



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

**RE: Wilson Sporting
Goods Co.
Hardin County
DHWM, NWDO
Partial Return to
Compliance**

September 5, 2008

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

Dear Mr. Riegle:

Thank you for sending the August 5, 2008, response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violations (NOVs) dated May 5, 2008, and July 10, 2008. Ohio EPA received the response on August 8, 2008.

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. **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 have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Ohio EPA received documentation on June 5, 2008, that Wilson Sporting Goods Co. (WSGC) has decided to manage the spent lamps as universal waste. This documentation included a brief summary of how the lamps will be managed at the facility and stated that Key Supply (KS) will pick up and recycle the lamps.

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On August 8, 2008, Ohio EPA received documentation that stated WSGC will not be working with KS to recycle the universal waste lamps, but will be working with Environmental Recycling Group (ERG) of Bowling Green, Ohio, instead. WSGC included a cost estimate and scope of work that ERG provided to WSGC. Also included in this documentation were photographs showing that WSGC has properly labeled, dated, and closed the universal waste lamp containers.

With this information, this violation is considered abated.

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. The HCC paperwork included in WSGC's response to Ohio EPA states that the printer ink/solvent waste will be analyzed for pH, flashpoint, total Resource Conservation and Recovery Act (RCRA) metals, and other organic analyses.

Due to the cost of sampling and analyzing this material, Ohio EPA has no problem with WSGC analyzing the printer ink/solvent waste for total RCRA metals. However, Ohio EPA would like to remind WSGC that based on the results of this test, a TCLP test for RCRA metals may also be required.

Once the results of the analyses have been received by WSGC, a copy should be sent to Ohio EPA. If the waste is hazardous, Ohio EPA will determine the status of WSGC's compliance with other

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hazardous waste laws and notify WSGC of the findings in a separate letter.

The analytical results should be submitted to Ohio EPA within 30 days of receipt of this letter.

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.

Ohio EPA received documentation on June 5, 2008, that WSGC is in discussions with HCC to properly dispose of this material.

On August 8, 2008, Ohio EPA received additional documentation that WSGC will be managing this material as used oil. HCC will be recycling WSGC's used oil by sending it to another facility for energy recovery. WSGC submitted photographic documentation that the used oil drum has been properly labeled.

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

- 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. However, WSGC must work to abate the outstanding violation that has been listed above.

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Should you have any questions, please feel free to call me at (419) 373-3065. Please send all information to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/lb

cc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
Tom Poffenbarger, DSW, NWDO
~~DHWM/NWDO: Hardin County: File: 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.