



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. Andre Adams
Manufacturing Manager
Romac Supply Co.
7400 Bandini Blvd.
Commerce, CA 90040

Re: August 24, 2010 Clean Water Act Inspection

Dear Mr. Adams:

Enclosed is the December 17, 2010 report for our inspection of Romac Supply Co. at the above address in Commerce, 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 silver plating and phosphating operations.
2. The facility practices safe disposal practices when using the Tarn-X tarnish remover by not disposing of the rinse water down the drain.
3. The facility had some violations of cadmium, silver, zinc, and TTO in March and September of 2009. For the time period reviewed by EPA, Romac has since returned to compliance with the federal categorical limits.

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: Romac Supply Co.
Industrial User Address: 7400 Bandini Blvd, Commerce, CA 90040

Inspection Date: August 24, 2010

EPA Region 9 Inspector: Anna Yen, Environmental Engineer
Water Division, CWA Compliance Office

Sanitation Districts of Los Angeles County Inspectors: John Boyd, Supervising Industrial Waste Inspector
Stephen Wittmer, Industrial Waste Inspector

Facility Contact During Inspection: Andre Adams, Manufacturing Manager

Report Date: December 17, 2010

Report prepared by Anna Yen

1.0 Scope and Purpose

The purpose of the industrial user inspection on August 24, 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

Romac Supply Co. ("Romac") began operations at this facility in approximately 1975. This facility remanufactures and reconditions existing equipment. It also manufactures new products – primarily enclosures for electrical equipment such as circuit breakers, fuses, switches, and switchgear. Raw materials to make these products include sheets of

steel, galvanized steel, copper, some aluminum, and channel iron for bases of its products.

Using machines at the facility, the sheets of steel or other metal are cut, punched, and formed. Coolant in the machines is changed every 3-5 years. It is taken offsite for disposal.

In the copper room of the facility, where the raw material is stored, Romac shears the copper to certain sizes. Once cut to the correct sizes, the copper is transported to the main part of the facility for punching and assembly.

Romac typically buys silver-plated copper. Romac used to perform silver plating of copper at its facility routinely but now does so on an infrequent basis. See more details in Section 2.0 of this report.

Welding and Painting

Welding and painting are performed onsite. Romac uses a water-based acrylic paint and applies it using a spray gun. Parts are air-dried by fan. Any parts that need to be painted by powder coating are shipped offsite.

Onsite Storage, Stripping, and Reconditioning

Romac buys old, used equipment from various facilities. In some cases, equipment is dropped off because the original owner simply does not want it anymore or because it does not work anymore. Romac stores a large amount of used equipment and extra parts onsite outside of the building.

Romac's stripping section of the facility is where Romac strips old equipment such as circuit breakers or transformers and salvages useable parts. Romac can sell some parts and reuse other parts to recondition or remanufacture a piece of equipment.

In the reconditioning area of the facility, Romac employees work on putting parts back together and rewiring units to make the equipment work like new. This is the only part of the facility where "Tarn-X" is allowed to be used. *See Photo 1 in Attachment 1.* Tarn-X is a wipe-and-rinse tarnish remover for metal parts. Tarn-X is poured into a small bin where it is applied by brush. The tabletop surface itself is contained. The rinse water used to rinse the parts off after Tarn-X is applied is contained in a small bucket. In the QC area of the facility, no water is used.

Cleaning

For large items such as transformers (with the electronic parts removed), Romac uses a steam cleaning bay. *See Photo 2 in Attachment 1.* For deburring and cleaning of small parts, Romac sends them through a tumbler which uses ceramic media as well as a soap solution. The used soap solution is collected and does not go down the drain. Romac stated that it allows the used soap solution to evaporate outside. *See Photos 3 & 4 in Attachment 1.* Once processed in the tumbler, the parts are rinsed off in sinks next to the tumbler. *See Photo 5 in Attachment 1.* An additional soap solution is used to wash parts

off in the sinks. Drainage from the sinks is piped to the steam cleaning bay. *See Photo 6 in Attachment 1.* Romac also uses a sandblaster to polish small parts.

Romac uses several different chemical products for degreasing parts manually. In a series of follow-up phone calls to Romac and with input from LACSD, EPA discovered that, for cleaning steel before painting, Romac uses two products, which are applied and wiped off with rags. One of these products is an iron phosphate cleaner/coating. Romac explained that the used rags are taken offsite by the supplier, and the supplier replaces them with clean rags.

Onsite Wastewater Treatment System

See Section 1.3.

1.2 Facility Wastewater Sources

Romac generates the following wastewaters that ultimately discharge to the local sewer system:

- Sink drainage – downstream of the tumbler
- Steam clean bay discharge

The sinks that are located next to the tumbler discharge through a common pipe through the wall to the steam cleaning bay. Both the sink discharge and discharge from steam cleaning are collected in the containment under the steam clean bay. *See Photos 6 & 7 in Attachment 1.* The wastewater discharges from there through a pool filter to the onsite wastewater treatment system. *See Photos 7 & 8 in Attachment 1.*

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

Though Romac has an air compressor, it simply allows the air compressor condensate to collect and evaporate outside.

1.3 Facility Process Wastewater Treatment System

The facility's wastewater treatment system consists solely of an underground three-stage clarifier. *See Photo 9 in Attachment 1.*

Romac has the clarifier cleaned out approximately every two years. Romac has the clarifier pumped out, and the contents are hauled off for offsite disposal.

Romac used to add chlorine to the clarifier but found that this created problems with proper operation of the clarifier, so Romac discontinued this practice.

The LACSD inspector manually inspected the third stage of the clarifier by placing a stick to the bottom of the clarifier. He found the clarifier to be quite clean at that time; there were no solids at the bottom of the clarifier and no oil-and-grease layer at the top.

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 metal finishing, 40 CFR 433, and is, therefore, a categorical industrial user (CIU). The silver plating of copper and phosphating performed at this facility trigger applicability of this categorical standard. During the inspection, Romac stated that it no longer performs the silver plating operation but did not want to change its permit. The inspection team also did not observe any plating operation occurring at the facility. In a follow-up phone conversation, Romac clarified to EPA that the facility does perform occasional silver plating of copper during emergency situations, such as when Romac needs silver-plated copper to complete a customer's order on time. Romac stated that this type of situation occurs infrequently, perhaps once every one to two years. Romac typically buys silver-plated copper. Romac performs phosphating by using rags to apply and wipe off an iron phosphate product on parts before painting.

Romac is classified as subject to 40 CFR 433 and not 40 CFR 413 because the facility owns more than 50% of the parts it works on; therefore, it is not a job shop. Only existing job shops (and independent printed circuit board manufacturers) are exempt from 40 CFR 433 and remain subject to 40 CFR 413. Romac is classified as an existing source because it has not made any installations at its facility after August 31, 1982, the publication date of the proposed rule, that would meet the definition of a “new source.” Therefore, the “Pretreatment standards for existing sources” in 40 CFR 433.15 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.

In follow-up phone conversations with Romac, EPA learned that Romac is considering ceasing silver plating permanently at its facility. In addition, it is investigating non-phosphating products to clean parts before painting. EPA informed Romac that if it eliminates plating and phosphating at its facility, then it will no longer be subject to 40 CFR 433. EPA recommended that Romac communicate with LACSD to learn about local limits that may still apply. EPA also informed Romac that it would need to contact LACSD to have its permit revised if it decides to make these changes at its facility.

Based on a review of monitoring records of November 2007 through June 2010, EPA found that Romac's sampling event in March 2009 showed violations of the federal limits

for cadmium, silver, and zinc. In September 2009, Romac violated the TTO federal limit. The facility stopped its practice of adding chlorine to the clarifier. Romac believes that the chlorine may have combined with other chemical compounds in the wastewater to form chloroform. This change in procedure seems to have resolved the TTO compliance issue. For the time period reviewed by EPA, Romac has also been in compliance with the other federal limits since then. *See table in Attachment 2.*

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. 10889 R-2. The facility's sample point, as indicated in its permit, is the sample box directly downstream of the clarifier. *See Photo 9 in Attachment 1.* The facility's permit requires Romac to sample once per six months.

3.0 Summary of Findings

1. This facility is subject to the federal categorical standard for metal finishing, 40 CFR 433, because of its silver plating of copper and phosphating operations.
2. This facility is an SIU and a CIU. The facility is subject to applicable pretreatment requirements in 40 CFR 403.
3. The facility practices safe disposal practices when using the Tarn-X tarnish remover by not disposing of the rinse water down the drain.
4. The facility had some violations of cadmium, silver, zinc, and TTO in March and September of 2009. The facility stopped its practice of adding chlorine to the clarifier which seems to have resolved the TTO compliance issues. For the time period reviewed by EPA, Romac has been in compliance with the other federal limits as well.
5. Romac is considering eliminating plating and phosphating operations at its facility. If Romac makes such changes, the facility will no longer be subject to 40 CFR 433. EPA recommends that Romac communicate with LACSD to learn about local limits that may still apply and to understand the permit revision process.

Attachment 1: Photos



Photo 1

Reconditioning area where Tarn-X is used
Taken by Anna Yen on August 24, 2010



Photo 2

Steam cleaning bay

Taken by Anna Yen on August 24, 2010



Photo 3

Tumbler

Taken by Anna Yen on August 24, 2010



Photo 4

Tumbler and bin of used wash water

Taken by Anna Yen on August 24, 2010



Photo 5

Sinks next to tumbler
Taken by Anna Yen on August 24, 2010



Photo 6

Sink discharge pipe to steam cleaning bay
Taken by Anna Yen on August 24, 2010

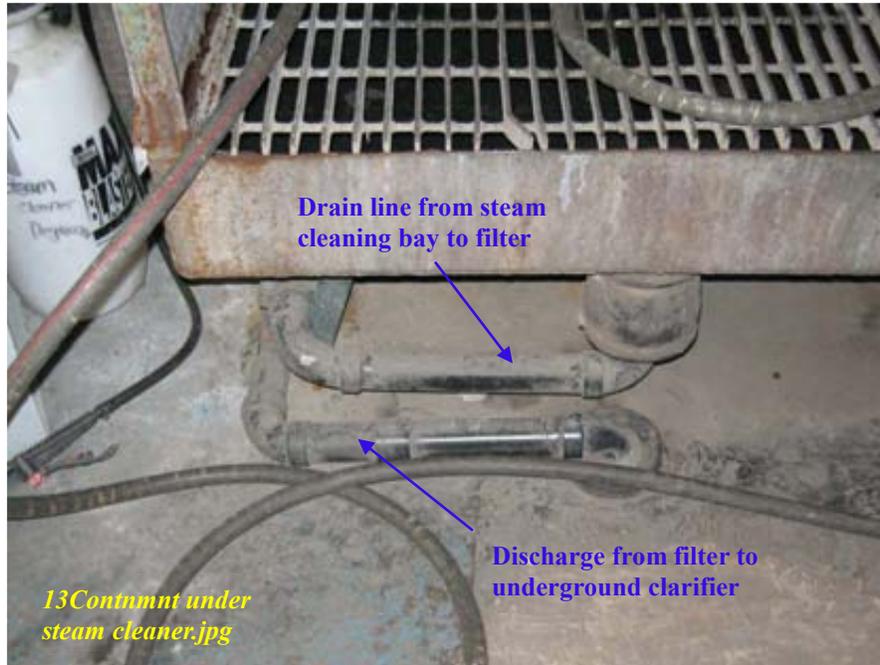


Photo 7

Drainage from steam cleaning bay
Taken by Anna Yen on August 24, 2010



Photo 8

Filter on discharge line from steam cleaning bay
Taken by Anna Yen on August 24, 2010



Photo 9

Underground clarifier and sample box
Taken by Anna Yen on August 24, 2010

Attachment 2: Compliance Monitoring Records Review

Permit Limits in mg/L (Federal Categorical Limits):	Cadmium	Silver	Zinc	TTO
Daily	0.69	0.43	2.61	2.13
Monthly	0.26	0.24	1.48	
Measured Levels (mg/L)				
Sample Date (1 st day of composite sample)	Cadmium	Silver	Zinc	TTO*
6/16/10	0.06	<0.05	0.47	
2/9/10	<0.02	<0.05	0.13	
1/11/10	<0.01	<0.05	0.034	
9/29/09				2.992
5/12/09	0.208	0.057	1.05	
3/19/09	0.53	0.45	4.29	
9/24/08	0.22	0.075	0.84	
6/26/08	0.24	0.16	1.24	
1/22/08	0.078	<0.05	0.28	
11/20/07	0.085	0.076	0.28	

* EPA did not collect compliance monitoring data for TTO. LACSD issued a notice of violation for the 9/29/09 violation of the TTO limit.

Key:

xxx Out of compliance with federal daily and/or monthly limit of 40 CFR 433.15