



CERTIFIED MAIL

91 7108 2133 3932 0812 2067

August 21, 2013

RESPONSIBLE REGULATORY OFFICIAL
ADJUSTA POST MFG CO
3960 SUMMIT RD
NORTON, OH 44203

**Re: 2010 Hazardous Waste Biennial Report Requirement – Notice of Violation
ADJUSTA POST MFG CO, NORTON - OHD004162046**

Dear Responsible Regulatory Official:

During a recent review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) and it was noticed that one or more shipments of hazardous waste were received from ADJUSTA POST MFG CO during the 2010 calendar year. The amounts reported, 32.47 tons, indicate that this site was a large quantity generator in 2010. Enclosed are printouts of the shipment information. Because I have not received a Hazardous Waste Biennial Report for 2010, ADJUSTA POST MFG CO may be in violation of current federal and state laws concerning the generation, transportation and treatment of hazardous waste.

A large quantity generator is defined as a site which generates in any single month 1000 kg (2200 lbs.) or more of non-acute hazardous waste or 1 kg (2.2 lbs.) or more of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. Generating hazardous waste at or above this amount for one or more months means that a facility is required to file a Hazardous Waste Report for the generating year in question. OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA a Hazardous Waste Biennial Report and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each even numbered year and must 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) do not have to file the Biennial Report requirement as described in OAC Rule 3745-52-44.

ADJUSTA POST MFG CO should have on file the manifest records necessary to complete this 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. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

Generator Facility

Generator US EPA ID: OHD004162046
 Generator Name: Packaging Materials Services
 Address: 3960 Summit Rd
 Norton, OH 44203-
 Total Tons Shipped: 32.47

Receiving Facility

US EPA ID: OHD001926740
 Name: Hukill Chemical Corp
 Customer Name: Adjusta-Post Lighting/Divcom Lighting:CI
 Customer Address: 3960 Summit Rd.
 Norton, OH 44203-

Waste Description:	Waste Calcium Hypochlorite Mixture, Dry	Page:	1020	Subpage:	208
System Type:	H141 Form: W319 Quantity: 20.00 P Density:				
	D001				
Waste Description:	Waste Corrosive Liquid, Acidic, inorganic, n.o.s.	Page:	1020	Subpage:	223
System Type:	H141 Form: W103 Quantity: 552.20 P Density:				
	D002				
Waste Description:	Waste Corrosive Liquid, Acidic, Inorganic, n.o.s.	Page:	1020	Subpage:	232
System Type:	H061 Form: W105 Quantity: 3157.00 P Density:				
	D002 D007				
Waste Description:	Waste Corrosive Liquid, Basic, Inorganic, n.o.s.	Page:	1020	Subpage:	266
System Type:	H141 Form: W110 Quantity: 643.10 P Density:				
	D002				
Waste Description:	Waste Flammable Liquid, n.o.s.	Page:	1020	Subpage:	470
System Type:	H061 Form: W206 Quantity: 1192.95 P Density:				
	D018 D001				
Waste Description:	Waste Flammable Liquid, n.o.s.	Page:	1020	Subpage:	519
System Type:	H061 Form: W211 Quantity: 826.65 P Density:				
	D035 F005 D001 D007 F003				
Waste Description:	Waste Flammable Liquids, Corrosive, n.o.s.	Page:	1020	Subpage:	576
System Type:	H141 Form: W203 Quantity: 487.85 P Density:				
	D001 D002				
Waste Description:	Waste Aerosols, Flammable	Page:	1020	Subpage:	175
System Type:	H141 Form: W801 Quantity: 269.00 P Density:				
	D040 D035 D001				
Waste Description:	Hazardous Waste Liquid, N.O.S.	Page:	1020	Subpage:	60
System Type:	H141 Form: W209 Quantity: 47977.60 P Density:				
	D007				
Waste Description:	Hazardous Waste Liquid, N.O.S.	Page:	1020	Subpage:	15
System Type:	H141 Form: W002 Quantity: 4669.50 P Density:				
	D007				
Waste Description:	Waste Flammable Solids, Organic, N.O.S.	Page:	1020	Subpage:	980
System Type:	H141 Form: W319 Quantity: 20.00 P Density:				
	D001				
Waste Description:	Waste Sulfuric Acid Solution	Page:	1020	Subpage:	1795
System Type:	H141 Form: W103 Quantity: 40.00 P Density:				
	D002				