



State of Ohio Environmental Protection Agency

STREET 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

MAILING ADDRESS:

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

June 11, 2007

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

Re: Second Notice of Violation of the 2006 Hazardous Waste Annual Report Requirement / Partial Return to Compliance: Structured Management Inc - OHR000137356

Dear Mr. Glaser:

The Division of Hazardous Waste Management has received amendments to your 2006 Hazardous Waste Annual Report on May 31, 2007. My review of the amended report you submitted shows that it is still not complete. Violations of Ohio Administrative Code (OAC) Rules 3745-52-41(A)(2), (4) and (8) have been abated, but OAC 3745-52-41(A)(5) has not. Because your submittal still does not contain data required by the rule, you remain in violation of OAC Rule 3745-52-41. Please see the reverse side of this letter for the details regarding this rule. Please note that some of the deficiencies have also not been corrected.

To abate the remaining violation of OAC Rule 3745-52-41, you must follow the instructions pertaining to your particular violation within **15** days of receipt of this letter. You should have on file the manifest records necessary for completion of the report. 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: Ronald Shadrach, DHWM, NEDO

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.

Other Deficiencies

Please note that all sections of the Site Identification Form must be completed in order to process the report. This includes Sections 6 and 9. For Section 6, the instructions clearly state that you must provide a minimum of 5 digits for the NAICS Code. And in Section 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. If this is what you would like, please confirm by indicating so in the comments box.

You have 15 days from receipt of this letter to respond with amendments to your report. If you need anything, please do not hesitate to contact me.

Fax : (614)728-1245

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

Regular Mail: Tammy Heffelfinger
DHWM
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.