



Environmental
Protection Agency

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

Eval. 010

Ent. 009

RTC'd 2 violations

August 6, 2012

Mr. Keith Goudy
Plating Technologies, Inc.
1525 West River Road
Dayton, OH 45418

RE: NOV/Partial RTC Plating Technologies, Inc. OHD000723452

Dear Mr. Goudy:

On July 18, 2012, I performed an inspection to determine Plating Technologies, Inc. (PTI) compliance with Ohio's hazardous waste rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). As is our practice, my inspection was unannounced. You and Arsenio Fletcher represented PTI. Our inspection began with a review of your processes with an emphasis on changes you have made since the last inspection. See the attached "Process Description Summary" for my understanding of your processes and waste management. Our physical inspection focused on the waste storage areas near your waste water pre-treatment system. We finished up with a review of employee training records, manifests and the contingency plan. You provided by e-mail copies of your inspections of the waste areas.

I found violations of the following hazardous waste rules.

1. Records must be maintained of tests and inspections of emergency equipment. OAC 3745-65-33 requires that emergency communications systems, alarms, spill control equipment and decontamination equipment must be tested and maintained to assure that they can be properly operated in the event of an emergency. The inspections must be recorded in a log or summary. You showed me a list of emergency equipment that was your first step in developing the inspection program. You had not yet begun to inspect the items.

To return to compliance, complete the list of emergency equipment. Note that this is functionally the same list that is required by OAC 3745-65-52(E) to be included in your contingency plan. Basically, the list should include all the things you would use to respond to a sudden or non-sudden release of hazardous waste to the air, ground or surface water.

I am asking you to do several things:

1. Assemble the list of emergency equipment.

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2. Determine the appropriate inspection frequency or test interval. Use the manufacturer's recommendation, fire codes, etc. if appropriate. Otherwise, you should use your best judgment.
3. Perform the inspections.
4. Maintain the records of the inspections. Electronic records or spreadsheets are acceptable. It is not necessary for all the inspections to be recorded on the same sheet or form for all inspections to be performed by the same person.

2. Inspections of containers used to manage hazardous waste. OAC 3745-66-74 requires generators who manage hazardous waste in containers to inspect the areas where the waste is stored on a weekly basis looking for leaks, deterioration or releases. The inspections must be recorded in a log or summary. You provided me by e-mail an electronic copy of forms used to document inspections of containers of drummed waste. The forms did not note any items related to the inspection of the ROB.

☞ You should develop a plan to inspect the ROB, any drummed waste in storage that will be worked through the WWT, and the area where the wastes are managed. You should develop a list of items to check (such as labels, leaks in containers, holes in the ROB, lids on drums, tarp on the ROB, etc.) Be sure to inspect the area where the wastes are managed for anything that could contribute to a release. The inspections must be recorded in a log or summary and should be performed no less frequently than every week. If your waste water plant operators maintain an operations log or operating records, you may maintain your inspection records there.

3. Hazardous waste must be managed in closed containers. OAC3745-66-73(A) requires that containers holding hazardous waste be closed except when it is necessary to add or remove wastes. You recently drained and removed the accumulated solids from an 18,000-gallon tank on plating line 4. Line 4 is an alkaline zinc line used to plate steel parts. Tank clean outs of this type are driven by maintenance needs and seldom occur more frequently than every 4 or 5 years. Plating Tech managed the sludge as a hazardous waste (F006) in a dozen closed steel drums in the aisle adjacent to the ROB. These drums were determined to be compliant. Four 55-gallon open-top blue polyethylene drums and three 5-gallon white plastic buckets were managed in a room adjacent to the WWT system. This room has a grating floor and is directly above the batch pit which functionally is the flow-equalizer at the front-end of the waste water treatment system. The blue poly drums were closed-top drums with the lids sawn off and the buckets did not have lids. It should be noted that a release or spill from these open containers would enter the batch pit and not be released to the environment.

☞ Since all the waste was worked away into the WWT system during the third shift, no further actions are required by you to be returned to compliance.

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4. Accumulation date must be clearly marked on containers used to manage hazardous waste. OAC 3745-52-34(A)(2) requires that the accumulation date be marked on containers used to manage hazardous waste.

5. Containers used to manage hazardous waste must be marked with the words "Hazardous Waste". OAC 3745-52-34(A)(3) requires the words 'Hazardous Waste' must be labeled or marked clearly on containers used to manage hazardous waste.

These two violations are cited because the roll-off box (ROB) used to manage the waste water treatment sludge was not labeled. It looked like an adhesive label had recently fallen off.

☞ To correct these violations you must develop a plan to implement the use of labels on the ROB. The rules allow you much flexibility and you are free to use either a removable sign label or a more permanent label to identify the ROB as a 'Hazardous Waste' container. You also have options for marking the date and you are free to experiment with adhesive labels marked with the date which can be covered with a new label. You also have the option of using an erasable label for the date or a larger label which new dates can be written and the previous date is marked off. Use the date which waste is first placed into the container. When the ROB is prepared for shipping, you must remove the labels required by these on these rules and replace them with the proper Department of Transportation (DOT) labels.

6. SQH must label unit holding universal waste lamps. OAC 3745-273-14(E) requires that containers used to store universal waste lamps be marked with one of the following phrases: "Universal Waste – Lamps" or: "Waste Lamps" or "Used lamps". The rules do not allow for alternate wording.

Carey Electric was in the process of changing the whole plant over to energy efficient lamps and fixtures. We saw three cardboard containers of universal waste lamps that were properly packaged but were not properly labeled. The containers were located on a cart in the production area.

☞ You marked the containers with the proper labels before we left the area. No further actions are required on your part to be returned to compliance for this violation.

This letter has already returned you to compliance (RTC) for violations #3 and #6. To abate the outstanding violations, I will schedule a re-inspection sometime after 30 days from your receipt of this letter.

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Enclosed you will find a copy of the LQG checklist, a process description summary, an LDR checklist and a universal waste checklist. Please call me at (937) 285-6090 if you have any questions about this letter or if I can assist you in any way.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ontko". The signature is fluid and cursive, with the first name "Tom" being more prominent than the last name "Ontko".

Tom Ontko
Hazardous Waste Inspector
Division of Materials and Waste Management

Enclosures

cc: Robyn Winstead, Ohio EPA, SWDO
George Strobel, Ohio EPA, SWDO

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.

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: =100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: = 1,000 Kg. (~300 gallons) of waste in a calendar month or =1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used: **safety glasses, safety shoes**

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	No
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	No
8.	Does the generator accumulate hazardous waste?	Yes

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	No
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	No
	a. Container that meets 3745-66-70 to 3745-66-77?	N/A
	b. Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	N/A
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	N/A
	d. Containment building that meets 3745-256-100 to 3745-256-102?	N/A

Plating Tech operates a waste-water pre-treatment system prior to discharge to the City of Dayton's POTW. As a matter of practice, PT works away plating wastes from small spills, floor sweepings, incidental losses, etc into their water treatment system. The pre-treatment system is regulated by the City of Dayton pre-treatment program. The practice of disposing of residual solids (such as sludges from process tank clean outs, spills and debris contaminated or potentially contaminated by plating chemicals) by introducing them into the WWT system is apparently standard industry practice. For the purposes of this inspection it was determined that this is a waste water process and not a hazardous waste treatment.

The sludge from the bottom of the process tank in Line 4 was labeled as F006. This sludge does not meet the definition of a waste water treatment sludge. It was not characterized but based on process knowledge, the sludge would be mostly composed of trace impurities in the High Grade zinc anodes (typical analyses-cadmium, 6 ppm; copper, 3 ppm; iron, 4 ppm; lead, 20 ppm). PT has not characterized this waste but it would almost certainly fail TCLP for one or more of the metals.

The improper waste designation is not cited as a violation because the waste was run through the waste water treatment process. It was not manifested off-site. PT also labels drums of floor sweepings, spill clean up, etc. as F006.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	No
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a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	N/A
b.	Has the generator complied with special manifest requirements? [3745-52-54]	N/A
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	N/A
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	N/A
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	N/A

MANIFEST REQUIREMENTS

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]

14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes
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NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17.	If the generator received a rejected load or residue, did the generator:	
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	N/A
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	N/A
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	N/A
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	N/A
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	N/A
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	N/A

Plating Technology Inc did not have any manifest discrepancies. They typically ship a ROB of F006 sludge every 7 or 8 days. David Boogaard in the Columbus plant typically receives all manifests and transmits the designated facility copy to the local plant.

PERSONNEL TRAINING

21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not

required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes	
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes	
25.	Does the generator provide refresher training to employees during each period from January 1 st to December 31 st and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes	
26.	Does the generator keep records and documentation of:		
	a. Job titles? [3745-65-16(D)(1)]	Yes	
	b. Job descriptions? [3745-65-16(D)(2)]	Yes	
	c. Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes	
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes	
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes	

Keith Goudry manages the training program and provides most of the employee training. He subcontracts some specialty training like lockout/tag out and confined space entry. The signed and dated 'test sheets' serve as the record that an employee has received annual refresher training.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>
WWT plant operator, first shift	Arsenio Fletcher	
quality lab tech	Kenneth Obrian	
WWT plant operator	Larry Tipton	

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes	
29.	Does the plan describe the following:		
	a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes	
	b. Arrangements with emergency authorities? [3745-65-52(C)]	Yes	
	c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes	
	d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes	
	e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes	

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes	
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes	
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-	Yes	

	65-55]	
<p>The contingency plan has been revised since the last inspection and it is much more robust and facility-specific than the previous plan. Emergency coordinators and backups are listed for all shifts. The list of emergency equipment referred to in item # 29d was comprehensive.</p>		
<p>EMERGENCY PROCEDURES</p>		
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	No
	a. Was the contingency plan implemented? [3745-65-51(B)]	N/A
	b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	N/A
	c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	N/A
<p><i>NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.</i></p>		
<p>PREPAREDNESS AND PREVENTION</p>		
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
	a. Internal communications or alarm system? [3745-65-32(A)]	Yes
	b. Emergency communication device? [3745-65-32(B)]	Yes
	c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes
	d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	N/A
<p>The F006 waste is not flammable and does not pose a fire threat. The facility has a PA system with an air horn backup.</p>		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] This deficiency is cited as a violation. See letter.	No
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	N/A
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	N/A
<p>SATELLITE ACCUMULATION AREA REQUIREMENTS</p>		
43.	Does the generator ensure that satellite accumulation area(s):	
	a. Are at or near a point of generation? [3745-52-34(C)(1)]	N/A
	b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	N/A

	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	N/A
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	N/A
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	N/A
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	N/A
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	N/A
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	N/A
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	N/A

Keith was not familiar with the reduced management standards applicable to wastes managed under the SAA rules and Plating Tech was not managing any SAA drums.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	No
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	No
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	No
	b.	In good condition? [3745-66-71]	Yes
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.		Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	No
	a.	Are inspections recorded in a log or summary? [3745-66-74]	No
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	N/A
50.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	N/A
51.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	N/A
52.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	N/A

The F006 waste is neither ignitable, reactive or incompatible (items #s 49, 50 and 51.

Item # 45 It looked like the adhesive hazardous waste label on the ROB holding the F006 sludge had fallen off. The ROB was not covered by a tarp at the time of the inspection but it was considered to be in the process of being filled. The open container violation (item # 47a) was cited for open-head blue poly drums managed in the room above the batch pit.

Item # 48a Keith provided container management inspection records as an attachment to a 7/20/2012 e-mail. The inspections are performed by Arsenio Fletcher and records are maintained by Kenneth Obrian. The inspection

records provided were for waste stored in drums that was destined for wastewater treatment. Plating Tech was not able to produce records for inspecting the F006 waste managed in the ROB.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	N/A
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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	No
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	No

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	N/A
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	N/A
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	N/A
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	N/A
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	N/A
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	N/A
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] No universal waste batteries were present during the inspection.	N/A

UNIVERSAL WASTE PESTICIDES

8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	N/A
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	N/A
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	N/A
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	N/A
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	N/A
13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-14(C)(1)&(2)] No universal waste pesticides were present at the time of the inspection.	N/A

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT		
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	N/A
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	N/A
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	N/A
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	N/A
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	N/A
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	N/A
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	N/A
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	N/A
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	N/A
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	N/A
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	N/A
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	N/A
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	N/A
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	N/A
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	N/A
UNIVERSAL WASTE LAMPS		

20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes	<input type="checkbox"/>
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	N/A	<input type="checkbox"/>
<p>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</p>			
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Carey Electric was in the process of changing the whole plant over to energy efficient lamps and fixtures. The lamps were properly packaged but they were not properly labeled.	No	<input type="checkbox"/>
ACCUMULATION TIME			
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes	<input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	N/A	<input type="checkbox"/>
<p>NOTE: Accumulation is defined as date generated or date received from another handler.</p>			
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: They ship lamps annually.	Yes	<input type="checkbox"/>
EMPLOYEE TRAINING			
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes	<input type="checkbox"/>
RESPONSE TO RELEASES			
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	N/A	<input type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	N/A	<input type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)] Plating Tech did not report any broken lamps or releases.	N/A	<input type="checkbox"/>
OFF-SITE SHIPMENTS			
<p>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</p>			
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes	<input type="checkbox"/>
30.	Is the handler aware of DOT requirements for packaging and shipping?	Yes	<input type="checkbox"/>

	If no, make aware of 49 CFR 171-180.	
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	No
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	N/A
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	N/A
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	N/A
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	N/A

EXPORTS

NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]

NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Plating Technologies, Inc. **Facility Type:** LQG SQG CESQG TSD **Date of Inspection:** November 24, 2008 **EPA ID#:** OHD000723452

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Waste water treatment sludge from electroplating	F006 pale brown solid sludge	filter press from WWT drops to ROB-one ROB per week	none	Heritage Environmental Services	
2	floor clean ups, drips, accumulations from plating processes are routed thru WWT	F006	combined with waste from first process		Heritage Environmental Services	
3	tank clean out sludges	F006			Heritage Environmental Services	
4						
5						
6						
7						

8							
9							

REMARKS **GENERAL INFORMATION**

General Process Information:

Plating Technology, Inc. electroplates metal parts using the following processes: alkaline zinc; zinc-iron; acid chloride, zinc; anodized chemical film on aluminum; and two lines for electrode-less nickel, a mid phosphate and a high phosphate. Prior to being anodized, aluminum parts are cleaned in a non-hazardous (per MSDS) cleaner. Floor sweepings, dribbles from process tanks and incidental losses are placed into drums, labeled and dated and stored adjacent to the WWT line. All residuals of this type are treated by working away batch-wise into the WWT system. Residuals contaminated with oily substances are introduced directly into the ROB because they tend to foul the system.

The WWT consists of two identical lines operating in parallel. They discharge to a screw conveyor which feeds the single ROB. The sludge is a listed hazardous waste (F006).

Plating Technology recently drained and removed the accumulated solids from an 18,000 gallon tank on plating line 4. Line 4 is an alkaline zinc line that plates zinc onto steel parts. Tank clean outs (this is a process tank, not a tank used to accumulate waste) of this type are driven by maintenance needs and seldom occur more frequently than every 4 or 5 years. Plating Tech managed the sludge as a hazardous waste (F006) in a dozen closed steel drums in the aisle adjacent to the ROB and in four 55-gallon open top blue polyethylene drums and three 5-gallon white plastic buckets in a room adjacent to the waste water treatment system. This room has a grating floor and is directly above the batch pit which functionally is the flow-equalizer at the front-end of the waste water treatment system. All of the containers were properly labeled and dated as hazardous waste. The blue poly drums were closed-top drums with the lids sawn off. It should be noted that a release or spill from these open containers would enter the batch pit and not be released to the environment. The sludges were worked away into the waste water treatment system during the third shift that evening.

Regulatory/Enforcement History (if applicable):

- January, 2003 inspection: cited for open container, emergency coordinator's name in contingency plan.
- May 1998 inspection: cited for failing to note time of inspections on log failing to list an emergency coordinator in the contingency plan.
- November 2008 inspection: deficiencies in employee training

Additional P2 remarks and information:

PTI has phased out the use of Cr(VI). The facility was in the process of changing out all plant light for a more energy efficient bulb.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]	N/A	
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)]	Yes	
<p><i>NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).</i></p>			
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes	
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes	
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	No	
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	N/A	
<p><i>FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.</i></p>			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	N/A	
<p><i>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.</i></p> <p><i>NOTE: Written documentation of this determination is not required.</i></p>			
7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	No	
<p><i>NOTE If Yes see question #16.</i></p>			
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]	Yes	
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	N/A	
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]	Yes	
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes	
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes	
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes	
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes	
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes	

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes
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NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	N/A
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NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	N/A
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NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION

12.	Is the HW treated by burning? If No, go to #15.		No
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13.	Is the HW a metal-bearing HW?		N/A
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NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
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	i.	Contains > 1% TOC?	N/A
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	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	N/A
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	N/A
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	N/A
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	v.	Co-generated with a HW that must be combusted?	N/A
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	b.	If all responses to 14 a.i. through 14 a.v. are ANo@, HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	
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15.	Was the HW treated by wastewater treatment?		No
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	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	N/A
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain \geq 10% TOC?	N/A
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	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	N/A
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NOTE: If the answers to b & c are Yes@ and ANo@, respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT

16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		No
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	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	N/A		
	If Yes...complete the rest of the checklist. If No...stop...you are done.			
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	N/A		
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	N/A		
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	N/A		
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	N/A		
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	N/A		
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	N/A		
NOTIFICATION FORM				
17.	a.	Contains all information in #11 a-g above and	Yes	
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.	Yes	
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	N/A	
	i.	Send a one-time notification to the director?[3745-270-09(D)]	N/A	
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	N/A	
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	N/A	
		1. Name & address of receiving landfill?	N/A	
		2. Description of HW when generated?	N/A	
		3. HW code when generated?	N/A	
		4. Treatability group when generated?	N/A	
		5. Underlying hazardous constituents present when generated?	N/A	
	iv.	Contain the right certification statement as required by 3745-270-07(b)(4)?	N/A	