

Environmental
Protection Agency

Governor
Lt. Governor
Director

July 22, 2011

CERTIFIED MAIL

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

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

Dear Mr. DeWeese:

On July 8, 2011, I received Bedford Anodizing Company's (BAC) response to Ohio EPA's June 1, 2011 Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. The following is the status of the previously cited violations:

1. OAC rule 3745-52-11, Waste Evaluation: BAC failed to evaluate the following wastes:
 - A. The contents of five, 55-gallon plastic drums identified as Alkali Etch Waste.
 - B. The contents of five, 55-gallon plastic drums identified as Sulfuric Acid Crystals.
 - C. The contents of 12, 55-gallon plastic drums identified as Phosphoric Acid Brite Dip Waste.
 - D. The contents of 11, 55-gallon plastic drums identified as Stannous Sulfate Crystals.
 - E. Floor sweepings and solids accumulating in the dust collector unit from the buffing process.

BAC's July 8, 2011 response indicated that the facility will obtain composite samples from each of the wastes identified in items 1.A. through 1.F. However, no waste evaluation information was provided with BAC's response. As previously requested, BAC must submit waste evaluation information, developed in accordance with OAC rule 3745-52-11, for these wastes. Once evaluated, please identify how these wastes will be managed and disposed. **This violation will remain unabated until BAC submits all of the requested documentation of compliance to my attention at Ohio EPA.**

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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.

2. Universal Waste Management Standards for Small Quantity Handlers, OAC rule 3745-273-13(D)(1): This violation was previously abated.
3. Labeling/marketing Standards for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-14(E): This violation was previously abated.
4. Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C)(1): BAC's July 8, 2011 response included a photograph depicting the 55-gallon drums labeled as "used oil." **Based on submitted documentation, this violation has been adequately abated. No further information is requested.**

Information Request

In order to fully evaluate BAC's claim that the spent acid is not a waste since it is being recycled, please submit the following information as previously requested:

- Identify the monthly generation rate of the spent acid; and
- Identify the monthly usage rate of the spent acid for pH adjustment.

Ohio EPA Comment

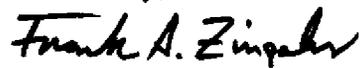
In response to Ohio EPA's comment number one, BAC will clean up the process area and trenches, and install a two-layer concrete block wall for secondary containment along the east wall of the facility. These activities will be completed in approximately three months.

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 14 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.

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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