



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

May 16, 2007

Mr. Michael Glaser
Structured Management Inc.
1669 W 130th St
Hinckley, Ohio 44233

**Re: Notice of Violation of the 2006 Hazardous Waste Annual Report Requirement
Structured Management Inc - OHR000137356**

Dear Mr. Glaser:

The Division of Hazardous Waste Management has received your 2006 Hazardous Waste Annual Report on April 9, 2007. The report was due on March 1, 2007, and because you were a Large Quantity Generator, you were in violation of OAC 3745-52-41 for not submitting the report by the due date. The violation for not submitting in time has been abated with the receipt of the report. However, my review of the report you submitted shows that it is not complete. Ohio Administrative Code (OAC) Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to Ohio EPA a Hazardous Waste Annual Report and to describe the type and amounts of waste generated and shipped off-site in the previous calendar year. Because your submittal does not contain data required by the rule, you are in violation. Please see the reverse side of this letter for the specific information that is missing from your report.

To abate the violations of OAC Rule 3745-52-41, you must follow the instructions pertaining to your particular violations within 30 days of receipt of this letter. You 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. I will send a letter acknowledging receipt of the amendment after I review and process it. DHWM recommends using the free software to complete the reports to reduce the occurrence of errors in the data submitted. If you have questions concerning the annual report requirements, you can reach me 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: DHWM, NEDO

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

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Violation OAC 3745-52-41(A)(2) Year covered by the report

While I can assume this report is for the current report year (2006), you need to indicate the year that the report information covers on both the Site Identification Form in Section 1, and at the top left of each GM and OI Form.

Violation OAC 3745-52-41(A)(4) Transporters

You are required to provide the name and US EPA ID number for each transporter used during the report year for shipments to a treatment, storage or disposal facility. This information is provided on the Off-site Information (OI) Form with the Transporter box checked for each one.

Violation OAC 3745-52-41(A)(5) Waste Description/Receiver

You are required to provide a description of your waste, and the quantity of waste sent to each receiving facility, and the manner in which it was managed once it arrived. This information is to be provided on the Generation and Management (GM) Form. Section 1 is where the description is located. Section 3 is where you report the quantities for each receiving facility and the management methods. Please note that the "pounds" indication should be listed as a "P" in the Unit of Measure (UOM) box in Section 2. Box C.

Violation OAC 3745-52-41(A)(8) Certification

The contents of the report need to be certified with an original wet-ink signature in Section 12 of the Site Identification Form. This signature should be of the generator or an authorized representative.

Other Deficiencies

Please note that all sections of the Site Identification Form must be completed in order to process the report. This includes Sections 1, 6, 8 and 9. While you have indicated you were an LQG for the report, you have not marked any normal operating generator status. If it is left blank, that indicates you wish to deactivate your EPA ID number.

You have 30 days from receipt of this letter to respond with a completed copy of the report. If you need anything from me, please do not hesitate to contact me.

Fax : (614)728-1245

E-mail: tammy.heffelfinger@epa.state.oh.us

Regular Mail: Tammy Heffelfinger
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Ohio EPA
PO Box 1049
Columbus, Ohio 43216-1049

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.