



State of Ohio Environmental Protection Agency

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March 28, 2007

Amy Brady
Von Roll America
1250 Saint George St.
East Liverpool, OH 43920

**Re: Notice of Violation of the 2006 Hazardous Waste Annual Report Requirement
Von Roll America - OHD980613541**

Dear Ms. Brady;

The Division of Hazardous Waste Management (DHWM) received Von Roll America's (VRA) 2006 Hazardous Waste Annual Report electronically on March 1, 2007. Upon review of this report, I have discovered some items that are violations of the Ohio Administrative Code Chapter 3745-54-75, and other areas of concern that need to be addressed. I have listed these items below. Please review each one and send me a response addressing each item within 30 days of receipt of this letter.

Violation OAC 3745-52-41(A)(5)

VRA has not reported all hazardous wastes shipped off-site. There are no pages that list the approximately 77 tons of hazardous wastes reported as H141 on the WR forms. These GM page(s) would have a source code of G61. Please see the WR summary document attached and send any amendments with your response.

Violation OAC 3745-52-41(A)(3)

Ross Incineration and Environmental Enterprises report receiving hazardous waste from VRA during 2006, but VRA does not list them on any GM or OI Form as a receiving facility. Please review the attached document showing what these facilities reported as received and include any amendments or comments with your response.

Concern GM page 2

Page 2 lists H141 as the off-site management method for discarded refractory brick shipped to Heritage. The comment says "microencapsulation". Assuming the microencapsulation was done at Heritage, the management method code should be H129, Other Treatment.

Concern Waste Receipt Forms

It appears that Address line 2 contains the street address and Address line 1 is blank except for the customers who have a PO Box. We will have a database administrator fix this on our end but please be sure in the future to populate Address line 1 with the location and only then use Address line 2 if needed.

Violation OAC 3745-54-75(C)

Customer ID corrections

Page	WR Customer info	Correction	Comments
382	OH0000874589 Central Transport Int	OH0000874 <u>859</u>	
1507	OHD698950104 Armor All	OHD068950104	This ID is assigned to the address but under the name "Cincinnati Industrial Machinery" and has not been updated since 1986.
617	NVD082109370 American Borate	NVD082109 <u>307</u>	
671	RID018564197 Brown University	RID0185641 <u>79</u>	
774	MID980668745 Delphi in Flint	MID980 <u>5</u> 68745	
827	MAD980670242 VA Hospital in Bedford	MAD980670 <u>343</u>	
1329	PAD987401268 UPS in Middletown	PAD987401 <u>288</u>	
1509	IND046399766 Borden Waste Away Svcs	IND04639 <u>7</u> 766	
1719	MDO000933546 New Page – Luke Mill	MD <u>0</u> 000933546	Location address for ID is in McCoolle, not Luke.
1733	KYD006384225 Daramic	KYD0063 <u>9</u> 4225	
1883	PAD981741228 Tyco Electronics in Mount Joy	PAD981741 <u>226</u>	
2283	MD0120508408 USDA BCF in Beltsville	MD012050 <u>8940</u>	There were multiple IDs for USDA in Beltsville but this one matches the best numerically.
2418	ILR000007338 Valspar	ILR000007 <u>336</u>	
130	KSD980684784 APAC	KSD980684 <u>724</u>	
147	PRR000011955 AES Puerto Rico	PRR000011 <u>965</u>	
317	NYR000109869 Target #1477	NYR00010 <u>97</u> 69	

The Customer ID corrections below are not violations, but you should change your database to reflect the corrections:

Page	WR Customer info	Correction	Comments
390	OHCESQG City of Mason (WW Plant)	OHR000104901	SQG, 2001
456	OHCESQG Franklynn Industries	OHR000135285	ID active between April and Sept 2006.
2398	OHCESQG Panhandle Eastern Pipeline	OHR000134270	SQG, February 2006
844	OHCESQG Rotek Inc	OHR000022723	In 1997 they deactivated the ID but obviously they still have activity there.
1474	OHD000039438 BP Amoco Pipeline in Cinci	OHR not OHD	
1539	OHD000040758 United Parcel Service	OHR not OHD	

Customer Questions

Target #1970, MDR000514830, pg 362 – This ID doesn't pass the check-digit test but I can't find any matches for an address containing "Martin" or city=Middle River in MD with Target as the facility name.

Composix, OHT400010302, pg 851 – This company was inspected recently and found to be using an ID for their old location at 112 Jefferson in Newark, which is the address listed on the WR. The current location is 23 Sisal St. Can you please verify the pickup location? Composix will have to send in a notification form but the ID for 23 Sisal is OHD117360420.

Design Ware American Greetings, MID005378095, pg 2398 – This ID doesn't pass the check digit test and I can't find a match by address or name in Kalamazoo. I did find MID005378096, but that is an inactive location with the name Penn Corp Beach Products Div at 2001 Fulford St. I forwarded the information to my contact at MI DEQ. This customer was in VRA's 2005 report with the same puzzling identification. Please verify the customer's location and EPA ID.

Kings College in Wilkes-Barre, PACESQG, pg 1103 – Both address lines contain a period instead of a street address. Please provide the generator's location.

Several addresses have asterisks at the beginning of the text. Does this have a specific connotation?

I will expect a response within 30 days of receipt of this letter, addressing each item. I can answer questions regarding 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: 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.