



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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

August 22, 2007

MARGO COLLINS  
STAVELEY SERVICES FLUIDS ANALYSIS  
18419 EUCLID AVE  
CLEVELAND, OH 441121016

**Re: 2006 Hazardous Waste Annual Report Requirement  
STAVELEY SERVICES FLUIDS ANALYSIS - OHD987009974**

Dear MARGO 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 2006 calendar year. The total amount reported indicates that STAVELEY SERVICES FLUIDS ANALYSIS was a large quantity generator in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, STAVELEY SERVICES FLUIDS ANALYSIS may be in violation of Rule 3745-52-41 of the Ohio Administrative Code (OAC). Please see the enclosed printout detailing the hazardous wastes received from STAVELEY SERVICES FLUIDS ANALYSIS during 2006.

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.

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

Ohio EPA is an Equal Opportunity Employer

To abate the violation of OAC Rule 3745-52-41, STAVELEY SERVICES FLUIDS ANALYSIS 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. You may access the reporting forms and instructions on our website at [http://www.epa.state.oh.us/dhwm/ann\\_report.html](http://www.epa.state.oh.us/dhwm/ann_report.html).

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 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 2006, 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 2006. 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) 644-2923. 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](mailto:paula.canter@epa.state.oh.us)

cc: Central File  
ec: 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.

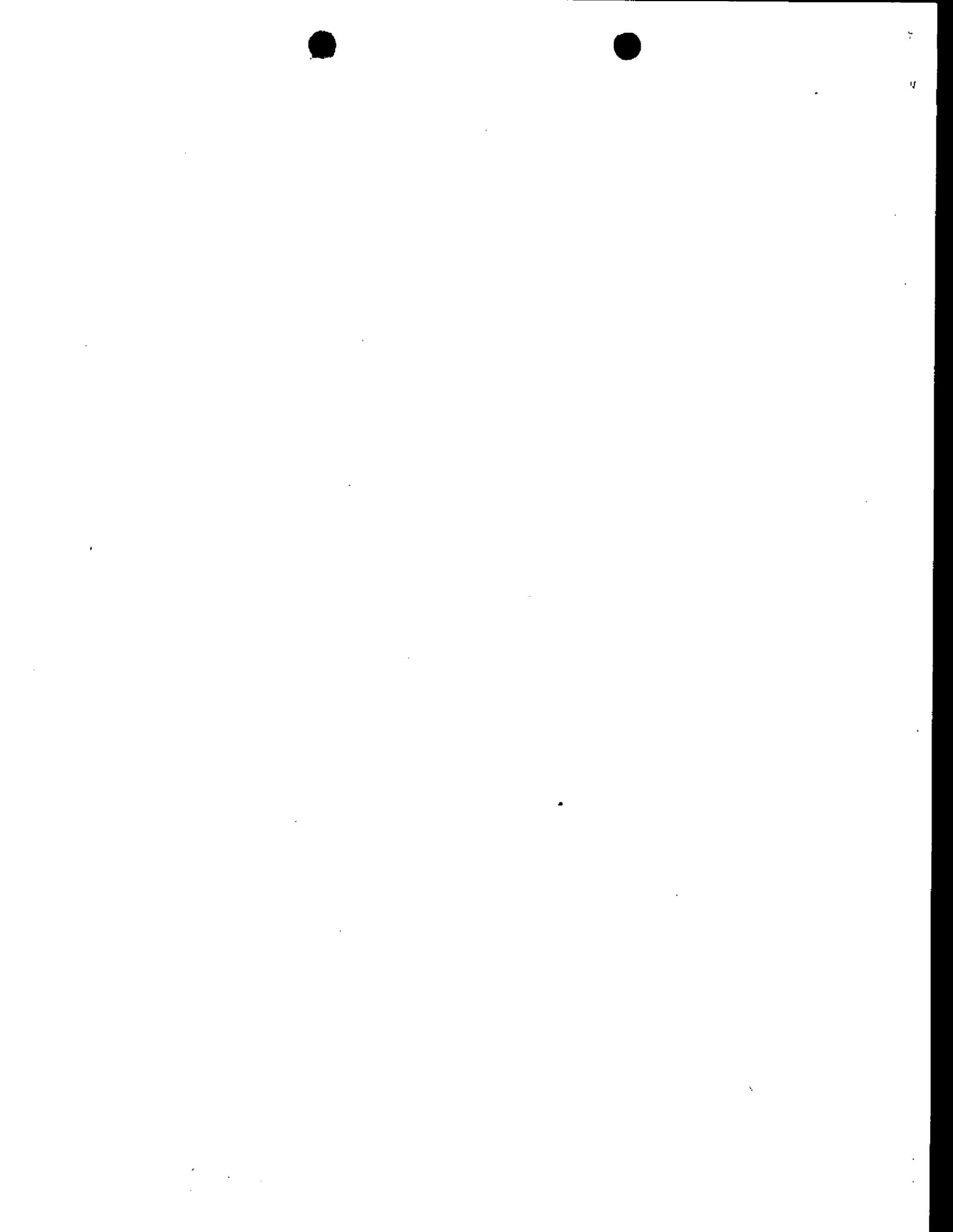
**Generator Facility**

Generator US EPA ID: OHD987009974  
 Generator Name: Staveley Services Fluids Analysis  
 Address: 18419 Euclid Ave  
 Cleveland, OH 44112-1016  
 Total Tons Shipped: 39.44

**Receiving Facility**

US EPA ID: OHD066060609  
 Name: Chemtron Corporation  
 Customer Name: STAVELY SERVICES FLUID ANALYSIS  
 Customer Address: 18419 EUCLID  
 CLEVELAND, OH 44112-

Waste Description:	System Type:	Form:	Quantity:	Density:	S.G.	Page:	Subpage:
CPS1936: INORGANIC ALKALINE LABPACK D002	H141	W001	9.00 P	1	S.G.	4925	2
CPS1936: MERCURY COMPOUND LABPACK D009	H141	W001	8.00 P	1	S.G.	4925	3
CPS1936: PERCHLORIC ACID LABPACK D001 D002	H141	W001	10.00 P	1	S.G.	4926	1
CPS1936: SODIUM SULFIDE LABPACK D003 D002	H141	W001	9.00 P	1	S.G.	4926	2
RAIN WATER AND OIL D002	H141	W113	100.00 P	0.97	S.G.	4922	1
WASTE SOLVENT F005 D022 D001	H061	W203	3982.50 G	0.93	S.G.	4923	1
WASTE SOLVENT F005 D022 D001	H141	W203	1080.00 G	0.93	S.G.	4923	2
CPS1936: FLAMMABLE LIQUID LABPACK D001	H141	W001	7.00 P	1	S.G.	4924	1
CPS1936: INORGANIC ACID LABPACK D002 D007	H141	W001	30.00 P	1	S.G.	4925	1
CPS1936: INORGANIC ACID LABPACK D002 D007	H141	W001	30.00 P	1	S.G.	4925	1
CPS1936: FLAMMABLE LIQUID LABPACK D001	H141	W001	7.00 P	1	S.G.	4924	1
WASTE SOLVENT F005 D022 D001	H141	W203	1080.00 G	0.93	S.G.	4923	2
WASTE SOLVENT F005 D022 D001	H061	W203	3982.50 G	0.93	S.G.	4923	1



**Generator Facility****Generator US EPA ID:** OHD987009974**Generator Name:** Staveley Services Fluids Analysis**Address:** 18419 Euclid Ave  
Cleveland, OH 44112-1016**Total Tons Shipped:** 39.44**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:** RAIN WATER AND OIL **Page:** 4922 **Subpage:** 1**System Type:** H141 **Form:** W113 **Quantity:** 100.00 P **Density:** 0.97 S.G.

D002

**Waste Description:** CPS1936: INORGANIC ALKALINE LABPACK **Page:** 4925 **Subpage:** 2**System Type:** H141 **Form:** W001 **Quantity:** 9.00 P **Density:** 1 S.G.

D002

**Waste Description:** CPS1936: SODIUM SULFIDE LABPACK **Page:** 4926 **Subpage:** 2**System Type:** H141 **Form:** W001 **Quantity:** 9.00 P **Density:** 1 S.G.

D003 D002

**Waste Description:** CPS1936: PERCHLORIC ACID LABPACK **Page:** 4926 **Subpage:** 1**System Type:** H141 **Form:** W001 **Quantity:** 10.00 P **Density:** 1 S.G.

D001 D002

**Waste Description:** CPS1936: MERCURY COMPOUND LABPACK **Page:** 4925 **Subpage:** 3**System Type:** H141 **Form:** W001 **Quantity:** 8.00 P **Density:** 1 S.G.

D009

