



State of Ohio Environmental Protection Agency

STREET 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

MAILING ADDRESS:

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

22
August 8, 2008

STEVE MANDEVILLE
CLEVELAND STEEL - NILES
115 ERIE ST
NILES, OH 44446

original returned by USPS.
resent to 412 Mason St
Niles OH 44446
330/544-2275

(from ecer info / return env.)

Re: 2007 Hazardous Waste Annual Report Requirement
CLEVELAND STEEL - NILES, NILES - OHD068892504

encl 006 10
encl 005

Dear STEVE MANDEVILLE:

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 CLEVELAND STEEL - NILES during the 2007 calendar year. The total amount reported is approximately 49.73 tons as shown on the enclosed printout. This total indicates that CLEVELAND STEEL - NILES was a large quantity generator in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, CLEVELAND STEEL - NILES 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, CLEVELAND STEEL - NILES 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.

CLEVELAND STEEL - NILES 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

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



transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

If CLEVELAND STEEL - NILES 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 CLEVELAND STEEL - NILES 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: OHD068892504
 Generator Name: Cleveland Steel Container Corp
 Address: 115 Erie St
 Niles, OH 44446-
 Total Tons Shipped: 49.73

Receiving Facility

US EPA ID: OHD980897656
 Name: Chemical Solvents Inc
 Customer Name: CLEVELAND STEEL CONTAIN
 Customer Address: 412 MASON STREET
 NILES, OH 44446-

Waste Description: LINE FLUSH SOLVENT	Page: 170	Subpage: 1
System Type: H020 Form: W203 Quantity: 56130.00 P Density: 6.66 Lbs. / Gal.		
D035 F005 D001 F003		
Waste Description: PAINT RAGS	Page: 170	Subpage: 1
System Type: H141 Form: W002 Quantity: 14751.00 P Density: 6.66 Lbs. / Gal.		
D035 F005 D001 D005 F003		
Waste Description: PAINT FILTERS	Page: 170	Subpage: 1
System Type: H141 Form: W310 Quantity: 20598.00 P Density: 8.5 Lbs. / Gal.		
D035 F005 D001 D005 F003		
Waste Description: OBSOLETE PAINT	Page: 170	Subpage: 1
System Type: H141 Form: W409 Quantity: 600.00 P Density: 9.17 Lbs. / Gal.		
D035 D001		
Waste Description: OBSOLETE PAINT	Page: 170	Subpage: 1
System Type: H061 Form: W209 Quantity: 2150.00 P Density: 9.17 Lbs. / Gal.		
D035 D001		
Waste Description: LINE FLUSH SOLVENT	Page: 170	Subpage: 1
System Type: H061 Form: W203 Quantity: 5060.00 P Density: 6.66 Lbs. / Gal.		
D035 F005 D001 F003		
Waste Description: UNUSED SODIUM HYDROXIDE SOLUTION	Page: 170	Subpage: 1
System Type: H141 Form: W110 Quantity: 180.00 P Density: 10 Lbs. / Gal.		
D002		

