity generated should be greater than zero. Please review this page and include any appropriate amendments or comments with your response.

**Concern – GM page 162**

Chemtron lists "Ohio EPA Special Waste" and no waste codes are listed. The software is not supposed to allow the export of data with missing information such as this, so I'm assuming it did not export properly. If this was a hazardous waste, please provide me with the wastes codes that apply to this waste stream so that I can add them to our copy of the report. If it is not hazardous, it should not be included in the report.

**Concern – WR 4492**

Chemtron reports waste received from Roman Chariot in Cleveland OH under OHG000029766. OHG ID numbers are assigned by the state of Michigan for non-hazardous waste shipments. They are not RCRA ID numbers. Please include a copy of the hazardous waste manifest from this generator so that I can contact them regarding use of that number. I do not see any RCRA ID number assigned to their location, so we will inquire if they need one.

**Concern – GM page 145**

Year	Waste Generated as H010 residual (G25) Pounds	Waste rec'd from off-site (G61)	Shipped Qty in report in Pounds	Amt left in > 90 day storage as of Dec 31 in Pounds
2001	0?	X	2490	16185
2002	12694		0	12694
2003	14694		14694	11637
2004	0?	X	21033	9745
2005	23299		23299	4331
2006	13630		13630	40

Chemtron reports 13,630 P of "mercury contaminated debris and devices" generated and 13,630 P shipped in 2006, with 40 P in >90 day storage. The problem with this is the 2005 report lists about 23,000 P generated and the same exact amount shipped during 2005 with approximately 4000 P left on-site in >90 day storage. Both of these years show this waste stream as being generated on-site as a residual from metal recovery (H010). The 2004 report does not appear to include this same waste stream being generated on-site. It lists this same waste description as Source Code G61 (received from off-site), and not managed on-site, but shipped off, with approximately 9700 P left on-site in >90 day storage at the end of 2004. My concern is that not all the waste shipped is being included in the reports.

## Manifest Requests

I am requesting copies of the hazardous waste manifests from the following generators for wastes received during 2006:

New London Regalia	4300 Rte 162 W	New London	44851	Specifically the manifest with ID OHD000039164 WR 3669
OHIO EPA/94320	4675 HOMER-OHIO LANE	GROVEPORT	43125	WR 3842-4
RICKENBACKER INT'L AIRPORT	7161 SECOND ST.	Columbus	43217	WR 4450
DYNEA USA INC	6175 AMIERCAN ROAD	Toledo	43612	WR 1800-3
Aero Classics	1710 Sawmill Pkwy	Huron	44839	WR 372-3
Anamax	599 Frank Rd	Columbus	43223	WR 586-590
Battelle	505 King Ave	Columbus	43201	WR 755
Formed Fiber	1630 Ferguson St	Sidney	45365	WR 2166-8
Hobart Brothers	101 Trade Square East	Troy	45373	WR 2686-7
Hospira	268 E Fourth St	Ashland	44805	WR 2725-30
Mold and Surface Textures	4485 Crystal Parkway	Kent	44240	WR 3471-2
Rheinchemie	1779 Marvo Dr	Akron	44306	WR 4422-3
Stavelly Services Fluid	18419 Euclid	Cleveland	44112	WR 4924-6

Customer Corrections that I have made to your report include the following:

Page	Incorrect Information	Corrected
WR 284	OHCESQG – AL Pavey	OHR000013987 CESQG
WR 296	OHCESQG – Aber's Truck	OHD987030368 SQG
WR 394	OHCESQG – Ahner	OH0000008458 CESQG
WR 970	OHCESQG – Carriage Hill	OHD082328717 SQG
WR 1175-6	OHCESQG – City of Youngstown	OHD987043601 SQG
WR 1208	OHCESQG – Clifton Cleaners	OHD017731670 SQG
WR 1263	OH0981956261	OHD981956261
WR 1290-1	OHCESQG – Conagra Food	OHR000019737 SQG
WR 1836-7	OHD000098954	OH0000098954
WR 2120-1	OHCESQG – Fluke Biomedical	OHR000025551 SQG
WR 2244-6	OHCESQG - Garfield Elementary	OHR000138404 SQG
WR 2593	OHCESQG – Hamilton's Body	OHD987055126 CESQG
WR 2703-5	OHCESQG – Home Depot 3860	OHR000123307 SQG
WR 2706	OHCESQG – Home Depot 3889	OHR000135194 SQG

WR 3126-7	OHCESQG – La France Cleaners	OHD053580189 SQG
WR 3223	OHCESQG – Lincoln Way Motors	OHD064104870 CESQG
WR 3521	OHCESQG – Motta's Body & Frame	OHD070754437 SQG
WR 3698	OHD000298489	OH0000298489
WR 3734	Zip code - 44214	44254
WR 3865	OHD000107714	OH0000107714
WR 3926	OHCESQG – Optimum Therapeutics	OHR000126797 CESQG
WR 4006	OHCESQG – Parma High School	OHD981530850 SQG
WR 4117	OHCESQG – Pitt Ohio	OHD124435314 SQG
WR 4231-2	OHCESQG – Press Work	OHD076762269 SQG
WR 4471-2	OHD000003475	OHR000003475
WR 4511	OHCESQG – Rubbermaid	OHR000136036 SQG
WR 4636	OHCESQG – Seneca Millwork	OHR000138412 SQG
WR 5246-9	OH0987050119	OHD987050119
WR 5372	OHCESQG – Ultra Cleaners	OHD987032265 SQG
WR 5519-22	OHCESQG – Valley Forge HS	OHR000116525 SQG

The ID numbers I have added are those for sites with active ID numbers. Please remind your customers that if they have an active EPA RCRA ID number, they should be using it on hazardous waste manifests. Additionally, if Chemtron is receiving quantities of hazardous waste from a generator in the SQG or larger quantity range, you should be inquiring about an ID if the generator is not providing it on the manifest.

I will expect a response to the items above in 30 days of receipt of this letter. I can answer any questions concerning the Annual Report at (614) 644-2954 or [tammy.heffelfinger@epa.state.oh.us](mailto:tammy.heffelfinger@epa.state.oh.us)

Sincerely,



Tammy Heffelfinger  
Annual Report Coordinator  
Regulatory and Information Services  
Division of Hazardous Waste Management

cc: (Central File)  
ec: 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.