



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: APR 05 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
WRE/Colortech, Wadsworth, Ohio

FROM: David Sutlin, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: WRE/Colortech

Facility Location: 668 Seville Road, Wadsworth, Ohio

Date of Inspection: February 5th, 2019

EPA Inspector(s):

1. David Sutlin, Environmental Engineer

Other Attendees

1. Dean Ellebruch, Vice President Midwest Operations
2. Pete Bach, Production Manager
3. Tom Codd, Environmental and Maintenance Supervisor

Contact Email Address: dellerbruch@wrecolor.com

Purpose of Inspection: To determine compliance with the Clean Air Act.

Facility Type: Hard chrome plating facility

Regulations Central to Inspection: 40 CFR Part 63, Subpart N - National Emission Standards for Hazardous Air Pollutants: Standards for Chromium Electroplating

Arrival Time: 8:45 AM

Departure Time: 10:30 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Bach, Mr. Ellebruch, and Mr. Codd unless otherwise noted.

Process Description:

The facility receives steel cylindrical bases from their customers. New bases are nickel-plated. All bases are then copper-plated, turned, and polished. Next, the printing images are electro-mechanically engraved into the bases. Finally, hard chrome plating is applied to the cylinders, by rotating them through a 400 gallon bath containing chromic acid and a small amount of sulfuric acid for 45 minutes. The facility operates two such baths, which are controlled by the "P-001 Scrubber." This control device consists of a composite-bed mist eliminator followed by a HEPA filter system. The engraved cylinders are then shipped to packaging printers.

Staff Interview:

The scrubber was last tested in 1999. Pressure drop across the scrubber is monitored and recorded daily. The facility tracks annual ampere hours and operating hours for each bath.

TOUR INFORMATION

EPA toured the facility: Yes

Photos and/or Videos: were taken during the inspection.

CLOSING CONFERENCE

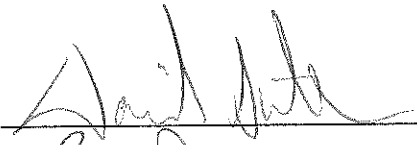
Requested documents:

- Manufacturer's operations and maintenance documents for scrubber
- Scrubber monitoring records
- 2nd half 2018 semiannual report
- Scrubber stack test report

Compliance Assistance: I noted that the pressure monitoring daily record sheets listed only the low pressure drop limit, not the high limit. Mr. Codd pointed me to an older version of these sheets which contained both limits and told me that this would be corrected.

SIGNATURES

Report Author:



Date:

4/5/19

Section Chief:



Date:

4/5/19

Facility Name: WRE/Colortech
Facility Location: 668 Seville Road, Wadsworth, Ohio
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APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: WRE/Colortech

Facility Location: 668 Seville Road, Wadsworth, Ohio

Date of Inspection: February 5th, 2019

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: David Sutlin	2. Date(s) of Inspection: February 5th, 2019
3. Company/Facility Name: WRE/Colortech	4. Street Address, City, State: 668 Seville Road, Wadsworth, Ohio
5. Number of Images: 2	6. Archival Record Location: Images are saved to a CD-R labeled "WRE/Colortech, Wadsworth, OH; 2-5-19 Inspection; Images"

Image Number	File Name	Date and Time (incl. time zone and DST)	Description of Image
1	P2050009.JPG	2/5/2019 8:50	Chrome plating baths
2	P2050010.JPG	2/5/2019 8:50	Control device for chrome plating baths