



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Wilson Sporting Goods Company
OHR 000 149 229
Hardin County
DHWM, NWDO
Return to Compliance

September 24, 2008

Mr. Dan Riegle, Plant Manager
Wilson Sporting Goods Company
217 North Liberty Street
Ada, Ohio 45810

Dear Mr. Riegle:

Thank you for sending the September 9, 2008, response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notices of Violation (NOVs) dated May 5, 2008 and July 10, 2008. Ohio EPA received the response on September 12, 2008. This response included waste evaluation information.

The following is a summary of the violations cited in the May 5, 2008 and July 10, 2008 NOVs and the facility's compliance with respect to each violation.

Violations:

1. **Ohio Administrative Code (OAC) Rule 3745-52-11; Hazardous Waste Determination**

"Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste ..."

Wilson Sporting Goods Co. (WSGC) failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

This violation is considered abated per the September 5, 2008, letter.

2. **OAC Rule 3745-52-11; Hazardous Waste Determination**

"Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste ..."

WSGC failed to determine if the printer ink/solvent waste was a hazardous waste in accordance with OAC Rule 3745-52-11.

Ohio EPA received documentation on August 8, 2008, that Heritage-Crystal Clean, LLC (HCC) sampled the printer ink/solvent waste at WSGC on July 30, 2008.

Ohio EPA received documentation on September 12, 2008, that included sampling results from HCC. These results show that the printer ink/solvent waste is a non-hazardous waste.

It appears from the other documentation included in the September 12, 2008, response that WSGC plans to have HCC dispose of the printer ink/solvent waste. However, since this waste is a non-hazardous waste stream, WSGC has the option of disposing of this waste in the local solid waste landfill, which may be the most cost-efficient option.

With this information, this violation is considered abated.

General Concerns:

- A. **Cutting Oil:** During the inspection, WSGC stated that the used cutting oil is cleaned out of the die machine approximately twice a year. Each cleaning generates approximately 10 – 15 gallons of waste. Previously, WSGC has disposed of this waste through the sewer.

No further information needs to be submitted to address this general concern per the September 5, 2008, letter.

- B. **Printer Ink/Solvent Waste:** The printer head is cleaned several times a day. At the time of the inspection, the waste ink was being kept in a liter container below the printer. This waste has not been disposed of yet.

No further information needs to be submitted to address this general concern.

All violations and general concerns that were the result of the April 1, 2008, compliance evaluation inspection have been abated and addressed, respectively.

Should you have any questions, please feel free to call me at (419)373-3065.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/cs

pc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
Tom Poffenbarger, DSW, NWDO
~~DHWM, NWDO File: Hardin County - Wilson Sporting Goods~~

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.