



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Trace Powell
Quick Turn Anodizing LLC
6973 S. US Hwy 31
Edinburgh, IN 46124
tpowell@quickturnanodizing.net

Re: Notice of Potential Violation and Opportunity to Confer
Compliance Evaluation Inspection Report and Description of Areas of Concern
Quick Turn Anodizing LLC
No RCRA ID
Edinburgh, Indiana

Dear Trace Powell:

On October 12, 2022, the U.S. Environmental Protection Agency ("EPA") conducted a Resource Conservation and Recovery Act ("RCRA") compliance evaluation inspection at Quick Turn Anodizing LLC ("you" or "QTA") located in Edinburgh, Indiana. The purpose of the inspection was to evaluate QTA's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the Inspection Report for your convenience. On November 2, 2022, EPA sent QTA an Information Request Letter ("IRL"). On November 15, 2022, QTA responded to the IRL ("IRL Response").

Information currently available to EPA suggests that QTA may be in violation of RCRA. By this letter, EPA is extending to you an opportunity to advise the Agency, in person or in writing, of any further information EPA should consider with respect to the areas of concern identified in this letter.

During the inspection, EPA observed several areas of concern, described below. The description of the areas of concern is not a final determination regarding QTA's compliance with RCRA. EPA requests that you voluntarily submit a response in writing to us no later than 30 calendar days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to address the areas of concern described below or demonstrating why the areas should not be of concern. We also ask that you voluntarily provide responses to the questions found in the "Additional Information" section below. After 30 calendar days from your receipt of this letter and, if applicable, review of your response, EPA will notify you of any further action.

Areas of Concern

During the inspection, EPA observed the following areas of concern:

1. Hazardous Waste Determination

Under 329 Ind. Admin. Code 3.1-7-1 and 40 C.F.R. Part 262.11, a generator must determine whether its waste is hazardous.

Pursuant to 40 C.F.R. § 262.11(a), a hazardous waste determination for each solid waste must be made at the point of waste generation, before any dilution, mixing, or other alteration of the waste occurs, and at any time in the course of the waste's management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the RCRA classification of the waste may change.

- A. At the time of the inspection, QTA was unable to provide documentation showing whether or not the wastewater generated at the high voltage sulfuric acid anodizing line and the wastewater and sludge generated at the black oxide line were hazardous wastes. On November 15, 2022, QTA's IRL Response purported to provide lab analytical results for these waste streams. However, these lab results were for QTA's facility in Guthrie, KY, and included only one wastewater sample from the high voltage sulfuric acid anodizing line. EPA has additional questions about these lab analytical results. See paragraphs 1 and 2 in the "Additional Information" section below for additional information we are requesting from QTA on this issue.
- B. At the time of the inspection, QTA had not made waste determinations for several waste streams generated at the facility, including used micron filters generated from process tanks along the high voltage sulfuric acid anodizing line that capture suspended solids; waste dyes containing chromium compounds; used micron filters and wastewater generated from the color dye line; and wastewater and precipitated chromium waste generated from the chromate/clear coat film line.
- C. At the time of the inspection, the EPA inspector observed three containers storing unknown wastes outside QTA's facility: a blue poly-drum container labeled "Desmut," an open grey poly-drum container of liquid with an apparent sheen, and an open square container of black liquid. QTA's IRL Response stated, "all blue-black-green-grey drums outside are cleaned before moving outside." Further, QTA stated that the container labeled "Desmut" had been brought inside, tested, and determined that it had accumulated rainwater. However, QTA did not provide any pictures or documentation of the "Desmut" container's contents. See paragraph 3 in the "Additional Information" section below for additional information we are requesting from QTA on this issue.

2. Used Oil Requirement

Under 329 Ind. Admin. Code 13-4-3 Section 3.(d)(1), containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “Used Oil.”

At the time of the inspection, two large containers of used oil, located in QTA’s outdoor storage areas, were not labeled with the words “Used Oil,” as required. Refer to images IMG_0749, IMG_0750, IMG_0751, & IMG_0752 in the Inspection Report.

Additional Information

1. The IRL Response contained lab analytical results for wastewater generated from the high voltage sulfuric acid anodizing line and for black oxide sludge generated from the black oxide line at QTA’s facility located in Guthrie, KY, not QTA’s facility located in Edinburgh, IN. The IRL Response also contained process control plans that reveal numerous points at which wastewater can be flushed from the high voltage sulfuric acid anodizing line’s rinse tanks at QTA’s Edinburgh facility. Please explain with supporting documents how the aforementioned analytical results are representative of the wastes generated from the high voltage sulfuric acid anodizing line and the black oxide line at QTA’s facility located in Edinburgh, IN. Further, please explain why only one wastewater sample was collected from the high voltage sulfuric acid anodizing line at QTA’s Guthrie facility and how that one sample is representative of the numerous points of wastewater generation along the high voltage sulfuric acid anodizing line at QTA’s facility located in Edinburgh, IN.
2. The IRL Response provided a lab report showing that the black oxide soap rinse wastewater generated from the black oxide line at QTA’s facility located in Edinburgh, IN contained concentrations of RCRA metals within allowable limits. However, the report did not evaluate the black oxide soap rinse wastewater for any other analytes besides RCRA metals. Please provide a written response explaining why VOC, pH, and flashpoint analyses were not performed on the black oxide soap rinse wastewater generated from the black oxide line, and state whether or not Midwest Environmental disposes of the black oxide soap rinse wastewater as hazardous waste.
3. Mixtures of residual waste and accumulated rainwater need to be treated as a hazardous waste where the mixture exhibits a characteristic of hazardous waste. Please provide a written response describing what, if any, tests were performed on the liquids stored in the containers referenced in Paragraph 1.C above and provide analytical documents or safety datasheets for those liquids.
4. Explain where the Luster-On chemicals (Luster-On Aluminescent, Luster-On 62AC, and Luster-On 224L) are used in the process and whether they generate any wastes.

5. Please state whether or not the black oxide sludge skimmed off the black oxide line contains pen dip oil and state whether it is disposed of as used oil or hazardous waste. Further, provide the name and address of the facility that disposes the black oxide sludge waste.

Actions Requested

By no later than 30 calendar days from the date of this letter, please provide information documenting the actions, if any, which you have taken since the inspection to address the identified areas of concern, and please provide the additional information requested.

Please send all information requested by this letter by electronic mail to:

r5lecab@epa.gov

and

Crank.Lee@epa.gov

The subject line of all email correspondence must include “No RCRA ID / QTA.” All electronically submitted materials must be in final and searchable format, such as Portable Document Format (PDF) with Optical Character Recognition (OCR) applied. If you are unable to send a response to these email addresses due to email size restrictions or other problems, contact Lee Crank to make additional arrangements for transmission of the response.

This letter is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks information from specific individuals or entities as part of an administrative investigation. You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to EPA in response to this letter. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

The EPA contact in this matter is Lee Crank. You may call him at (312) 886-7568 if you have additional questions. Thank you for your prompt attention to these concerns and your efforts to protect human health and the environment.

Sincerely,

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Enclosure

cc: Jennifer Reno, Indiana Department of Environmental Management (jreno@idem.in.gov)