



State of Ohio Environmental Protection Agency

Northeast District Office

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

April 30, 2007

RE: **CBM SUPPLY COMPANY**  
**OHD 004154944**

Richard Chandler  
CBM Supply Company  
2950 E. 55<sup>th</sup> Street  
Cleveland, Ohio 44127-1286

Dear Mr. Chandler:

I have received the April 9, 2007 letter from Tammy Rodrigues which responded to the violations and concerns found during my March 9, 2007 inspection of Central Brass Manufacturing Company located at 2950 E. 55<sup>th</sup> Street in Cleveland. I understand this location is now called CBM Supply Company. The status of those issues is outlined below.

We spoke on the telephone on April 23, 2007. You stated that Central Brass is in Chapter 11 bankruptcy and that the foundry has been shut down. You said that other operations, such as, plating and machining are planned to be shutdown within the next two weeks. We agreed that I would call you on May 14<sup>th</sup> so that we could schedule a follow up inspection and discuss closure and Cessation of Regulated Operations (CRO) rules. For more information on these requirements please see my March 15, 2007 letter and: [http://www.epa.state.oh.us/dhwm/cro/CRO\\_Manual.pdf](http://www.epa.state.oh.us/dhwm/cro/CRO_Manual.pdf).

### **Small Quantity Generator Requirements**

1. OAC rule 3745-52-11 – Hazardous waste determination.  
The drum of waste nickel plating solution was put into the wastewater treatment system. Other similar waste, such as the plating solutions when the plating line is closed, could be used by another company or recycled. This would avoid the nickel ending up in the treatment sludge which may then need to be disposed or, at least, will not be as easily recycled. A waste exchange such as Ohio's Material Exchange which can be found at: <http://www.epa.state.oh.us/ocapp/p2/omex/omex.html> may help you find a company that can reuse your waste.

Nickel solutions, as well as nickel containing treatment sludge, may be able to be recycled by companies such as:  
Agmet in Oakwood Village, OH  
Ph. 440-439-7400  
<http://www.agmet1.com/home.htm>

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Inmetco in Ellwood City, PA  
Ph. 724-758-2800  
<http://www.inmetco.com/>

2. OAC rule 3745-65-31 – Maintenance and operation of facility.  
A green contamination was seen in the ice and snow and on the concrete outside in the area where empty drums are stored. You took several samples in this area and provided the results of one of those samples. The April 9, 2007 letter stated that no hazardous substances were found in excess of regulatory limits. While it is true that none of the results provided were over the TCLP limit that would make a waste a hazardous waste, please be advised that these TCLP limits are not used as standards to determine whether a cleanup has been completed. I will look again at this area during a follow up inspection and we can discuss it then.
3. OAC 3745-52-34(C)(1)(a) – Satellite accumulation area.  
Your response documents the correction of this violation.

#### **Universal Waste Handler Requirements**

4. OAC 3745-273-13 (D) - Universal waste lamp containers.
5. OAC 3745-273-14 (E) - Universal waste lamp labeling.  
Your response documents the correction of these violations.

#### **Used Oil Requirements**

6. OAC rule 3745-279-22(C) - Used oil labels.  
Your letter states that this material is used coolant. It may fit the definition of used oil and, if so, you need to follow the used oil rules which include labeling these containers as used oil (not used coolant). A fact sheet regarding used oil is enclosed and can also be found at:  
[http://www.epa.state.oh.us/dhwm/pdf/Used Oil Generators Guidance.pdf](http://www.epa.state.oh.us/dhwm/pdf/Used_Oil_Generators_Guidance.pdf)

#### **Concerns**

1. Waste was seen on the floor at your plating operation. Photographs of this have been emailed to you. This waste should be cleaned up and, as with any waste, you must determine whether it is a hazardous waste. As stated at the beginning of this letter, Central Brass will be subject to CRO rules when it shuts down. Included in these is OAC 3745-352-20 which requires the removal from the facility of all regulated substances and all debris. If the equipment that is in this area of waste will be sold as part of the plant closure, it would make sense to wait until then to clean the floor. I understand that no plans for the sale of the equipment have been made as of April 23, 2007. Please keep me posted on your plans in this regard.

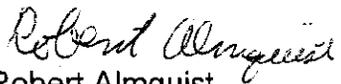
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2. Central Brass is currently a small quantity generator of hazardous waste. However, Central Brass was a large quantity generator in the past. For this reason you are subject to the generator closure requirement in OAC 3745-52-34(A)(1). More information regarding this is enclosed. In general, this requires a cleanup in any area that hazardous waste was accumulated. We can discuss this further at the follow up inspection.
3. You sent me paperwork showing the recent shipment of your waste fluorescent amps to Lightsout/Harrington Electric on Perkins Avenue.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,

  
Robert Almquist  
Division of Hazardous Waste Management

RA:cl  
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Ed D'Amato, DHWM, NEDO  
Tammy Rodriguez, Central Brass

**Notice:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.