



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

April 6, 2007

RE: **Avery Dennison**
OHD 010 836 716

Kevin Weeks
Avery Dennison
1770 Foltz Industrial Parkway
Strongsville, Ohio 44149

Dear Mr. Weeks:

This letter will report on the recent hazardous waste inspection of Avery Dennison. It will document any violations and concerns found and outline what you need to do to correct them. A written response to these issues is required within 30 days. Please also see the enclosed Process, Waste, and Pollution Prevention Summary and the enclosed inspection checklists.

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Avery Dennison (Avery) located at 15939 Industrial Parkway in Cleveland, Ohio on March 22, 2007. The purpose was to determine if Avery had violations of Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

You explained that this location used to manufacture products but since the end of 2005 it has been used only for warehousing, packaging and shipping. The hazardous waste shipped in 2006 was a result of the shutdown of the manufacturing operations. At the time of the inspection there was a small amount of used oil, waste flammable liquids, and waste lamps being accumulated. You stated this facility will not normally generate hazardous waste.

The following violation was found:

1. OAC rule 3745-52-11 – Hazardous waste determination.
This rule requires that any person who generates a waste must determine if that waste is a hazardous waste. The following documents give more information regarding this:

Identifying Your Hazardous Waste, November 2006

<http://www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf>.

Use of Generator Knowledge in Complying with OAC 3745-52-11, July 2005

<http://www.epa.state.oh.us/dhwm/pdf/GeneratorKnowledge6.pdf>.

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Avery Dennison violated this rule by having waste in at least one of its drum containment pallets without determining whether it is a hazardous waste. You stated this liquid may be a result of the recent sprinkler system leak. **You must determine whether this liquid is a hazardous waste and send that determination to me.**

Please send a written response to this letter within 30 days including the documentation required above.

The following information is offered:

Generator Closure

This facility was at one time a large quantity generator of hazardous waste and, therefore, is subject to closure/cleanup requirements for the areas that hazardous waste was accumulated. This is referred to as generator closure to distinguish it from the closure required of hazardous waste treatment, storage and disposal facilities. More information is enclosed and can be found on pages 23 to 26 of Chapter 1 of the following document: <http://www.epa.state.oh.us/dhwm/cprg.html>.

Cardboard and Plastic Shrink Wrap Recycling

Waste cardboard and plastic shrink wrap was being disposed. You may want to investigate recycling of these materials. A list of cardboard recyclers can be found at: <http://www.epa.state.oh.us/ocapp/p2/recyc/CardboardRecyclers.html>.

Some of the companies in Cuyahoga county that pick up cardboard for recycling are:

BFI Waste Systems of Ohio, Garfield Heights, 216-441-6300
Caraustar Cleveland Recycling, Cleveland, Ohio, 216/961-5060
Cordell Hauling, Cleveland, Ohio, 216-651-4285
Gateway Recycling, Cleveland, Ohio, 216/341-8777
Global Lake Enterprises, Cleveland, Ohio, 216-671-1935
Peltz Group, Cleveland, Ohio, 216-481-3200
Ponz Industries, Cleveland, Ohio, 216/661-8999
Recycle Midwest, Cleveland, Ohio, 216/481-9490
Republic Waste, Cleveland, Ohio, 216/741-4013
Weingold Rubbish, Cleveland, Ohio, 216/641-1071

For recycling of the shrink wrap, Ohio EPA maintains a list of plastics markets and recyclers at: <http://www.epa.state.oh.us/opp/recyc/pete-rc.html>.

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In addition, the following organizations may be able to help you:

http://www.plasticsresource.com/s_plasticsresource/index.asp
[http://www.aor-omex.org/omex/.](http://www.aor-omex.org/omex/)

Energy use reduction:

ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their web site is at: [http://www.energystar.gov/.](http://www.energystar.gov/)

This link leads to the part of the site that deals with improving the energy performance of buildings and plants:

[http://www.energystar.gov/index.cfm?c=business.bus_index.](http://www.energystar.gov/index.cfm?c=business.bus_index)

Ohio businesses that spend less than \$150,000 on their annual energy bill now have a tool to help them reduce energy waste and hold costs down. The Ohio Department of Development has developed a free online tool that is confidential and easy to use. If you are looking for ways to save on energy expenses at your business, visit the Small Business Energy Saver at:

[http://www.energyguide.com/EnergySmartSBE/welcomeba.asp?referrerid=227&sid=436.](http://www.energyguide.com/EnergySmartSBE/welcomeba.asp?referrerid=227&sid=436)

Grant funding is available for business owners who are ready to implement measures suggested by the Ohio Small Business Energy Saver. For more information, visit:

[http://www.odod.state.oh.us/cdd/oeel/ELFGrant.htm#NOFA_07-05.](http://www.odod.state.oh.us/cdd/oeel/ELFGrant.htm#NOFA_07-05)

The Ohio Department of Development's Office of Energy Efficiency may also be able to help with energy efficiency issues. Their web site is at:

[http://www.odod.state.oh.us/cdd/oeel/.](http://www.odod.state.oh.us/cdd/oeel/)

OCAPP

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. They can be contacted at 800-329-7518 or <http://www.epa.state.oh.us/ocapp/ocapp.html>. In June 2006 they published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at: <http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at [http://www.epa.state.oh.us/dhwm/.](http://www.epa.state.oh.us/dhwm/)

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If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO
Chris Jones, Avery Dennison

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO

NOTICE:

OHIO EPA'S FAILURE TO LIST SPECIFIC DEFICIENCIES OR VIOLATIONS IN THIS LETTER DOES NOT RELIEVE YOUR FACILITY FROM ITS OBLIGATION TO COMPLY WITH ALL APPLICABLE REGULATIONS.

E-mail this completed form to tammy.mcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only						
2. Site EPA ID No.	EPA ID Number: OHD 010 836 716								
3. Site Name	Name: Avery DennisonAutomotive		Website (optional):						
4. Site Location Information	Street Address: 15939 Industrial PKWY								
	City, Town, or Village: Cleveland		State: OH						
	County Name: Cuyahoga		Zip Code: 44135						
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	X								
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.						
	C.		D.						
	7. Facility Representative		First Name: Kevin		MI:		Last Name: Weeks		
	Phone Number: 440-878-7326		Phone Number Extension:						
Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	E-Mail Address: Kevin.weeks@averydennison.com								
	Fax Number:		Fax Number Extension:						
	Street or P.O. Box: 17700 Foltz Industrial Parkway								
	City, Town or Village: Strongsville								
	State: Ohio		Country:		Zip Code: 44149				
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):						
	Avery Dennison								
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:		Owner Phone #:						
	State:		Country:		Zip Code:				
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):						
	Avery Dennison								
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:		Operator Phone #:						
	State:		Country:		Zip Code:				
9. Violations Cited?	X	Yes		No					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
Not Regulated									

10. Type of Regulated Waste Activity (Mark all of the appropriate boxes.)

A. Hazardous Waste Activities																
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste															
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste															
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace															
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption															
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption															
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility															
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter															
B. Universal Waste Activities	C. Used Oil Activities															
<input type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> Transporter															
	<input type="checkbox"/> Transfer Facility															
	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> Processor															
	<input type="checkbox"/> Re-refiner															
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align:center">Generated</th> <th style="text-align:center">Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td style="text-align:center"><input checked="" type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td style="text-align:center"><input type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td style="text-align:center"><input type="checkbox"/></td> <td style="text-align:center"><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td style="text-align:center"><input checked="" type="checkbox"/></td> <td style="text-align:center"><input checked="" type="checkbox"/></td> </tr> </tbody> </table>		Generated	Accumulated	A. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	Generated	Accumulated														
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B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)															
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil															
	<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

no	Announced ?	Additional Facility Representatives: Chris Jones, David
no	Tanks?	Other comments: Stopped production here at the end of 2005. Now is used for warehousing and packaging.
unknown	Containers?	

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Robert Almquist		03-22-2007 11:35am

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

Process, Waste, and Pollution Prevention Summary for:

Avery Dennison, OHD 010 836 716, , 3-22-07 inspection

#	Process generating the waste	Waste details	On-site management	Off-site management	Current pollution prevention	Possible pollution prevention
1	Lighting	lamps	Had a small box of waste lamps	Will be sent to Chemtron as a universal waste		
2		flammable liquids	Had a few smaller than 1 gallon containers, will determine if it is hazardous waste			
3		Batteries		Will be sent offsite as universal waste		
4		cardboard		Disposed as solid waste		May be feasible to send for recycling
5		Plastic shrink wrap		Disposed as solid waste		May be feasible to send for recycling

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce < 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so**, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

Process, Waste, and Pollution Prevention Summary for:

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