



**Environmental
Protection Agency**

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

April 28, 2011

**WASHINGTON COUNTY
GENERAL FILE (MICHAEL
BRADLEY APPARATUS)
DHWM/SEDO
OHD010460806**

Mr. Jon Pollard, Safety Coordinator
Michael Bradley Apparatus
16 Industry Road
Marietta, OH 45750

Dear Mr. Pollard:

On April 14, 2011, Ohio EPA inspected Michael Bradley Apparatus ("MBA") in Marietta, Ohio to determine MBA's 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). MBA was represented by you and Plant Manager Jonathan Harris. This letter will explain the violations I found, what you need to do to correct the violations, other general concerns we have, what you need to do to respond to my general concerns and any pollution prevention opportunities I identified.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within 30 days** of the date of this letter:

- (1) **OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste in Ohio must evaluate it to determine if the waste is hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. MBA failed to evaluate the following waste streams:
 - a. Spent paint thinner/paint waste from spray painting of engines in a small paint booth. According to you, this waste is typically managed by placing in an open container and allowing it to evaporate. As a result, there was no spent paint waste accumulating onsite during the inspection. During the evaluation, this waste was determined to be an F003 hazardous waste based on MSDS information that you provided.
 - b. Spent paint filters from small paint booth. Filters are currently typically disposed of as a solid waste every six months or so.
 - c. Wastewater accumulating in an 800 gallon below-ground holding tank in the steam cleaning area. The tank is plumbed to the Marietta POTW; however, MBA does not release it to the treatment plant until the tank is full. This has not occurred for a number of years. It is not clear if the company has received permission from the city for acceptance of this waste.

- d. Liquid in an in-floor concrete tank located beneath the varnish dip tank. This includes water, varnish drag-out, and possibly other wastes. During the inspection MBA was unsure of the purpose of this tank and therefore plans to empty the vault and dispose of this liquid.

MBA must evaluate the waste streams described in b, c and d above either by using process knowledge (this can be based on MSDS information, if adequate), or chemical analysis. The results of this evaluation should be submitted to this office for review and further instructions. For example, MBA may base the determination on paint filters on MSDS information for paints used, however, MSDS information alone is not sufficient to determine if the contents of the two tanks described in c and d above are a hazardous waste, since additional contaminants could be present in the waste. Should the wastes be hazardous, they must be managed as such.

Please also submit an estimate of the volumes contained in each tank described in c and d above. Also, as we discussed during the inspection, please note that prior to disposing of the filter on the steam cleaning system, MBA must evaluate it per the above-cited regulation and if hazardous, manage it as such.

- (2) **OAC Rule 3745-279-22 (C) and (D), Used Oil Storage Requirements for Generators:** (C) Containers of used oil must be labeled with the words "Used Oil"; (D) Upon detection of a release of used oil to the environment, a used oil generator must stop the release, contain the released used oil, clean up and properly manage the released used oil and any materials used to clean up the used oil, and if necessary, repair or replace any leaking used oil storage containers prior to returning them to service for used oil storage.

(C) A black drum containing used oil stored behind the shop was not labeled. In order to abate this violation, you must immediately label the drum as described above and submit photographs of the properly labeled drum to this office. Alternatively, you may recycle the contents of the drum to a used oil recycler and submit evidence that this has been done.

(D) The above described black drum and several open top steel containers with slotted bottoms which held scrap metal were releasing used oil onto the ground, thus contaminating soils and gravel.

In order to abate (D), you must immediately stop all used oil from releasing onto the ground; excavate all visibly oil-contaminated soils and gravel; clean up any oil which may have contaminated the concrete pad; dispose of oily soils, gravel and cleanup materials in your dumpster or at a licensed solid waste landfill; and submit photographs of the cleaned area and disposal receipts to me. In addition, you must prevent all future releases of used oil by improving your used oil and scrap metal housekeeping operations, and by training your employees in proper handling of used oil and oily scrap metal, and cleanup procedures to take immediately upon the release of used oil. Please submit a detailed description of the steps you will take to improve housekeeping, train employees, and address any future spills.

GENERAL COMMENTS

- (a) Your company generates spent fluorescent lamps, which are a universal waste in Ohio. Information on proper management of universal waste lamps, as well as a list of recyclers of spent fluorescent lamps, can be found at the following links:

<http://www.epa.ohio.gov/dhwm/fluorescent.aspx>

- (b) As a generator of used oil, you must maintain in your files receipts for all offsite shipments of used oil to a recycler. You may self transport no more than 55 gallons at a time of your used oil in your company vehicle or your own vehicle or that of one of your employees. Used oil must be delivered to a used oil collection center that is registered with the Ohio EPA to manage used oil. If you have your used oil transported by someone other than as described above, the transporter must have obtained a USEPA ID number. In other words, you cannot provide your used oil to someone who is using it for heating oil unless they have the proper EPA registration and have done the proper analysis to determine that your used oil is not contaminated with excess levels of hazardous waste (such as spent lacquer thinner or paint) that you mix into your used oil. Mixing small quantities of hazardous waste into your used oil is permissible so long as you generate no more than 27.5 gallons per month of hazardous waste. More information on management for used oil generators and a list of registered used oil recyclers can be found at the following links:

http://www.epa.ohio.gov/dhwm/used_oil.aspx

<http://www.epa.state.oh.us/ocapp/p2/recyc/oilmark.html>

Please submit information that documents that you will manage all future used oil in accordance with the above information.

- (c) As previously requested, please submit all receipts for the past year for spent solvents managed by Safety Kleen or other contractors. Information that you submitted to me appears to be for purchase of solvents rather than for removal of spent solvents.
- (d) A number of empty steel drums were stored at the facility. We briefly discussed recycling of drums during the inspection. The following is list of drum recyclers and re-conditioners that you may find helpful:

<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp>

Mr. Jon Pollard
Michael Bradley Apparatus
April 28, 2011
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Enclosed, you will find a copy of the checklists that were completed during the inspection. 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 Materials and Waste Management

DG/mlm

Enclosure

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 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 brad.hauser@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD010460806	
Site Name	Name: Michael Bradley Apparatus	Website: (Optional)
Site Location Information	Street Address: 116 Industry Road	
	City, Town, or Village: Marietta	State: OH
Site Land Type (check only one)	County Name: Washington	
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: 456750
	811310	

Facility Representative	First Name: Jon	MI:	Last Name: Pollard
Additional names can be recorded in number 12.	Title: Safety Coordinator		
Only provide address information if it is different than the site address	Phone Number: 740-374-6255		Phone Number Extension:
	E-Mail Address:		
	Fax Number:		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		
	State:	Zip Code:	

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: Mike Beardmore and Brad Loeber		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:	Zip Code:	
	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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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"/> 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"/> Large Quantity Generator (LQG) <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 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 3745-52-200 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.

F003

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: **Jonathan Harris, Plant Manager**
 Tanks Yes No
 Containers Yes No

Name of Inspector(s)
Donna Goodman

Name of Inspector(s)

Date of Inspection/Time
 (mm/dd/yyyy) (hh:mm)
4/14/11 1:00 PM

Comments:

No spent xylene (paint thinner) was being accumulated while onsite, however, company was told that they must begin to containerize spent paint thinner instead of allowing it to evaporate, as is current practice.

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] Used oil is leaking onto the ground from containers holding scrap metal.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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a.	Stopped the release?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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b.	Contained the release?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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[Facility Name/Inspection Date]

[ID Number]

Used Oil Checklist for Generators/August 2009

Page 1 of 2

ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] It is unclear who hauls the used oil offsite to a "friend with a used oil space heater".	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		

**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:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] /Spent paint thinner and paint booth filters have not been evaluated.	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)] Not all wastes have been evaluated yet.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE

4.	Does the generator treat hazardous waste in a:	
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"/>

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Michael Bradley Apparatus **Facility Type:** CESQG **Date of Inspection:** 4/14/11 **EPA ID#:** OHD010460806

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Steam Cleaning engines	Wastewater	Approx. 800 gallon underground tank		Marietta Wastewater Treatment Plant		
2 Parts Washing	Spent Solvent	35 gal/3 months		Safety Kleen		
3 Steam Cleaning Engines	Spent filter Not evaluated	Never replaced yet				
4 Painting of Engines	Spent paint thinner Not evaluated	5-10 gallons per year	Allowed to evaporate			
5 " "	Spent filters Not evaluated	varies		Placed in dumpster		
6 Dipping in varnish (tank beneath varnish dip tank)	Spent liquid , F003	Tank in floor beneath varnish dip tank				
7 Draining engines and misc.	Used oil	varies		Gives to friend with used oil burner		
8 Spent fluorescent lamps	unevaluated			Placed in dumpster		

9						
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REMARKS **GENERAL INFORMATION**

General Process Information:

Michael Bradley Apparatus repairs heavy electric motors for various industries in a small machine shop. Motors are disassembled, steam cleaned, rewound, soaked in a varnish bath, baked in an oven to cure the varnish, and reassembled, and shipped out.

Regulatory/Enforcement History (if applicable):

This company was formerly known as Eastern Electric Apparatus Repair Company and later, Ohio Valley Apparatus. In 2005 it was purchased by a new owner and renamed. Eastern Electric Apparatus was last inspected in 2001. No violations were cited. An NOC was sent on 10/01/01.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: