



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Glassline Corporation
Wood County
OHD987010899
Hazardous Waste
Return to Compliance

January 14, 2010

Mr. Brad Borkosky, General Manager
Glassline Corporation
28905 Glenwood Road
P. O. Box 147
Perrysburg, Ohio 43552-0147

Dear Mr. Borkosky:

Thank you for your December 21, 2009, response to Ohio EPA's December 9, 2009, Partial Return to Compliance letter. The information you submitted included waste analysis documentation that was completed for the spent paint booth filters. My review of the documentation submitted reveals that Glassline Corporation (Glassline) has adequately demonstrated abatement of all of the violations cited in the October 26, 2009, Notice of Violation (NOV) letter.

The following is a summary of the violations cited in the October 26, 2009, NOV as a result of our October 13, 2009, inspection and your compliance with respect to each:

1. Waste Evaluation, OAC Rule 3745-52-11:

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a) At the time of the inspection, Glassline did not have waste evaluation documentation for the spent paint filters. Glassline has historically disposed of this spent material as a non-hazardous waste. Glassline must immediately cease disposing of the waste paint filters as non-hazardous waste until a proper waste evaluation has been completed.

Glassline must obtain a representative sample of the spent paint booth filter waste stream and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010) and volatile organics (SW-846 Method 1311/8260). You must notify me at least seven days prior to the sampling event date so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary.

To abate this violation, Glassline must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise you on proper disposal options as well as plans for the future management of this waste stream.

On November 30, 2009, Glassline reported, via electronic mail, that they have arranged for the spent paint booth filters to be sampled on December 4, 2009, and sent to Jones & Henry for laboratory analysis. On December 4, 2009, Ohio EPA was on-site to oversee the sampling locations of the paint booth filters for proper waste analysis.

On December 21, 2009, Glassline submitted, via electronic mail, the waste analysis results for the paint booth filters. The submitted analytical results indicate that the spent paint booth filters are a non-hazardous waste. These filters may be managed as a solid waste. This portion of the violation has been abated.

- b)** In addition, Glassline failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Glassline must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Glassline plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. Glassline must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. Please review the universal waste requirements with the appropriate employees and send me documentation that this has been completed.

On November 11, 2009, Glassline submitted, via electronic mail, a copy of the training material presented to the applicable employees regarding the proper management of universal waste lamps. You indicated that you reviewed your internal memo along with the fact sheets provided by Ohio EPA with the employees who will be responsible for the management of universal waste. Glassline will manage all spent fluorescent bulbs as universal waste. Glassline intends to ship the universal waste lamps off-site for recycling at Environmental Recycling in Bowling Green, Ohio. This portion of the violation has been abated.

With this information, the two portions of this violation have been completely abated.

2. OAC Rule 3745-279-22(C)(1): Labeling

Containers, aboveground tanks and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

Glassline had four 55-gallon drums, one storage tank and one bucket of used oil (cutting oil, hydraulic oil, coolant mixture) that were not properly labeled.

In order to correct this violation, Glassline must properly label the drums, storage tank and bucket with the words "used oil" and submit photographic documentation to Ohio EPA.

On November 5, 2009, Glassline submitted, via electronic mail, photographic documentation showing the used oil drums, storage tank and bucket now properly labeled.

This violation was previously abated in the Partial Return to Compliance letter dated December 9, 2009.

As a result of exceeding the allowable total accumulation amount for a CESQG, Glassline is in violation of the following SQG hazardous waste rules:

3. **OAC Rule 3745-52-34(D)(4): Accumulation Start Date**
4. **OAC Rule 3745-52-34(D)(4): Hazardous Waste Labeling**
5. **OAC Rule 3745-52-34(C)(1)(a): Satellite Containers Closed**
6. **OAC Rule 3745-52-34(C)(1)(b): Satellite Containers Labeled**
7. **OAC Rule 3745-52-34(D)(4): Container Management**
8. **OAC Rule 3745-52-34(D)(5)(a): Emergency Coordinator**
9. **OAC Rule 3745-52-34(D)(5)(b): Emergency Information Posted by the Telephone**
10. **OAC Rule 3745-52-34(D)(5)(c): Employee Training**
11. **OAC Rule 3745-65-31: Facility Operated to Minimize Accidents**
12. **OAC Rule 3745-65-33: Emergency Equipment**
13. **OAC Rule 3745-66-74: Weekly Inspections**

In order to abate the above violations, Glassline must immediately ship off-site for proper disposal the spent paint solvents which have exceeded the total accumulation amount allowed on-site and submit a copy of the manifest along with the land disposal restriction (LDR) form to Ohio EPA. Weekly inspections (OAC Rule 3745-66-74) are required for as long as the excess hazardous waste is on-site. In addition, the requirements for container management (OAC Rule 3745-52-34) must be in place before the waste leaves the facility for proper disposal.

On November 11, 2009, Glassline submitted, via electronic mail, a copy of the manifest and LDR form for eight (8) drums of hazardous waste (D001, D035, F003, F005) that were shipped off-site for disposal on November 11, 2009.

Mr. Brad Borkosky, General Manager
January 14, 2010
Page 4

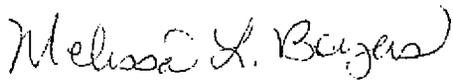
On December 4, 2009, Ohio EPA made a site visit and verified that the amount of spent paint solvents currently in storage on-site did not exceed the total accumulation amount allowed for a CESQG.

These violations (numbers 3-13) were previously abated in the Partial Return to Compliance letter dated December 9, 2009 .

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

l/r

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
DHWM, NWDO File: -Wood County, Glassline File -- j

ec: Melissa Boyers, DHWM, NWDO