



Environmental
Protection Agency

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

May 30, 2012

Mr. Keith Willike
Ohio Anodizing, Inc.
915 N. Twentieth St.
Columbus, OH 43219

Re: **[NCR] Ohio Anodizing, Inc.**
CR 1004291506 LQG, Franklin County

Dear Mr. Willike:

Thank you for your time and assistance during my inspection visit to Ohio Anodizing at its 915 N. Twentieth Street facility on March 6, 2012. The purpose was to review your facility's generation and management of hazardous waste. Ohio's laws under Chapter 3743 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of this waste. This letter summarizes the inspection findings.

I found that Ohio Anodizing is presently operating as a large quantity generator (LQG) with shipments of regulated large quantity batches of hazardous waste every 4 to 6 months.

The following violations were noted:

1. **Hazardous Waste Evaluation, OAC rule 3745-52-11:** A business which generates a waste must determine if that waste is hazardous waste, using methods defined in this chapter.

The following wastes had not been evaluated:

- a) An approximately 10-inch layer of unidentified sludge waste contents in a large elevated steel blowdown tank in the pipe-fitting room. The liquid fraction (but evidently not this solid portion) of the tank contents was removed in 2007, evaluated and determined to be hazardous waste and sent to a TSD facility for management as such. This tank had not been used for about 18 years, and was unmarked, not inspected daily, etc. **(Similar problem noted in 2007.)**
- b) Waste residues from corrosive hydroxide dragout spillage and evaporation in between process tanks in the large anodize line adjacent to the west of the caustic tank. The waste was up to 8 feet thick in a space about 18 inches wide. Generation of this waste could have been prevented if a baffle were placed between the tops of the two adjacent process tanks.
- c) A few inches thick layer of waste crystals (dragout precipitate) accumulated on the floor in the Rittal Process Line area, especially near the caustic dip tank. **(Similar problem noted in 2007.)**

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- d) Approximately 800 gallons of solidified sodium hydroxide waste residue in an unmarked rectangular steel process chemical holding tank by the shipping and receiving room east door. If this was liquid at the time you decided it could not be used, then it needs to be managed as hazardous waste even though it has crystallized now, unless Ohio Anodizing wants to document compliance with requirements for generator treatment of hazardous waste under the Land Disposal Restrictions.

Ohio Anodizing must properly evaluate these wastes and take steps to properly manage each of them as hazardous waste if they are found to be such. Please provide a description of steps taken to evaluate and properly manage this waste. [Hazardous waste must be placed in compatible closed containers, marked as such, with accumulation start dates, and properly disposed to a permitted facility.]

2. **Preparedness and Prevention, OAC rule 3745-65-16(C):** Annual refresher training for employees regarding hazardous waste management procedures must be provided and documented.

Records of employee training in hazardous waste management procedures were not adequate to demonstrate that it was being provided and received on the required annual basis.

To correct this problem, provide the necessary training updates and keep records of this activity, including content such as outlines of material covered and sign-in sheets with dates of training. Send copies of the sheets showing things are again up to date.

3. **Contingency Plan, OAC rule 3745-65-52(D):** The plan must include a current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator.

The contingency plan was out of date, with contact information numbers not updated since 2000.

To correct this problem, update this section of the plan and send a copy of the page(s) which have changed, as evidence to confirm this has been done.

4. **Preparedness and Prevention, OAC rule 3745-65-33:** Emergency equipment must be tested (inspected) as necessary to ensure proper operation in time of emergency. [Note: in the case of fire extinguishers, this is understood to be on a frequency consistent with the uniform fire code.]

Fire extinguishers were only being checked annually (by a contractor) and no monthly checks were being done or recorded on the inspection tags in the spaces provided for this purpose. This was mentioned as a comment suggestion after my 2007 inspection.

To correct this problem, add monthly inspections of fire extinguisher condition (gauge levels of charge) in your operations procedures and send a confirmation in writing us indicating when that has been accomplished and the date(s) the first such inspection(s) were done.

5. **Land Disposal Restrictions, OAC rule 3745-270-07(A)(2):** A generator must designate whether their hazardous waste is classified as a "wastewater" or a "non-wastewater" on their land disposal restriction notification to a permitted receiving facility. A "wastewater" is defined as having less than one per cent by weight total organic carbon (TOC) and less than one per cent by weight total suspended solids (TSS) [per OAC Rule 3745-270-02(A)(10)].

The same spent sulfuric acid waste stream was being described as a "wastewater" (to Vickery TSD facility) and as a "nonwastewater" (to the Clean Harbors TSD facility).

To correct this problem, determine which of these characterizations is accurate with respect to this waste stream, and follow it consistently, regardless of which TSD facility you elect to receive the waste. Make sure the receiving facility is properly permitted to receive the waste in either case. Send copies of corrected LDR Notifications to the receiving facility(ies), and to me to show you have properly resolved this problem.

Please submit an update with documentation showing progress toward abatement of the violation outlined above, to this office within 14 days of receipt of this letter.

In addition, I also offer the following comments, concerns and/or suggestions:

- Ohio Anodizing's more routine and frequent generation of hazardous waste at large quantity generation batch amounts is the major change since 2007. This probably relates to a management decision to ship caustic hydroxide waste offsite for treatment and disposal rather than attempting to neutralize and treat it on site. Practically speaking, some things that were considered good advice in 2007, now are considered mandatory requirements under the rules for regular large quantity generators.
- Structural repairs to the containment berm at the west end of the Rittal process line area are needed in order to ensure that any spilled liquids do not migrate across the floor elsewhere beyond that area. Spilled liquids were in fact noted flowing across the floor outside the berm there at the time of my inspection. Any spills of potential hazardous waste liquids, especially if outside of proper containment, need to be promptly cleaned up and prevented wherever possible.
- My 2007 Notice of Violation letter to you mentioned the need to ensure that containment floor areas function "as intended, for emergency containment only rather than as something that could be considered a regulated hazardous waste accumulation unit". Conditions next to the caustic process tank on the large anodize line (with up to 8 feet thick layer of dried residues built up there) were NOT consistent with this expectation if such waste at the time of spillage is or would be determined to be hazardous waste (under violation #1b above). Ohio Anodizing needs to undertake much more serious effective efforts to prevent routine spills and discharges of potential hazardous wastes from regular processes. For this we would expect:
 - i. Dragout drip excluding baffles (rubber mats or similar, bridging between the tops of two adjacent process tanks) utilized consistently as a routine measure.
 - ii. Prompt correction of any plumbing or process tank leaks which may be discovered from time to time is part of this expectation.

Ohio hazardous waste regulations require that the facility be operated "to minimize the possibility of any unplanned release of hazardous waste (OAC Rule 3745-65-31). Sumps which routinely accumulate hazardous wastes may be subject to regulation as hazardous waste tanks under OAC Rule 3745-66-90 through -101. Please include in your follow-up letter to me, a detailed description of how Ohio Anodizing will effectively address these concerns.

- Discussions of waste water flow reduction opportunities through dragout reduction, which I mentioned in 2007 remain just as applicable at this time. Spills of dragout beyond the process tanks are just one example of the waste and cost associated with this problem. **A repeat mention...** Adding a second rinse tank in sequence with in each process (even by adding internal baffles between wider larger tanks without taking up any extra floor space) may help you to reduce necessary rinse flows by an order of magnitude. Spray or mist rinses over a second empty drip tank can also be cost-effective. Countercurrent rinse tank flows may be combined with heated rinses/baths to allow some or all of the process dragout to be used as makeup, instead of requiring waste water treatment. Ohio EPA technical staff in the Office of Compliance Assistance and Pollution Prevention can provide detailed assistance through a free P2 Assessment analysis of these and other money saving opportunities. For more information contact the OCAPP Hotline at (800) 329-7513.

Enclosed are copies of the checklists that were completed for this inspection. Our website, www.epa.gov/epaospr/ohio/, provides links to copies of Ohio hazardous waste rules. Should you have any questions, please feel free to call me at (614) 729-3885. I look forward to receiving your response soon regarding follow-up to the violations and issues noted above.

Sincerely,



J. David Hohmann
Division of Materials and Waste Management
Central District Office

Enclosure

c: CDO File

JDH/nsm Ohio Anodizing 12 NOV

Notice: Ohio EPA's failure to list specific deficiencies/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

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 = Amount in pounds.

Safety Equipment Used: Safety Glasses and steel-toed boots.

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-40(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste in other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit at a another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste? <i>RMK: 2 liter container waste residues, liquid portion of which had previously been determined to be hazardous.</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)] <i>RMK: No treatment except for corrosive waste water in a pretreatment system prior to discharge to POTW.</i>			
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45? <i>RMK: caustic spillage on the floor was allowed to evaporate (solidify). This did not appear to be intended as hazardous waste treatment. It was not clear whether the floor would meet standards for drip pads either.</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
11.	Does the generator export hazardous waste? If so: <i>RMK: N/A</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator & initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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 &/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests & any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)] <i>RMK: This was not being provided or documented.</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:			
	a. Job titles? [3745-65-16(D)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	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)] <i>RMK: It needed to be updated with current addresses & phone numbers.</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
EMERGENCY PROCEDURES				
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: <i>RMK" a.-c. = N/A</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
PREPAREDNESS AND PREVENTION				
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if required due to actual hazards associated with the waste:			
	a. Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. Water of adequate volume/pressure per documentation or facility rep? [3745-	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

	65-32(D)]	
<i>NOTE: Verify that the equipment is listed in the contingency plan.</i>		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] <i>RMK: Fire extinguishers are not tested monthly, only annually.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator been paid in full by emergency authorities with possible hazards and facility layout? [3745-65-36]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	When authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS <i>425, 64 = N/A</i>		
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS <i>N/A at time of inspection</i>		
45.	Has the generator marked containers as "Hazardous Waste"? [3745-66-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date marked on each container? [3745-66-34(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. In good condition? [3745-66-71]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Compatible with wastes stored in them? [3745-66-72]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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? [3745-62-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
PRE-TRANSPORT REQUIREMENTS <i>RMK: Most hazardous waste shipments were by bulk tanker loads</i>		
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Ohio Anodizing, Inc. Facility Type: LQG Date of Inspection: 3/6/2012 EPA ID#: OHD004291506

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) & location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Anodizing process flowing rinse baths	Spent rinse waters with possible corrosive characteristics	15,000 gallons/day	Pretreated by elementary neutralization	discharged under permit to City of Columbus to sanitary sewer (POTW)	Turn off taps at night	Regulate rinse flows, define rinse quality and set flows accordingly, turn off rinses during breaks, consider spray rinses and second rinse tanks in the same process line
2 wastewater treatment (for sulfuric acid anodizing of aluminum parts)	WWT filter press sludge (not considered hazardous waste)	~10 cubic yards/month in a rolloff box	n/a	Suburban Landfill disposal as solid waste	None identified	These would include the same measures identified for waste streams #1, #3 and #4
3 Caustic etch bath maintenance	Spent caustic solution (D002)	~4000 gallons every 6 months (batch)	n/a, formerly used as reagent to neutralize other waste waters	Clean Harbors (OH) and/or Vickery (OH)	None identified	Dragout reduction techniques including increased drip times, parts racking review
4 Sulfuric acid anodize bath maintenance	Spent sulfuric acid solution (D002)	~4000 gallons annually (batch)	n/a	for TSD treatment and disposal		
5 Containment area cleanup	Spent caustic etch waste residues (liquid and solid)	Intermittent.	n/a. this usually dries to a solid on the floor before being cleaned up	When solid, has been managed as solid waste with waste #2	None identified	Install baffles between adjacent tanks to eliminate dragout hitting the floor and keep process chemicals in process tanks longer. Avoid moving racked dripping parts over the floor areas.
6 Equipment maintenance	Waste residues in old tank from previous owners. (D008 as liquid)	Several 100s of gal. of liquid (one-time D008 haz waste) in 2007. Solidified residues remain in a tank in the pipe-fitting room	N/A this appeared to have dried out to a solid in the tank since 2007	Stored indefinitely on site for about 18 years	None identified	Eliminate old equipment and materials which are no longer needed on site.

Remark: see narrative report for further information about this facility.

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)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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)] If not: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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).

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| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 3745-270-07(A)(8)(a) or 3745-270-07(A)(8)(b)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #3, above, on-site for at least three years from the last date the HW/soil was sent on-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, [a. = N/A] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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.

NOTE: Written documentation of this determination is not required.

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| 7. | Did the generator treat his HW/soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
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NOTE: If "Yes" see question #16.

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| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | i. Applicable HW codes? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | ii. Manifest number of the first shipment to the TSD? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iii. A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?" | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTIFICATION FORM

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| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)] <i>RMK: the same waste was described as "wastewater" to one TSD facility, and as "Nonwastewater" to another TSD. Reason(s) for this were unclear.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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, EPA-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
PROHIBITED DILUTION			
12		Is the HW treated by burning? If "No" go to #13 (#13-14= N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
13		Was the HW treated by wastewater treatment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)]			
GENERATOR TREATMENT			
16.		Does the generator treat to meet LDRs on-site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
		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? <i>RMK: Spilled liquid corrosive wastes were being allowed to dry/solidify on the floor but this did not appear to be intended to avoid the LDR requirements.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.			
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTIFICATION FORM FOR GENERATOR TREATMENT

17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Prepare a one-time notification? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]	
		1. Name & address of receiving facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		2. Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		3. HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		4. Toxicity group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

