



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

August 6, 2008

RAY BRABSON
SHINCOR SILICONES INC
1030 EVANS AVE
AKRON, OH 44305-1021

**Re: 2007 Hazardous Waste Annual Report Requirement
SHINCOR SILICONES INC, AKRON - OH0000065342**

Dear RAY BRABSON:

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 SHINCOR SILICONES INC during the 2007 calendar year. The total amount reported is approximately 18.33 tons as shown on the enclosed printout. This total indicates that SHINCOR SILICONES INC was a large quantity generator in 2007. Because I have not received a Hazardous Waste Annual Report for 2007, SHINCOR SILICONES INC 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, SHINCOR SILICONES INC 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. You may access the reporting forms and instructions on our website at http://www.epa.state.oh.us/dhwm/ann_report.html.

SHINCOR SILICONES INC 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 SHINCOR SILICONES INC 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 SHINCOR SILICONES INC did not generate more than the threshold quantity of hazardous waste in any month during 2007. 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) 644-2891. Your prompt attention to this matter is appreciated.

Sincerely,



Mary Ann Silagy
Environmental Specialist 2
Regulatory and Information Services
Division of Hazardous Waste Management
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enclosure

cc: Central File
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:** OH0000065342**Generator Name:** Shincor Silicones Inc**Address:** 1038 Evans Ave
Akron, OH 44305-1021**Total Tons Shipped:** 18.33**Receiving Facility****US EPA ID:** OHD066060609**Name:** Chemtron Corp**Customer Name:** SHINCOR SILICONES, INC.**Customer Address:** 1030 EVANS AVE.
AKRON, OH 44305-**Waste Description:** ACETIC ACID LAB WASTE **Page:** 5355 **Subpage:** 1**System Type:** H061 **Form:** W219 **Quantity:** 70.50 G **Density:** 1.08 S.G.
D001 D002**Waste Description:** DMX & DOE MIXER LINE WASTE **Page:** 5356 **Subpage:** 1**System Type:** H061 **Form:** W219 **Quantity:** 1435.75 G **Density:** 0.98 S.G.
D001**Waste Description:** FLAMMABLE SILICONES **Page:** 5356 **Subpage:** 2**System Type:** H061 **Form:** W219 **Quantity:** 2700.00 G **Density:** 1 S.G.
D001**Waste Description:** FLAMMABLE SILICONES **Page:** 5356 **Subpage:** 3**System Type:** H141 **Form:** W219 **Quantity:** 944.00 P **Density:** 1 S.G.
D001**Waste Description:** LAB WASTE FUELS **Page:** 5357 **Subpage:** 1**System Type:** H061 **Form:** W203 **Quantity:** 115.00 G **Density:** 0.86 S.G.
F005 D001 F003