UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME:	Mid City Plating Company
EPA ID No.:	IND 006 049 456
LOCATION ADDRESS:	912 East Charles Street Muncie, Indiana 47305
NAICS CODE(S):	332813 [Electroplating, Plating, Polishing, Anodizing, and Coloring]
DATE OF INSPECTION:	June 22, 2010
EPA INSPECTOR:	Jamie L. Paulin Chemist LR-8J Compliance Section 1 (312) 886-1771 Direct (312) 353-4788 Facsimile paulin.jamie@epa.gov

PREPARED BY: Jamie L. Paulin — 11/24/10
Jamie L. Paulin
Chemist
Date

REVIEWED BY: Lorna M. Jereza, Chief — 11/24/10
Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at Mid City Plating Company (Mid City Plating), located at 912 East Charles Street, Muncie, Indiana 47305, to examine Mid City Plating's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, by the U.S. Environmental Protection Agency.

Mid City Plating notified as a large quantity generator on or about March 1, 1990 and remained in large quantity generator status until 2008, when they re-notified as a small quantity generator. Then in 2010, they reported on the March 2, 2010, biennial report, as a conditionally exempt small quantity generator.

Mid City Plating also has an NAICS code of 332813 [Electroplating, Plating, Polishing, Anodizing, and Coloring], and is mainly operating two out of four plating lines; zinc electroplating on steel. Cyanide is also still being used within the plating operations.

Mid City Plating stores hazardous wastes on-site in a roll-off container, containers, and storage tanks. The waste waters collected from the plating lines are treated on-site in the waste water treatment (WWT) unit system. A hazardous waste filter cake, F006, is collected after WWT and stored in a container underneath the filter press. The F006 filter cake is then transferred into a roll-off container, approximately 20-yards, that is stored outside. A hazardous waste, carrying the waste code of F008, is collected into 55-gallon containers, from cleaning out the plating baths where cyanide is still used in the process.

Mid City Plating operates with one shift and employs approximately 5 employees.

Mid City Plating has never been inspected by EPA; however the Indiana Department of Environmental Management (IDEM) has inspected them seven times since 1992.

OPENING CONFERENCE:

I arrived at Mid City Plating at or around 9:50 am on June 22, 2010. Ms. Lisa Frost, Environmental Manager Industrial Waste, from IDEM, Office of Land Quality, joined me and we entered the building together. No receptionist was located at the front desk. Mr. Marc Muzzarelli, Production Manager, greeted us and we convened in a conference room for the opening conference.

During the opening conference, I presented my credentials to all personnel in attendance and explained that I would like to perform the physical inspection first and then conduct the records review.

The personnel that were in attendance at the opening conference are listed in *Table 1*.

Table 1. Personnel in Attendance during CEI at Mid City Plating Systems, Inc.

Personnel	Title	Department
Marc Muzzarelli	Production Manager	Mid City Plating
Rodney Muzzarelli	Owner	Mid City Plating
Lisa Frost	Environmental Manager	IDEM
Jamie Paulin	Chemist	EPA RCRA Branch

Mr. Muzzarelli explained to us that business had decreased significantly over the last few years from 3.5 million dollars per year to 500,000 dollars per year. He further explained that the number of Mid City Plating employees had decreased from 55 employees to 5 employees. Only one shift was in operation at the time of the inspection.

According to Mr. Muzzarelli, the only type of operation that was occurring was zinc electroplating on steel. He stated that Mid City Plating had four plating lines; however they were only operating two of the four lines. He also explained that the WWT system was only being operated every two months.

I inquired about the trailers parked outside the facility, on the East side. Mr. Muzzarelli explained that Mid City Plating used to be involved in the trucking of their products. However, they have since discontinued trucking the products and therefore, the trailers are parked at the facility and not in-use.

We began the physical inspection near the Hanson Plating line, located inside and on the East side of the facility.

SITE INSPECTION:

Mr. Muzzarelli escorted us on the physical inspection, which began near the Hanson Plating line, located inside and on the East side of the facility.

Mr. Muzzarelli explained that the line had not been in operation since January 2010. However, there was a liquid being stored within a trench, located in the floor near the Hanson Plating line. Mr. Muzzarelli stated that muriatic acid and hydrochloric acid are used within this process. The acid waste collects into the trench and then is pumped into the WWT unit every three months for

treatment, according to Mr. Muzzarelli. He further stated that, in addition, the "working solutions" from the process were also being stored in totes to be used in the process, if the process operates again. *See, photographs 1, 2 and 3.*

The E-Coat Line was located on the East side of the Hanson Plating Line. Mr. Muzzarelli stated that the E-Coat Line was only operated 1 or 2 shifts per month. A 5-gallon bucket of liquid was positioned on a trench/sump pit with a grate. The bucket was open and did not contain any type of labeling. Mr. Muzzarelli explained that the bucket was storing a "cleaner" and it was going to be added back into the E-Coat Line tank when the line would be operated again. He further explained that the trench/sump pit collects waste water from the E-Coat operation that is eventually pumped into the WWT unit. *See, photographs 4 through 7.*

On the floor, near the E-Coat Line, were three 5-gallon open buckets containing an un-identified liquid. The buckets were not labeled. Mr. Muzzarelli stated that the buckets probably contained paint; however spider webs/cob webs were located inside of the buckets showing that they had been there for some time. *See, photographs 8 and 9.*

Puddles of liquid were located on the floor near the E-Coat Line and another open, un-labeled, 5-gallon bucket containing an un-identified liquid was also located in this area. *See, photograph 10.*

As we proceeded west through the facility, shelving units were positioned along the walls. The shelving units contained many 55-gallon containers. Mr. Muzzarelli described the containers as either empty, storing raw materials, or storing oil. *See, photographs 11 through 14 and 21.*

In this area, an open, un-labeled, 5-gallon bucket was being stored on a pallet. The bucket contained an un-identified material. Also, being stored on the pallet, was a corroded metal lid to a 55-gallon container. *See, photograph 15.*

At least three totes were being stored in this area, as well. The totes were filled with a liquid material. Mr. Muzzarelli stated that he stores various plating line waste waters, prior to treatment in the WWT unit, inside of these totes. The totes were not labeled with any wording and were not dated. *See, photograph 19.*

A pit, with a grate, was located near these totes. A 4-inch thick solidified and un-identified material was located inside of the pit. Mr. Muzzarelli explained that the pit was designed to capture spilled waste water. *See, photographs 16 through 20.*

A plastic pallet was also positioned in this area. Nothing was being stored on the pallet; however an un-identified liquid was located inside of the pallet. *See, photographs 22 and 23.*

Along the South wall of this area of the facility, were several stacked 55-gallon containers. Totes were also being stored along this wall in a 3-tiered fashion. The totes definitely contained a liquid, which Mr. Muzzarelli identified as "working solutions." He further stated that he used his

own color-coded labeling system to identify specific "working solutions," that could be used in the plating processes. However, no words, identifying the contents, were located on the totes. *See, photographs 24 through 26.*

As we continued the inspection, a gray tank was located within the facility and was attached to an above-ground piping system. Mr. Muzzarelli expressed that the tank is used to heat city water to be used in the E-Coat Plating Process. Also being stored in this area, was a 10,000 gallon blue tank. Mr. Muzzarelli explained that this tank was empty and was to be used as a "crash" tank for the E-Coat Line material(s) in case of an emergency. *See, photographs 27 and 28.*

We continued the inspection, outside, on the East side of the facility. An open storm water reservoir was located in this area. The grid covering was not safely placed on the reservoir. *See, photograph 29.*

Four trailers were parked in this outside area. Mr. Muzzarelli had previously explained that Mid City Plating used to be involved in the trucking business of shipping the finished products to their customers. However, they no longer are in the trucking business so the four trailers were parked in this outside area. Trailers 1 and 2 were empty (from East to West). Trailer 3 was being used for the Barrel Row Line plating equipment that had been dismantled. Trailer 4 was being used for storage of fans, light fixtures, pallets and other pieces of equipment. One of the trailers did have Mid City Plating's name and logo located on the outside of the trailer. *See, photographs 30 through 34.*

As we entered the facility on the East side, a spill kit was being stored inside. No hazardous waste was being stored in this area. I opened the spill kit container and the container was being used as a garbage can. *See, photograph 35.*

We then proceeded West through the inside of the facility. We entered a room where the Barrel Row Plating Line had once been in operation. According to Mr. Muzzarelli, this Barrel line had been discontinued and was in the process of being dismantled. Used oil was being stored inside of a pit that once was used in this Barrel Row Plating Line operation. Equipment was still being stored in this area. Liquids, material(s) and staining were located on the floor. An un-identified liquid was being contained inside of a white tank, and inside of a 5-gallon bucket that were also being stored in this area. Mr. Muzzarelli seemed to think that this liquid was hydraulic oil. *See, photographs 36, 37 and 39 through 41, 45, 46, 48, 49 and 50.*

A Strip Line was still in operation, across the aisle from where the Barrel Row Plating line was once in operation. Debris and equipment were being stored inside of the containment pit of the Strip Line. *See, photograph 38.*

An empty tank, that was once used in the Barrel Row Line operation, was also located in this area. No liquid was located inside of the tank; however a blue/white/yellow residue was still located inside of the tank. Mr. Muzzarelli explained that the tank would be dismantled. *See, photograph 42.*

A broken fluorescent light bulb was also located on the floor of this area. Zinc metal, obtained from the plating line, was being stored on a piece of fabric on the floor in this area, as well, near the broken fluorescent light bulb. *See, photographs 43 and 44.*

Additionally, within this area, an open 55-gallon container was being stored. The container was approximately ¼ full with a liquid, which Mr. Muzzarelli described as RIT dye that is used in the plating dye operation. *See, photograph 47.*

I then inspected the WWT system. [The WWT system adjusts pH first and then chemically destructs each stream, creating a metal-hydroxide sludge. Once the sludge is filter pressed, the F006 hazardous waste stream is generated.] Mr. Muzzarelli also expressed that the discharge from the WWT system is released into the sewer system and that Mid City Plating does have a discharge permit via the Muncie Sanitary District, Bureau of Water Quality. *See, photograph 58.*

The filter press of the WWT system did discharge the F006 WWT sludge into a container, with a volume of approximately 110 gallons. Mr. Muzzarelli stated that he dumps the F006 into the roll-off storage container every month to 3 months. The F006 collection container was not labeled with the words, "Hazardous Waste," nor was it labeled with a date of accumulation. The container also did not contain a lid and was being stored in an opened position. *See, photographs 51 through 53.*

A 300 gallon sump pit was located underneath the WWT system, which collects the waste water solutions from the plating baths. A trench was also connected to the sump pit. Mr. Muzzarelli confirmed that he was only running the WWT system twice every 3 months, therefore the hazardous waste water solutions were being stored within the sump pit and trench prior to treatment. Green liquid was seeping out of the ground sump pit/trench and located on the floor. Liquid and debris were located in between the treatment baths. In addition, it appeared that a blue liquid had leaked out of a tank, labeled "Sulfuric Acid." *See, photographs 54 through 57.*

We continued west inside of the facility where I inspected the zinc plating line. Mr. Muzzarelli explained that the process causes a continual spill of alkaline cleaner onto the floor. He then places kitty litter on top of the spilled material onto the floor on a continual basis and never cleans the spilled material and kitty litter combination, according to Mr. Muzzarelli. Material from the plating operation was also being collected in the containment pit, located underneath the plating line. Material from the plating operation was also located on the floor. Corrosion was evident on the surface of the floor. *See, photographs 59 through 64.*

A vertical, rectangular tank on wheels was also being stored near the zinc plating line. Mr. Muzzarelli described this tank as storing "chromate working solution," to be re-used in the plating line. *See, photograph 65.*

I then inspected the laboratory area, where Mid City Plating conducts testing on its products or conducts testing to see if it can plate a certain product. A bath was full of a liquid within this area, and was described, by Mr. Muzzarelli, as containing laboratory water. *See, photograph 66.*

We then proceeded to the South/West corner of the facility. Another zinc plating line was in operation in this area. A trench was located on the floor in between this room and the WWT system room. Red un-identified liquid was being stored within the trench. Pipes were located inside of the trench and were not connected from the exposed ends. *See, photographs 67 and 69.*

Liquid was located on the floor near this plating line. Various equipment and raw materials were also being stored near this line. *See, photographs 68, 70 and 71.*

A gray tank was being stored within this area. Mr. Muzzarelli described this tank as a storage tank for "working solutions." *See, photograph 72.*

A containment pit was located underneath this zinc plating line. Liquids were being stored inside of the containment pit and on the floor. Kitty litter was being thrown on the liquid material, according to Mr. Muzzarelli. See, *photographs 73 and 74.*

Liquids were located on the floor in the South/West corner of the room. Un-identified material and equipment were also located on the floor of this corner. *See, photographs 75 and 76.*

On the North/West corner of the room, red liquid was located inside of the containment pit of the plating line. Material was also being accumulated and stored on the floor near the line. A water tank was located in this area that was used in pumping water into plating baths where required. *See, photographs 77 through 80.*

I then inspected the hazardous waste storage area. No containers were being stored on the pallet specific to the storage area. However, one 55-gallon container was being stored near this storage area. The container was closed; however not labeled or dated. Mr. Muzzarelli explained that this container was a satellite accumulation area container storing F008 hazardous waste. The container was not located at or near the point of generation. *See, photographs 81 through 84.*

We exited the building on the North/West side of the facility. A roll-off container was located outside. The roll-off was filled to the top, inside of the container, with F006 hazardous waste. The lid was not completely closed and was not capable of physically closing completely due to the design of the container and lid. The container was not labeled with the words, "Hazardous Waste," or with a date of accumulation. Mr. Muzzarelli explained that he was having Envirite manifest the container off-site, as hazardous waste, for disposal approximately one time per year. The volume of the container was approximately 20 cubic yards. In addition, F006 hazardous waste was located on the container and on the ground. *See, photographs 85 through 90.*

We continued the inspection in the maintenance room, located on the West side of the facility. A trench/pit with a grate was located inside of this room. Liquid was being stored within the trench/pit. Mr. Muzzarelli stated that a cleaner collects inside of this trench/pit and is periodically pumped to the WWT system. *See, photographs 91 through 93.*

Once the site inspection was completed, we continued the records review inspection in the conference room located in the office area.

Mr. Muzzarelli aided us during the records review.

RECORDS REVIEW:

Mr. Muzzarelli aided us in the review of the hazardous waste records after we completed the physical site inspection.

The records that I inspected were records required under Indiana Administrative Code (IAC) 329 IAC § 3.1-7-1 [40 CFR § 262] for large quantity generators, which included hazardous waste determination information, waste analyses, manifests, emergency procedures and training records.

1. Manifests

I reviewed the manifests of the hazardous waste shipments from 2006 to the time of the inspection. The list of manifests shipped since 2006 are located in Table 2. below. ***No manifests were available after 2007.***

Mr. Muzzarelli explained that he is only shipping the F006 roll-off, quantity of shipment 20 – 25 yards, approximately once per year. It is not clear when the last shipment of the F006 occurred. It appears that a shipment has not occurred since 2007.

Table 2. List of Manifests on File during CEI at Mid City Plating Systems, Inc.

Manifest Number	TSDF	Date	Hazardous Waste Code	Volume Shipped
MI 9369686	Michigan Disposal	12/29/2006	F008	7 x 55-gallon containers
IL 11434566	Envirite	2/9/2006	F006	25 yards
	Michigan Disposal	2/27/2006	F008	7 x 55-gallon containers

Manifest Number	TSDF	Date	Hazardous Waste Code	Volume Shipped
	Michgan Disposal	3/3/2006	F008	7 x 55-gallon containers
IL 11434568	Envirite	4/13/2006	F006	25 yards
IL 11088964	Envirite	6/20/2006	F006	25 yards
IL 11091075	Envirite	9/1/2006	F006	20 yards
IL 000113601	Envirite	11/27/2006	F006 and D007	25 yards
IL 000113602	Envirite	7/26/2007	F006	25 yards

2. Waste Analysis and Recordkeeping

I observed that Mid City Plating did not have, as a record on-site, a land disposal restriction (LDR) notification form for the shipments of hazardous waste, F008, to Michigan Disposal.

3. Personnel Training

At the time of the inspection, according to Mr. Muzzarelli, RCRA training had not been conducted since April 12, 2003. Delta Chemicals and Equipment, Inc. performed the training in 2003. Therefore, Mid City Plating was not training the employees who handle hazardous waste on an annual basis. Mid City Plating was operating as a large quantity generator at the time of the inspection.

In addition, Mid City Plating did not have a complete written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management.

Lastly, the following training documents were not available at the time of the inspection: 1) job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job; and 2) a written job description for each position related to hazardous waste management, including the requisite skill, education or other qualifications and duties of personnel assigned to each position.

To note, Jerry Rollins signed a manifest in 2007 and he was not listed on any document showing that he had received RCRA training within six months of filling his position dealing with

hazardous waste management or that he had received an annual refresher of the initial training.

4. Contingency Plan

A Contingency Plan was available for my review during the inspection. I did not observe any deficiencies with the plan at the time of the inspection.

5. Preparedness and Prevention

Based on my review of Mid City Plating's records, Mid City Plating appeared to have made agreements with local emergency authorities, contractors and had made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility.

6. Biennial Reporting

Based on my review of the records, Mid City Plating had filed a biennial report with the Indiana Department of Environmental Management, by March 1 for the reporting years of 2009, 2007, and 2005. They reported as a large quantity generator for the reporting year of 2005, as a small quantity generator for the reporting year of 2007 and as a conditionally exempt small quantity generator for the reporting year of 2009.

7. Weekly and Daily Inspections

I observed at the time of the inspection that Mid City Plating was not documenting weekly inspections of the hazardous waste storage container areas and was not documenting the daily inspections of hazardous waste tanks and the tank systems.

8. Tank Systems

The sump pits, trenches and containment pits do meet the definition of a tank. Written statements, including certification statements of the design and installation requirements, were not located at Mid City Plating at the time of the inspection.

The sump pumps, pits and trenches did not have secondary containment. Ancillary equipment/piping was located both aboveground and below-ground; however no daily inspections were documented as being performed.

I did not notice any spill prevention controls or overfill prevention controls other than visual inspection, which was not documented as being performed.

A written daily inspection log was not available. Additionally, no tank assessments, or observable leak detection systems, were available at the time of the inspection.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Muzzarelli and Ms. Frost, and provided Mr. Muzzarelli with the following recommendations:

a. To ensure proper labeling of containers.
b. To keep containers of hazardous waste closed – especially the roll-off container of F006 hazardous waste. The lid of the F006 roll-off container did not close.
c. To ensure RCRA training was to be conducted annually since they were still operating as a large quantity generator and meet all of RCRA training requirements.
d. To make waste determinations on all of the liquids being stored in buckets, pits, trenches, containers and then dispose of the material(s) properly.
e. Make waste determinations on all spills, liquids, and kitty litter combinations on floor and dispose of the material(s) properly.
f. To ensure that hazardous waste is shipped within 90 days.

During the closing conference, Mr. Muzzarelli explained that G and G Oil ws taking Mid City Plating's used oil for disposal and that Lighting Resources was taking their fluorescent light bulbs for recycling.

I departed Mid City Plating around 2:30pm.

ATTACHMENT: (1)

Attachment 1 Photographs taken during the time of the inspection.

ENCLOSURE: (1)