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State of Ohio Environmental Protection Agency

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P.O. Box 1049  
Columbus, OH 43216-1049

May 5, 2008

Mr. Denny Hess  
Kaiser Aluminum Fabricated Products, LLC  
600 Kaiser Drive  
Heath, OH 43056

Re: **Kaiser Aluminum Fabricated Products, LLC**  
**Licking County, LQG OHD 004298089**

Dear Mr. Hess:

Thank you and to Mr. Al Dantzer for your assistance during my inspection visits to your Heath, Ohio facility on March 31 and April 9, 2008. The purpose was to review your facility's generation and management of hazardous waste, universal waste and used oil. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of these wastes. This letter summarizes the inspection findings.

The following violations were noted:

- 1. **Hazardous Waste Contingency Plan, OAC rule 3745-65-52(E):** A Contingency plan must include a list of all emergency equipment, including the location(s), a physical description and brief outline of capabilities.

The contingency plan lacked this required information. An update was planned or in progress.

*Please update the plan as needed to include this information and send copies of the changed pages to demonstrate correction of this violation.*

- 2. **Universal Waste Lamp Container Marking, OAC rule 3745-273-14(E):** Containers of universal waste lamps must be marked as "Waste Lamp(s)", Universal Waste Lamp(s), or "Used Lamp(s)".

A wooden box of waste lamps on March 31<sup>st</sup> located along H-aisle, Column G-59 was not properly marked. It was simply marked as "fluorescent lamp storage". On April 9, 2008 some fiberboard containers for waste lamps in the electric shop, were unmarked. *This problem was partially corrected by repackaging the lamps into suitable container for shipping and it had been sent to a Universal Waste recycling facility before my return visit on April 9, 2008.*

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

2. **Closed, Compatible Universal Waste Lamp Containers, OAC rule 3745-273-13(D)(1):** Universal waste lamps must be contained in packages or containers that are structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. They must be kept closed and lack evidence of damage that could cause leakage.

Fiberboard containers for universal waste lamps (fluorescent tubes) in the electric shop on April 9<sup>th</sup> were left open. The wooden box on March 31<sup>st</sup> was not adequate to prevent breakage, as it contained numerous broken lamp tubes.

*The problem with the wooden box was resolved, as noted above. However, please ensure that the other containers for universal waste lamps in the electric shop are properly kept closed when waste is not being added. A container with special liner bag is recommended in the event that any potential breakage may occur incidentally during handling.*

Warning Note:

***Caustic dip tank containment problems must be satisfactorily addressed in a timely fashion by Kaiser by changing operation of the area so the containment functions not as an ongoing hazardous waste accumulation tank but as simple emergency containment, as it was designed. Hazardous waste tanks require daily inspection with log recordkeeping, engineering assessments, and other operating procedures specified in OAC Rule 3745-66-90 through -992. With your response to this letter, please include a detailed description of actions Kaiser will take to satisfactorily address this problem. See also the waste reduction comment (third bullet item) below.***

I also offer the following comments/suggestions:

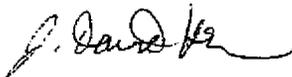
- In addition to fluorescent lamp tubes, Kaiser was also using HID lamps for lighting in its buildings. Please be advised that those lamps/bulbs may also exhibit hazardous characteristics, and must be evaluated by testing prior to disposal unless you choose to proactively manage them as universal waste lamps.
- Detailed information on energy efficiency as a waste reduction and pollution prevention opportunity was provided to you during my second visit on April 9<sup>th</sup>. I hope that Kaiser is able to use the information to help recapture some of the large amount of waste heat that is coming from the gas-fired melting furnaces.
- The caustic dip process tank and adjacent rinse tank, continues to be an area of concern. As noted in my 2003 inspection here, there appears to be a significant amount of drag-out waste falling off the parts and onto the floor, collected in the secondary containment under the floor grate. The waste is allowed to remain in the containment for a period of months before being removed at the same time your caustic tank is serviced. I strongly recommend upgrading this area to prevent drips and spills to the floor by matching the rinse tank height and width to that of the adjacent caustic tank, installing a drip baffle between the tanks, using a drain tray if necessary to rinse or drip the part (rather than over the floor) and if necessary decreasing the hoist speed overhead so parts are allowed to drip longer before being moved.

- An in-ground tank outside the truck garage included two chambers, one of which was being used to collect liquids (antifreeze and floor washing waste) from a floor drain system inside the building. Those liquids were being managed as used oil, transferred via a sucker truck to the large tanks serviced by ESI. According to the worker in this area, the age of these tanks was believed to exceed 27 years. One of the tanks was full to the ground surface with liquid. Ohio EPA recommends that the out of service tank be properly closed and decommissioned/removed. The other tank, being this old, should have its integrity assessed on a regular schedule to help reduce the possibility of releases of used oil contents to the soil, ground water and/or environment.
- A letter report dated December 10, 2007 was received on January 8, 2008 pertaining to actions taken by Kaiser related to obligations for Generator Closure of the pad area. Significant cracking across the pad apparently was not sealed until late in its operating lifetime. With the present information, it is not possible to confirm with any great certainty that no releases occurred from this unit. However, the minimal performance standards for generators in OAC 3745-66-11(A) and (B) for this unit appear to have been met.

We understand that Sitewide VAP Phase 1 and 2 studies are being undertaken, including this area footprint. For more certainty about conditions underneath this slab, sampling beneath one or more of the major slab cracks should be considered. A scale drawing of the pad would also be recommended, cross referenced with a site map, as part of the closure documentation records.

I look forward to receiving *the requested compliance follow-up information* from you within **30 days**. Should you have any questions, please feel free to call me at (614) 728-3885.

Sincerely,



J. David Hohmann  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

c: Tammy McConnell-DHWM/CO  
CDO File

JDH/hsm Kaiser 08 NOV

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



Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD004298089								
3. Site Name	Name: Kaiser Aluminum & Fabricated Products, LLC					Website: (Optional)			
4. Site Location Information	Street Address: 600 Kaiser Drive								
	City, Town, or Village: Heath					State: OH			
	County Name:					Zip Code: 43056			
5. Site Land Type (check only one)	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"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	331316		331314						
7. Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Denny			MI:	Last Name: Hess				
	Phone Number: 740-522-0436				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:			Country:		Zip Code:			
8. 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: Kaiser Aluminum			Date Became Owner (mm/dd/yyyy): 10/28/2006					
	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: 27422 Portola Parkway, #350								
	City, Town or Village: Foothill Ranch				Owner Phone #:				
	State: CA				Country: USA		Zip Code: 92610-2831		
	Name of Site's Operator: Same as above				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input 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:			
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))					
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>			<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)		
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>					
Check all boxes below that apply for each of the three types of facilities above			10C. Used Oil Activities (Indicate Type(s) of Activity(ies))		
<b>Managed</b>			<input checked="" type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>	
<b>Batteries</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>	
<b>Pesticides</b>	<input type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>	
<b>Mercury containing equipment</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Processor</b>		
<b>Lamps</b>	<input checked="" type="checkbox"/>		<input type="checkbox"/> <b>Used Oil Re-refiner</b>		
11. 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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.					
<b>D001</b>	<b>D002</b>	<b>D008</b>	<b>D035</b>	<b>F003</b>	<b>F005</b>
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.					
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>		<b>Al Dantzer</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments: narrative report in DHWM files. NOV issued</b>		
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
13. Name of Inspector(s)			Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>David Hohmann</b>					<b>03/31/08 and 04/09/08</b>
14. <del>OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</del>					
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)	

## PROCESS, WASTE, P2 SUMMARY SHEET

**Kaiser Aluminum Fabricated Products, LLC**

episodic LQG

Inspected on: 3/31 &amp; 4/9/2008

ID#: OHD004298089

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.	Average quantity generated per Month, Type of Accumulation (container, tank, etc) & 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	Die cleaning by immersion in caustic dip tank	Spent Sodium Hydroxide solution (D002, D008)  Was 1200 gallons/batch every 5 months in '03  Pumped directly from process bath and from secondary containment tank on floor around it	n/a	Chemtron, Inc. (Avon, OH)  Permitted TSD treatment	n/a	Prevent drips/spills by configuring rinse tank height/width equal to adjacent caustic tank; and install drip baffle or drain tray; decrease hoist speed with cam on pulley.
2	Painting	Waste paint (D001, D035, F003, F005)  Satellite accumulation 55-gal. drum @ paint shop booth entrance in maintenance department	n/a	HW fuels blending	n/a	None noted
3	Solvent immersion cleaning of paint tools	spent solvent (D001, D035, F003, F005)  Not in accumulation. The solvent is removed directly from process equipment by vendor at time of service.	n/a		n/a.	Automated gun cleaner?
4	Process coolant bath maintenance	Spent coolant-water mixtures with oil (managed as used oil)  Transferred and accumulated in two Used Oil ASTs outside building near the 10"press area.	n/a		ESI (Youngstown, OH)  Processes for used oil fuels blending (energy recovery)	n/a.
5	Truck maintenance	Used oil, hydraulic fluids & antifreeze (all managed as used oil)  Drained to containers and drain system to underground tank, then transferred via tanker trailers to ASTs by 10"press area	n/a	None noted		None noted
6	Hydraulic press equipment maintenance	Used hydraulic oil  Transferred and accumulated in two Used Oil ASTs outside building near the 10"press area. Onsite reclamation and storage of oil in toter containers.	On-site reclamation is done by a contractor	On-site filtration to reclaim some oils		None noted
7	Furnace maintenance	Spent refractory liner and debris with lead (D008)	n/a	CWM, Inc. (Model City, NY) NYD049836679	None noted	None noted
8	Solvent parts cleaning	used ignitable solvent  Removed by vendor directly from process equipment	n/a	Enviro-Kleen (Hebron, OH) takes for "continued use"	None noted	None noted

**REMARKS-GENERAL INFO** See narrative report for details. Additional P2 remarks and info: Would this facility be interested in a P2 assessment? \*If yes, refer promptly to OCAPP., 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

