



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

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

September 5, 2007

Mr. Eric M. Schreibman  
Omni Pride One  
387 Medina Road, Suite 600  
Medina, OH 44256

Re: **2006 Hazardous Waste Annual Report Requirement**  
**Lake Erie Products at 13001 Athens Ave in Lakewood - OHD0041898177**

Dear Mr. Schreibman:

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 Lake Erie Products during the 2006 calendar year. The total amount reported indicates that Lake Erie Products was a large quantity generator in 2006. Since I have not received a Hazardous Waste Annual Report for 2006, Lake Erie Products 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 Lake Erie Products 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.

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

Ohio EPA is an Equal Opportunity Employer

To abate the violation of OAC Rule 3745-52-41, Lake Erie Products must complete and submit to Ohio EPA a 2006 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. You may access the reporting forms and instructions on our website at [http://www.epa.state.oh.us/dhwm/ann\\_report.html](http://www.epa.state.oh.us/dhwm/ann_report.html).

Lake Erie Products 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 Lake Erie Products 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 Lake Erie Products 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.

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  
Niyall McKenna, 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: OHD004189817  
 Generator Name: Lake Erie Screw Corp  
 Address: 13001 Athens Ave  
 Lakewood, OH 44107-6297  
 Total Tons Shipped: 36.10

Receiving Facility

US EPA ID: OHD020273819  
 Name: Vickery Environmental Inc  
 Customer Name: LAKE ERIE SCREW CORP  
 Customer Address: 13001 ATHENS AVE  
 CLEVELAND, OH 44107-

Waste Description: SPENT SULFURIC ACID Page: 150 Subpage: 1  
 System Type: H134 Form: W103 Quantity: 31.00 T Density:  
 K062 D002

Receiving Facility

US EPA ID: OHD980897656  
 Name: Chemical Solvents, Inc.  
 Customer Name: LAKE ERIE SCREW  
 Customer Address: 13001 ATHENS AVE  
 CLEVELAND, OH 44107-

Waste Description: FLAMMABLE-LOOSE PACK Page: 505 Subpage: 1  
 System Type: H141 Form: W001 Quantity: 50.00 P Density: 7.5 Lbs. / Gal.  
 D001

Waste Description: BLEACH POWDER-LOOSE PACK Page: 505 Subpage: 1  
 System Type: H141 Form: W001 Quantity: 5.00 P Density: 9.75 Lbs. / Gal.  
 D001

Waste Description: PAINT IN CANS Page: 505 Subpage: 1  
 System Type: H141 Form: W001 Quantity: 400.00 P Density: 7.5 Lbs. / Gal.  
 D001

Waste Description: INORGANIC ACIDS-LOOSE PACK Page: 505 Subpage: 1  
 System Type: H141 Form: W001 Quantity: 20.00 P Density: 9.16 Lbs. / Gal.  
 D002

Waste Description: BLEACH POWDER Page: 505 Subpage: 1  
 System Type: H141 Form: W110 Quantity: 5.00 G Density: 9.16 Lbs. / Gal.  
 D002

Waste Description: AMINE-LOOSE PACK Page: 505 Subpage: 1  
 System Type: H141 Form: W001 Quantity: 10.00 P Density: 8.33 Lbs. / Gal.  
 D001 D002

Receiving Facility

US EPA ID: OHD980568992  
 Name: Envirite of Ohio, inc.  
 Customer Name: LAKE ERIE SCREW  
 Customer Address: 13001 Athens Avenue  
 CLEVELAND, OH 44107-

Waste Description: WASTE WATER Page: 274 Subpage: 1  
 System Type: H077 Form: W103 Quantity: 4.78 T Density: 8.43 Lbs. / Gal.  
 D002

Generator Facility

Generator US EPA ID: OHD004189817  
Generator Name: Lake Erie Screw Corp  
Address: 13001 Athens Ave  
Lakewood, OH 44107-6297  
Total Tons Shipped: 36.10

Receiving Facility

US EPA ID: OHD980897656  
Name: Chemical Solvents, Inc.  
Customer Name: LAKE ERIE SCREW  
Customer Address: 13001 ATHENS AVE  
CLEVELAND, OH 44107-

Waste Description: AEROSOLS

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Subpage: 1

System Type: H141 Form: W001 Quantity: 100.00 P Density: 6.66 Lbs. / Gal.

D001