



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

September 5, 2007

RE: LAKESIDE PLATING  
ASHTABULA COUNTY  
COMPLAINT # 7005  
NOTICE OF VIOLATION

Tracy McBride  
Lakeside Plating Collision and Towing  
373 Commerce St.  
Conneaut, OH 44030

Dear Mr. McBride:

On August 14, 2007, the Ohio EPA, represented by Ed D'Amato and Robert Almquist of the Division of Hazardous Waste Management, conducted a complaint inspection at Lakeside Plating. The complaint alleged improper management of plating solutions. The complaint was unfounded.

You represented Lakeside Plating during the inspection. Lakeside Plating plates automotive parts for vintage car restorations. You assumed ownership of the facility in May 2005. Most rinse waters are recycled into heated plating tanks as make-up water. Wastes from the soap tank and some of the plating solutions are treated in an evaporator. You have not yet had to dispose of any wastes from the plating process.

Lakeside Plating was found to be in violation of the following provisions of the Ohio Administrative Code (OAC). To abate the violations, you must do the following and submit all requested information **within 30-days** of the date of this letter:

**1. Hazardous Waste Determination  
OAC 3745-52-11**

*Any person who generates a waste in the state of Ohio...shall determine if the waste is a listed hazardous waste...*

- A. You explained that you discard spent fluorescent and other lamps with your solid waste. Often these lamps contain mercury at a level that make them a hazardous waste if disposed. This can also be true of mercury vapor, sodium vapor, and metal halide lamps.

If the spent lamps are sent for recycling instead of disposal, they would be exempt from the hazardous waste management requirements. Although Ohio EPA encourages recycling in any case, low-mercury lamps that are not considered hazardous waste when disposed are commercially available.

To abate this violation, you must notify this office, in writing, within 30-days of the date of this letter, of how you intend to manage spent fluorescent and other lamps at your facility. During the inspection, you were provided with a copy of Ohio EPA's Fluorescent Lamp Fact Sheet and a list of lamp recyclers.

- B. Waste paint and paint thinner was found on a concrete pad behind your building. The waste was generated from the restoration of an automobile. To abate this violation, you must clean up the waste and properly dispose of it. You must submit a photograph showing this has been done and submit copies of documentation.

In addition to the above violations, Ohio EPA noted the following concern:

1. Lakeside Plating has not determined its hazardous waste generator category. The facility has also not specifically determined which of its wastes are hazardous wastes and which ones are not.

To address this concern, you must submit a list of each of the solutions utilized by Lakeside Plating. The list must note which wastes are hazardous wastes and which ones are not.

You must also determine the amount of hazardous waste you generate on a monthly basis and submit that information to this office. Ohio EPA suggests you keep a monthly log of all wastes that are generated.

Ohio EPA offers the following suggestions for your facility:

1. You explained that you intend to use a plastic tank to accumulate plating wastes in the event that wastes are generated faster than the evaporator can handle. The tank has not been used to date. Please be advised that, depending upon your hazardous waste generator status, the tank may be subject to regulation under Ohio EPA's tank rules found in OAC 3745-66-90 through 100 or OAC 3745-66-101.

You may want to consider using a tote or similar portable container for this purpose. A portable container would not be subject to the tank rules.

2. Lakeside Plating's current arrangement of the plating tanks requires a lot of back and forth movement across the plating room. This results in a loss of solutions as the parts drip when they are carried between the tanks. You may want to evaluate alternative layouts for the plating tanks that would be more efficient. This would reduce the loss of plating solutions and reduce waste generation. You may find the information at the following internet link helpful:

<http://www.p2pays.org/ref/02/01304.pdf>

3. The ground just outside the large door of the plating room was wet. The concrete inside, between the door and the plating containment berm, was wet and stained. We saw an employee start to rinse a rack on the side of a tank close to the edge of the containment berm. It appears that some plating solutions have not been contained by this berm. Extending the berm closer to the door, raising its height, and/or instituting employee procedures that limit the escape of plating solutions are possible solutions to this problem. In addition, having the berm enclose the water hose used for rinsing would help this. Please respond with a description of actions you have taken to prevent the release of plating solutions to the environment.

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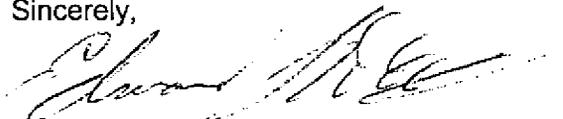
You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at <http://www.epa.state.oh.us/ocapp/ocappmain.html> is also a good source of information.

Failure to list specific deficiencies in this communication does not relieve Lakeside Plating from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Enclosed is a copy of the checklist used for the inspection.

Please feel free to contact me at (330) 963-1170 if you have any questions about the inspection or this letter.

Sincerely,



Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

Enclosure

ec: Frank Popotnik, DHWM, NEDO  
Robert Almquist, DHWM, NEDO  
Natalie Oryshkewych, DHWM, NEDO  
Adrienne LaFavre, OCAPP, NEDO  
Harry Sarvis, DHWM, CO

