



State of Ohio Environmental Protection Agency

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STREET ADDRESS:

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

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www.epa.state.oh.us

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

September 22, 2009

GERALD WHITECOTTON
ITW BEDFORD WIRE
26101 FARGO AVENUE
BEDFORD HEIGHTS, OH 44146

**Re: 2008 Hazardous Waste Annual Report Requirement – Notice of Violation
ITW BEDFORD WIRE, BEDFORD HEIGHTS - OHD092620723**

Dear GERALD WHITECOTTON:

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 ITW BEDFORD WIRE during the 2008 calendar year. The total amount reported is approximately 64.96 tons as shown on the enclosed printout. This total indicates that ITW BEDFORD WIRE was a large quantity generator in 2008. Because I have not received a Hazardous Waste Annual Report for 2008, ITW BEDFORD WIRE 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 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, ITW BEDFORD WIRE 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

ITW BEDFORD WIRE 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.

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

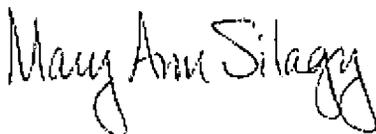
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Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

If ITW BEDFORD WIRE 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 ITW BEDFORD WIRE 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

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: OHD092620723
 Generator Name: ITW Anchor Fasteners/Bedford Wire
 Address: 26101 Fargo Ave
 Bedford Heights, OH 44146-1372
 Total Tons Shipped: 64.96

Receiving Facility

US EPA ID: OHD980568992
 Name: Envrite of Ohio Inc
 Customer Name: Bedford Wire
 Customer Address: 26101 Fargo Avenue
 Bedford Heights, OH 44146-

Waste Description: SULFURIC ACID SLUDGE Page: 1068 Subpage: 1
 System Type: H077 Form: W103 Quantity: 40420.00 P Density:
 D002

Waste Description: SULFURIC ACID SLUDGE Page: 1068 Subpage: 1
 System Type: H111 Form: W519 Quantity: 2160.00 P Density:
 D002

Waste Description: SULFURIC ACID SLUDGE Page: 1068 Subpage: 1
 System Type: H077 Form: W519 Quantity: 67420.00 P Density:
 D002

Waste Description: SULFURIC ACID SLUDGE Page: 1068 Subpage: 1
 System Type: H111 Form: W103 Quantity: 19920.00 P Density:
 D002

WR H077 to Env. $\begin{matrix} 40420P \\ 67420P \\ \hline 107840 \end{matrix}$

GM H077 to Env. $\begin{matrix} 8963G @ 1.35g = 97177P \\ 1800G @ 10\#/G = 18000P \\ \hline 115,177 \end{matrix}$

(26698 G to Reserve - exempt)
 (H077)

OK
 probably some H111 by Env. is reported as H077 by Bed Wire

WR H111 to Env. $\begin{matrix} 2160P \\ 19920P \\ \hline 22080P \end{matrix}$

GM H111 to Env. - 24 @ 15g = 3369 P

TOTAL WR to Env 129,920
 " GM to Env 118,546
11,374 = 9.6% OK

not so good, but