



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Dürr Ecoclean, Inc.
OHD005052154
Hazardous Waste
Wood County
NOV/PRTC

February 7, 2012

Mr. Steve Vollmar, Plant Manager
Dürr Ecoclean, Inc.
1350 Van Camp Road
Bowling Green, Ohio 43402-0859

Dear Mr. Vollmar:

On October 27, 2011, Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Dürr Ecoclean, Inc. (Dürr). On November 17, 2011, Ohio EPA issued a Notice of Violation/Return to Compliance and a request for information letter. Ohio EPA requested that Dürr attempt to determine the amount of still bottoms residue (F005) generated in the containers from the solvent distillation unit which was being disposed in the trash (solid waste landfill).

On December 13, 2011, I conducted a follow up site visit at your facility to my October 27, 2011, CEI. You had begun to utilize the processing bags suggested by the manufacturer for ease of determining how much waste is generated. Kevin Cole of Dürr had been collecting this material and weighing to determine the generation amount of this material. Dürr is now utilizing the processing bags to collect the solvent still bottoms, closing these bags and placing these bags in a hazardous waste drum to be picked up by a hazardous waste hauler. The facility has been generating approximately 20 pounds of solvent distillation waste per month in 2011. This is roughly four times the amount the facility has generated in previous years due to increased production. Mr. Cole also provided a demonstration of how the solvent is placed into the still for distillation and the appearance of the waste solvent still bottoms just after being generated. In addition, you stated that you spoke with your paint supplier about utilizing a different solvent which may not be an F-listed hazardous waste. Your supplier stated that Dürr needed to utilize this F-listed solvent to clean the type of paint used at the facility.

On December 13, 2011, via email I sent you a list of Ohio Commercial Facilities Accepting Hazardous Waste, information on how to find a licensed hazardous waste transporter and the photographs I took during the December 13, 2011, site visit.

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On January 4, 2012, via email Steve Miller of Dürr sent me analytical of your waste solvent still bottoms dated December 27, 2011, indicating that there were no hazardous waste characteristics associated with this waste.

Based on the October 27, 2011, CEI and the December 13, 2011, site visit, I found the following violation of Ohio's hazardous waste laws:

**1. Unlawful transportation of hazardous waste to an unauthorized facility.
ORC § 3734.02 (F)**

No person shall unlawfully allow hazardous waste to be transported to an unauthorized facility, a RCRA subtitle D solid waste (non-hazardous) landfill.

Dürr unlawfully disposed of their solvent distillation still bottoms (F005) from their facility into their solid waste stream. Thus Dürr's hazardous waste (F005) was transported by Allied Waste/Republic Services to a RCRA subtitle D solid waste (non-hazardous) landfill for disposal for up to 20 years.

On November 15, 2011, Steve White representing Allied Waste/Republic Services told me via telephone that solid waste from your facility would go to either the Wood County Landfill in Bowling Green, Ohio or the Vienna Junction Landfill in Michigan.

Dürr offered for transport approximately 1380 pounds or 209 gallons (roughly 3.8 drums) of hazardous waste over the course of 20 years or so.

Year	Waste generated in pounds	Waste generated in gallons	Waste generated (55-gallon drums)
2011	240	36	0.6
1991-2010	1140	173	3.2
Total	1380	209	3.8

Please be advised that due to the nature of the violation, Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. In addition, please note that violation of ORC Section 3734.02 (F) is a serious violation of Ohio's hazardous waste laws and Dürr may be referred to Ohio EPA's Central Office for possible escalated enforcement action.

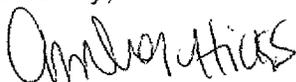
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Please note that on Mr. Miller's response (analytical) emailed to me on January 4, 2012, Mr. Miller states that your laboratory "conducted a full investigation and determined that the waste produced from the paint distiller is in fact safe to dispose of with regular landfill waste". Please be advised that this is not accurate. Your distillation waste is an F005 listed *hazardous waste* as explained to you during the October 27, 2011, CEI and the December 13, 2011, site visit. Dürr generates an F-listed solvent (D001, F003, F005) which they run through their on-site Sidewinder solvent recovery system. Since Dürr generates an F-listed solvent their solvent still bottoms would also be a hazardous waste (F005). Please consult the copy of OAC Rule 3745-51-31 (which includes the F-listings) that I gave you during the October 27, 2011, CEI. Dürr must manage their F005 solvent distillation bottoms as a hazardous waste and dispose as a hazardous waste following all applicable hazardous waste regulations for a conditionally exempt small quantity generator of hazardous waste. Please consult the Ohio EPA fact sheet Identifying your Hazardous Waste given to you during the CEI.

I have enclosed the U.S. EPA guidance Managing your Hazardous Waste: A Guide for Small Businesses – December 2001. In addition, the following weblink has Ohio EPA's Generator Handbook: http://www.epa.state.oh.us/portals/32/pdf/gen_handbook.pdf. Please consult these resources for information pertaining to the conditionally exempt small quantity generator hazardous waste requirements.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082 or email me at amber.hicks@epa.state.oh.us.

Sincerely,



Amber M. Hicks
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

ec: Amber Hicks, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

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.