



Environmental  
Protection Agency

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

Re: Alpha Coatings, Inc.  
OHR000114736  
Seneca County  
Hazardous Waste  
NOV

May 13, 2011

Mr. Ed Cortez, Business Systems Manager  
Alpha Coatings, Inc.  
622 South Corporate Drive  
Fostoria, Ohio 44830

Dear Mr. Cortez:

Thank you for your responses to Ohio EPA's November 12, 2010, letter requesting additional information as a follow-up to Alpha Coatings, Inc. (Alpha)'s October 22 & 25, 2010, hazardous waste compliance inspection (CEI). I have outlined your responses below:

- On December 23, 2010, Shara Dine of Dine Comply, Inc. via email submitted to me on your behalf a universal waste management plan for lamps for both Alpha and your facility, LFC, located at 622 South Corporate Drive, Fostoria, Ohio.

On February 23, 2011, I observed sampling of the following hazardous waste streams:

1. Liquid hazardous waste from residual application of adhesive coatings, cleaning of spray guns, and expired product; and
  2. Solid hazardous waste stream which consists of dried adhesive overspray.
- On March 22, 2011, via email and March 24, 2011 via regular mail, I received the analytical results from the February 23, 2011, sampling event from Shara Dine on your behalf.

Based on my review of your analytical, it appears that your solid waste stream contains selenium (D010) (your results total – 50300 mg/kg) above the regulatory limit of 1.0 mg/L. To date, Alpha has not been coding this hazardous waste for selenium. Thus, based on this information, Alpha has incurred the following violation:

**1. Waste Evaluation.  
OAC Rule 3745-52-11**

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

Alpha failed to have its solid waste stream evaluated and correctly coded as a hazardous waste for selenium (D010).

- ***To abate this violation, Alpha will either have to add selenium (D010) as a hazardous waste code to your manifests for this waste stream or run the Toxicity Characteristic Leaching Procedure (TCLP) test for your sample to confirm or deny selenium is above the regulatory limit of 1.0 mg/L.***
- ***Please submit to me a response within 15 days of receipt of this letter indicating which option you plan to enact to address the selenium in your waste stream.***

Based on my review of Material Safety Data Sheets (MSDS) of your coatings and primers during my CEI on October 22 & 25, 2010, these materials contain various constituents such as: toluene, xylene, ethyl benzene, selenium, methyl ethyl ketone, etc. You stated that the only cleaning solvent you utilize to clean the guns utilized to spray the above primers and coatings is tertiary butyl acetate (TBA). Based on this MSDS reviewed during the CEI, TBA is hazardous for D001 (flashpoint) and has no other listing or characteristic.

As discussed during the CEI, Alpha needs to evaluate the source of the constituents present in its waste stream to assist them in determining whether a waste has an "F" listed hazardous waste code or not. If Alpha utilizes a solvent to clean which contains such constituents as toluene, xylene, etc. then they would have an F-listed hazardous waste stream based on the solvent. The current solvent utilized to clean does not contain these listings. However, if Alpha utilizes another solvent in the future or changes its processes then this waste determination will have to be re-evaluated. For example, based on your analytical, acetone was detected in your liquid hazardous waste stream at 1280 mg/kg.

If the source of the acetone is a solvent utilized in cleaning then your waste stream may be an F-listed hazardous waste for acetone (F003).

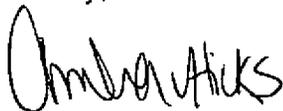
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If the source of the acetone is another of your ingredients such as your paints or coating then the waste would not carry this F-listing [though it would probably still be hazardous for other characteristics such as flashpoint (D001), etc.]

If the paints, primers, and coatings utilized in the processes at Alpha have any of the characteristics D001-D043 [e.g. your Chemlock 6254 adhesive contains selenium which likewise appeared in your analytical results (D010)] then Alpha needs to ensure to evaluate their waste correctly based on these products/ingredients.

Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082 or email at [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
DMWM-HW; NWDO File: Alpha Coatings, Inc. (S. Corporate Drive) )

ec: Amber Hicks, DMWM, NWDO  
Shara Dine, Dine Comply, Inc., [dine@rrohio.com](mailto:dine@rrohio.com)

**NOTICE:**

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