



EPA

40 years and moving forward

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CERTIFIED MAIL

91 7108 2133 3932 0812 2050

August 21, 2013

ROBERT CAIRNIE
ORRVILLE BRONZE AND ALUMINUM CO
CENTRAL CT
ORRVILLE, OH 44667

**Re: 2010 Hazardous Waste Biennial Report Requirement – Notice of Violation
ORRVILLE BRONZE AND ALUMINUM CO, ORRVILLE - OHD004215125**

Dear ROBERT CAIRNIE:

During a recent review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) it was noticed that one or more shipments of hazardous waste were received from ORRVILLE BRONZE AND ALUMINUM CO during the 2011 calendar year. The amounts reported, 63.86 tons, indicate that this site was a large quantity generator in 2010. Enclosed are printouts of the shipment information. Because I have not received a Hazardous Waste Biennial Report for 2010, ORRVILLE BRONZE AND ALUMINUM CO may be in violation of current federal and state laws concerning the generation, transportation and treatment of hazardous waste.

A large quantity generator is defined as a site which generates in any single month 1000 kg (2200 lbs.) or more of non-acute hazardous waste or 1 kg (2.2 lbs.) or more of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. Generating hazardous waste at or above this amount for one or more months means that a facility is required to file a Hazardous Waste Report for the generating year in question. OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA a Hazardous Waste Biennial Report and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each even numbered year and must contain information about the activities of the previous calendar year. Only small quantity generators (between 220 and 2200 lb/mo of non-acutely hazardous wastes) and conditionally exempt small quantity generators (less than 220 lb/mo of non-acutely hazardous wastes) do not have to file the Biennial Report requirement as described in OAC Rule 3745-52-44.

ORRVILLE BRONZE AND ALUMINUM CO should have on file the manifest records necessary to complete this report. OAC Rule 3745-52-40 requires generators to keep a signed copy of each manifest for a period of at least three years from the date the waste was accepted by the initial transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

Generator Facility

Generator US EPA ID: OHD004215125
 Generator Name: Orrville Bronze & Aluminum Co
 Address: Central Court
 ORRVILLE, OH 44667-
 Total Tons Shipped: 63.86

Receiving Facility

US EPA ID: OHD066060609
 Name: Chemtron Corp
 Customer Name: ORRVILLE BRASS & ALUMINUM
 Customer Address: CENTRAL CT
 ORRVILLE , OH 44667-

Waste Description: WASTE GREASE Page: 381 Subpage: 2167
 System Type: H141 Form: W603 Quantity: 90.00 P Density:
 D006 D007 D008

Waste Description: PHOSPHORIC ACID 30% Page: 381 Subpage: 4049
 System Type: H141 Form: W105 Quantity: 83.45 P Density:
 D002

Waste Description: LEAD DUST Page: 381 Subpage: 5800
 System Type: H141 Form: W310 Quantity: 72350.70 P Density:
 D008

Waste Description: WASTE OIL Page: 381 Subpage: 6034
 System Type: H061 Form: W203 Quantity: 458.98 P Density:
 D008

Waste Description: PIT WATERS HAZARDOUS Page: 381 Subpage: 7450
 System Type: H141 Form: W113 Quantity: 54242.50 P Density:
 F002

Waste Description: ISOPROPYL ALCOHOL Page: 381 Subpage: 7914
 System Type: H061 Form: W203 Quantity: 500.70 P Density:
 D001