



**Environmental
Protection Agency**

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

June 28, 2011

**RE: AKRON BRASS CO. PLANT 3
OHD 981 090 376
PRTC**

Alora Miller
Akron Brass Company
343 Venture Blvd.
Wooster, OH 44691

Dear Ms. Miller:

I have received you June 3, 2011 letter and attachments which responded to my May 17, 2011 letter. With the exception of number 5 (see below) you have documented the correction of all the violations found during my April 11, 2011 inspection of Akron Brass Plant 3 located at 1415 E. Bowman St., Wooster, Ohio.

1. **OAC Rule 3745-52-34(A)(1) –Uncontainerized waste.**
2. **OAC Rule 3745-65-16(A)(2) – Training program.**
3. **OAC Rule 3745-65-16(D)(1) – Job titles and names.**
4. **OAC Rule 3745-65-16(D)(2) – Job descriptions.**
5. **OAC Rule 3745-65-16(D)(4) – Training records.**
The attendance sheet you submitted for the May 24, 2011 annual refresher did not include Dave Grosjean. Please let me know when he last had the annual refresher.
6. **OAC Rule 3745-65-52(D) - Emergency coordinators.**
7. **OAC Rule 3745-65-52(E) – Contingency plan emergency equipment.**
8. **OAC Rule 3745-65-53(A) – Copies of contingency plan.**
9. **OAC Rule 3745-65-35 – Required aisle space.**
Your letter documents the correction of this violation. You also have moved the hazardous waste storage area. OAC Rule 3745-66-11(A) and (B) require the owner or operator to close his facility in a manner that: (A) Minimizes the need for further maintenance; and (B) Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or

hazardous waste decomposition products to the ground water, or surface waters, or to the atmosphere. I suggest you photograph the former accumulation area and make a brief report of the closure of it so that you will be able to document compliance with this rule in the future.

10. **OAC Rule 3745-52-34(C)(1)(a) – Open satellite containers.**
11. **OAC Rule 3745-52-34(C)(1)(b) – Satellite container labeling.**
12. **OAC Rule 3745-52-34(C)(2) – Dating of satellite containers.**
13. **OAC Rule 3745-52-34(A)(3) – Container labeling.**
14. **OAC Rule 3745-52-34(A)(2) – Accumulation start date.**
15. **OAC Rule 3745-66-73(A) – Closed containers.**
16. **OAC Rule 3745-66-74 – Inspections of container storage areas.**
17. **OAC rule 3745-270-07(A)(2) – Land disposal restriction notice.**
You submitted the results of four samples collected on April 21, 2011. These results show that the west bag house sample is hazardous waste for lead (D008) and cadmium (D006); the west dust collector is hazardous for cadmium (D006); the east baghouse is hazardous for lead (D008); and the return sand is hazardous for lead (D008).

Your letter asks whether the west bag house waste (D008, D006) and the west dust collector waste (D006) need to be listed on separate lines on the manifest and land disposal restriction notice. I suggest that you list these two wastes on separate lines so that you have a clear record of how much waste is generated from each process. This may help you in future waste minimization or recycling options that you explore.
18. **OAC Rule 3745-273-13 (D)(2) - Universal waste lamp containers.**
19. **OAC Rule 3745-273-14 (E) - Universal waste lamp labeling.**
20. **OAC Rule 3745-273-16 –Universal waste training.**

Alora Miller
Akron Brass Company
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If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us. I look forward to your prompt response addressing the one remaining violation.

Sincerely,



Robert Almquist
Division of Materials and Waste Management

RA:cl

ec: Frank Popotnik, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
Sherry Slone, DMWM, NEDO

cc: Marlene Kinney, DMWM, NEDO

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.