40 years and moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED MAIL 91 7108 2133 3932 0812 1442

August 27, 2013

LARRY BARTH
HFI INC
2421 MCGAW RD
COLUMBUS, OH 43207

Re: 2011 Hazardous Waste Biennial Report Requirement – Notice of Violation
HFI INC, COLUMBUS - OHD987043049

Dear LARRY BARTH:

During a recent review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) it was noticed that one or more shipments of hazardous waste were received from HFI INC during the 2011 calendar year. The amounts reported, 17.17 tons, indicate that this site was a large quantity generator in 2011. Enclosed are printouts of the shipment information. Because I have not received a Hazardous Waste Biennial Report for 2011, HFI INC 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.

HFI INC 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.

Annual Reports - NOV Candidate Report for 2011

Generator Facility

Generator US EPA ID: OHD987043049
Generator Name: HFI LLC
Address: 2421 McGaw Rd
OBETZ, OH 43207-
Total Tons Shipped: 17.17

Receiving Facility

US EPA ID: OHD066060609
Name: Chemtron Corp
Customer Name: HFI, INC.
Customer Address: 2421 MCGAW RD
OBETZ , OH 43207-

Waste Description: VORALUX HE 134 ISOCYANATE **Page:** 2252 **Subpage:** 1484
System Type: H141 **Form:** W606 **Quantity:** 2524.35 P **Density:**
D001

Waste Description: WASTE WAX **Page:** 2252 **Subpage:** 2786
System Type: H129 **Form:** W211 **Quantity:** 1413.64 P **Density:**
D001

Waste Description: WASTE ADHESIVE **Page:** 2252 **Subpage:** 3752
System Type: H061 **Form:** W210 **Quantity:** 8641.32 P **Density:**
D006 D018 D035 F005 D001 F003

Waste Description: WASTE RESIN **Page:** 2252 **Subpage:** 4808
System Type: H061 **Form:** W119 **Quantity:** 9156.60 P **Density:**
D001

Waste Description: WASTE ADHESIVE **Page:** 2252 **Subpage:** 6396
System Type: H141 **Form:** W210 **Quantity:** 12192.60 P **Density:**
D006 D018 D035 F005 D001 F003

Waste Description: WASTE METHYL ETHEL KETONE **Page:** 2252 **Subpage:** 6858
System Type: H061 **Form:** W203 **Quantity:** 413.08 P **Density:**
D018 D035 F005 D001