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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

September 22, 2009

MARGO M COLLINS  
STAVELEY SERVICES FLUIDS ANALYSIS  
18419 EUCLID AVE  
CLEVELAND, OH 44112

**Re: 2008 Hazardous Waste Annual Report Requirement – Notice of Violation  
STAVELEY SERVICES FLUIDS ANALYSIS, CLEVELAND - OHD987009974**

Dear MARGO M COLLINS:

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 STAVELEY SERVICES FLUIDS ANALYSIS during the 2008 calendar year. The total amount reported is approximately 19.89 tons as shown on the enclosed printout. This total indicates that STAVELEY SERVICES FLUIDS ANALYSIS was a large quantity generator in 2008. Because I have not received a Hazardous Waste Annual Report for 2008, STAVELEY SERVICES FLUIDS ANALYSIS 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, STAVELEY SERVICES FLUIDS ANALYSIS 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](http://www.epa.ohio.gov/dhwm/ann_report.aspx)

STAVELEY SERVICES FLUIDS ANALYSIS 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

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

CGR  
10/15/09



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 STAVELEY SERVICES FLUIDS ANALYSIS 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 STAVELEY SERVICES FLUIDS ANALYSIS 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: OHD987009974  
 Generator Name: Staveley Services Fluids Analysis NA  
 Address: 18419 Euclid Ave  
 Cleveland, OH 44112-1016  
 Total Tons Shipped: 19.89

**Receiving Facility**

US EPA ID: OHD066060609  
 Name: CHEMTRON CORPORATION  
 Customer Name: STAVELEY SERVICES FLUIDS ANALYSIS  
 Customer Address: 18419 EUCLID AVE  
 CLEVELAND, OH 44112-

Waste Description: ACID LABPACK System Type: H141 ✓ Form: W001 Quantity: 60.00 ✓ P Density: GM3 D002 D005	Page: 3648	Subpage: 1
Waste Description: SULFURIC ACID CLEANING SOLUTION System Type: H141 ✓ Form: W103 Quantity: 37.00 ✓ P Density: GM11 D002 D007	Page: 3648	Subpage: 1
Waste Description: WASTE ACETONITRILE AND ACID System Type: H061 ✓ Form: W219 Quantity: 46.00 ✓ P Density: GM15 D001 D002	Page: 3648	Subpage: 1
Waste Description: WASTE ACETONITRILE AND ACID System Type: H141 ✓ Form: W219 Quantity: 40.00 ✓ P Density: GM15 D001 D002	Page: 3648	Subpage: 1
Waste Description: ACETIC ACID GLACIAL System Type: H141 ✓ Form: W219 Quantity: 125.00 ✓ P Density: GM17 D001 D002	Page: 3648	Subpage: 1
Waste Description: WATERBASE COOLANT AND ACID System Type: H141 ✓ Form: W219 Quantity: 2295.00 ✓ P Density: GM19 D002	Page: 3648	Subpage: 1
Waste Description: BASIC FLAMMABLE LABPACK System Type: H141 ✓ Form: W001 Quantity: 55.00 ✓ P Density: GM5 D001 D002	Page: 3648	Subpage: 1
Waste Description: OXIDIZER LABPACK System Type: H141 ✓ Form: W001 Quantity: 29.00 ✓ P Density: GM7 D001 D011	Page: 3648	Subpage: 1
Waste Description: MERCURY LOOSEPACK System Type: H141 ✓ Form: W001 Quantity: 9.00 ✓ P Density: GM9 D009	Page: 3648	Subpage: 1
Waste Description: MIXED ACID WASTE System Type: H141 ✓ Form: W103 Quantity: 7117.00 ✓ P Density: GM13 D002	Page: 3648	Subpage: 1
Waste Description: WASTE SOLVENT System Type: H061 ✓ Form: W203 Quantity: 28992.00 ✓ P Density: GM1 F005 D022 D001	Page: 3648	Subpage: 1
Waste Description: WASTE SOLVENT AND SULFURIC ACID System Type: H061 ✓ Form: W203 Quantity: 42.00 ✓ P Density: GM21 F005 D022 D001 D002	Page: 3648	Subpage: 1
Waste Description: SORBENTS AND SOLVENT System Type: H141 ✓ Form: W310 Quantity: 935.00 ✓ P Density: GM23 F005 D022 D001	Page: 3648	Subpage: 1