

**Environmental
Protection Agency**

Ohio Environmental Protection Agency
19700 East Avenue
Columbus, Ohio 43240-9797
614.644.6300
www.epa.ohio.gov

Governor
Lt. Governor
Director

October 5, 2011

RE: MAHONING COUNTY
LOWELLVILLE
ALUMINUM COLOR INDUSTRIES, INC.
PERMIT NO. 3DP00001*EP
INDUSTRIAL USER INSPECTION

Ms. Tina Spinosa
Aluminum Color Industries, Inc.
369 West Wood Street
Lowellville, OH 44436

Dear Ms. Spinosa:

On September 21, 2011, this office conducted an Industrial User inspection of the above facility. Ryan Laake and Donna Kniss represented the Ohio Environmental Protection Agency (EPA), and you represented the company. Aluminum Color Industries, Inc. (ACI) discharges to the Village of Lowellville Wastewater Treatment Plant (WWTP) and has been issued Indirect Discharge (IDP) Permit NO. 3DP00001*EP. The purpose of the inspection was to evaluate ACI's compliance with the existing IDP.

ACI fabricates and anodizes aluminum parts. The anodizing process is a sulfuric acid anodizing process, with a nickel sealant. There are approximately 10 employees working one (1) shift per day, five (5) days per week. The anodizing operation is usually run one (1) day per week. Anodizing is run predominately at night. The anodizing line rinses overflow during operations, and the tanks are drained after every five (5) days of production. There are three (3) holding tanks for soap, nickel, and acid. Nickel and acid solutions are bled into the treatment system, and soap solution is bled into the sewer. The last time the soap was bled into the sewer was about two (2) years ago.

ACI has a pretreatment system that operates after the anodizing line is started. Wastewater flows into pits and is then pumped into the treatment system, where acid or caustic is added to a target pH of 7.5 and coagulant is added. Scrubber water is also routed into a pit and through the treatment system. The water then flows through a polymer addition flocc tank and into two (2) inclined plate clarifiers. The clarifier overflow is routed to the "City tank T". Downstream of the City tank there are treatment pits that were installed for additional treatment such as pH adjustment, but no additional treatment occurs. Sludge from the clarifiers is pumped into tank "O", and is dewatered in a plate and frame filter press.

Laboratory analyses are conducted by Cardinal Laboratories. A grab sample is collected from the last pit before discharge. The samples are collected by ACI employees in bottles provided by Cardinal. The sample is refrigerated after collection, and a Cardinal Labs representative usually picks up the samples the day after collection. The reported pH is from the mixer pit when the sample is taken. A review of the chain-of-custody forms showed that they were generally completed correctly. Flow is estimated based on the water used in the production processes.

Aluminum Color

Data June 2005 through June 2011

Limit Violations

| Permit No | Reporting Period | Station | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|-------------|------------------|---------|------------------------|------------|-------|----------------|----------------|
| 3DP00001*EP | | 100 | Nickel, Total Recovera | 1D Conc | 3980 | 4180. | 11/23/2010 |
| 3DP00001*EP | | 100 | Nickel, Total Recovera | 30D Conc | 2380 | 4180. | 11/1/2010 |

Frequency Violations

| Permit No | Reporting Period | Station | Parameter | Sample Frequency | Expected | Reported | Violation Date |
|-------------|------------------|---------|------------------------|------------------|----------|----------|----------------|
| 3DP00001*EP | June 2008 | 100 | Total Toxic Organics | 2/Year | 1 | 0 | 06/01/2008 |
| 3DP00001*EP | April 2009 | 100 | Nickel, Total Recovera | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Cyanide, Total | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Chromium, Total (Cr) | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Copper, Total (Cu) | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Lead, Total (Pb) | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Zinc, Total (Zn) | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Flow Rate | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Cadmium, Total (Cd) | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | April 2009 | 100 | Silver, Total (Ag) | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | January 2009 | 100 | Total Toxic Organics | 1/6Months | 1 | 0 | 01/01/2009 |
| 3DP00001*EP | April 2009 | 100 | pH, Minimum | 1/Month | 1 | 0 | 04/01/2009 |
| 3DP00001*EP | January 2010 | 100 | Total Toxic Organics | 1/6Months | 1 | 0 | 01/01/2010 |
| 3DP00001*EP | July 2010 | 100 | Total Toxic Organics | 1/6Months | 1 | 0 | 07/01/2010 |
| 3DP00001*EP | May 2011 | 100 | Nickel, Total Recovera | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Cyanide, Total | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Chromium, Total (Cr) | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Copper, Total (Cu) | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Lead, Total (Pb) | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Zinc, Total (Zn) | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Flow Rate | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Cadmium, Total (Cd) | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | May 2011 | 100 | Silver, Total (Ag) | 1/Month | 1 | 0 | 05/01/2011 |
| 3DP00001*EP | January 2011 | 100 | Total Toxic Organics | 1/6Months | 1 | 0 | 01/01/2011 |
| 3DP00001*EP | May 2011 | 100 | pH, Minimum | 1/Month | 1 | 0 | 05/01/2011 |

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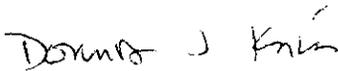
A review of the IDP monitoring data from June 2005 to July 2011 showed one (1) permit violation in November 2010 for exceeding the nickel concentration limit. The nickel concentration was well below permit limits in December 2010. There were frequency violations in April 2009 and May 2010. A copy of the violation data is attached.

The Aluminum Color IDP expired March 31, 2010, and we could not locate a renewal application. During the inspection, you indicated that you thought you had filed the renewal application, and would review your records. In order to satisfy the outstanding compliance issues, please provide the following to this office:

1. A completed IDP application with the appropriate fee. If the application was previously filed, please provide a copy of that application and documentation, such as a cancelled check, showing that the renewal fee was paid.
2. Documentation that spill/slug areas were investigated and a spill prevention and slug discharge control plan has been developed.
3. Documentation that an operation and maintenance manual for the pretreatment system has been developed.
4. Documentation that an operations log, including pH meter calibration, has been developed. Please send a copy of a completed log page with this documentation.

If you have any questions or comments, please contact me at (330)963-1285. I can also be reached via e-mail at donna.kniss@epa.state.oh.us.

Sincerely,



Donna J. Kniss
Environmental Engineer
Division of Surface Water

DJK/cs
attachment

cc Mayor and Council
Rich DeLuca
Ryan Laake, Ohio EPA, CO, DSW

Ec ✓ John Kwolek, Ohio EPA, NEDO, DSW

File: Pretreatment Industrial User/Permit-Compliance