



**EPA**

*40 years and moving forward*

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

**CERTIFIED MAIL** 91 7108 2133 3932 0812 1510

August 27, 2013

Responsible Regulatory Official  
P&J INDUSTRIES INC  
4934 LEWIS AVE  
TOLEDO, OH 43612

**Re: 2011 Hazardous Waste Biennial Report Requirement – Notice of Violation  
P&J INDUSTRIES INC, TOLEDO - OHD009702531**

Dear Responsible Regulatory Official:

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 P&J INDUSTRIES INC during the 2011 calendar year. The amounts reported, 88.05 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, P&J INDUSTRIES 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.

P&J INDUSTRIES 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.

Generator Facility

Generator US EPA ID: OHD009702531  
 Generator Name: P & J Industries Inc  
 Address: 4934 Lewis Ave  
 Toledo, OH 43612-  
 Total Tons Shipped: 88.05

Receiving Facility

US EPA ID: OHD048415665  
 Name: Ross Incineration Services Inc  
 Customer Name: P & J INDUSTRIES, INC.  
 Customer Address: 4934 LEWIS AVE  
 TOLEDO , OH 43612-

Waste Description: LAB PACK: REDUCING AGENTS Page: 1110 Subpage: 10735  
 System Type: H040 Form: W001 Quantity: 5.00 P Density: 1.4 S.G.  
 D003 D001

Waste Description: LAB PACK: TOXIC/PIH COMPOUNDS Page: 1110 Subpage: 10734  
 System Type: H040 Form: W001 Quantity: 10.00 P Density: 1.4 S.G.  
 D002

Waste Description: SODIUM NITROBENZOATE Page: 1110 Subpage: 10733  
 System Type: H040 Form: W409 Quantity: 20.00 P Density: 1.5 S.G.  
 D001

Waste Description: LAB PACK: 4.2 COMPOUNDS Page: 1110 Subpage: 10732  
 System Type: H040 Form: W001 Quantity: 15.00 P Density: 1.4 S.G.  
 D001

Receiving Facility

US EPA ID: OHD020273819  
 Name: Vickery Environmental Inc  
 Customer Name: P & J INDUSTRIES INC  
 Customer Address: 4934 LEWIS AVE  
 TOLEDO, OH 43612-

Waste Description: ZINC/NICKEL PLATING SOLUTION Page: 136 Subpage: 1  
 System Type: H134 Form: W110 Quantity: 70.00 T Density:  
 D002

Receiving Facility

US EPA ID: OHD048415665  
 Name: Ross Incineration Services Inc  
 Customer Name: P & J INDUSTRIES, INC.  
 Customer Address: 4934 LEWIS AVE  
 TOLEDO , OH 43612-

Waste Description: LAB PACK: TOXIC COMPOUNDS Page: 1110 Subpage: 10736  
 System Type: H040 Form: W004 Quantity: 50.00 P Density: 1.4 S.G.  
 D003 P106 P104 P029

Receiving Facility

US EPA ID: OHD020273819  
 Name: Vickery Environmental Inc  
 Customer Name: P & J INDUSTRIES INC  
 Customer Address: 4934 LEWIS AVE  
 TOLEDO, OH 43612-

Waste Description: ALKALINE CLEANER Page: 136 Subpage: 1  
 System Type: H134 Form: W110 Quantity: 18.00 T Density:  
 D002