



State of Ohio Environmental Protection Agency

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June 22, 2009

→ Mr. Brian Allen ←
Eastman Kodak Co
3000 Research Blvd
Dayton, OH 45420-4003

Re: Changes to Authorization
Notices of Violation
OHR000024927

eval 005
enF 003 (K)

Dear Mr. Allen:

On February 26, 2009, the Division of Hazardous Waste Management (DHWM) electronically received the 2008 Hazardous Waste Annual Report for the Eastman Kodak facility in Dayton. You are listed as the certifier of the reports for this facility for 2006, 2007 and 2008. Robert Elicker is the Authorized Representative who signed the Electronic Data Submittal Memorandum of Agreement (PIN Application form) that DHWM received from Eastman Kodak on January 3, 2001. Mr. Elicker is the only individual who can certify Eastman Kodak's Reports with the assigned PIN in accordance with the Agreement, which is based on Ohio Administrative Code rule 3745-50-42. Because the certifier of the 2006, 2007 and 2008 reports is not the same individual who filed the Agreement, Eastman Kodak is in violation of 3745-50-42(C), Changes to Authorization.

Attached note specifies 52-41 (A) (8) (e)

To abate these violations, the DHWM requests a letter from your supervisor explaining that you are authorized to submit these reports, and that you certify that the information contained in them is complete and accurate according to the certification statement that can be found on both the Annual Report Site ID form and the PIN application. Your letter should contain your original signature for our records. Normally we would ask you to submit a new PIN Application form, but we expect to implement the use of Ohio EPA's eBusiness Center for our reporting and PIN management for the 2009 report due in March, 2010.

If you have any questions, please contact me via e-mail sent to maryann.silagy@epa.state.oh.us or by phone at (614) 644-2891.

Sincerely,

Mary Ann Silagy
Annual Report Coordinator
Regulatory and Information Services
Division of Hazardous Waste Management

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.



From: Paula Canter
To: MaryAnn Silagy
Date: 6/30/2008 3:50 PM
Subject: Eastman Kodak PIN violation

OHR000024927

Brian Allen/Eastman Kodak needs to be cited with a PIN violation. I discovered that his name is listed as the certifier for both 2006 and 2007 but Rob Elicker is the PIN holder. His job title is listed as Environmental Specialist so I'm not sure whether he meets the Responsible Official definition. Brian was the contact for 2007 also, but in 2006, Rob was.

I sent Brian an e-mail to tell him I unchecked the TSD box but I didn't mention this particular issue because it deserves NOV treatment, not a casual reminder.

I am going to post the report.

Robt Elicker 11/9/01

'00 - ?	
'01 - paper (#1)	- R.E. ✓
'02 - " "	" ✓
'03 - ∅	" ✓
'04 - ∅	" ✓
'05 - ∅	" ✓
'06 - ∅	Brian Allen - Env. Spec.
'07 - ∅	"
'08 - ∅	"

} X

