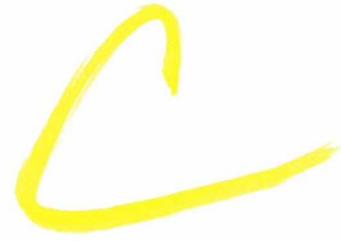


**Environmental
Protection Agency**

John Kasich Governor
Mary Taylor, Lt. Governor
Scott Pruitt Director



December 13, 2011

Ms. Deborah A. Bishop
Environmental Compliance Supervisor
Ross Incineration Services, Inc.
36790 Giles Road
Grafton, OH 44044

**RE: ROSS INCINERATION SERVICES, INC., OHD 048 415 665,
OHIO ID# 02-47-0295, NOTICE OF VIOLATION (NOV)**

Dear Ms. Bishop:

On December 12, 2011 Ohio EPA received a letter dated December 9, 2011 from Ross Incineration Services Inc. (RIS) in which RIS voluntarily disclosed an instance of noncompliance with a permit condition pursuant to Permit Condition A.22, specifically:

- Copies of 56 manifests had not been returned to generators within 30 days after delivery as required by OAC 3745-54-71 (A)(2)(d).

The letter also noted that RIS took the following steps to abate the violation and to prevent reoccurrence:

- Standard operating procedures were reviewed with all associates responsible for assuring that manifests are returned in a timely manner; and,
- A re-evaluation of the manifest return process was initiated.

This is the second voluntary disclosure that Ohio EPA has recently received from RIS regarding failure to return manifests within 30 days. On November 4, 2011 Ohio EPA received a letter dated November 3, 2011 in which RIS voluntarily disclosed that two manifests had not been returned in a timely manner.

In addition to the above steps already taken by RIS, the following additional steps must be completed to abate this violation:

- Complete the re-evaluation of the manifest return process and provide a summary of the results, including a copy of the revised manifest return procedures, or if it is determined that no revisions are appropriate, a copy the existing procedures;

ROSS INCINERATION SERVICES, INC.
DECEMBER 13, 2011
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- Train associates responsible for assuring that manifests are returned in a timely manner on all new procedures; and
- Submit documentation of response actions taken to this office within 60 days of receipt of this letter.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Materials and Waste Management

NJW:ddw

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO
Nyall McKenna, Ohio EPA, DMWM, NEDO
Jeff Mayhugh, Ohio EPA, DMWM, CO
John Paquelet, DMWM, NEDO

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.