



State of Ohio Environmental Protection Agency

**Central District Office**

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MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

July 16, 2007

Re: Ohio Anodizing, Inc.  
OHD004291506 *Franklin County*  
*episodic LQG [NOV]*

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

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 June 25, 2007. The purpose was to review your facility's generation and management of hazardous waste. Ohio's laws under Chapter 3745 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.

Ohio Anodizing is currently operating as an episodic large quantity generator (LQG) with at least one regulated large quantity batch of hazardous waste per calendar year, but with less than 100 kilograms of hazardous waste generated in the most recent current month.

The following violations were noted:

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

The following wastes had not been evaluated:

- Approximately one-foot-deep (over 1000 gallons estimated) of unidentified oily liquid contents in a large elevated steel blowdown tank in the pipe-fitting room which had not been used for at least 13 years.
- Various unneeded dye solutions in 20-gallon stainless steel containers and a drum beside the Rittal Line, and in the warehouse.
- 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.

☞ *Ohio Anodizing must properly evaluate this waste and take steps to properly manage it as hazardous waste if it is found to be such. Please provide a description of steps taken to evaluate and properly manage this waste. [Hazardous waste must be placed in*

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

EFF COB

Mr. Keith Willike  
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*compatible closed containers, marked as such, with accumulation start dates, and properly disposed to a permitted facility.]*

2. **Preparedness and Prevention, OAC rule 3745-65-31**): The facility must be operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste. Spilled waste material was present on the floor around the Rittal Process Line. A thick layer of apparent dragout waste residue from the process was visible around many of the tanks. The floor in the area was intended to function as secondary containment for emergencies and not as a hazardous waste tank. The floor surface did not appear to have been adequately coated or sealed to protect the soil and ground water. The concrete floor area in this department was severely deteriorated, with exposed aggregate visible and an eroded top 3-inch layer.

To address this violation, Ohio Anodizing needs to:

- a. *Clean up accumulated waste material from the floor in the Rittal Process area, and take steps to ensure that the area functions as intended, for emergency containment only rather than as something that could be considered a regulated hazardous waste accumulation unit.*
- b. *Repair the containment floor to ensure that any spills of materials that would be considered hazardous waste (liquid or solid) in this area can't threaten soil or the ground water environment. Ensure that floor surfaces and coatings are in good condition and compatible with waste chemicals that may come in contact with them, and seal any cracks or joints in the floor.*

*Please provide a written description of actions taken to address this issue, including a suitable schedule to be followed for any work not done within 30 days of receiving this letter. Updates on completion of such scheduled work will be required to document a full return to compliance.*

**Please submit documentation showing abatement of the violations outlined above, to this office within 30 days of receipt of this letter.**

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

- The Contingency (SPCC) Plan appeared to contain accurate and necessary information required of large quantity generators, but it should be reviewed on a regular basis to ensure it is kept current. You indicated it hadn't been internally reviewed or changed since 2000.
- Likewise, training of key staff in hazardous waste compliance practices had not been refreshed since 2000, but was probably due for general preventive purposes.

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- Fire extinguisher inspections were being conducted and documented annually. Monthly inspections are usually considered more appropriate, based on our experience at other facilities.
- Waste water flows from your operations averaged 15,000 gallons per day. Waste reduction opportunities likely exist to save significantly on sewer fees, waste handling costs, and process chemical costs. Dragout reduction is the key to reducing wastewater flows. Adding a second rinse tank in sequence within each process may reduce necessary rinse flows by an order of magnitude. Spray or mist rinses over a second empty drip tank may 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.
- Ensure that rinse tank flows are precisely controlled, and are only set at the rate necessary to provide adequately clean rinse quality for product specifications. Automated rinse flows and with solenoid controlled valves, triggered by conductivity sensors or other means, may be effective for this purpose. Shutting off flowing rinses during times that operations in that tank are not happening, and during lunch breaks, will eliminate excessive wastewater flows.
- I strongly encourage considering obtaining a free waste reduction technical assistance Pollution Prevention Assessment from Ohio EPA's Office of Compliance Assistance and Pollution Prevention. Information on their services is available online at <http://www.epa.state.oh.us/opp/ocapp.html>

Enclosed is a copy of the checklist that was completed for this inspection. Our website, [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm), provides links to copies of Ohio hazardous waste rules. Should you have any questions, please feel free to call me at (614) 728-3885. I look forward to receiving your response soon regarding followup addressing the two violations noted above.

Sincerely,



J. David Hohmann  
Division of Hazardous Waste Management  
Central District Office

Enclosure

c: Tammy McConnell  
CDO File

JDH/sjl Ohio Anodizing 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)

CESQG:  $\leq 100$  Kg. (Approximately 25-30 gallons) of waste in a calendar month or  $< 1$  Kg. of acutely hazardous waste.

LQG:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  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, ear protection

## GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A
2. Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] Yes  No  N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes  No  N/A
4. Were annual reports filed with Ohio EPA on or before March 1<sup>st</sup>? [3745-52-41(A)] Yes  No  N/A
5. Are annual reports kept on file for at least 3 years? [3745-52-40(B)] Yes  No  N/A
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)] Yes  No  N/A
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 hazardous waste? [ORC 3734.02(E) & (F)] Yes  No  N/A
8. Does the generator accumulate hazardous waste? Yes  No  N/A   
*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)? Yes  No  N/A
10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
  - a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes  No  N/A
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A
11. Does the generator export hazardous waste? If so: [N/A] Yes  No  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)] Yes  No  N/A
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes  No  N/A
14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes  No  N/A
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  No  N/A
16. Have manifests been signed by the generator & initial transporter? [3745-52-23(A)(1)&(2)] Yes  No  N/A
17. 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)] Yes  No  N/A
18. 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  No  N/A
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes  No  N/A

**PERSONNEL TRAINING** [under 52-34, these requirements do not apply since no current accumulation or treatment of hazardous waste]. Staff received awareness training, but no other hazardous waste training since 2000.

20. 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)]
21. 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)(a-f)]
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]

24. Does the generator provide annual refresher training to employees? [3745-65-16(C)]
25. Does the generator keep records and documentation of: a. Job titles [3745-65-16D(1)]? b. Job descriptions [3745-65-16D(2)]? c. Type and amount of training given to each person [3745-65-16D(3)]? d. Completed training or job experience required [3745-65-16D(4)]?
26. 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)]

**CONTINGENCY PLAN** [under 52-34, these requirements do not apply since no current accumulation or treatment of hazardous waste]. A contingency plan appeared to be still current & accurate, although it had not been updated in 7 years.

27. 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)]
28. 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)]?
  - b. Arrangements with emergency authorities [3745-65-52(C)].
  - 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)]
  - d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? [3745-65-52(E)]
  - e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]
29. 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)]
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]

**EMERGENCY PROCEDURES**

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: [N/A] Yes  No  N/A

**PREPAREDNESS AND PREVENTION** [N/A waste not accumulated]

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [N/A, 34 and following]

**SATELLITE ACCUMULATION AREA REQUIREMENTS** [N/A]

**PRE-TRANSPORT REQUIREMENTS** [N/A]

**REMARKS:**

52-11: The following wastes needed to be evaluated: Contents of a blowdown tank in the pipe fitting room (about 1 foot deep of an oily watery liquid); various unneeded dye solutions in containers beside the Rittal Line and in the warehouse. Unidentified waste crystals accumulated on the floor in the Rittal Process line area needed to be cleaned up and evaluated.

Normally, hazardous wastes are not accumulated on site. Episodic batches of sulfuric acid waste are generated about once a year, being removed straight from process tanks. About once every 3 years, a batch of waste caustic sodium hydroxide is generated and shipped off-site. Normally the excess caustic is reused as a reagent in the on-site wastewater pretreatment process.

Fire extinguishers were only being inspected annually. There was a fire alarm but no sprinklers, and no other emergency communication system.

The floor surface in the Rittal Process line area was severely deteriorated, with exposed aggregate visible and an eroded top section of concrete missing down to a lower layer.

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22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]

24. Does the generator provide annual refresher training to employees? [3745-65-16(C)]
25. Does the generator keep records and documentation of: a. Job titles [3745-65-16D(1)]? b. Job descriptions [3745-65-16D(2)]?  
c. Type and amount of training given to each person [3745-65-16D(3)]? d. Completed training or job experience required [3745-65-16D(4)]?
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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)]  
d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? [3745-65-52(E)]  
e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]
29. 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)]
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]
31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]

**EMERGENCY PROCEDURES**

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: [N/A] Yes  No  N/A

**PREPAREDNESS AND PREVENTION** [N/A waste not accumulated]

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [N/A, 34 and following]

**SATELLITE ACCUMULATION AREA REQUIREMENTS** [N/A]

**PRE-TRANSPORT REQUIREMENTS** [N/A]

**REMARKS:**

52-11: The following wastes needed to be evaluated: Contents of a blowdown tank in the pipe fitting room (about 1 foot deep of an oily watery liquid); various unneeded dye solutions in containers beside the Rittal Line and in the warehouse. Unidentified waste crystals accumulated on the floor in the Rittal Process line area needed to be cleaned up and evaluated.

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Fire extinguishers were only being inspected annually. There was a fire alarm but no sprinklers, and no other emergency communication system.

The floor surface in the Rittal Process line area was severely deteriorated, with exposed aggregate visible and an eroded top section of concrete missing down to a lower layer.

# LDR CHECKLIST

## GENERAL REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A  RMK#
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A  RMK#
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes  No  N/A  RMK#
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A  RMK#
- 
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No  N/A  RMK#
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A  RMK#

*If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: [N/A] Yes  No  N/A  RMK# a
6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes  No  N/A  RMK#
- 
7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A  RMK#

*A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater. [3745-270-03(B)]*

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes  No  N/A  RMK#
- 
9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes  No  N/A  RMK#
10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] If so: [N/A] Yes  No  N/A  RMK#
11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so: [N/A] Yes  No  N/A  RMK#
- 
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: [N/A] Yes  No  N/A  RMK#

## NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes  No  N/A  RMK#

14. If a generator's waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes  No   
N/A  RMK#
15. If a generator's waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes  No   
N/A  RMK#
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes  No   
N/A  RMK#
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes  No   
N/A  RMK#
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes  No   
N/A  RMK#

*Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))*

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes  No   
N/A  RMK#

**GENERATORS TREATING HAZARDOUS WASTE [N/A]**

**HAZARDOUS DEBRIS [N/A]**

**TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS [N/A]**

**REMARKS**

- a. Wastewater treatment sludge from sulfuric acid anodizing of aluminum parts is not subject to the F019 waste code listing, according to Ohio's application of the federal rules.

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility:** Ohio Anodizing Facility **Type:** LQG (episodic) CESQG (current) **Date of Inspection:** 06/25/07 **EPA ID#:** OHD004291506

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 Anodizing	wastewater	about 340,000 gal.	waste water pretreatment and discharge to sanitary sewer	n/a	turn off taps at night	regulate rinse flows. define rinse quality and set flows accordingly. turn off rinses during breaks. consider spray rinses, second rinse tanks in line.
2 anodizing	spent bath solutions (D002)	4000 gal per batch avg 1x/yr	n/a	Clean Harbors (Cleveland) Treatment under permit & discharge	not known	not identified
3 cleaning associated with anodizing	spent caustic cleaning solution (D002)	4000 gallons per batch avg 1x/ every 3 yrs	normally reused as reagent in waste water pretreatment	Clean Harbors (same as above) takes	reused as reagent on site	none identified
4 bright dip process bath maintenance	spent phosphoric acid (crystals) with aluminum, non-hazardous	batch of avg. 4000 lbs every 9 months or so	n/a	EQ, Detroit MI accepts and manages under HW permit	unknown	none identified
5 color anodizing process change	excess unneeded colorants and dyes	infrequent batches, currently remain in containers.	n/a	undetermined	unknown	unknown. OMEX?

**General Process Information:** See Narrative report **Additional P2 remarks and information:** This facility had some of the largest wastewater treatment process tank capacity I have seen at a plater. Their process line tanks are also somewhat larger than average, being intended to accommodate small aircraft wing parts or spars originally. Space is not a premium at this facility so it is likely that improvements/additions to rinse tanks and their operations may be able to be accommodated. Large cost savings may be possible if waste water flows could be reduced and/or eliminated.

Would this facility be interested in a P2 assessment?  Yes\*  No  Maybe **(Encouraged P2 Assessment, as comment in NOV letter)**

