



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

February 27, 2008

**WASHINGTON COUNTY  
GENERAL FILE  
(ZIDES SCREEN PRINTING)  
DHWM/SEDO  
OHD987007473**

Ms. Brenda Schwendeman  
Assistant Manager  
Zides Screen Printing  
118 Industry Road  
Marietta, OH 45750

Dear Ms. Schwendeman:

On February 15, 2008, Ohio EPA inspected Zides Screen Printing's Marietta facility to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection, I also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violation I found, what you need to do to correct the violation, other general concerns I have, and what you need to do to respond to the general concerns.

We found the following violation of Ohio's hazardous waste laws. In order to correct this violation, you must do the following and send me the required information **within 45 days** of your receipt of this letter:

- (1) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Zides Screen Printing paints football helmets in a spray booth at the business. The spray booth filters are changed approximately once per week and then disposed of in the general trash. Zides Screen Printing failed to evaluate the spray booth filters to determine if they are hazardous wastes, in violation of this rule. The spent filters need to be analyzed at an analytical laboratory capable of running the Toxicity Characteristic Leaching Procedure (TCLP) Volatiles test. Attached is a list of laboratories that you may contact. After the filters have been evaluated, Zides Screen Printing shall forward the results to Ohio EPA.

**GENERAL COMMENTS**

- (a) During the inspection, a review of Zides Screen Printing's waste manifests and receipts was conducted. The last manifest in your files was dated July 21, 2004. As we discussed, please forward to Ohio EPA copies of manifests and/or receipts from the last 3 years. If these records are not available in your files you may have to contact your waste disposal company (Southeastern Chemical & Disposal Co.) for copies.

- (b) During my visit, we discussed the issue of mercury-containing spent fluorescent bulbs, which your company generates. All fluorescent bulbs contain mercury and can potentially exhibit the characteristic of toxicity for mercury or other metals when disposed, rendering them a hazardous waste. Ohio EPA recommends that the bulbs be recycled instead of disposing of them as a hazardous waste. The bulbs should not be crushed; rather, spent bulbs should be placed in a box or other suitable container prior to recycling. Enclosed is a fact sheet concerning fluorescent bulbs, along with a listing of fluorescent bulb recyclers for your information.

As discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs, and you may possibly reduce your regulatory requirements. The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You may benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets, at the following web address: [http://www.epa.state.oh.us/ocapp\\_recycle.html](http://www.epa.state.oh.us/ocapp_recycle.html). If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to contact me at (740) 380-5288. 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,



Scott N. Bergreen  
Environmental Specialist  
Division of Hazardous Waste Management

SNB/mlm

cc: Rod Zide, Zides Sports Shop

**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  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD987007473									
3. Site Name	Name: Zides Screen Printing					Website: (Optional)				
4. Site Location Information	Street Address: 118 Industrial Park									
	City, Town, or Village: Marietta					State: OH				
	County Name: Washington					Zip Code: 45750				
5. Site Land Type (check only one)	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"/>		
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>										
7. Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Brenda			MI:	Last Name: Schwendeman					
	Phone Number: (740) 373-8199				Phone Number Extension:					
	E-Mail Address:									
	Fax Number: (740) 374-3406				Fax Number Extension:					
	Street or P.O. Box: 118 Industry Road									
	City, Town or Village: Marietta					State: OH			Country: USA	Zip Code: 45750
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Rod Zide				Date Became Owner (mm/dd/yyyy):					
	Owner Type:	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"/>	
	Street or P.O. Box: 253 Second Street									
	City, Town or Village: Marietta				Owner Phone #: (740) 373-6446					
	State: OH				Country: USA		Zip Code: 45750			
	Name of Site's Operator: Zides Screen Printing				Date Became Operator (mm/dd/yyyy):					
	Owner Type:	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"/>	
	Street or P.O. Box: 118 Industry Road									
	City, Town or Village: Marietta				Operator Phone #: (740) 373-8199					
	State: OH				Country: USA		Zip Code: 45750			
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No									
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)										
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator						
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste						
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator						
<input type="checkbox"/> Small Quantity Generator (SQG)										
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace						
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption						
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption						
<input type="checkbox"/> Underground Injection Control Facility										

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
Check all boxes below that apply for each of the three types of facilities above		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.			
D001	F003	F005	
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: Mr. Josh Smith
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Scott Bergreen			2/15/2008 10:30 am - 12:45 pm
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)

**PROCESS, WASTE, P2 SUMMARY SHEET**

<b>Facility Name:</b> Zides Screen Printing	<b>Facility Type:</b> CESQG	<b>Date of Inspection:</b> 2/15/08	<b>EPA ID #:</b> OHD987007473
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<b>Waste Generated</b>			<b>On- or Off-Site Management</b>		<b>P2 Activities</b>	
<b>Process/Activity Generating Waste</b> (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	<b>Waste Description</b> (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	<b>QTY Generated per Month, Type of Accumulation</b> (container, tank, etc) and location of waste accumulation area	<b>Type of On-Site Treatment</b> (recycle, wwt, etc)	<b>Name, state, and type of activity occurring at the off-site facility.</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>
1 Screen Cleaning	Screen Wash  Non-haz.	~10 gallons/ month  Stored in 55 g. plastic drums	N/A	Southeastern Chemical & Solvent Co. Sumter, SC		
2 Painting	Spent Paint/ Solvent  D001/F003/ F005	Varies  Stored in 55 g. plastic drums	N/A	Southeastern Chemical & Solvent Co. Sumter, SC		
3 Painting	Spent booth filters	Varies	N/A	Filters are disposed of as a solid waste		

## REMARKS-GENERAL INFORMATION

### **General Process Information:**

Zides Screen Printing, located at 118 Industry Road in Marietta, is a commercial silk screen printing operation. The company makes custom tee shirts, jerseys, and outerwear using the silk screening and seam stitching processes. The company's products are sold at Zide's Sport Shops in Marietta. The company also sells many products to schools, colleges, etc. through custom orders. Various inks are used in the process (plastisol inks, nylon based inks, enamel inks), depending on the material being silk screened. After silk screening, screens are cleaned in the screen cleaning room using various non-hazardous cleaners (Screen Wash 147, LSR/30) manufactured by Chemical Consultants Inc. Screen wash is re-used until the liquid becomes too dirty, when it is drummed up in plastic 55-gallon drums for disposal.

Zides Screen Printing has a separate business operation that cleans, paints, and rebuilds high school and college football helmets and shoulder pads (this operation is active from January to August of each year). The helmet padding is removed, washed, and re-used in good condition. The helmet exteriors are then sanded and buffed prior to painting. Helmets are spray painted in a spray booth. After the paint is dry, the helmets are re-assembled. Waste solvent/paint is collected in a plastic 55 gallon drum located inside the spray booth. Filters in the spray booth are changed once per week.

**Regulatory/Enforcement History:** The last compliance evaluation inspection was conducted at Zides Screen Printing on February 20, 1997.

### **Additional P2 remarks and information:**

Would this facility be interested in a P2 assessment? Yes\* \_\_\_\_\_ No X \_\_\_\_\_

**CONDITIONALLY 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  No  N/A

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes ? No  N/A

*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 ? No  N/A

**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  No  N/A
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A
  - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
  - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

*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.*

**REMARKS**