



State of Ohio Environmental Protection Agency

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May 4, 2007

Mr. Peter Davis
Klor Kleen
3118 Spring Grove Ave
P.O. Box 25183
Cincinnati, Ohio 44225

**Re: Notice of Violation of the 2006 Hazardous Waste Annual Report Requirement
Klor Kleen - OHD980821862**

Dear Mr. Davis:

The Division of Hazardous Waste Management (DHWM) received Klor Kleen's 2006 Hazardous Waste Annual Report electronically on February 2, 2007. Upon review of this report, I have discovered some items that violate the Ohio Administrative Code Chapter 3745. Please review the details below and make the appropriate changes to your records. If I have requested additional information, please respond within 30 days of receipt of this letter.

Violation – OAC 3745-52-41(A)(5)

Klor Kleen is reporting that 620 tons of hazardous waste was generated on-site during 2006 from 'air pollution control devices' (G21) and 'laboratory analytical wastes' (G22). Based on our knowledge of your site activities, DHWM believes that most, if not all, of these Source Codes should be 'hazardous wastes received from off-site' (G61) and a generation quantity of zero. I will change your GM forms to reflect this, and if any of this waste was generated on-site, please let me know. This violation has been abated with the changes I made to your report.

Violation - OAC 3745-54-75(C)

Waste Receipt page 25 lists 24,900 pounds of hazardous waste received from Dayton Power & Light located at 745 U.S. Route 52 in Manchester, Ohio, under EPA ID OHD000821407. DHWM actually found this generator to be located at 745 US Highway 52 in Aberdeen, OH, under EPA ID OHD000721407. The validation report that you run before submitting the report notifies you of all EPA ID numbers that fail the check-digit test. These should be checked using US EPA's Envirofacts Data Warehouse at <http://www.epa.gov/enviro/> and corrected if possible. This is especially important when the quantities of waste received exceed the Small Quantity Generator threshold because generators are then required to have and use an EPA ID number for shipping hazardous waste. This violation has been abated with the correction I made to your report.

Additional Customer Corrections

Waste Receipt page 8 also had the ID number off by one digit, and DHWM corrected that ID number to read KYD985077825. This site is classified as a Conditionally Exempt Small Quantity Generator.

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

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WR page 80 lists waste received from customer USA Lamp & Ballast. This is a destination facility for universal waste, and they have an active ID number (OHR000109819). I have added their ID number to this WR page. Please send me a copy of the hazardous waste manifests from this generator.

GM Form Corrections

Several of your GM Forms list invalid management method codes for the receivers of your hazardous waste. The validation report identifies the invalid codes, and we expect them to be corrected before the report is submitted. I have made the following corrections to these pages:

GM 6 H111 for MID000724831
GM 7 H135 for OHD004274031
GM 8 H129 for MID980991566
GM 8 H111 for MID000724831
GM 9 H135 for OHD004274031
GM 9 H111 for MID000724831
GM 11 H111 for MID000724831
GM 15 H111 for MID000724831
GM 17 H111 for MID000724831
GM 19 H141 for IND085616837

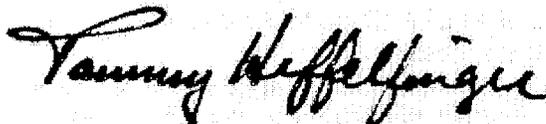
GM Questions

While reviewing your 2006 report, I noticed that you reported no > 90-day storage of hazardous waste. When I looked at the past years' reports, I also saw little/no storage reported. The quantities of hazardous waste received each year on the WR forms, and the quantities shipped each year on the GM forms don't seem to add up and account for all of the waste. It appears that you have a growing amount of hazardous waste on-site that isn't being reported anywhere. I made a table with summaries back through the 2003 report. Please review your records and send me a response to explain this discrepancy.

Year	WR total (tons)	Ship total (tons)	>90-day storage total	Discrepancy
2003	1494	781	0	713
2004	3583	1519	0	2777
2005	2229	1002	5	3999
2006	1340	620	0	4719

I can answer any questions concerning the Annual Report at (614) 644-2954 or tammy.heffelfinger@epa.state.oh.us

Sincerely,



Tammy Heffelfinger
Annual Report Coordinator
Regulatory and Information Services
Division of Hazardous Waste Management

cc: Central File
ec: Pam Hull, 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