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

REPLY TO THE ATTENTION OF:

MAR 24 2016

CERTIFIED MAIL 7009 1680 0000 7677 7803
RETURN RECEIPT REQUESTED

Mr. Vik Sahni
Director of Operations
A&B Foundry
835 North Main Street
Franklin, Ohio 45005

Re: Request for Information
EPA ID No.: OHD987000015

Dear Mr. Sahni:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of the U.S. EPA to require you to submit certain information.

This request requires A&B Foundry (hereinafter "A&B," "facility," or "you") to submit certain information relating to A&B's waste management procedures. We are requiring this information to determine the facility's compliance status with the provisions of RCRA as delineated in the authorized Ohio Administrative Code (OAC), and the United States Code of Federal Regulations (C.F.R.); specifically, those regulations related to the generation, treatment, and storage of hazardous waste set forth in OAC 3745-52-34 [40 C.F.R. § 262.34(a)]. The enclosure specifies the information you must submit. You must submit this information within 21 calendar days of receiving this request to the U.S. EPA, Attention: Brenda Whitney, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

A&B must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly

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providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. §§ 3501 *et seq*., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject A&B to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Brenda Whitney at (312) 353-4796.

Sincerely,

Julie Morris, Chief
Compliance Section 2

Enclosure

REQUEST FOR INFORMATION

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

If information not known or not available to A&B as of the date of submission of its response should later become known or available to A&B, then A&B must supplement its response to the EPA.

All terms used in this Request for Information shall have their ordinary meaning unless such terms are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.* and its implementing regulations.

The information requested below pertains to an EPA compliance evaluation inspection ("CEI") conducted by Brenda Whitney at the A&B facility on December 17, 2015.

Requests:

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked for or at A&B.

2. Provide documentation supporting your non-hazardous waste determinations for the following general categories of spent materials:
    a. Tan Shake-out/knock-off sand (See Appendix A: Photograph 14);
    b. Pink Shake-out/knock-off sand (See Appendix A: Photograph 18);
    c. Sand fines collected in dust collectors;
    d. Refractory bricks generated during furnace repairs;
    e. X-ray film and developing/processing chemicals; and
    f. Fluorescing penetrant.

    Provide true, accurate and complete copies of all documents that contain information responsive to this request including, but not limited to, all sampling and analytical results, and all hazardous waste profiles and determinations.

    Also, provide shipping documents or manifests that accompanied the most recent shipments of the above wastes, if any were shipped off-site since December 17, 2015.

3. Provide documentation supporting waste determinations for the following containers or piles of unknown spent materials which were observed during the inspection outside in the northwest portion of the facility property, unless otherwise noted:
    a. One 55-gallon poly drum near the "1989 Building" on its side, which contained unknown liquid. This drum was righted at the time of the inspection (See Appendix A: Photograph 3).
    b. A small pile of red-colored sand (perhaps 2 feet in diameter) located next to the drum identified in item 1.e. above.
    c. Several containers noted in the brush along the rear fence line (See Appendix A:

Photographs 5 and 6).

d. Twenty-two 55-gallon drums aligned in a row in front of "Buildings C and D" that were banded together and palletized in groups of four. (See Appendix A: Photographs 7 – 9).
e. Old electronic equipment and other abandoned items on the ground outside (See Appendix A: Photograph 10).
f. One blue 55-gallon poly drum located outside near the back door of the 1989 Building (See Appendix A: Photograph 11).
g. One 30-gallon drum outside the back door of the 1989 Building, which appeared to be filled with oil. The oil was spilling out on top of the container (See Appendix A: Photograph 15).
h. Two 55-gallon drums of unknown material located near the container of oil identified in 1.k., above. (See Appendix A: Photograph 16).
i. One 55-gallon drum labeled as "Full" observed in the maintenance building located at the northeast side of the property.

Provide true, accurate and complete copies of all documents that contain information responsive to this request including, but not limited to, all sampling and analytical results, and all hazardous waste profiles and determinations.

Also, provide shipping documents or manifests that accompanied the most recent shipments of the above wastes, if any were shipped off-site since December 17, 2015.

Certification

4. Provide the following certification by a responsible corporate officer:

> I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Appendix A

Photograph Log

Inspection Date:
December 17, 2015

Facility Name and ID Number:
A & B Foundry and Machining
EPA ID: OHD987000015

Inspector and Photographer:
Brenda Whitney
Compliance Section 2
RCRA Branch
Land and Chemicals Division

Camera Used:
Olympus Stylus 600
Serial Number: A47525904

Photograph 1

Taken at 8:44 am CST

An employee was applying "hot topping" to the molten metal in the risers of this mold.

Photograph 2

Taken at 8:51 am CST

In Building 1989 was a pile of sand shake-out/knock-off.

Photograph 3

Taken at 9:16 am CST

One 55-gallon drum of unknown material was located outside on the property north of the foundry building.

Photograph 4

Taken at 9:16am CST

A small pile of red-colored sand was located outside of the foundry near the drum identified in Photograph 3.

Photograph 5

Taken at 9:21am CST

Containers were observed in the brush along the fence line along the north side of the property. (Rectangle added by B. Whitney for emphasis)

Photograph 6

Taken at 9:21 am CST

One container was observed buried beneath brush near the fence line on the north side of the property. (Rectangle added by B. Whitney for emphasis).

Photograph 7

Taken at 9:22 am CST

Containers located in front of Buildings C and D were banded together in groups of four and were palletized. Some of these containers were bulging and rusting.

Photograph 8

Taken at 9:23 am CST

Containers located in front of Buildings C and D were banded together in groups of four and were palletized. Some of these containers were bulging and were rusting. (Rectangle added by B. Whitney to emphasize bulging container).

Photograph 9

Taken at 9:23 am CST

Containers located in front of Buildings C and D were banded together in groups of four and were palletized. Some of these containers were bulging and were rusting.

Photograph 10

Taken at 9:25 am CST

Old electronic equipment were abandoned on the ground behind the containers identified in Photographs 7-9, above.

Photograph 11

Taken at 9:26 am CST

One 55-gallon poly drum located outside on the north side of the property was not labeled and contained unknown material.

Photograph 12

Taken at 9:29 am CST

This photograph shows the product label on an Alphaset tote that was stored outside of the facility.

Photograph 13

Taken at 9:30 am CST

Additional containers were stored outside near the fence line of the property. It was unknown at the time of the inspection if these containers held waste. The totes in the foreground are empty containers of Alphaset.

Photograph 14

Taken at 9:32 am CST

Piles of shake-out/knock-off sand were accumulating outside around the property.

Photograph 15

Taken at 9:35 am CST

One 30-gallon drum outside the back door leading into the 1989 Building appeared to be filled with oil. The oil was spilling out on top of the drum.

Photograph 16

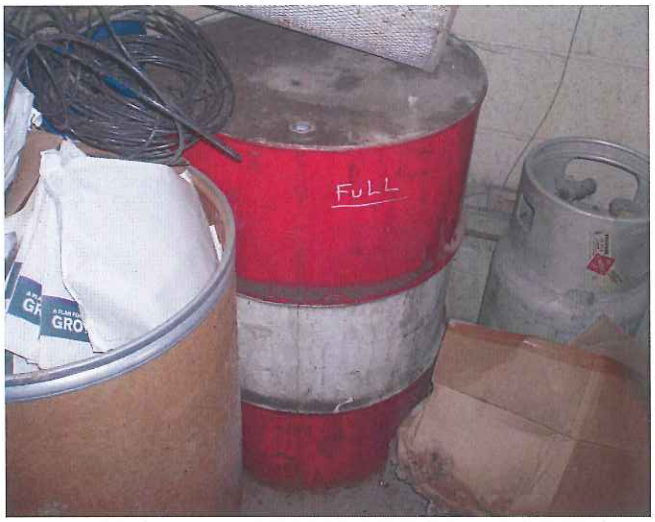
Taken at 9:35 am CST

Two 55-gallon drums were positioned on a pallet near the container identified in Photograph 15, above. The leftmost (white) drum contained unknown material.

Photograph 17

Taken at 9:49 am CST

One 55-gallon drum in the maintenance building in the eastern corner of the property was labeled as "Full." It was not known at the time of the inspection what was in this container.



Photograph 18

Taken at 9:51 am CST

Piles of shake-out/knock-off sand were accumulating outside the property.