



**Environmental
Protection Agency**

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

June 1, 2011

CERTIFIED MAIL

Thomas DeWeese
Bedford Anodizing Company
7860 Empire Parkway
Macedonia, OH 44056

RE: BEDFORD ANODIZING CO., OHD987034584, SUMMIT COUNTY, NOV-PRTC

Dear Mr. DeWeese:

On March 21, April 12 and April 18, 2011, this writer, representing Ohio EPA, Division of Materials and Waste Management (DMWM), visited Bedford Anodizing Company (BAC), located at 7860 Empire Parkway in Macedonia, Ohio to conduct a hazardous waste compliance evaluation inspection (CEI). BAC was represented by you.

The purpose of the inspection was to determine BAC's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). The inspection included a review of the facility's operations, as well as the management of wastes. Due to unevaluated waste streams at the facility, BAC's hazardous waste generator category could not be confirmed. Therefore, BAC must submit an inventory of all types and amounts of hazardous waste generated and accumulated on a monthly basis. The inventory must be submitted on a monthly basis for the next three months and is due by the seventh day of the following month (e.g., June 2011 amounts due by July 7, 2011).

Based on the inspection, Ohio EPA identified the following violation:

1. **OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate that waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

BAC failed to evaluate the following wastes:

- A. The contents of five, 55-gallon plastic drums identified as Alkali Etch Waste. **To abate this violation, BAC must submit waste evaluation information, developed in accordance with OAC rule 3745-52-11, for these wastes. Additionally, please identify how this waste stream will be managed and disposed.**

- B. The contents of five, 55-gallon plastic drums identified as Sulfuric Acid Crystals. **To abate this violation, BAC must submit waste evaluation information, developed in accordance with OAC rule 3745-52-11, for these wastes. Additionally, please identify how this waste stream will be managed and disposed.**
 - C. The contents of 12, 55-gallon plastic drums identified as Phosphoric Acid Brite Dip Waste. **To abate this violation, BAC must submit waste evaluation information, developed in accordance with OAC rule 3745-52-11, for these wastes. Additionally, please identify how this waste stream will be managed and disposed.**
 - D. The contents of 11, 55-gallon plastic drums identified as Stannous Sulfate Crystals. **To abate this violation, BAC must submit waste evaluation information, developed in accordance with OAC rule 3745-52-11, for these wastes. Additionally, please identify how this waste stream will be managed and disposed.**
 - E. Floor sweepings and solids accumulating in the dust collector unit from the buffing process. **To abate this violation, BAC must submit waste evaluation information, developed in accordance with OAC rule 3745-52-11, for these wastes. Additionally, please identify how these waste streams will be managed and disposed.**
2. **Universal Waste Management Standards for Small Quantity Handlers, OAC rule 3745-273-13(D)(1):** A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
- BAC failed to accumulate universal waste lamps in closed containers. During the April 12, 2011 inspection, BAC closed the two containers. **This violation has been adequately abated. No further information is requested.**
3. **Labeling/marking Standards for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-14(E):** Universal waste lamps must be labeled/marked with one of the following phrases: "universal waste lamp(s)," or "waste lamp(s)" or "used lamp(s)."

BAC failed to label/mark two cardboard containers of universal waste lamps with the words required by this rule. During the April 12, 2011 inspection, BAC marked the containers with the words "used lamps." **This violation has been adequately abated. No further information is requested.**

4. **Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C)(1):** Used oil generators must store used oil in containers and tanks that are in good condition and not leaking. The containers and tanks must be labeled with the words "used oil." If used oil is released to the environment, the generator must stop the release, contain the used oil, and clean-up and properly manage the released oil and other materials.

BAC failed to label four, 55-gallon drums with the words "used oil." **To abate this violation, submit photograph(s) which clearly show the drums labeled as "used oil."**

Information Request

In addition to the above violations, Ohio EPA requests information concerning the facility's generation, management and use of spent acid. During the inspection, you indicated that spent acid from anodizing operations is used for pH adjustment in the facility's wastewater treatment system. BAC has accumulated approximately 12,500 gallons of spent acid in at least four tanks located inside the facility. Specifically, these tanks are located at the following areas:

- Three above-ground storage tanks (ASTs), observed south of the anodizing line, with capacities of at least 3,000; 4,000 and 4,000 gallons, respectively.
- One AST, observed southwest of the anodizing line, with a capacity of at least 1,500 gallons.

Pursuant to OAC rule 3745-51-02(F), BAC must submit documentation that the spent acid from anodizing operations is not a waste or is conditionally exempt from regulation. BAC is requested to submit the following information:

- Identify the process that generates the spent acid;
- Identify how the spent acid is managed on-site;
- Identify the exclusion or exemption being applied to the spent acid, as well as how the use of the spent acid meets the terms of the exclusion or exemption;
- In addition to the use of the spent acid for pH adjustment in the facility's wastewater treatment system, identify any other management method(s) for the spent acid;

- Identify the monthly generation rate of the spent acid;
- Identify the monthly usage rate of the spent acid for pH adjustment;
- Identify the monthly usage rate of the spent acid for any other purpose (if applicable); and
- Identify whether the spent acid has been shipped off-site for management. If so, identify the date(s) and amounts shipped, name of receiving facility and how it was managed by the receiving facility.

Ohio EPA offers the following comments:

1. During the inspection of the east side of the anodizing line, a significant amount of sludge/solids were observed in and around the wastewater collection trench and process tanks. The wastewater collection trench is located in close proximity to the east wall of the facility where multiple bay doors are located. In order to prevent a release to the environment from along the east side of the facility, BAC should implement the following measures:
2.
 - Remove and lawfully dispose of sludge/solids from the wastewater collection trench and around the process tanks, and
 - Install adequate secondary containment measure(s).

Based on the above, please inform me of the actions taken by BAC to prevent a release from the east side of the facility. Your response should include dates, either actual or proposed, for completion of the actions.

3. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to environmental matters in Ohio. For more information, please refer to: <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage>.
4. The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. For more information, please refer to: <http://development.ohio.gov/Energy>.
5. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. OCAPP provides free compliance and pollution prevention assistance on environmental issues related to air, land and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at: <http://www.epa.ohio.gov/ocapp/contact.aspx>.

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6. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.ohio.gov/dhwm>.

The above violations must be immediately addressed and all of the above requested documentation must be submitted to my attention at the Ohio EPA **within 30 days of receipt of this letter**. Please be advised that additional violations may be cited upon review of forthcoming documentation. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve you from having to comply with all applicable regulations.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Materials and Waste Management

FAZ:cl

ec: Natalie Oryshkewych, DMWM, NEDO
Frank Poptnik, DMWM, NEDO
Jeff Mayhugh, DMWM, CO

cc: Marlene Kinney, DMWM, NEDO

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only
Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us .			
Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHD987034584 Name: Bedford Anodizing Co. Website: (Optional) Street Address: 7860 Empire Pkwy City, Town, or Village: Macedonia State: OH County Name: Summit Zip Code: 44056 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"/> 332813		
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Thomas MI: Last Name: DeWeese Title: President Phone Number: 330-468-0468 Phone Number Extension: E-Mail Address: Fax Number: 330-468-3426 Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:		
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: Bedford Anodizing Realty Co. Inc. Date Became Owner (mm/dd/yyyy): 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: 7860 Empire Pkwy City, Town or Village: Macedonia Owner Phone #: State: OH Country: USA Zip Code: 44056 Name of Site's Operator: Bedford Anodizing Co. Date Became Operator (mm/dd/yyyy): Operator 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: 7860 Empire Pkwy City, Town or Village: Macedonia Operator Phone #: State: OH Country: USA Zip Code: 44056		
VIOLATIONS CITED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
TYPE OF HANDLER - MARK "X" AS APPROPRIATE			
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <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"/> Large Quantity Generator (LQG) <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 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 checked="" 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 Yes No Additional Facility Representatives:
Tanks Yes No
Containers Yes No

Name of Inspector(s)
Frank Zingales

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
03/21/2011 08:10

Comments:

In addition to waste evaluation violation (OAC 3745-52-11), information was requested on management/use of spent acid.