



Environmental  
Protection Agency

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

*RTU'd 1 violation*

July 8, 2011

**Re: NCT Complaint Investigation**  
Large Quantity Hazardous Waste  
Generator (until otherwise determined)  
OHR000146688  
Clark County  
Return to Compliance

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

Dear Mr. Kay:

On June 22, 2011 NCT submitted digital documentation. Your digital documentation showed your D002 solid oxidation sludge satellite container located in the heat treating area with a label having the words "Hazardous Waste" which **abated the violation** listed below:

Letter Citation #	Rule Citation
1	OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste

Also, on June 21, 2011 Rick Hartzell of TSUSA provided me with a copy of the non-hazardous waste manifest disposal record for the "nutride". I requested this paperwork in a May 23, 2011 letter regarding Ohio EPA's and RAPCA's May 3, 2011 complaint investigation.

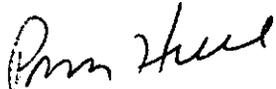
Additionally, NCT submitted digital photos on June 22, 2011 that addressed concerns that Matt Walbridge with the Division of Surface Water (DSW) identified in Ohio EPA's May 23, 2011 letter.

Finally, NCT submitted a PTI application Matt Walbridge requested in the May 23, 2011 letter, and he provided NCT with comments on May 27, 2011 (see enclosed). However, he has not received any response back to address his comments. Please provide Matt with comments so he can continue his review of your PTI application.

Mr. Paul Kay  
July 8, 2011  
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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

Enclosure

- 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  
Rick Hartzell, TSUSA

**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.

PH\bp

## Hull, Pam

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**From:** Walbridge, Matt  
**Sent:** Friday, May 27, 2011 11:34 AM  
**To:** Harmony\_ehs@earthlink.net  
**Cc:** Hull, Pam; pkay@northeastcoating.com  
**Subject:** PTI application for NCT

Dear Ms. Lucas:

I have completed my initial review of the permit to install (PTI) application for the proposed waste water evaporator to serve NCT in Springfield and I have the following comments for you to address:

1. The engineering report states that the amount of wastewater generated by the quench tank discharge will average 30 gpd with a maximum of 320 gpd. It also states that the evaporator is capable of processing 15 to 20 gph (360 to 480 gpd). Although on page 2 it states that the evaporator will be operated continuously, if 30 gpd of wastewater is generated by the nitrating line, how likely is it that the evaporator might be operated periodically to process batches of accumulated water instead of being operated daily - especially in light of the approximately 1,000-gallon surge tank?
2. Please provide a detail and specifications for the sump (not the pump) to be located adjacent to tank T7. The plan sheet should show a profile view of the sump with inlet piping, pump, pump controls, electrical wiring, nominal water level and discharge piping, fittings and valves.
3. I recommend that a high level alarm be provided given the out-of-sight location of the sump behind the process line.
4. I am concerned that the water temperature in the sump will be higher than the maximum allowable temperature of 130 F specified by the manufacturer. Please verify that the selected pump will function in this application.
5. Please provide a profile view of the receiving tank including inlet piping, pump, pump controls, nominal water level and discharge piping.
6. The engineering report states that the operation of the pump in the 60 gallon sump tank will be controlled by float switches in the receiving tank. It seems the pump should instead be controlled by float switches in the sump tank. Also, on page 4 of the report it states that the pumps will be rated at 10 gpm but on page 5 they are said to be 0.33 gpm pumps. Please reconcile this discrepancy (I believe their horsepower rating and pumping capacity were mixed).

Have you considered a gravity feed system from the receiving tank to the evaporator using a float valve at the evaporator and/or a solenoid switch at the receiving tank?

7. Please provide details on the plans showing how the evaporator will be elevated above the IBC tote. Also, all valves and piping for discharging from the evaporator into the tote need to be shown on the plans.
8. Please note that the IBC tote used for accumulating evaporated waste is subject to the hazardous waste storage criterion which, depending on the level of generation by the facility, may require labeling and have limits on how long waste can accumulate in the tote. Ms. Pam Hull of this office can assist in this determination - she can be contacted via e-mail or phone at (937) 285-6091.
9. The engineering report states that there are three rinse tanks following the nitrating process whereas the plan sheet shows there to be four tanks with a cascade rinse; please reconcile this discrepancy.



10. Information on the amount of rinse water generated by the 2-stage rinse following the citrus-based degreasing step is needed. The plans need to show how/where this wastewater will be managed/disposed.
11. The engineering report needs to address the possible periodic dumps from all tanks in the process and how they will be managed.
12. Please explain how the tank identified as 'Corolac' fits into the coating process. Will parts be rinsed after the coating is applied? Plan sheet NCT-001 needs to show the location of this tank.
13. It seems that the discharge from tank T7, identified as a quench tank, will be fairly warm, if not hot. Given that the evaporator's capacity (15 gph) far exceeds the rate of wastewater generation (30 gpd) which have you considered trying to route this wastewater directly into the evaporator when possible to reduce energy usage?
14. It is necessary to describe and show how the drain sump located next to the air scrubber will be operated into the future. Also, please explain how rainwater that accumulates in the containment area will be managed.
15. When I was at the facility on May 3rd, I observed a new vibratory tumbler. Please quantify and characterize the wastewater from this operation. Also, the plans need to show the location of the tumbler and the plumbing for its discharge.

Once I receive your written response to these comments, along with any necessary revisions (four copies), I will be able to continue my review of the PTI application. If you have any questions concerning my comments, please call or e-mail me.

Sincerely,  
Matt Walbridge  
(937) 285-6095



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