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Not Resolvable

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

August 31, 2007

Commissioner Fred Szabo  
Cleveland Hopkins International Airport  
PO Box 81009  
Cleveland, OH 44181-0009

**Re: 2006 Hazardous Waste Annual Report Requirement  
Cleveland Hopkins International Airport – OHD076755081**

Dear Mr. Szabo:

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 Hopkins International Airport during the 2006 calendar year. The total amount reported indicates that Cleveland Hopkins International Airport was a large quantity generator in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, Cleveland Hopkins International Airport may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC). Please see the enclosed printout detailing the hazardous wastes received from Cleveland Hopkins International Airport during 2006.

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 Hopkins International Airport 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. 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).

Cleveland Hopkins International Airport 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 Cleveland Hopkins International Airport 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 Cleveland Hopkins International Airport did not generate more than the threshold quantity of hazardous waste in any month during 2006. 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) 644-2923. 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](mailto:paula.canter@epa.state.oh.us)

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: OHD076755081

Generator Name: Cleveland Hopkins International Airport

Address: 5300 Riverside Dr  
Cleveland, OH 44135-3193

Total Tons Shipped: 50.43

**Receiving Facility**

US EPA ID: OHD980897656

Name: Chemical Solvents, Inc.

Customer Name: CLEVELAND HOPKINS AIRPO

Customer Address: 5300 RIVERSIDE DRIVE  
CLEVELAND, OH 44135-

|                    |                               |            |           |            |               |             |            |
|--------------------|-------------------------------|------------|-----------|------------|---------------|-------------|------------|
| Waste Description: | PAINT & SOLVENTS              |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H141                          | Form: W604 | Quantity: | 40.00 G    | Density: 7.08 | Lbs. / Gal. |            |
|                    | F005 D001 F003                |            |           |            |               |             |            |
| Waste Description: | PAINT & SOLVENTS              |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H061                          | Form: W211 | Quantity: | 67.00 G    | Density: 7.08 | Lbs. / Gal. |            |
|                    | F005 D001 F003                |            |           |            |               |             |            |
| Waste Description: | LUBRICANTS/RUST PREVENTATIVES |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H061                          | Form: W211 | Quantity: | 52.00 G    | Density: 6.67 | Lbs. / Gal. |            |
|                    | D001                          |            |           |            |               |             |            |
| Waste Description: | JET FUEL & WATER              |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H061                          | Form: W219 | Quantity: | 11457.00 G | Density: 8.33 | Lbs. / Gal. |            |
|                    | D001                          |            |           |            |               |             |            |
| Waste Description: | GASOLINE/DIESEL/ABSORBANTS    |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H141                          | Form: W310 | Quantity: | 3100.00 P  | Density: 10   | Lbs. / Gal. |            |
|                    | D018 D001                     |            |           |            |               |             |            |
| Waste Description: | ROOF COATINGS                 |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H141                          | Form: W606 | Quantity: | 150.00 G   | Density: 7.5  | Lbs. / Gal. |            |
|                    | D001                          |            |           |            |               |             |            |
| Waste Description: | AEROSOLS                      |            |           |            |               | Page: 207   | Subpage: 1 |
| System Type:       | H141                          | Form: W001 | Quantity: | 100.00 P   | Density: 6.66 | Lbs. / Gal. |            |
|                    | D001                          |            |           |            |               |             |            |

