



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, OH 43216-1049

July 21, 2008

DAVID C OSMUN
BRIDGESTONE-APM COMPANY
235 COMMERCE WAY
UPPER SANDUSKY, OH 43551

eval 004

KD

enf 003

Re: 2007 Hazardous Waste Annual Report Requirement
BRIDGESTONE-APM COMPANY, UPPER SANDUSKY - OHR000020230

Dear DAVID C OSMUN:

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 sent by BRIDGESTONE-APM COMPANY to receiving facilities in Michigan during the 2007 calendar year. The total is approximately 15.69 tons as shown on the enclosed printout. This total indicates that BRIDGESTONE-APM COMPANY was a large quantity generator of hazardous waste in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, BRIDGESTONE-APM COMPANY 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, BRIDGESTONE-APM COMPANY must complete and submit to Ohio EPA a 2007 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

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



forms and instructions are on our Web site at
http://www.epa.state.oh.us/dhwm/ann_report.html.

BRIDGESTONE-APM COMPANY 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 BRIDGESTONE-APM COMPANY was not a large quantity generator in 2007, documentation must be submitted to this office within 30 days of receipt of this letter. This documentation must show that BRIDGESTONE-APM COMPANY did not generate more than the threshold quantity of hazardous waste in any month during 2007. 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) 644-2891. Your prompt attention to this matter is appreciated.

Sincerely,



Mary Ann Silagy
Environmental Specialist 2
Regulatory and Information Services
Ohio EPA - Division of Hazardous Waste Management
maryann.silagy@epa.state.oh.us

enclosure

cc: Central File
DHWM, NWDO

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.

2007 Michigan DEQ Manifest Data for Ohio Generators

8.34 lbs/gal density assumed

Receiving Facility	Qty	Unit	Tons	Mgmt Method	Waste Code(s)
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OHR000020230 BRIDGESTONE-APM COMPANY

01/12/2007

000396193JJK

MID000724831	55	G	0.23	H111	D002
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01/17/2007

000393176JJK

MID980615298	220	G	0.92	H141	F005	D001	D035
MID980615298	300	P	0.15	H141	D001		
MID980615298	165	G	0.69	H141	D002		
MID980615298	55	G	0.23	H141	D001		

02/18/2007

000393136JJK

MID000724831	55	G	0.23	H111	D002
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02/20/2007

000393346JJK

MID980615298	110	G	0.46	H141	D002		
MID980615298	55	G	0.23	H141	D001		
MID980615298	330	G	1.38	H141	F005	D001	D035

03/13/2007

000393439JJK

MID980615298	110	G	0.46	H141	D002		
MID980615298	165	G	0.69	H141	F005	D001	D035

04/13/2007

000393475JJK

MID000724831	55	G	0.23	H111	D002
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04/20/2007

000393500JJK

MID980615298	55	G	0.23	H141	D001		
MID980615298	220	G	0.92	H141	F005	D001	D035
MID980615298	55	P	0.03	H141	D001		

05/11/2007

000393482JJK

MID000724831	55	G	0.23	H111	D002
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05/15/2007

000394638JJK

MID980615298	300	P	0.15	H141	D001		
MID980615298	165	G	0.69	H141	F005	D001	D035

06/27/2007

000394858JJK

MID980615298	200	P	0.10	H141	D001		
MID980615298	55	G	0.23	H141	D002		
MID980615298	275	G	1.15	H141	F005	D001	D035

08/03/2007

2007 Michigan DEQ Manifest Data for On-Site Generators

8.34 lbs/gal density assumed

Receiving Facility	Qty	Unit	Tons	Mgmt Method	Waste Code(s)
OHR000020230 BRIDGESTONE-APM COMPANY					
08/03/2007					
000394848JJK					
MID000724831	55	G	0.23	H111	D002
08/08/2007					
000397988JJK					
MID980615298	55	G	0.23	H141	D001
MID980615298	165	G	0.69	H141	F005 D001 D035
MID980615298	55	G	0.23	H141	D002
09/14/2007					
000397841JJK					
MID000724831	55	G	0.23	H111	D002
09/18/2007					
000397855JJK					
MID980615298	55	P	0.03	H141	D001
MID980615298	275	G	1.15	H141	F005 D001 D035
MID980615298	55	G	0.23	H141	D002
10/31/2007					
001554052JJK					
MID980615298	55	G	0.23	H141	D002
11/09/2007					
000397732JJK					
MID000724831	55	G	0.23	H111	D002
11/15/2007					
000397660JJK					
MID980615298	55	G	0.23	H141	D001
MID980615298	330	G	1.38	H141	F005 D001 D035
MID980615298	85	P	0.04	H141	D001
12/14/2007					
000397558JJK					
MID000724831	168	G	0.70	H111	D002
000397583JJK					
MID980615298	80	P	0.04	H141	D001
MID980615298	55	G	0.23	H141	D002

Total Tons for Generator 15.69