UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

Dec 20, 2010

In Reply Refer To: WTR-7

Mr. Bernard Kerper
Owner
Anaplex Corporation
15547 S. Garfield Ave.
Paramount, CA 90723

Re: August 25, 2010 Clean Water Act Inspection

Dear Mr. Kerper:

Enclosed is the December 17, 2010 report for our inspection of Anaplex Corporation at the above address in Paramount, CA.

The main findings are summarized below:

1. This facility is subject to the federal categorical standard for metal finishing, 40 CFR 433, because of its electroplating, electroless plating, anodizing, chemical coating, and chemical etching operations.
2. Anaplex's onsite wastewater treatment system is not a best available technology economically achievable (BAT) system, and Anaplex's compliance rates show that performance of its treatment system is inferior to that of a BAT system. Anaplex is also out of compliance with the 40 CFR 433 self-monitoring requirement for cyanide. As a result of an enforcement meeting with LACSD, Anaplex must comply with a set of requirements, including installing a pretreatment system by March 1, 2011.
3. Anaplex implements inefficient water use practices. Anaplex should consider alternative rinse systems, as well as operational changes, to enable the facility to use water more efficiently.

By January 31, 2011, please submit a short response letter to the Summary of Findings in Section 3.0 of this report. Your letter should include an individual response to each of the numbered findings in Section 3.0.

Please send your letter to the attention of Anna Yen at EPA (and include the code "WTR-7" in the address above), with copies to the Sanitation Districts of Los Angeles Counties and the Los Angeles Regional Water Quality Control Board.

We would like to thank you for your cooperation during the inspection. If you have any questions, please call Anna Yen at (415) 972-3976 or e-mail her at yen.anna@epa.gov.

Sincerely,
<Original signed by>
Ken Greenberg
Chief, Clean Water Act Compliance Office

Enclosure

cc (enclosure by email):
Rob Wienke, Sanitation Districts of Los Angeles County
Brandi Outwin-Beals, Regional Water Quality Control Board, Los Angeles Region

U.S. Environmental Protection Agency
Region 9
Clean Water Act Compliance Office

Industrial User Inspection Report

Industrial User:	Anaplex Corporation
Industrial User Address:	15547 S. Garfield Ave., Paramount, CA 90723
Inspection Date:	August 25, 2010
EPA Region 9 Inspector:	Anna Yen, Environmental Engineer Water Division, CWA Compliance Office
Sanitation Districts of Los Angeles County Inspectors:	Fred Cannizzaro, Supervising Industrial Waste Inspector Steve Sealy, Industrial Waste Inspector
Facility Contacts During Inspection:	Butch Griffiths - consultant to Anaplex Bernard Kerper, Owner (present only during a portion of the inspection)
Report Date:	December 17, 2010

Report prepared by Anna Yen

1.0 Scope and Purpose

The purpose of the industrial user inspection on August 25, 2010 was to determine the pretreatment standards and requirements that apply to this facility and to ensure compliance with those standards and requirements. This inspection is part of a regionwide EPA effort, stemming from an environmental justice initiative, to focus inspections along the I-710 corridor in the Los Angeles area.

This facility is an industrial user which discharges to the local publicly owned treatment works (POTW), the Joint Water Pollution Control Plant (JWPCP).

1.1 General and Process Description

Operations began at this plating facility in 1961. The current owner bought it in 1992. The facility was fire-damaged in 2007 and was subsequently rebuilt. Anaplex Corporation ("Anaplex") performs electroplating, electroless plating, anodizing, chemical

coating, chemical etching, and painting at the facility, primarily for the aerospace industry. Metal parts that are processed at this facility are primarily of aluminum, stainless steel, steel, and copper. A small percentage of parts are of brass, titanium, and magnesium.

Anaplex has a trichloroethane solvent-based machine it uses for degreasing of some parts. Parts are placed in the machine, the machine is turned on, and the process is automatic. No liquid is discharged, as the solvent is vaporized; the vapor is contained and then reused in liquid form.

In the same building as the degreasing machine, a paint stripper is applied manually. Parts are rinsed off in the static rinse tank, then brought to the main facility for further rinsing.

Anaplex performs painting by spray gun. Air pollution filters are used in the spray booths. No water discharge occurs from these booths.

Metal finishing operations

Metal finishing operations occur in two buildings: a plating building and an anodize building. Both buildings have a similar layout. Tanks sit on floor grating which sits above secondary containment. Each building houses approximately 40-50 tanks. *See Photos 1 & 2 in Attachment 1.*

The plating building contains process lines for silver, cadmium, copper, nickel, zinc, zincate, and tin plating, as well as phosphating and several different types of chromating and passivation. The building also contains two drums for electroless nickel plating and tanks for electropolishing and electrocleaning.

The anodize building contains process lines for chem film and different types of anodizing: chromic acid, sulfuric acid, and hard anodizing. It also contains tanks for dyes and seals.

LACSD inspectors had with them during the inspection the last submitted tank schedule and layout in their file. Based on EPA's observations during the inspection, these documents are not up-to-date. In particular, the anodize building currently has a number of tanks that were not shown on the tank schedule and layout. *See Anaplex's last submitted tank floor plan and tank schedule (as of August 25, 2010) in Attachment 2.*

Rinses

All rinse tanks in both buildings have continuous flowing rinses unless those tanks are not being used at all for the day. However, if parts are being processed through a tank at any time during the day, even if not at that moment, the rinse water is left running. *See Photos 3 & 4 in Attachment 1.* All rinses are conveyed through one line from each building. These two lines lead to the onsite wastewater treatment system.

The exception is that static rinses are used for the cyanide-based plating solutions. This

area of the plating building contains a separately bermed area under the floor grating so that any liquid is contained in this area and does not flow to the treatment system. The owner stated that the parts are then carried over to a nearby flowing rinse tank for further rinsing. This flowing rinse tank is located outside of the separately bermed area for cyanide-based plating.

Rinse tanks are cleaned out by visual determination. The owner stated that there is no schedule; he cleans out a rinse tank "whenever it looks like it needs replacing." A rinse tank is cleaned out by vacuuming the water out, filtering the solids out, and then placing the filtered water back into the tank. The copper strip tank contents are replaced but infrequently.

Condensate from air compressors and a boiler is simply allowed to drip to the pavement outside and evaporate.

The inspection team observed a couple employees plating and rinsing parts and noted the following:
In some cases, spray rinsing is performed over the tank. Once a part is pulled out of a plating bath, the employees do not allow the part to drip over the tank for a few moments but, rather, immediately carry the part to the next tank. This practice leads to unnecessary dripping of plating solution into the secondary containment under the floor grating.

Onsite Wastewater Treatment System
See Section 1.3.

1.2 Facility Wastewater Sources and Other Wastes

Anaplex generates the following wastewaters:

- Rinses from the plating and anodize buildings
- Dragout from metal finishing baths

The dragout and rinses from the metal finishing processes collect in the secondary containment areas under the floor grating in each of the two buildings. One line from each building conveys the wastewater to the onsite wastewater treatment system.

Once processed through the onsite wastewater treatment system, the treated wastewater is discharged to the local sewer system.

Anaplex implements inefficient water use practices. The facility often is not processing parts through a rinse tank as the water continuously flows into and out of the tank, resulting in excess water to the facility's wastewater treatment system. Anaplex should consider alternative rinse systems to enable the facility to use water more efficiently. For example, on-demand rinse systems would enable Anaplex to keep a flowing rinse system rather than a static rinse if Anaplex requires it for product quality, yet the facility would still use less water than it does currently, resulting in potential cost savings for Anaplex.

In addition, several other small improvements and changes in operational practices could lead to cumulative reductions in dragout going to the wastewater treatment system and, subsequently, reductions in water input. Examples include placing tanks in one process line directly next to each other and placing drip guards between the tanks, allowing parts to hang over and drip into the tank for a few moments before moving them to the next tank, and even adding hang bars above some tanks to allow parts to hang above a final rinse tank. Another option for potential cost savings is performing routine analyses of each tank's contents. This practice more accurately establishes when chemicals need to be added to tanks and, therefore, prevents the too-frequent addition of a chemical.

1.3 Facility Process Wastewater Treatment System

The facility's wastewater treatment system consists of pH adjustment and clarification. The pH is controlled automatically to neutralize the wastewater. At the time of our inspection, the pH monitor showed a reading of approximately 7.2. A three-stage underground clarifier, followed by a four-stage underground clarifier which is set up with several 90-degree turns, is followed by the sample box. A bubbler is used in the clarifier. *See Photos 5-7 in Attachment 1.*

This treatment system does not include a precipitation step. Hydroxide, or alkaline, precipitation would treat the wastewater for most of the metals that are regulated under 40 CFR 433. Following precipitation and settling, regular removal and disposal of the solids would be necessary.

Chromium and cyanide, both regulated under 40 CFR 433, would need to be removed separately prior to precipitation and sedimentation steps. Hexavalent chromium is not removed by precipitation/sedimentation, and cyanide complexes metals which will prevent efficient removal of these metals through the precipitation/sedimentation treatment process. Anaplex does not have treatment systems specifically for removing hexavalent chromium or cyanide from its wastewater.

1.4 Wastewater Discharge

Wastewater from this facility discharges to the Joint Water Pollution Control Plant. The Sanitation Districts of Los Angeles County (“LACSD”) owns and operates the wastewater treatment plant, which is subject to requirements under an NPDES permit (No. CA0053813) issued by the Regional Water Quality Control Board.

2.0 Compliance with Federal Categorical Standards

This facility is subject to the federal categorical standard for electroplating, 40 CFR 433, and, therefore, is a categorical industrial user (CIU). The plating, anodizing, chemical coating, and chemical etching processes performed at this facility trigger applicability of this categorical standard. Additionally, because the facility was reconstructed after August 31, 1982, the publication date of the proposed rule, after fire damaged the facility in 2007, the facility is a new source rather than an existing source. Therefore, the

"Pretreatment standards for new sources" in 40 CFR 433.17 apply.

An industrial user is subject to the federal categorical standard for metal finishing if it performs any of the following six core operations listed in 40 CFR 433: electroplating, electroless plating, chemical coating, chemical milling/etching, anodizing, and printed circuit board manufacturing.

Anaplex's pretreatment permit contains limits that are based on the federal limits of 40 CFR 433.17, but slightly adjusted using the combined wastestream formula to account for dilution flows from the water-cooled rectifiers.

Compliance with Federal Limits

Based on a review of monitoring records from October 2007 through April 2010, EPA found that Anaplex had multiple violations of the federal categorical limits for cadmium, chromium, and nickel, and one violation of the federal categorical limit for zinc. The most recent violations during this time period occurred in February 2010. Anaplex's compliance rates are lower than those achievable by a facility properly operating a best available technology economically achievable (BAT) system. For the time period reviewed, Anaplex demonstrates only a 72% compliance rate with the cadmium limit, a 62% compliance rate with the chromium limit, and an 83% compliance rate with the nickel limit. *See table in Attachment 3.*

The limits in the federal categorical standard for metal finishing were based on the technology that was determined to be BAT for the metal finishing industry. Specifically, the Part 433 limits represent the effluent concentrations attainable by a properly operating BAT system 99% of the time. Anaplex's onsite wastewater treatment system is not a BAT system, and Anaplex's compliance rates show that performance of its treatment system is inferior to that of a BAT system.

Compliance with Federal Cyanide Monitoring Requirement

Anaplex rinses parts that have been through the cyanide tanks first in a static rinse tank, then in a flowing rinse tank (see the subsection titled "Rinses" under Section 1.1.) Because the flowing rinse tank is located outside the separately bermed area, the facility should have a separate sampling point for cyanide waste streams, or the facility's cyanide limit at the currently permitted sampling point needs to be adjusted. Per 40 CFR 433.12(c):

> "Self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. Alternatively, samples may be taken of the final effluent, if the plant limitations are adjusted based on the dilution ratio of the cyanide waste stream flow to the effluent flow."

However, an adjusted cyanide limit will not be allowed if the calculated value is less than the analytical detection limit for cyanide. Alternatively, Anaplex could move the flowing rinse tank to the bermed area; however, as long as that tank remains a continuously

flowing rinse tank, Anaplex would have to regularly pump out the bermed area and have the cyanide-contaminated rinse water hauled away for appropriate offsite disposal.

2.1 Compliance with Other Federal Pretreatment Requirements

This facility is a categorical industrial user (CIU) and, therefore, is also a significant industrial user (SIU) because it is subject to a federal categorical standard. Like any industrial user, it must comply with pretreatment requirements in 40 CFR 403, including, but not limited to, national prohibitions in 40 CFR 403.5 and reporting requirements in 40 CFR 403.12. Note that some requirements in 40 CFR 403 are applicable specifically to SIUs and some even more specifically to CIUs.

2.2 Compliance with Local Limits

The facility's most recent pretreatment permit issued by LACSD is Permit No. 013078. The facility's sample point, as indicated in its permit, is the sample box immediately downstream of the clarifiers. The facility's permit requires Anaplex to sample once per quarter.

In addition to violation of federal limits, Anaplex violated the local limit for chromium in March 2009. LACSD has issued multiple notices of violation to Anaplex due to these violations. This past October, LACSD escalated enforcement by conducting a compliance meeting with Anaplex. In a letter summarizing the outcome of the meeting, LACSD states that Anaplex has been on the significant noncompliance (SNC) list for the past five consecutive years. In the letter, LACSD also states that Anaplex must contain all the cyanide bearing rinse within the bermed area. LACSD further states that Anaplex will be adding a rinse tank in the bermed area and has agreed to keep all the cyanide bearing waste within the bermed area. Finally, LACSD's letter includes a number of requirements with which Anaplex must comply, including submittal of a detailed engineering proposal for a new pretreatment system; installation of the proposed pretreatment system; and self-monitoring over five consecutive days for cadmium, chromium, nickel, and zinc. All of the requirements contain deadlines, the last of which is April 1, 2011.

3.0 Summary of Findings

1. This facility is subject to the federal categorical standard for metal finishing, 40 CFR 433, because of its electroplating, electroless plating, anodizing, chemical coating, and chemical etching operations.
2. This facility is an SIU and a CIU. The facility is subject to applicable pretreatment requirements in 40 CFR 403.
3. EPA reviewed monitoring records from October 2007 through April 2010 and found that Anaplex violated the federal categorical limits for cadmium, chromium, and nickel on multiple occasions.
4. Anaplex's onsite wastewater treatment system is not a BAT system, and Anaplex's compliance rates show that performance of its treatment system is

inferior to that of a BAT system.

5. Anaplex is out of compliance with the 40 CFR 433 self-monitoring requirement for cyanide. The facility needs to establish a new sampling point for cyanide or have its cyanide permit limit at the currently permitted sampling point adjusted.
6. Anaplex implements inefficient water use practices. Anaplex should consider alternative rinse systems, as well as operational changes, to enable the facility to use water more efficiently.
7. As a result of an enforcement meeting with LACSD, Anaplex must comply with a set of requirements, including installing a pretreatment system by March 1, 2011.

Attachment 1: Photos

Photo 1

Plating Room
Taken by Anna Yen on August 25, 2010

Photo 2

Anodize Room
Taken by Anna Yen on August 25, 2010

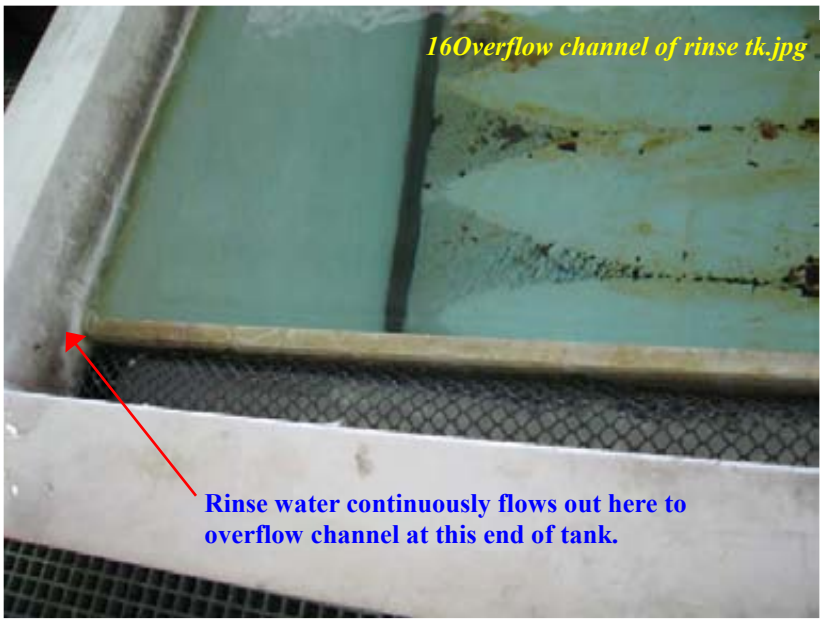


Photo 3

Taken by Anna Yen on August 25, 2010

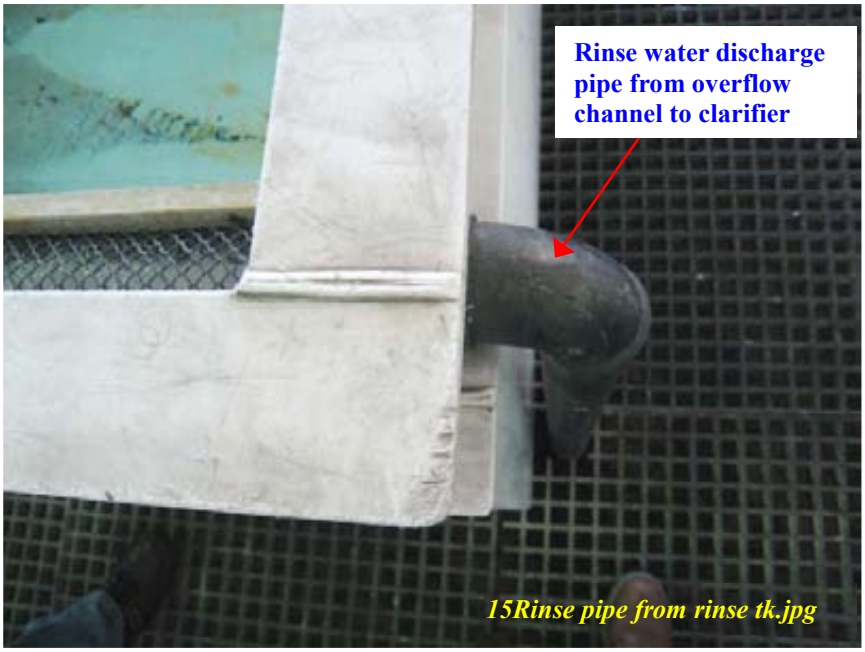


Photo 4

Taken by Anna Yen on August 25, 2010

Photos 3 & 4: Continuously flowing rinse tank

Photo 5

Discharge pipe from plating and anodize rooms
to first underground clarifier (3-stage)
Taken by Anna Yen on August 25, 2010

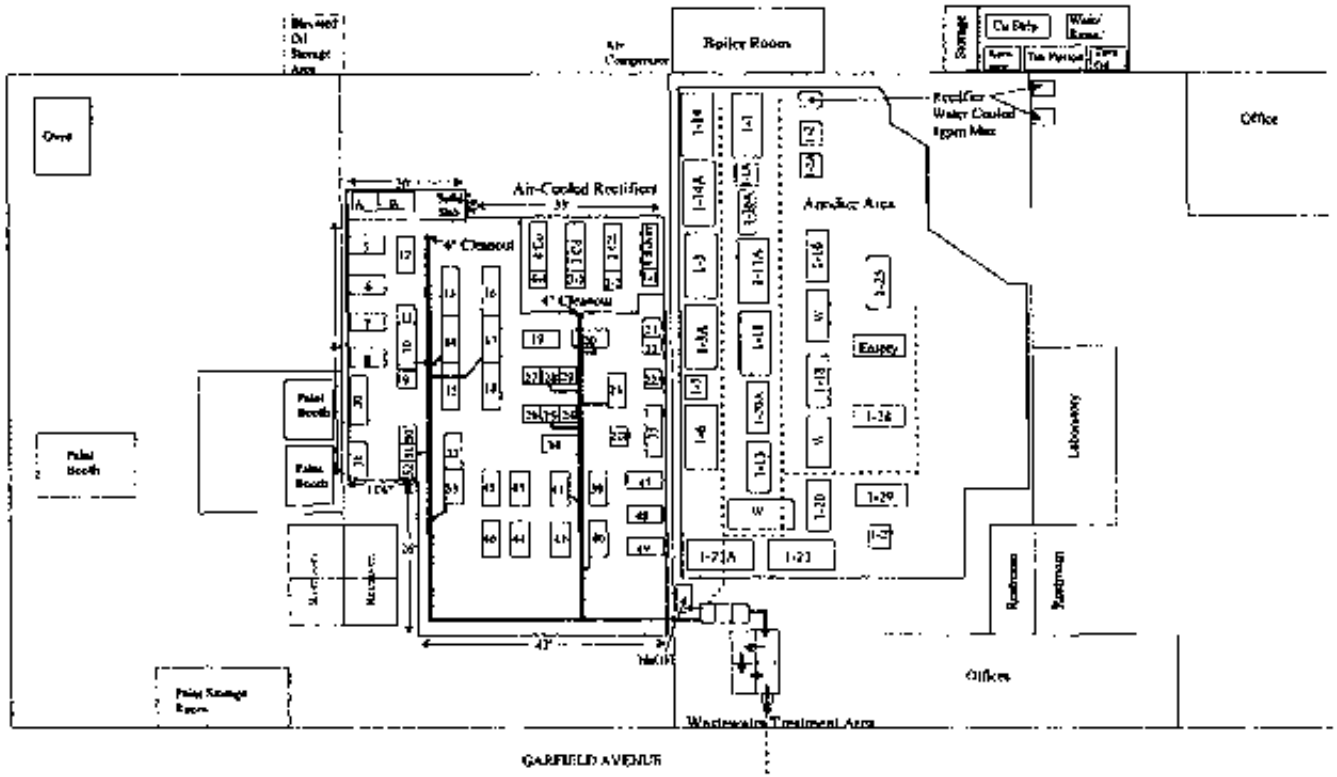
Photo 6

Discharge pipe and first underground clarifier (3-stage)
Taken by Anna Yen on August 25, 2010

Photo 7

Second underground clarifier (4-stage) and sample box
Taken by Anna Yen on August 25, 2010

Attachment 2: Latest Tank Floor Plan and Tank Schedule



Anodize Area - No Change
Anodize Area Containment: 2' Berm x 2,328 sq ft = 42,333 gal

Southern Area - Rebuild from Fire Damage

Northwestern Area Containment: 2' berm x 346.5 sq ft = 5,194 gal

Southwestern Area Containment (sill): 2' berm x 90 sq ft = 1,347 gal

Main Area Containment: 2' berm x 3,248 sq ft = 49,195 gal

Wastewater Treatment Area: No Change
(Refer to Fig 2, 4/23/2003)

——— New 4" ABS Waste Line

——— New 2" ABS Waste Line

- - - - - - Existing Waste Line

Drawn By: CM | Date: 6/12/2008

Cast Metal Services
2113 Foothill Boulevard
Suite D
La Verne, CA 91750
Tel: 909-392-8656

0 20 40
SCALE

N

FIGURE 2: Building Layout Map
Amaplex Corporation
15547 Garfield Avenue
Paramount, California 90723

ANAPLEX TANK SCHEDULE

TANK ID	TANK NAME	TANK SIZE	TANK CONTENT	pH	Is Tank Elevated
PLATING					
1	Silver	6'x3'x3'	Silver Cyanide, Potassium Cyanide	11-12	Yes
1-1	Drag-out	3'x3'x3'	Water, trace chemicals	10	Yes
2	Cadmium +	8'x3'x3'	Cadmium Oxide, Sodium Cyanide, Sodium Hydroxide	12.5 – 13.2	Yes
2-2	Drag-out	3'x3'x3'	Water, trace chemicals	11	Yes
3	Bright Cadmium	8'x3'x3'	Cadmium Oxide, Sodium Cyanide, Sodium Hydroxide, Brightener Super XL	12.5 – 13.2	Yes
3-3	Drag-out	3'x3'x3'	Water, trace chemicals	11	Yes
4	Copper	8'x3'x3'	Copper Cyanide, Potassium Hydroxide	12.0 – 12.5	Yes
4-4	Drag-out	3'x3'x3'	Water, trace chemicals	10	Yes
19	Hot Water	6'x3'x3'	Hot Deionized Water	7.0	Yes
20	Rinse	6'x3'x3'	Water	7	Yes
21	Nickel	3'x3'x3'	Nickel Sulfate, Sodium Hypochlorite	4.6 – 5.1	Yes
22	Nickel	3'x3'x3'	Nickel Sulfate, Sodium Hypochlorite	4.6 – 5.1	Yes
22A	Hold Tank	3'x3'x3'	Nickel Sulfate, Sodium Hypochlorite	4.6 – 5.1	Yes
22B	Hold Tank	3'x3'x3'	Nickel Sulfate, Sodium Hypochlorite	4.6 – 5.1	Yes
23	Nickel Rinse	6'x3'x3'	Water	7.0	Yes
24	Zincate	3'x3'x3'	Caustic Soda, Zinc Oxide	13.5 – 14.0	Yes
25	Rinse	3'x3'x3'	Water, trace chemicals	7.6	Yes
26	Caustic	3'x3'x3'	Sodium Hydroxide ,1%	12.0	Yes
27	Deox	3'x3'x3'	Sodium Bisulfate, Potassium Dichromate	2.0	Yes
28	Rinse	3'x3'x3'	Water, trace chemicals	5.0	Yes
29	Cleaner	3'x3'x3'	Sodium Nitrate	9.3	Yes
34	Hot Water	6'x3'x3'	Hot Deionized Water	7.0	Yes
35	Nickel Tank	9'x3'x3'	Nickel Sulfate, Sodium Hypochlorite	4.6 – 5.2	Yes
39	Passivate Type II	6'x3'x3'	Sodium Dichromate, Nitric Acid	<1	Yes
41	Rinse	6'x3'x3'	Water, trace chemicals	<7	Yes

TANK ID	TANK NAME	TANK SIZE	TANK CONTENT	pH	Is Tank Elevated
42	Passivate Type 6	6'x3'x3'	Nitric Acid (25-45%/V)	<1	Yes
43	Passivate Type 8	6'x3'x3'	Nitric Acid (45-55%/V)	<1	Yes
44	Nitric Acid	6'x3'x3'	Nitric Acid (40-50%/V)	<1	Yes
45	Ammonium Nitrate	6'x3'x3'	Ammonium Nitrate	6.0	Yes
46	HCl 50%	6'x3'x3'	Hydrochloric Acid 50%	<1	Yes
47	Nickel Strip	6'x3'x3'	Nickel Sulfonate	9.0	Yes
48	Electro Polish	6'x3'x3'	Glycol Ether <15% Ethylene Glycol <15% Phosphoric Acid <8%	<1	Yes
49	Zinc Phosphate	6'x3'x3'	Phosphoric Acid	2.0	Yes
5	90-10 Tin L	6'x3'x3'	NF Tin Concentrate, NF Lead Concentrate, NF Tin Acid	<1	Yes
6	60-40 Tin L	6'x3'x3'	NF Tin Concentrate, NF Lead Concentrate, NF Acid	<1	Yes
7	Bright Tin	6'x3'x3'	Stannous Sulfate, Sulfuric Acid, Tin Brightener, Tin Make-up	<1	Yes
8	Tin	6'x3'x3'	Stanous Sulfate, Sulfuric Acid	<1	Yes
9	Acid Dip	3'x3'x3'	Water, trace chemicals	1.0	Yes
10	Rinse	8'x3'x3'	Water	6.8	Yes
11	Rinse	3'x3'x3'	Water, trace chemicals	1.0	Yes
12	Copper Strip	6'x3'x3'	Potassium Carbonate	9.0	Yes
13	De-Scale	8'x3'x3'	Sulfamic Acid, Sodium Bisulfate	0.5-2.5	Yes
14	Rinse	8'x3'x3'	Water	7	Yes
15	Nickel Strike	8'x3'x3'	Nickel Chloride, HCl	<1	Yes
16	Electroclean	8'x3'x3'	Sodium Hydroxide, Sodium Metasilicate	12.9	Yes
17	Rinse	8'x3'x3'	Water, trace chemicals	6.0	Yes
18	HCl	8'x3'x3'	Hydrochloric Acid	<1	Yes
30	Zinc Plate	8'x3'x3'	Zinc Chloride, Potassium Chloride, Ammonium Chloride	4.5 - ??	Yes
31	Activator	6'x3'x3'	Sodium Hydroxide <1%, Acetic Acid <1%	11 – 12.0	Yes

TANK ID	TANK NAME	TANK SIZE	TANK CONTENT	pH	Is Tank Elevated
32	Gold Chromate	6'x3'x3'	Chromic Acid 10%	1.2 @ 75°F	Yes
33	Rinse	6'x3'x3'	Water	7	Yes
50	Clear Chromate	3'x3'x3'	Pavchrome 927	<2.5	Yes
51	Rinse	3'x3'x3'	Water	7	Yes
52	Black Chromate	3'x3'x3'	Pavchrome Black Ab Pavchrome Black CC	1.6-2.5	Yes
Oil A		4.5'x3'x3'			Yes
Oil B		4.5'x3'x3'			Yes
ANODIZING					
1-1	Hard Anodize	1250 gal	Sulfuric Acid <20%	<2	Yes
1-1A	Hard Anodize Rinse	3'x3'x3'	Water	<7	Yes
1-2	Hard Anodize	200 gal	Sulfuric Acid <20%	<2	Yes
1-2A	Hard Anodize Rinse	200 gal	Water	<7	Yes
1-3	Aluminum Etch	1,200 gal	Sodium Hydroxide <1%	12	Yes
1-3A	Aluminum Etch Rinse	10'x4'x3'	Water, trace NaOH	>7	Yes
1-5	Activator Acid	160 gal	Ammonium Bifluoride 12%, Hydrofluoric Acid <7%	<2	Yes
1-6	Chem Film	1,070 gal	Sodium Fluoborate <1% Chromic Acid <1% Potassium Ferricyanide <1%	1.5 - 2.0	Yes
1-11	Aluminum Deoxidizer	1,100 gal	Sodium Bisulfate <1% Potassium Dichromate	2	Yes
1-11A	Deoxidizer Rinse	10'x4'x3'	Water, trace chemicals	5.0	Yes
1-13	Black Dye	660 gal	Chromium <1%	5.0 – 5.5	Yes
	Water Rinse	660 gal	Water, trace chemicals	7	Yes
1-16	Alkaline Cleaner	1068 gal	Sodium Nitrate	9.3	Yes
	Water Rinse		Water, trace chemicals		Yes
1-18	Dichromate Seal	660 gal	Sodium Dichromate <6%	5.5 – 6.5	Yes
	Water Rinse		Water, trace chemicals		Yes
1-20	Nickel Acetate Seal	600 gal	Nickel Acetate <6%	5.5-5.7	Yes

TANK ID	TANK NAME	TANK SIZE	TANK CONTENT	pH	Is Tank Elevated
1-20A	Water Rinse		Water, trace chemicals	7	Yes
1-23	Chromic Anodize	1,250 gal	Chromic Acid 9%	<1	Yes
1-23A	Chromic Anodize Rinse	1,250 gal	Water, trace chemicals	7	Yes
1-14	Sulfuric Anodize	864 gal	Sulfuric Acid	<1	Yes
1-14A	Water Rinse Sulfuric Anodize	864 gal	Water, trace Sulfuric Acid	4.0	Yes
1-25	DI Hot Water Drying Aid	600 gal	Deionized Water	5.0	Yes
1-27	Gold Dye	142 gal	Chromium complex of Azo Dye	5.5-6.5	Yes
1-28	Red Dye Alum	274 gal	Chromium <1%?? Hexylene Glycol 2-3%	5.8-6.3	Yes
1-29	MF Blue Dye	274 gal	Blue Dye	5.5-6.0	Yes
Empty		274 gal	Empty		Yes
1-36A	Rack Saver Anodize Stripper	280 gal	Sodium Hydroxide	12.0	Yes

Attachment 3: Compliance Monitoring Records Review

Permit Limits in mg/L (Federal Categorical Limits Adjusted for Dilution Flows):	**Cadmium**	**Chromium**	**Nickel**	**Zinc**
Daily	0.11	2.76	3.97	2.60
Monthly	0.07	1.70	2.37	1.48

	Measured Levels (mg/L)			
Sample Date (1st day of composite sample)	**Cadmium**	**Chromium**	**Nickel**	**Zinc**
4/29/10	0.058	0.87	0.069	0.14
2/23/10	**0.73**	1.89	**10.2**	0.27
2/16/10	0.089	0.35	0.1	0.1
12/17/09	0.024	1.39	0.058	0.21
11/30/09	0.056	1.77	<0.07	0.16
11/4/09		1.00		
11/3/09		1.16		
11/2/09		1.91		
9/23/09	0.063	**5.42**	<0.07	0.16
8/3/09	0.057	**8.72**	0.11	0.27
7/30/09	0.041	1.63	0.062	0.14
5/11/09				**0.170; 6.0**
4/28/09	0.049	**4.59**	0.13	0.34
4/23/09	0.062	1.49	0.21	0.17
3/10/09	**0.339**	**57.3**	**5.58**	1.18
2/10/09	0.062	**2.19**	0.2	0.15
12/9/08	**0.072**	1.59	<0.07	0.15
12/3/08				
10/29/08	0.041	**1.89**	0.078	0.11
7/23/08	0.022	1.44	1.93	0.034
5/14/08	0.025	1.38	0.24	0.068
1/15/08	**0.079**	0.73	0.3	0.14
10/23/07	0.018	**1.74**	0.036	0.046

Key:

xxx Out of compliance with federal daily and/or monthly limit (adjusted) of 40 CFR 433.17