

003/002



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

October 3, 2007

BEVERLY M CARTER  
3M PRECISION OPTICS INC  
4000 MCMANN RD  
CINCINNATI, OH 45245

Re: 2006 Hazardous Waste Annual Report Requirement  
3M PRECISION OPTICS INC, CINCINNATI - OHD982072696

Dear BEVERLY M CARTER:

My review of manifest data from the Michigan Department of Environmental Quality (MI DEQ) has revealed that one or more shipments of hazardous waste were shipped by 3M PRECISION OPTICS INC to receiving facilities in Michigan during the 2006 calendar year. The total is approximately 350.02 tons as shown on the enclosed printout. This total indicates that 3M PRECISION OPTICS INC was a large quantity generator of hazardous waste in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, 3M PRECISION OPTICS INC 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, 3M PRECISION OPTICS INC 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. The reporting forms and instructions are on our Web site at [http://www.epa.state.oh.us/dhwm/ann\\_report.html](http://www.epa.state.oh.us/dhwm/ann_report.html).

3M PRECISION OPTICS INC 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 3M PRECISION OPTICS INC 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 3M PRECISION OPTICS INC did not generate more than the threshold quantity of hazardous waste in any month during 2006. If you believe that the manifest information supplied by MI DEQ 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  
Environmental Specialist 3  
Regulatory and Information Services  
Division of Hazardous Waste Management  
paula.canter@epa.state.oh.us

cc: Central File  
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.

Michigan DEQ 2006 Manifest records for Ohio generators as of late August 2007

8.34 lbs/gal and 1 cubic yard = 1 ton assumed for conversion of volume to weight.

Manifest Date & Number	Receiver ID	Mgmt Method	Gallons	Cubic Yards	Pounds	Tons (Converted)
<b>OHD982072696</b>						
02/06/2006 MI9036558	MID000724831		0	30	0	30.00 D005
02/22/2006 MI8028290	MID000724831		0	30	0	30.00 D005
03/03/2006 MI8028291	MID000724831		0	20	0	20.00 D005
03/17/2006 MI8028292	MID000724831		0	30	0	30.00 D005 D008
05/25/2006 MI8028293	MID000724831		0	20	0	20.00 D005
05/31/2006 MI8028295	MID000724831		0	30	0	30.00 D005 D008
07/11/2006 MI10276424	MID000724831		0	30	0	30.00 D005
07/20/2006 MI8028297	MID000724831		0	20	0	20.00 D008 D005
07/27/2006 MI8028299	MID000724831		0	30	0	30.00 D005 D008
08/10/2006 MI8028300	MID000724831		0	0	30	0.02 D005 D008
08/21/2006 MI9036560	MID000724831		0	30	0	30.00 D005 D008
08/31/2006 MI9036562	MID000724831		0	30	0	30.00 D005 D008
09/01/2006 MI9036563	MID000724831		0	20	0	20.00 D005 D008
09/25/2006 000399652FLE	MID000724831	H129	0	30	0	30.00 D005 D008

350.02 Total Tons for OHD982072696

