

**Environmental
Protection Agency**

Robert R. Corio, Governor
L. Ed Brown, Lt. Governor
Cynthia M. Smith, Director

November 12, 2010

Don Senne
General Manager
Brass Accents, Inc.
1693 Salem Parkway West
Salem OH 44460

**RE: BRASS ACCENTS, OHR000162206, COLUMBIANA COUNTY
COMPLAINT #7373, CESQG NOV RTC**

Dear Mr. Senne:

On October 14, 2010, Wade Balsler and I, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited Brass Accents, Inc. (Brass Accents) to conduct a hazardous waste compliance evaluation inspection (CEI). Brass Accents was represented by John Senne. The inspection was a result of a complaint received by Ohio EPA concerning the management of wastes from the plating line at the facility.

The purpose of the inspection was to determine Brass Accents' compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The inspection included a review of the facility's operations, as well as the management of wastes. Brass Accents was evaluated for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste.

On October 19, October 22, October 25, November 2, November 4, November 5 and November 8, 2010, Brass Accents submitted documentation concerning waste evaluation information and other corrective actions implemented at the facility.

Based on the inspection, Ohio EPA identified the following violation:

- OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate that waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Brass Accents failed to evaluate the following wastes:

- A. Spent copper and nickel solutions generated from plating operations. These wastes were being accumulated in two, six-gallon containers.

Brass Accents indicated that the facility will manage these wastes as hazardous waste due to corrosivity (hazardous waste number D002). This violation has been adequately abated. No further information is requested.

- B. Spent blast media generated from the abrasive blasting of brass hardware. Brass Accents indicated that the facility will manage the waste as a hazardous waste due to the presence of lead (hazardous waste number D008). This violation has been adequately abated. No further information is requested.
- C. Waste generated from the polishing/abrasive wheels operation. Brass Accents indicated that the facility will manage the waste as a hazardous waste due to the presence of lead (hazardous waste number D008). This violation has been adequately abated. No further information is requested.
- D. Brass turnings generated from machining operations. Brass Accents indicated that the turnings will be collected and recycled as scrap metal. This violation has been adequately abated. No further information is requested.
- E. Used fluorescent lamps. Brass Accents committed to manage used lamps as Universal Waste. This violation has been adequately abated. No further information is requested.

Ohio EPA offers the following comments:

1. Ohio EPA assigned an EPA ID number to track the inspection activity at Brass Accents. Brass Accents may not use this number for manifesting hazardous waste shipments. If Brass Accents wishes to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, please complete and submit a Notification of Regulated Waste Activity form (EPA Form 9029) to Ohio EPA. This form is available at: <http://www.epa.ohio.gov/dhwm/notiform.aspx> or by contacting me.
2. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to hazardous waste activities in Ohio. For more information, please refer to: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

3. The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. For more information, please refer to: <http://development.ohio.gov/Energy>
4. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. OCAPP provides free compliance and pollution prevention assistance on environmental issues related to air, land and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at: <http://www.epa.ohio.gov/ocapp/contact.aspx>
5. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.ohio.gov/dhwm>

Information obtained pertaining to Brass Accents' processes and waste generation is discussed on the Process Description-Waste Activities Summary Sheet within the enclosed inspection checklists.

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Brass Accents from having to comply with all applicable regulations.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

ec: Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
Nyall McKenna, DHWM, NEDO

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHR000162206 Name: Brass Accents, Inc.	Website: http://www.brassaccents.com/ (Optional)
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Site Location Information	Street Address: 1693 Salem Parkway West City, Town, or Village: Salem	State: OH Zip Code: 44460
Site Land Type (check only one)	County Name: Columbiana	Private <input 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"/>

NAICS code(s) www.census.gov/epcd/www/naics.html	332323
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Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Don MI: Last Name: Senne Title: General Manager Phone Number: 330-332-9500 Phone Number Extension: E-Mail Address: don@brassaccents.com Fax Number: 330-337-8775 Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:
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Legal Owner And Operator of the Site. 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 Type: Private <input 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"/> Street or P.O. Box: City, Town or Village: State: Country: Zip Code:	Date Became Owner (mm/dd/yyyy): Owner Phone #: Zip Code:
	Name of Site's Operator: Operator Type: Private <input 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"/> Street or P.O. Box: City, Town or Village: State: Country: Zip Code:	Date Became Operator (mm/dd/yyyy): Operator Phone #: Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN. Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" 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"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

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

- | | |
|---|---|
| <input checked="" 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 Used Oil
- Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-209 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
- Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them; instead just indicate the date of the most recent source record.

D002 D008

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

Announced Yes No Additional Facility Representatives: **John Senne present during 10/14/10 inspection.**

Tanks Yes No
Containers Yes No

Name of Inspector(s)
Frank Zingales

Name of Inspector(s)
Wade Balsler

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
10/10/2010 09:30

Comments:

PROCESS DESCRIPTION / WASTE ACTIVITIES SUMMARY

Facility Name: Brass Accents, Inc.

Facility Type: CESQG

EPA ID#: OHR000162206

Process Information: Facility conducts finishing activities on brass hardware (e.g., pulls, knobs, plates). See attached matrix for wastes generated.

Regulatory / Enforcement History: None to date.

<i>Description of Waste</i>				<i>On-Site Management</i>	<i>Off-Site Management</i>
Process/Activity Generating Waste	Waste Generated	EPA Waste Code	Quantity Generated	Type of Accumulation / Storage	Name, state, and type of activity occurring at the facility.
1. Plating	Spent copper and nickel solutions (pH<2).	HW Corrosive Liquid - D002	5-gallons episodically generated.	Container	Must be delivered to a permitted hazardous waste management facility.
2. Abrasive blasting	Spent blasting media.	HW Solid (Lead) - D008	200 pounds / 3 months.	Container	Must be delivered to a permitted hazardous waste management facility.
3. Polishing/buffing	Waste from polishing/abrasive wheels.	HW Solid (Lead) - D008	5 pounds / month	Container	Must be delivered to a permitted hazardous waste management facility.
4. Machining	Turnings				For recycle as scrap metal.
5. Maintenance	Spent lamps	Universal Waste Lamps			Intended management as universal waste. Must be delivered to a universal waste handling facility.

Would this facility be interested in a pollution prevention (P2) assessment? Made facility aware of opportunity.

Office of Compliance Assistance and Pollution Prevention: 1-800-329-7518 or p2mail@epa.state.oh.us or <http://epa.ohio.gov/ocapp/contact.aspx>

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: Safety Glasses

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Future shipments of hazardous waste must be delivered to a permitted TSD.
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TREATMENT OF HAZARDOUS WASTE

4.	Does the generator treat hazardous waste in a:	No treatment.
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>