



State of Ohio Environmental Protection Agency

PH  
File

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

May 27, 2009

Mr. Mike Barr  
Metal Brite Polishing  
2445 Neff Road  
Dayton OH 45414

RE: Complaint Investigation at Metal Brite Polishing and Notice of Violation

Dear Mr. Barr:

On May 12, 2009, Ohio EPA conducted a complaint investigation at Metal Brite Polishing (MBP) located in Dayton. The investigation performed by the Ohio EPA was the result of a complaint received by this Agency on March 12, 2009. The complaint alleged that MBP disposes of chemicals illegally by throwing containers of hazardous material on the ground or into dumpsters. I represented Ohio EPA. In this matter, you represented MBP.

You informed me on May 12, 2009 that you polish steel, zinc and aluminum parts and that this waste is disposed of in your solid waste. You also provided me with information that you dispose of your sulfuric acid waste as a hazardous waste through Veolia Environmental. Additionally, I found no evidence that you were dumping any waste on the ground. However, zinc can make your grinding waste hazardous. Also, I am enclosing information that identifies chromium as being a component in steel. Depending on laboratory analysis of your waste, zinc and chromium may cause it to be hazardous.

Based on these findings, Ohio EPA has identified the following violation of Ohio's hazardous waste laws:

**Hazardous Waste Determination  
(OAC 3745-52-11)**

Any person who generates a waste must determine if the waste is a hazardous waste.

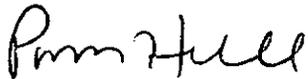
MBP failed to evaluate its polishing waste to determine if it is hazardous.

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MBP must immediately contact Veolia (or any other vendor or your choice) to determine if your polishing waste stream is hazardous. Please submit this determination **within 45 days upon your receipt of this letter.** **Additionally, do not dispose of any further polishing material containing steel in your solid waste until this analysis has been performed.**

If you have any questions, please call me at (937) 285-6091

Sincerely,



Pam Hull  
District Representative  
Division of Hazardous Waste Management

cc: Dinah Crawford, SWDO-DHWM/SWDO file  
SWDO-file: Metal Brite Polishing Complaint, Montgomery County

PH/lai

## Ohio Commercial Facilities Accepting Hazardous Waste

updated June 2008

Company	Address	Telephone/Fax	Management Activity
Agmet Metals, Inc. OHD986976348	7800 Medusa Street Oakwood Village, Ohio 44146 <a href="http://www.agmetmetals.com/">http://www.agmetmetals.com/</a>	(440) 439-7400 / (440) 439-7446	Metals Recovery
Chemical Solvents OHD980897656	1010 Denison Avenue Cleveland, Ohio 44109 <a href="http://www.chemicalsolvents.com/">http://www.chemicalsolvents.com/</a>	(216) 741-9310 / (216) 741-4080	Solvent Recycling, Fuel Blending
Chemtron Corporation OHD066060609	35850 Schneider Court Avon, Ohio 44011 <a href="http://www.chemtron-corp.com/">http://www.chemtron-corp.com/</a>	(440) 937-6348 / (440) 937-6845	Solvent Recycling, Fuel Blending, Mercury Recovery
Clean Harbors Environmental Services OHD000724153	2900 Rockefeller Avenue Cleveland, OH 44115 <a href="http://www.cleanharbors.com/">http://www.cleanharbors.com/</a>	(216) 429-2402 / (216) 883-1918	Chemical Reduction, Chemical Precipitation
Clean Harbors Recycling Services of Hebron OHD980587364	581 Milliken Drive SE Hebron, Ohio 43025 <a href="http://www.cleanharbors.com/">http://www.cleanharbors.com/</a>	(740) 929-3532 / (740) 928-1347	Solvent Recycling, Fuel Blending
Clean Water Ltd OHD004274031	300 Cherokee Drive Dayton, Ohio 45427 <a href="http://www.cleanwaterltd.com/">http://www.cleanwaterltd.com/</a>	(800) 543-3670 / (937) 268-5734	Storage/Transfer, Aqueous Treatment
Envirite Corporation OHD980568992	2050 Central Avenue SE Canton, Ohio 44707 <a href="http://www.envirite.com/">http://www.envirite.com/</a>	(330) 456-6238 / (330) 456-2801	Chemical Precipitation, Chemical Treatment, Metals Recovery
Environmental Enterprises Inc. OHD083377010	4650 Spring Grove Avenue Cincinnati, Ohio 45232 <a href="http://www.eeienv.com/">http://www.eeienv.com/</a>	(513) 541-1823 / (513) 541-1638	Fuel Blending, Aqueous Organic & Inorganic Treatment, Stabilization
Environmental Recycling OHR000034025	527 E Woodland Circle Bowling Green, Ohio 43402 <a href="http://www.envrecycle.com/">http://www.envrecycle.com/</a>	(419) 354-6110 / (419) 354-5110	Mercury recovery from electrical devices, Battery storage/transfer
Envirosafe Services of Ohio OHD045243706	876 Otter Creek Road Oregon, Ohio 43616 <a href="http://www.envirosafeservices.com/">http://www.envirosafeservices.com/</a>	(800) 537-0426 / (419) 698-8663	Landfill

Heritage-WTI Inc OHD980613541	1250 Saint George Street East Liverpool, Ohio 43020 <a href="http://www.heritage-wti.com/">http://www.heritage-wti.com/</a>	(330) 385-7336 / (330) 386-2160	Incineration
Hukill Chemical Corporation OHD001926740	7013 Krick Road Bedford, Ohio 44146 <a href="http://www.hukill.com/">http://www.hukill.com/</a>	(440) 232-9400 / (440) 232-9477	Fuel Blending, Solvent Recycling
Klor Kleen Inc. OHD980821862	3118 Spring Grove Avenue Cincinnati, Ohio 45225 <a href="http://www.midwestenvironmentalservices.com/">http://www.midwestenvironmentalservices.com/</a>	(513) 681-9990 / (513) 681-1185	Storage/Transfer
Reserve Environmental OHD980793384	4633 Middle Road Ashtabula, Ohio 44004	(440) 992-2162 / (440) 992-9262	Wastewater Treatment
Ross Incineration Services OHD048415665	36790 Giles Road Grafton, Ohio 44044 <a href="http://www.rossenvironmental.com/">http://www.rossenvironmental.com/</a>	(440) 728-2200 / (440) 728-1339	Incineration
Spring Grove Resource Recovery OHD000816629	4879 Spring Grove Avenue Cincinnati, Ohio 44115 <a href="http://www.cleanharbors.com/">http://www.cleanharbors.com/</a>	(513) 681-6242 / (513) 681-6246	Fuel Blending, Stabilization, Aqueous Treatment with Carbon Adsorption
Systech Environmental Corporation OHD005048947	11397 County Road 176 Paulding, Ohio 45879 <a href="http://www.sysenv.com/">http://www.sysenv.com/</a>	(419) 399-4835 / (419) 399-4876	Fuel Blending
Toxco Inc. OHD071654958	265 Quarry Road Lancaster, Ohio 43130 <a href="http://www.toxco.com/">http://www.toxco.com/</a>	(877) 461-2345 / (740) 653-3240	Battery Recycling
USA Lamp & Ballast Recycling Inc. OHR000109819	7806 Anthony Wayne Ave. Cincinnati, Ohio 45216 <a href="http://www.usalamp.com/">http://www.usalamp.com/</a>	(513) 641-4155 / (513) 641-4156	Lamp Recycling
Veolia ES Technical Solutions LLC OHD093945293	4301 Infirmary Road West Carrollton, Ohio 45449 <a href="http://www.veoliaes-ts.com/">http://www.veoliaes-ts.com/</a>	(937) 859-6101 / (937) 859-6242	Fuel Blending, Solvent Recycling
Vickery Environmental OHD020273819	3956 State Route 412 Vickery, Ohio 43464 <a href="http://www.wm.com/">http://www.wm.com/</a>	(419) 547-7791 / (419) 547-6144	Underground Injection



June 9, 2006

## MATERIAL SAFETY DATA SHEET

Conforms to Requirements of OSHA Standard 1910.1200

### HAZARD COMMUNICAITON

I. Product identification: Low Alloy Steel Castings Bearing Material Codes  
Containing the letters C, H or K.

II. Hazardous Components:

	<u>CAS No.</u>	<u>Percent</u>	<u>TLV Mg/CuM</u>	<u>PEL Mg/CuM</u>
Chromium	7440-47-3	0-6	0.5	1.0
Iron	7439-89-6	>90%	5.0	10.0
Molybdenum	7439-98-7	0-2%	10.0	15.0
Nickel	7440-02-0	0-2%	1.0	1.0

III. Overview:

There are no chemical hazards from these castings in solid form at room temperature. Machining, grinding, welding and flame or Air-Arc cutting of castings can generate dust or fume. Most of this will be iron or iron oxide and overexposure to iron oxide can cause siderosis or iron pigmentation of the lungs. Little or no disability results from siderosis.

This same dust fume may also contain chromium and nickel. If the total dust fume from the process is kept below TLV then the individual components will be adequately controlled.

Some forms of nickel have been found to cause cancer in animals. The potential for ordinary forms of nickel or its oxides to cause cancer in humans is very weak if it exists at all.

IV. Physical Data:

Odorless silver gray solid with a S.G. of about 7.8. Other properties as BP, VP and water solubility are not applicable.

V. Fire Explosion Data:

Low alloy steel castings will not burn or explode.

VI. Health Hazard Data:

Eyes: Metal particles in the eyes may cause irritation if not removed. Particles should be removed by a trained person.

Skin Contact: No hazards known.

Breathing : Prolonged or repeated exposure to iron oxide fume may cause siderosis. Maintain adequate ventilation when welding on or thermally cutting castings.

Ingestion Not applicable

VII. Reactive Data:

Low Alloy steel castings are chemically stable. Hazardous polymerization will not occur. Chromium metal dust may burn or explode on contact with ammonium nitrate.

VIII. Spill and Leak procedure:

Dust collected from machining, welding or thermal cutting may be classified as "Hazardous Waste". Also, castings can be recycled. Consult local authorities about disposition of these items.

IX. Protective Equipment:

Respiratory: Wear a NIOSH approved respirator for dust or fume if concentration exceed the TLV or PEL.

Ventilation: Provide general ventilation and/or local exhaust if necessary to maintain concentration below TLV.

Eye Protection: Safety glasses with side shields and/or face shields for grinding; goggles or helmet for welding.

Other: Protective apron and gauntlets when welding on or thermally cutting castings.

X. Special Procedures:

Storage requires no special requirements.

**Ohio Environmental Protection Agency  
RCRA SUBTITLE C SITE  
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: Name: <b>Metal Brite Polishing</b>	Website: (Optional)
	Street Address: <b>2445 Neff Rd</b> City, Town, or Village: <b>Dayton</b> County Name: <b>Montgomery</b>	State: OH Zip Code: <b>45414</b>
	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	
	<b>332813</b>	

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Mike</b> MI: Last Name: <b>Barr</b> Phone Number: <b>937-278-9739</b> Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:
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<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:  Owner Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State:	Date Became Owner (mm/dd/yyyy):  Owner Phone #: Country: Zip Code:
	Name of Site's Operator:  Operator Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State:	Date Became Operator (mm/dd/yyyy):  Operator Phone #: United States Zip Code:

**VIOLATIONS CITED?**  Yes  No

<b>TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED</b>	
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11
	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Small Quantity Generator (SQG)
	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
	<input type="checkbox"/> U.S. Importer of Hazardous Waste
	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))**

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil  
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

**D002**  
**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: <b>Complaint investigation. CESQG for acid strip generation</b>
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<b>(pending results of polishing waste).</b>

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>Pam Hull</b>		<b>5/12/2009 9:45</b>

**OPTIONAL CERTIFICATION.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)