



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

April 14, 2010

**ROSS COUNTY
GENERAL FILE
(BRAY LOGGING)
DHWM/SEDO
OHR000120634**

Mr. Robert Bray
Robert Bray Logging
1636 Baum Hill Road
Chillicothe, Ohio 45601

Dear Mr. Bray:

On March 30, 2010, Ohio EPA conducted a complaint investigation of your logging facility located at 9636 Upper Twin Road, South Salem, Ohio in order to determine your company's compliance with Ohio's hazardous waste laws. According to the complainant, diesel fuel and tires had allegedly been disposed of on the ground. During the investigation, I met with you and observed unlabeled drums of used oil and spillage of diesel fuel on the ground near a diesel fuel tank. I did not observe any improperly stored tires. As a result of conditions observed onsite, your company has violated the following rule of the Ohio Administrative Code (OAC):

- (1) **OAC Rule 3745-279-22 (B), Used Oil Storage Requirements for Generators:** Used oil must be stored in containers that are in good condition, not leaking, and labeled with the words "used oil".

During the inspection, I observed three drums of used oil in good condition but without labels. On April 6, 2010, you sent me photographs of properly labeled used oil drums. Therefore, this violation has now been abated.

GENERAL COMMENTS

- (a) Soils adjacent to the diesel fuel tank, which is used to pump diesel into company vehicles, were saturated with spilled diesel fuel. This appeared to be from sloppy operations rather than from a malfunctioning pump. While onsite, I explained that all saturated soils must be excavated and disposed of as a solid waste. On April 6, 2010, you submitted photos documenting that soils had been excavated and disposed of. As a result, you have now adequately addressed this issue.

Mr. Robert Bray
Robert Bray Logging
April 14, 2010
Page 2

Should you have any questions, please feel free to call me at 740-380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mlm

NOTICE:

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

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
---	---	-----------------------

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHR000120634 Name: Robert Bray Logging		Website: (Optional)
Site Location Information	Street Address: 9399 Upper Twin Road City, Town, or Village: South Salem		
Site Land Type (check only one)	State: OH	County Name: Ross	
NAICS code(s) www.census.gov/epcd/www/naics.html	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"/>	Zip Code: 113310

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Robert	MI:	Last Name: Bray
	Phone Number: 740-701-4602		Phone Number Extension:
	E-Mail Address:		
	Fax Number:		Fax Number Extension:
	Street or P.O. Box: 1636 Baum Road		
	City, Town or Village: Chillicothe		
	State: OH		Zip Code: 45601

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:		Date Became Owner (mm/dd/yyyy):	
	Owner Type:	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"/>	Street or P.O. Box:		
	City, Town or Village:		Owner Phone #:	
	State:		Country:	
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):	
	Operator Type:	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"/>	Street or P.O. Box:		
	City, Town or Village:		Operator Phone #:	
	State:		Country:	
			Zip Code:	

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE	
<input checked="" 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"/> 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)

- Small Quantity Handler of Universal Waste Destination Facility for Universal Waste
 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 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.

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:
Tanks Yes No Containers of used oil only
Containers Yes No

Name of Inspector(s)
Donna Goodman

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
3/31/10, 12:00PM

Comments: