



State of Ohio Environmental Protection Agency

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April 4, 2007

Mr. John Hannah
Veolia ES Technical Solutions LLC
4301 Infirmary Road
West Carrollton, Ohio 45449

**Re: Notice of Violation / Return to Compliance
2006 Hazardous Waste Annual Report Requirement
(Veolia ES Technical Solutions LLC - OHD093945293)**

Dear Mr. Hannah:

The Division of Hazardous Waste Management (DHWM) received Veolia's initial 2006 Hazardous Waste Annual Report submittal electronically on March 1, 2007, and the completed version of the report on March 9, 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)

Veolia is not accurately reporting the management of wastes generated from on-site treatment. Residuals from fuel blending are reported as being fuel blended a second time on-site, and subsequently sent off-site. It is redundant to again report on-site fuel blending of the residual. Literally it would read as "fuel blending residual that was fuel blended a second time". Therefore, on the following GM pages I have deleted the on-site fuel blending: 298, 299, 300, 301, 302, 308, 523, 1662, and 1663. The only remaining on-site fuel blending is on page 2198, the still bottom waste.

Violation - OAC 3745-54-75(C) Customer ID Corrections

Page	Customer Identification	Correction
3436	OHR000013529 LeSaint Logistics	OHR000135293
4223	VAR000505290 Adenosine Therapeutics Emerging Tech Center One	VAR000504290 = Emerging Tech Center One

2443	KYD036009005	KY0360090005
2544	KY0036009005 VA Hospital in Louisville	
2321	IND005437794 E K Blessing Co	IND005427794

Please make these corrections to your records.

The following customer corrections do not constitute a violation.

Page	Customer Identification	Correction
3493	OH0987023686 Broughton Foods	OHD...
3082	OHCESQG Abbott Labs in Grove City	OHR000135699 Assigned May 2006
3084	OHCESQG AFCO	OHR000129270, assuming AFCO = "Amish Furniture". Assigned in 2005, SQG.
3098	OHCESQG CJ Mahan Construction	OHD987016292
3099	OHCESQG Collins Career Center	OHD986970847, assuming this is the Lawrence Co JVS.
3113	OHCESQG GE (Campbell Tech Resources)	OHD987054020 is the ID for Campbell Tech Resources.
3117	OHCESQG Hap Cremean Water Treat Plt	OHD986966364
3135	OHCESQG Milestone Services Corp	OH0000567537, SQG 9/06
3150	OHCESQG Resource One	OH0000988196, assigned January 2007.
3165	OHCESQG TRW Automotive in Mt Vernon	OHD079436218, with facility name as Kelsey Hayes (2000) but owner as TRW Automotive.
3179	OHD000361857 Krieger Lincoln Mercury	OH0 (zero)

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 Veolia is receiving quantities of hazardous waste from a generator in the SQG or larger quantity range, you should be inquiring about an ID number if the generator is not providing it on the manifest. I noticed that Dayton Public Schools at 4280 N James H McGee Blvd shipped 5508 P of mercury and mercury spill cleanup waste, but doesn't have an ID number.

Customer Questions

Affinity Medical (Dr.'s Hospt), page 3085, OHCESQG – The hospital has an ID number at this address: OHD080141874. Is the hospital the generator or is Affinity separate?

ERSHIGS – DPL Killen, page 3108, OHCESQG – DLP Killen has an ID: OHD000724310. Was the waste generated by DPL? What is "ERSHIGS"?

ERSHIGS – DPL Stuart Station, page 3109, OHCESQG – DLP Stuart has an ID: OHD000721407. Was the waste generated by DPL? What is "ERSHIGS"?

Techneglas Facility, page 3163, OHCESQG – The address is listed as 845 E Markinson. I think it is Markison, which parallels Jenkins. Techneglas has a plant at 727 E Jenkins that has been in the process of closing, OHT400010815. If you plot either address on Mapquest and look at the aerial view, it appears this ID number should apply. Please verify. We did not receive a 2006 report for this facility so I am not certain of its status. The ID has not been formally deactivated.

OHD987033305, pages 3415 (Alfrebro) and 3416 (Cargil), 1055 Reed Dr in Monroe – The current name for this facility is Degussa Flavors & Fruit Systems. I know that Alfrebro is a former name, but am concerned at seeing Cargil listed as a name for the facility. Please verify the generator of the waste on page 3416.

Peter Cremer North America, pages 3469 and 3470 – The same ID is listed for both pages, OHR000118513, but the addresses are different. Page 3470 lists the address associated with the ID in our records: 100 June St. Page 3429 lists the address for a separate Peter Cremer location, 3117 Southside Ave. Was the waste on page 3429 picked up at Southside or June? Peter Cremer has not officially notified us of HW activity at Southside. They are listed on page 3144 as OHCESQG.

PA State Police, PADEPPP12793, page 3590 – Is this supposed to be PADEP0012793?

PADER0012826, Chestnut Hill Rehab, page 3625 – Is this supposed to be PADEP0012826?

I will expect a response to the items above within 30 days of receipt of this letter. Please note that Veolia did not make any confidentiality claim for their customer information this year. If Veolia would like to hold this customer information confidential, a public version of the report must be submitted with a letter substantiating the claim. I can answer any questions concerning the Annual Report at (614) 644-2954 or 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, SWDO

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.

