



State of Ohio Environmental Protection Agency

001/001

STREET ADDRESS:

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Columbus, Ohio 43215

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MAILING ADDRESS:

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

September 5, 2007

Facility Manager  
Ravenna Aluminum  
5159 S Prospect St  
Ravenna, OH 44266

**Re: 2006 Hazardous Waste Annual Report Requirement  
Ravenna Aluminum at 706 N Walnut in Ravenna – OHD987023074**

Dear Sir/Madam:

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 Ravenna Aluminum at 706 N Walnut during the 2006 calendar year. The total amount reported indicates that Ravenna Aluminum was a large quantity generator in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, Ravenna Aluminum 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 Ravenna Aluminum 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.

To abate the violation of OAC Rule 3745-52-41, a 2006 Annual Hazardous Waste Report must be completed for Ravenna Aluminum and submitted to Ohio EPA 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 can access the reporting forms and instructions 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).

Ravenna Aluminum 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 Ravenna Aluminum 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 Ravenna Aluminum 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.

Please note that an earlier letter I sent to 706 N Walnut was returned to me by the post office, but the Division of Hazardous Waste Management has not been informed that this facility is no longer operating. Our Cessation of Regulated Operations database indicates that the facility temporarily ceased operations but then resumed operations.

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*

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  
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: OHD987023074  
 Generator Name: Ravenna Aluminum Industries Inc  
 Address: 706 N Walnut St  
 Ravenna, OH 44266-  
 Total Tons Shipped: 15.84

*Some of the waste info is duplicated*

Receiving Facility

US EPA ID: OHD066060609  
 Name: Chemtron Corporation  
 Customer Name: RAVENNA ALUMINUM  
 Customer Address: 706 NORTH WALNUT AVENUE  
 RAVENNA, OH 44266-

Waste Description: CAUSTIC SLUDGE Page: 4370 Subpage: 1  
 System Type: H141 Form: W110 Quantity: 6083.00 P Density: 1.15 S.G.  
 D002

Waste Description: CAUSTIC SLUDGE Page: 4371 Subpage: 1  
 System Type: H141 Form: W110 Quantity: 112.50 G Density: 1.15 S.G.  
 D002

Receiving Facility

US EPA ID: OHD048415665  
 Name: Ross Incineration Services Inc  
 Customer Name: RAVENNA ALUMINUM  
 Customer Address: 5159 S. PROSPECT ST.  
 RAVENNA, OH 44266-

Waste Description: ZIRCON AND SOLVENTS Page: 3518 Subpage: 1  
 System Type: H040 Form: W403 Quantity: 150.00 G Density: 1.3 S.G.  
 D001

Receiving Facility

US EPA ID: OHD066060609  
 Name: Chemtron Corporation  
 Customer Name: FSI RAVENNA ALUMINUM/RAVENNA  
 Customer Address: 706 NORTH WALNUT STREET  
 RAVENNA, OH 44266-

Waste Description: CAUSTIC SLUDGE Page: 2226 Subpage: 1  
 System Type: H141 Form: W110 Quantity: 4200.00 P Density: 1.22 S.G.  
 D002

Waste Description: ISOSET 4550 Page: 2227 Subpage: 1  
 System Type: H141 Form: W219 Quantity: 3663.00 P Density: 1 S.G.  
 D001

Waste Description: CAUSTIC SLUDGE Page: 2226 Subpage: 1  
 System Type: H141 Form: W110 Quantity: 4200.00 P Density: 1.22 S.G.  
 D002

Waste Description: ISOSET 4550 Page: 2227 Subpage: 1  
 System Type: H141 Form: W219 Quantity: 3663.00 P Density: 1 S.G.  
 D001

Waste Description: CAUSTIC SLUDGE Page: 4371 Subpage: 1  
 System Type: H141 Form: W110 Quantity: 112.50 G Density: 1.15 S.G.  
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