



State of Ohio Environmental Protection Agency

FILE COPY

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P.O. Box 1049  
Columbus, OH 43216-1049

August 17, 2009

Mr. Brad Moore  
DuraShield USA  
601 West Cherry Street  
Sunbury, OH 43074

Re: **DuraShield USA**  
**Conditionally Exempt Small Quantity Generator**  
**U.S. EPA ID#: OHD987037785**  
**Delaware County, CDO**  
**NOV/RTC**

Dear Mr. Moore:

On August 6, 2009, I inspected DuraShield USA's (DuraShield's) facility in Sunbury, Ohio, to determine DuraShield's compliance with Ohio's hazardous waste laws and rules as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Deb Daniels assisted me with my inspection.

At the time of my inspection, DuraShield was operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste and a used oil generator. During the inspection, I found the following violation of Ohio's used oil rules.

- 1. **OAC Rule 3745-279-22(C)(1), Used oil storage requirements for generators:** Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

DuraShield was storing two 55-gallon drums of used oil in the shop storage area that were incorrectly labeled as "Waste Oil."

- During the inspection, DuraShield correctly labeled the two drums as "Used Oil." The violation was abated at that time.

**General Comments:**

- 1. As discussed during the inspection, DuraShield is a CESQG of hazardous waste. A CESQG is someone who generates no more than 220 lbs (100 kg) of hazardous waste per month. As such, you must ensure delivery of your hazardous waste (i.e., MEK waste) to an off-site permitted treatment or disposal facility. A list of commercial facilities in Ohio that are permitted to accept hazardous waste is available at: <http://www.epa.state.oh.us/dhwm/pdf/accepting.pdf>.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



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DuraShield USA  
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2. During our inspection, we also discussed the requirements for managing batteries and fluorescent bulbs. Both of these waste streams can be managed as universal waste. Universal wastes are specific hazardous waste streams that a generator can choose to manage in an alternative manner in place of the more complex hazardous waste requirements. Additional information about Universal Waste is available at: <http://www.epa.state.oh.us/dhwm/guidancedocs.html#UW>.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) at (800) 329-7518 or visit <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at (614) 728-3887. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Melissa M. Storch  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosure

c: Kristina Durnell, DHWM/CO  
CDO File

MMS/msm DuraShield.NOV.August09

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

Ohio Environmental Protection Agency  
**RCRA SUBTITLE C SITE  
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to [kristina.durnell@epa.state.oh.us](mailto:kristina.durnell@epa.state.oh.us)  
 or mail it to Kristina Durnell, Central Office

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHD987037785</b> Name: <b>DuraShield USA</b>		Website: <b>www.thebundycompanies.com</b> (Optional)	
<b>Site Location Information</b>	Street Address: <b>601 W. Cherry St.</b> City, Town, or Village: <b>Sunbury</b> County Name: <b>Delaware</b>		State: <b>OH</b> Zip Code: <b>43074</b>	
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>			
<b>Facility Representative</b>  Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	First Name: <b>Brad</b> MI: _____ Last Name: <b>Moore</b> Phone Number: <b>740-965-3008</b> Phone Number Extension: _____ E-Mail Address: <b>bsmdurashield@copper.net</b> Fax Number: <b>740-965-4485</b> Fax Number Extension: _____ Street or P.O. Box: _____ City, Town or Village: _____ State: _____ Zip Code: _____			
<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>R.T. Bundy and Associates</b> Owner Private County District Type: <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: <b>417 E. Water Street</b> City, Town or Village: <b>Urbana</b> State: <b>OH</b> Name of Site's Operator: <b>DuraShield USA</b> Operator Private County District Type: <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: <b>601 W. Cherry St.</b> City, Town or Village: <b>Sunbury</b> State: <b>OH</b>		Date Became Owner (mm/dd/yyyy): <b>1996</b> Federal Indian Municipal State Other <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Owner Phone #: <b>937-652-2151</b> Country: <b>USA</b> Zip Code: <b>43078</b> Date Became Operator (mm/dd/yyyy): <b>1996</b> Federal Indian Municipal State Other <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Operator Phone #: <b>740-965-3008</b> United States Zip Code: <b>43074</b>	

**VIOLATIONS CITED?**  Yes  No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator



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**PROCESS DESCRIPTION SECTION**

Give a general process description (include all processes at the facility)

DuraShield USA (DuraShield), a division of American Pan Company, operates at 601 West Cherry Street, Sunbury, Ohio. DuraShield USA applies nonstick coating to different types of baking pans for distribution to commercial bakers, including McDonald's and Wendy's. The Sunbury location mostly ships finished products to commercial bakers overseas. The company receives aluminized steel pans from one of its sister companies and applies coating using either its robotic system or by hand (usually for smaller pieces). First, when the pans are received at the facility, they are blasted with aluminum oxide to prep them for the coating. Next, the pans are coated with water-based primer. In rare instances, for special types of pans, the company uses a MEK or solvent-based primer. In addition, some parts are also dipped into an inhibitor (P3 Neutrasure 5156) prior to coating. Next, the parts are coated with a powdered top coat (plastic flakes) and cured in an oven. After they are cured, a second top coat is applied, and they are cured again. All of DuraShield's pans are PFOA free.

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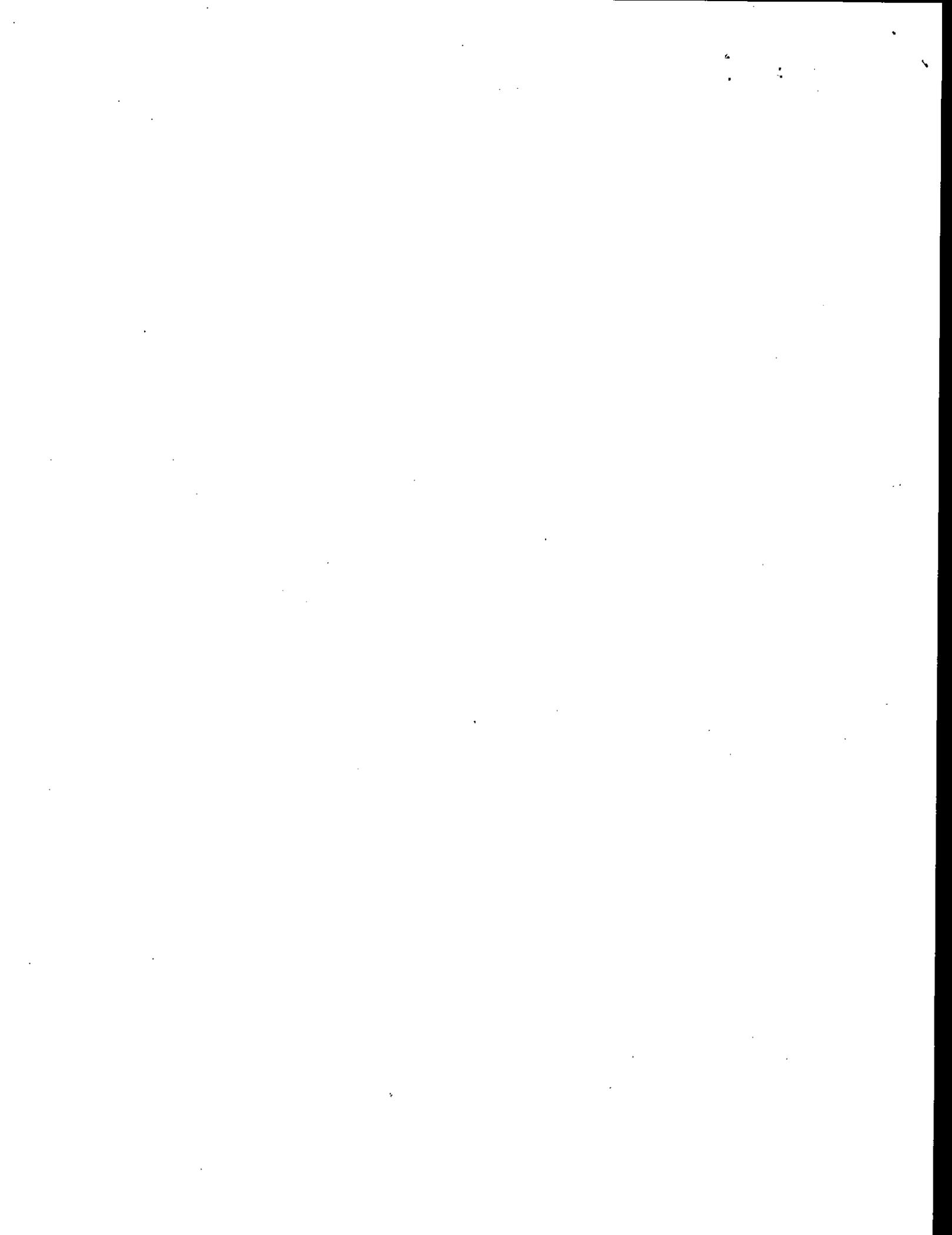
**WASTE ACTIVITIES AND P2 SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

At the time of my inspection, DuraShield was operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste and a used oil generator. Both of these waste streams are accumulated in the Shop Storage Area. The company had one 55-gallon drum of hazardous waste that was being used to accumulate leftover MEK, MEK-contaminated materials, and other leftover solvent-based coatings (D001, D035). The company has been operating at its Sunbury location since 1996 and has not had to ship a full drum off site yet. Used oil is generated from equipment maintenance. At the time of my inspection, two drums of used oil were being accumulated in the storage area. All of the facility's used oil is managed by Safety-Kleen.

Nonhazardous waste that the facility generates includes spent aluminum oxide and scrap pans. DuraShield used to send its scrap pans off site for recycling, but encountered problems with using the vendor's dumpster. Currently, scrap pans are being disposed of as solid waste. The powder being used as top coat is also not hazardous. Any excess is collected in the facility's powder collector and reused in the process.

At the time of my inspection, no universal waste lamps or batteries were being accumulated on site.



**CONDITIONAL EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or ≤ 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

4.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

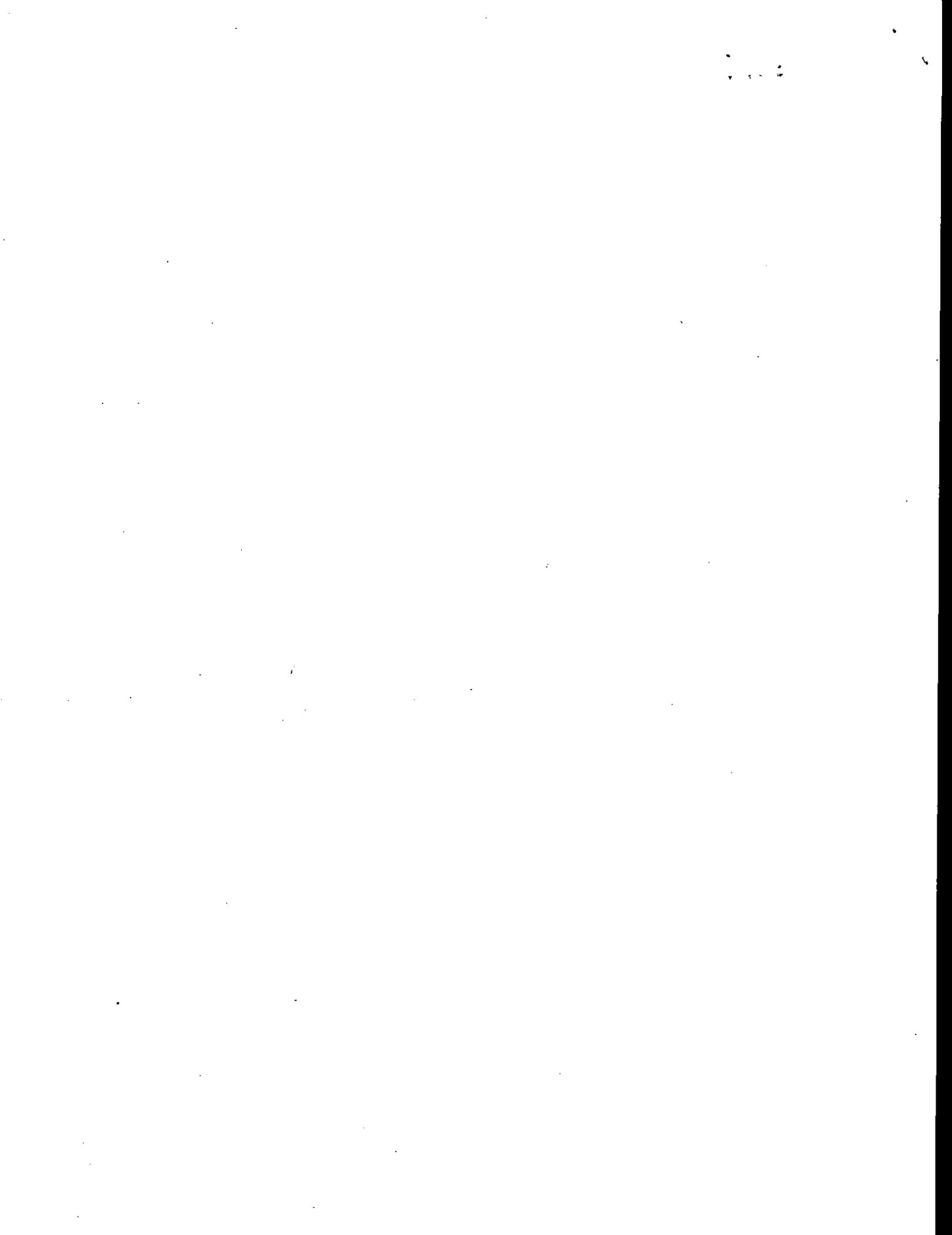
NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>



**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.*

**PROHIBITIONS**

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes  No  N/A

a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A

*NOTE: For example, used oil contaminated scrap metal stored in a pile.*

2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A

3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

*NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).*

**GENERATOR STANDARDS**

4. Does the generator mix hazardous waste with used oil? If so, Yes  No  N/A

a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

*NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.*

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes  No  N/A

*NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.*

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes  No  N/A

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] **At the time of my inspection, 2 drums of used oil were incorrectly labeled as "Waste Oil." DuraShield correctly labeled the 2 drums as "Used Oil" during the inspection.** Yes  No  N/A

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] Yes  No  N/A

a. Stopped the release? Yes  No  N/A

b. Contained the release? Yes  No  N/A

c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

**ON-SITE BURNING IN SPACE HEATER**

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:

a. Does the heater burn only used oil that owner/operator generates or Yes  No  N/A

	used oil received from household do-it-yourself (DIY) used oil generators?	
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).*

**GENERATOR TRANSPORTATION**

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).*

**COLLECTION CENTERS AND AGGREGATION POINTS**

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.*