

ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF
OXFORD PLATING COMPANY
OXFORD, ALABAMA

ORDER NO. 87-042-WP/HW

FINDINGS OF FACT

Pursuant to the provisions of the Alabama Environmental Management Act, Code of Alabama 1975, §§ 22-22A-1 through 22-22-16 (1984 and 1986 Cum. Supp.), the Alabama Water Pollution Control Act, Code of Alabama 1975, §§ 22-22-1 through 22-22-14 (1984 and 1986 Cum. Supp.), and the Hazardous Wastes Management Act of 1978, Code of Alabama 1975, §§ 22-30-1 through 22-30-24 (1984 and 1986 Cum. Supp.), the Alabama Department of Environmental Management (hereinafter, "the Department") makes the following FINDINGS OF FACT:

1. Oxford Plating Company operates a metal finishing facility in Oxford, Alabama.
2. Oxford Plating Company was issued a State Indirect Discharge permit by the Department authorizing the discharge of pollutants and other wastes to Choccolocco Creek through the Choccolocco Creek Wastewater Treatment Plant, subject to certain limitations, terms, and conditions.
3. Among the terms and conditions of Oxford Plating Company's SID permit are daily maximum discharge limitations for

total cyanide, total copper, total iron, total suspended solids, total zinc, total tin, and pH and a daily minimum discharge limitation for pH.

4. Said daily discharge limitations are as follows:

Parameter	Daily Minimum	Daily Maximum
Total Cyanide		0.2 mg/l
Total Copper		1.0 mg/l
Total Iron		6.0 mg/l
Total Suspended Solids		60.0 mg/l
Total Zinc		1.6 mg/l
Total Tin		2.0 mg/l
pH	6.0 s.u.	9.0 s.u.

5. Results of analyses made on wastewater discharged from Oxford Plating Company's facility to the Choccolocco Creek Wastewater Treatment Plant on November 17 - 19, 1986 reveal the following violations of the daily discharge limitations of Oxford Plating Company's SID permit:

Date	pH	Total Suspended Solids	Total Copper	Total Iron	Total Tin	Total Zinc	Cyanide
11/11/86	5.5 s.u.	113.0 mg/l	3.45 mg/l	33.75 mg/l	2.65 mg/l	49.88 mg/l	
11/18/86			3.70 mg/l			7.45 mg/l	
11/19/86			7.60 mg/l			1.89 mg/l	16.66 mg/l

6. Oxford Plating Company stores on its premises drums containing wastewater treatment sludge from its electroplating operation. Said sludge is a hazardous waste as defined by ADEM Admin. Code R. 335-14-2-.04(2).

7. Inspections by Department staff on November 18, 1986 and February 4, 1987 reveal that Oxford Plating Company has violated various provisions of ADEM Admin. Code Chapters 14-3 and 14-6. Specifically, Oxford Plating Company has violated the following Rules:

a. Rule 335-14-3-.03(5)(a) 2. Accumulation Time.

Oxford Plating Company has stored hazardous wastes in drums upon which the beginning of the period of accumulation is not clearly marked.

b. Rule 335-14-3-.03(5)(a) 3. Accumulation Time.

Oxford Plating Company has stored hazardous wastes in drums which are not clearly labeled "Hazardous Waste" and are not clearly marked with the EPA hazardous waste number.

c. Rule 335-14-3-.03(5)(b) Accumulation Time. Oxford Plating company has stored hazardous wastes on-site for more than 90 days without complying with the requirements for permitted facility.

d. Rule 335-14-6-.02(7). Personnel Training. Oxford Plating Company does not have a written Personnel Training Plan.

e. Rule 335-14-6-.03(2). Maintenance and Operation of a Facility. Spills from the overflow of the wastewater treatment

units were observed during both the November 18, 1986 and the February 4, 1987 inspections. Failure to clean up the spilled material indicates that Oxford Plating Company has not operated and maintained the facility in a manner designed to minimize the possibility of a release of hazardous waste constituents into the environment.

f. Rule 335-14-6-.04 Contingency Plan and Emergency Procedures. Oxford Plating Company does not have a contingency plan for the facility.

g. Rule 335-14-6-.09(2) Conditions of Containers. Oxford Plating Company has continued to store drums in poor condition (as leaks were observed during both inspections).

h. Rule 335-14-6-.09(4)(a) Management of Containers. Oxford Plating Company has continued to store wastes in drums which do not have tops and are not closed.

i. Rule 335-14-6-.09(5) Inspections. Oxford Plating Company has failed to make weekly inspections of the hazardous waste storage areas.

ORDER

Based upon the foregoing FINDINGS OF FACT and pursuant to Code of Alabama 1975, §§ 22-22A-5(10), 22-22-9(i), 22-22-9(k), 22-22-9(c), 22-30-19(a), and 22-30-20(10) (1984 and 1986 Cum. Supp.), it is hereby ORDERED:

A. That not later than June 1, 1987, Oxford Plating Company shall submit to the Department a pollution abatement plan designed to bring Oxford Plating Company into compliance with the discharge limitations contained in its SID permit. Said plan shall provide engineering design, piping and instrumentation diagram and any design modifications necessary to achieve and maintain compliance with the permit. Said plan shall also provide for containment of all plating lines and for implementation of proper testing procedures as approved by the U.S. Environmental Protection Agency and the Department. The plan shall be prepared and certified in accordance with ADEM Admin. Code R. 335-6-3-.01 through 335-6-3-.09 by a registered professional engineer licensed to practice in the State of Alabama.

B. That not later than July 1, 1987 Oxford Plating Company shall have attained compliance with the terms, conditions and limitations contained in its SID permit.


C. That immediately upon receipt of notice of this Order, Oxford Plating Company shall commence monitoring its discharge in accordance with the terms and conditions of its SID permit. Said monitoring shall continue until such time as the Department releases Oxford Plating Company from this requirement in writing.

D. That not later than June 1, 1987, Oxford Plating Company shall have achieved compliance with all Generator Standards described in Chapter 14-3 of the ADEM Admin. Code, Division 14.

E. That the failure to comply with the provisions of this Order shall constitute cause for the commencement of legal action for the recovery of civil penalties, criminal fines, or other appropriate relief by the Department or others against Oxford Plating Company.

F. That issuance of this Order does not preclude the Department or others from seeking civil penalties, criminal fines, or other appropriate relief against Oxford Plating Company for the violations stated herein.

ORDERED and ISSUED this 27th day of March, 1987.




Leigh Pegues, Director
Alabama Department of
Environmental Management
1751 Federal Drive
Montgomery, Alabama 36130
(205) 271-7700

CERTIFICATE OF SERVICE

I hereby certify that I have served Order No. 87-042-WP upon Oxford Plating Company by sending the same, postage paid, through the United States Mail, as Certified Mail No. P 266-617-369, with instructions to forward and return receipt requested to:

M. L. Willingham
2030 Barry Street
Oxford, Alabama 36203

Done this 27th day of March, 1987.



Olivia Hardy Hudgins
Associate General Counsel