



State of Ohio Environmental Protection Agency

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November 18, 2009

Ms. Susan Sevy
Compliance Manager
Clean Harbors Recycling Services of Ohio LLC
581 Milliken Dr SE
Hebron, Ohio 43025

**Re: Notice of Violation - 2008 Hazardous Waste Annual Report
EPA ID OHD980587364**

Dear Ms. Sevy:

The Division of Hazardous Waste Management received Clean Harbors' 2008 Hazardous Waste Annual Report electronically on February 27, 2009. I reviewed the report and e-mailed a Word document (enclosed) containing a list of concerns to Andy Lonzo on June 15, 2009. To date, I have not received any corrections in answer to those concerns, one of which is that the management method information for the some of the waste receipts is in error when compared to other corresponding data in the report. Therefore Clean Harbors is in violation of Ohio Administrative Code (OAC) rule 3745-54-75(E), which requires a facility to correctly report the method of treatment, storage, or disposal for each hazardous waste.

You and I have discussed the concerns several times over the phone. They include:

- Proper identification of fuel blended residuals shipped off-site.
- Lack of correspondence between the total amount identified as transshipped (H141) on the WR Forms versus the source code G61 shipment data on the GM Forms.
- Lack of correspondence between the total amount of waste identified as recycled on the WR Forms and the amount listed on the solvent recycling PS Form.

To abate the violation of OAC rule 3745-54-75(E), Clean Harbors must submit corrections to Ohio EPA for the 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.

The 2009 Annual Report will be due March 1, 2010, and I hope that any issues related to the tracking of information in Clean Harbors' database application will be resolved before then so the issues of concern are not repeated. If you have any questions about providing corrections or report completion, please contact me at (614) 644-2923. Your prompt attention to this matter is appreciated.

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

Sincerely,

Paula Canter

Paula Canter
System Administrator
Regulatory and Information Services Section
Division of Hazardous Waste Management

Enclosure

cc: Central File
Mary Ann Silagy, DHWM, CO
Melissa Storch, DHWM, CDO

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.

Review of the 2008 HW Report for OHD980587364, Safety-Kleen/Clean Harbors

Paula Canter, Reviewer

June 15, 2009

GM Forms

- There are no GM page(s) listing fuel blended wastes (G25/H061). According to the Waste Receipt (WR) and Process System (PS) forms, waste was received and processed for fuel blending in 2008. What was the disposition of this waste? There are no GM forms listing shipments to a H050 (energy recovery) facility. There are three pages listing H061 receivers: 9184, 18001, and 18002, representing a total of 823.7 tons shipped.
- Why is page 9200 (tetrachloroethylene, lead) a source code of G24? If this waste is a residual from recycling it should be G25/H020. It was sent to a landfill and the form code is W409.

GM vs WR – H141

The total of G61 records shipped in 2008 is 2315.48 tons (see spreadsheet attached to e-mail). I looked at the waste in storage at the end of 2007 with a source code of G61 and that total is 351.42. Assuming some of the G61 shipped in 2008 is from 2007, I subtracted 351.42 from 2315.48 and the result is 1964.06 tons of waste received and then shipped in 2008. I did notice several G61 pages with waste in storage as of 12/31/2008, at a total of 1257 tons. However, the total receipts coded as H141 for 2008 are 0.58 tons. Are there WR records that should be coded as H141 but are listed as H020 instead? (See WR vs PS – H020 below.)

WR vs PS

- H061 – The WR total is 720.25 tons and the PS total is 706.54 tons. These match fairly well but there are no G25/H061 GM form(s) as stated above.
- H020 – The WR total is 12,285.39 tons but the PS total is 8,791.54 tons, a difference of 3,493.85 tons. Is the management method code incorrect on some of the WR forms?

WR Customer ID Corrections

Corrections are based on the researching the address provided for the customer, prompted by the failure to pass the check-digit test as listed in the Validation Report. Judging by the page numbers, all of these except the last one are from Clean Harbors' data.

Customer	Page	Correction	Notes
FLD000104028 Angel Michael & St Mary	263	FL0001040286	
CTD982710908 Danver	816	CTD982710998	

Customer	Page	Correction	Notes
OHD09794620 Cleansville Cleaners	913	OHD09794620 <u>6</u>	
NYD02065437 Commodore Cleaners	1096	NYD02065437 <u>2</u>	
VAD10053692 Cross Road Cleaners	1175	VAD01005369 <u>2</u>	
NCD077840146 Davids Cleaners, 3435 Robinhood Rd	1243	NCD98185946 <u>5</u>	The ID they are using is almost identical to SK in Archdale.
MOD098576792 DRS Technologies	1486	MOD98576792 <u>0</u>	
MAD981897644 Eastern Packaging	1563	MAD9818970 <u>44</u>	
NYD01355620 Gail Pettits Dry Cleaners	1938	NYD01355620 <u>4</u>	
DCD98113475 Georgetown Valet	1975	DCD98111347 <u>5</u>	
NCD000000123 Grace Hospital in Morganton	2080	NCD07106858 <u>9</u>	
FLD05550608 Hawkins in Largo	2144	FLD05575060 <u>8</u>	
IN040292674 Henry's 1 Hr Cleaners	2181	IND04029267 <u>4</u>	
VAD98110802 Hilltop Cleaners	2221	VAD98111080 <u>2</u>	
WVD105766135 Maces Cleaners, 711 N St Rt 2	2845	WVR000501577 (assigned in 2001)	WVD103766135 is the company's old location at 293 N St Rt 2 in the same town.
WAD000028713 Pacific Crest Cabinets	3423	WAH00002871 <u>3</u>	
VAD98103968 Pan Am Cleaners	3487	VAD9810390 <u>68</u>	
VAD055400166 Paddock Dry Cleaners	3500	VAD0554001 <u>88</u>	
PAR00011403 Permanent Odor Removal	3553	PAR00001140 <u>3</u>	
IND981796676 Reds Cleaners	3926	IND9817966 <u>26</u>	
MID016373850 Roth Cleaners	4029	MID01673785 <u>0</u>	
TND98212365 Smart Services dba Dryve Clean	4326	TND98212365 <u>5</u>	
LAD000101778 Sunshine Cleaners	4599	LA00010177 <u>48</u>	
IND000014497 Tuchman Cleaners, Western Blvd in Greenwood	4872	INR00001440 <u>7</u>	
NJD98663427 Anthony's Cleaners	21946	NJD9866332 <u>7</u>	