



Environmental  
Protection Agency

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

val. 001  
Enf 001

May 23, 2011

**Re: NCT Complaint Investigation**  
Hazardous Waste Generator (status unknown at this time)  
OHR000146688  
Clark County  
NOV

Mr. Paul Kay  
Northeast Coating Technologies (NCT)  
2105 Progress Drive  
Springfield, OH 45505

Dear Mr. Kay:

On April 20, 2011, Ohio EPA received a complaint alleging that NCT (identified as its previous name, HEF USA) has leaking drums of cyanide hazardous waste all over the facility. Also, the complaint alleges that a large spill of solid heat treating salt happened in the shipping area and contaminated the dock storm drains. During my May 3, 2011 site visit, you and Rick Hartzell of TSUSA showed me around your heat treating process, your hazardous waste storage area and the shipping area dock and storm drains. Jeff Smith with Ohio EPA's DMWM, Matt Walbridge with Ohio EPA's DSW and Heather Kawecky with the Regional Air Pollution Control Agency (RAPCA) were also present.

This letter will outline Ohio EPA DMWM's and DSW's observations, determinations and comments. RAPCA will communicate their findings separate from Ohio EPA.

#### DMWM

I found no evidence that NCT has leaking drums. I did find evidence that a spill of a product called "nutride" occurred on the shipping area dock and storm drains. The only way the "nutride" becomes hazardous is when this salt is melted in nitriding pots. The broken bags and spilled material were cleaned up and are currently stored on pallets inside. Once the insurance claim is paid the spilled material will be disposed of as a solid waste. **Please send me a copy of the disposal paperwork once it is available for Ohio EPA's records.**



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Additionally, NCT is currently identified as a large quantity generator of hazardous waste in Ohio EPA's records. During the time of our inspection, NCT was most likely a conditionally exempt small or small quantity generator. I'm including a link to the Hazardous Waste Generator Handbook that explains the differences between the descriptions/requirements for each generation status:

[http://epa.ohio.gov/portals/32/pdf/gen\\_handbook.pdf](http://epa.ohio.gov/portals/32/pdf/gen_handbook.pdf)

Ohio EPA determined the above complaint allegations are unfounded; however, I found the following violation of Ohio's hazardous waste laws. In order to correct this violation, you must do the following and send me the required information **within 30 days** upon your receipt of this letter:

**Accumulation Time of Hazardous Waste  
OAC Rule 3745-52-34(C)(1)(b)**

While being accumulated on site, each satellite container must be labeled or marked clearly with the words "Hazardous Waste" or other words that identify the contents.

During the inspection, the D002 solid oxidation sludge satellite container located in NCT's heat treating area were not labeled with the words "Hazardous Waste" or other words that identify the contents.

**NCT must label each container with the words "Hazardous Waste" and submit photographic documentation to demonstrate compliance with this rule.**

You can find Ohio's hazardous waste rules and other information on the division's web page at:

<http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/dhwm>

**DSW**

Matt Walbridge with Ohio EPA's Division of Surface Water was present to investigate complainant allegations that the facility has been in non-compliance with the City of Springfield for discharging cyanide-bearing waste water into their sanitary sewer system. Data provided by the city does indeed show that up until January 2011, the previous owner of the facility had significant violations of both cyanide and copper. As such, the complaint appears valid.



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However, you indicated that since January 2011 there have been no discharges to the sanitary sewer with all wastewater being accumulated in the metal storage tank located at the end of the process line. You also indicated that the pollutants in the process waste water have been eliminated since you took over operations and switched to a new chemical process.

The valve on the storage tank drain line connected to the sanitary sewer is closed as is the bypass valve for the sump drain discharge into the storage tank. Given the history of discharge non-compliance and the proposal for evaporation of all process waste water, Matt recommends all drain connections to the sanitary sewer be removed until such time as the City of Springfield grants you approval to discharge to the sanitary sewer as appropriate.

Matt observed that a containment pad located outside the building where the air scrubber is located was flooded with rainwater up to the level of the building foundation. An apparently inoperable drain sump that discharges into the indoor storage tank would be the only means for conveying the accumulated water out of the containment area. Attention will have to be given to ensuring only process-related wastewater associated with the scrubber is allowed to be conveyed to the sanitary sewer. Uncontaminated storm water might be able to be discharged onto the lawn area. Alternatively, the containment berm around the scrubber might be able to be made smaller thereby minimizing the amount of rainwater entering the sump. This will be a critical design consideration for operation of the proposed evaporator. The City of Springfield otherwise prohibits clean water connections to the sanitary sewer.

You indicated that a Permit to Install (PTI) application for an evaporator system was in the process of being prepared for submittal to this office. The evaporator (present on-site, but not connected to anything) is said to be for avoiding the need to discharge any process waste water from the facility, thereby avoiding permitting.

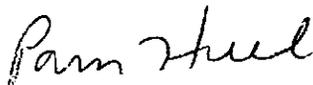
Based on the indication you made that the manufacturing process is not expected to generate waste water necessitating treatment for compliance with local limits, Matt was surprised to hear that an evaporator is being proposed given the significant energy cost associated with your operation. Regardless, he asks that you **please provide a complete PTI application to him as soon as possible so the proposal can be reviewed.**



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Should you have any questions, please feel free to call me at (937) 285-6091 or Matt at (937) 285-6095. You can also contact us via e-mail, [pam.hull@epa.ohio.gov](mailto:pam.hull@epa.ohio.gov) or [matt.walbridge@epa.ohio.gov](mailto:matt.walbridge@epa.ohio.gov).

Sincerely,



Pam Hull  
District Representative  
Division of Materials and Waste Management

cc: :Robyn Fox, SWDO-DMWM/SWDO Facility File  
Facility File: NCT, Hazardous Waste Generator, OHR000146688, Clark County

ec: Heather Kawecki, Regional Air Pollution Control Agency  
Matt Walbridge, DSW/SWDO

PH/ca

**NOTICE:**

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



Field Notes for 5/3/11 complaint investigation of (Northeast Coating Technologies) NCT-OHR000146688

Regulatory Staff present: Pam Hull and Jeff Smith (DMWM), Matt Walbridge (DSW) and Heather Kawecki (RAPCA)

Facility Staff: Paul Kay, NCT and Rick Hartzell, TSUSA (previously HEF)

Rick Hartzell initially met us but explained that he now works for TSUSA that owns the warehouse part of the building only. He had Paul Kay show us around the heat treating operation in the building. Paul explained that the way they perform heat treating should yield no cyanide (emissions, waste or water discharge). He said that they now have an oxide bath that "kills" any small amounts of cyanide present in the previous baths. We did find a satellite drum of D002 solid waste that was not labeled and will cite this violation in our complaint investigation letter. Paul explained that when NCT took over the operations, that they still had a large automotive job to finish up under the old process. The old process used a water rinse that release cyanide in the waste water.

Also, regarding the claim that a large spill of solid heat treating salt on the dock (& its storm drains), Rick Hartzell stated product cyanate salt did spill and once they receive compensation for it from the insurance, they will send the bags of cyanate out for non-hazardous disposal. The only way the cyanate becomes viable is when it is melted in nitrating pots. Heather Kanecki with RAPCA collected MSDS for various products (including this one); I asked her to scan them & send them to me on 5/16/11 & they are attached.

Regarding the water treatment issues, Paul Kay stated that they have not had any water discharge since November and that they were submitting an application to DSW for a water evaporator. Matt Walbridge thoughts were that if they cyanide is no longer in the final bath (due to the oxide bath that "kills" any small amounts of cyanide that may be present). Matt was also perplexed by an outdoor drain that would be pumped into their water evaporator (since it is predominantly rain water & would be a waste of resources to evaporate rain water).

Matt will be adding on to the NOV/complaint investigation letter that is going to be sent to NCT. The draft letter will be sent to Matt for him to add point regarding NCT's wastewater treatment (WWT).

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	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](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHR000146688</b>							
<b>Site Name</b>	Name: <b>Northeast Coating Technologies</b>					Website: (Optional)		
<b>Site Location Information</b>	Street Address: <b>2105 Progress Drive</b>							
	City, Town, or Village: <b>Springfield</b>				State: <b>OH</b>			
	County Name: <b>Clark</b>				Zip Code: <b>45505</b>			
<b>Site Land Type</b> (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"/>
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>								

<b>Facility Representative</b>	First Name: <b>Paul</b>		MI:	Last Name: <b>Kay</b>	
Additional names can be recorded in number 12	Title:				
	Phone Number: <b>937-323-2556</b>			Phone Number Extension:	
Only provide address information if it is different than the site address	E-Mail Address: <b>pkay@northeastcoating.com</b>				
	Fax Number: <b>937-323-5787</b>			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
	State:			Zip Code:	

<b>Legal Owner And Operator of the Site.</b> 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: <input type="checkbox"/>	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:					Owner Phone #:				
	City, Town or Village:					Country:		Zip Code:		
	State:					Date Became Operator (mm/dd/yyyy):				
	Operator Type: <input type="checkbox"/>	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:					Operator Phone #:				
	City, Town or Village:					Country:		Zip Code:		
	State:									

<b>VIOLATIONS CITED?</b>	<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 checked="" type="checkbox"/> Large Quantity Generator (LQG)
	<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"/> 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"/> 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 checked="" 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.

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

- |            |   |  |                                      |
|------------|---|--|--------------------------------------|
| Announced  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks      | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |                                      |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |                                      |

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ohio EPA -Pam Hull, Jeff Smith, Matt Walbridge	RAPCA-Heather Kawecki	05/03/2011

**Comments:**  
Complaint investigation-complaint allegations were unfounded.