



**Environmental  
Protection Agency**

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

Re: Dillin Engineered Systems  
OHR000008672  
Wood County  
Hazardous Waste  
**Notice of Violation**

October 12, 2012

Mr. Martin Shaffer, General Manager  
Dillin Engineered Systems  
8030 Broadstone Road  
Perrysburg, Ohio 43551

Dear Mr. Shaffer:

On September 27, 2012, Wendy Miller and I conducted a compliance evaluation inspection at Dillin Engineered Systems (DES) located at 8030 Broadstone Road in Perrysburg, Ohio. We inspected DES to determine its 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). Pollution prevention options were also discussed during this inspection. This letter will explain the violations we found and what you need to do to correct these violations.

During our visit we toured your facility, observed your operations and reviewed applicable paperwork. DES is a fabricator of packaging line equipment such as conveyor belts and food carton lines. Sheets of stainless steel come into the facility and DES fabricates, presses, welds, and paints the steel. Used oil generated from the punch press and brake press is stored in a 55-gallon drum and picked up by Safety Kleen for recycling. DES operates a sandblast unit and generates spent sandblast material that is managed as a solid waste. Scrap metal is picked up by Omnisource and recycled. Shop towels are laundered by Cintas.

DES does painting on-site and generates, depending on production volume, approximately 3 to 5 gallons of waste paint solvent from line flushing (D001, D005, D006, D035, F003, F005) per month. DES paints approximately 30% of the equipment they manufacture. DES uses 2-part epoxy paints and air dry enamels. DES has one paint booth and changes the paint booth filters infrequently, based upon the operating meter in the paint booth. The spent paint booth filters are managed as a solid waste. The facility has a ten gallon gun washer unit (D001, D018, D035, D039, F003, F005) that is serviced once a month by Safety Kleen. DES also generates spent fluorescent bulbs, which are managed as universal waste.

Mr. Martin Shaffer, General Manger  
October 12, 2012  
Page 2

At the time of our inspection, DES was operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste.

We found the following violations of Ohio's hazardous waste laws:

**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, DES did not have waste evaluation documentation for the spent paint booth filters. DES has historically disposed of this spent material as a non-hazardous/solid waste via Modern Disposal. DES must immediately cease disposing of the waste paint booth filters as non-hazardous waste until a proper waste evaluation has been completed.

DES 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). To abate this portion of the violation, DES 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.

Ohio EPA may use the data you collect, in part, to make regulatory decisions concerning the waste(s) tested. A data review process, referred to as data validation, may be utilized to confirm the validity of the data. This data validation can include a review of the following components: sampling techniques, sample containers, representativeness of sample, laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody and quality assurance/quality control (QA/QC) data. Please include data sufficient for Ohio EPA to perform the data validation review. Information on conducting a data validation can be obtained from Ohio EPA's web page:  
[http://www.epa.state.oh.us/dhwm/tier\\_i\\_data\\_validation\\_manual.html](http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html).

Ohio EPA will review the submitted waste evaluation information and determine if there is a change in DES' generator status. Additional violations may be cited based upon your determined generator status. You will be notified of any additional violations in a separate letter.

- b) At the time of the inspection, DES did not have waste evaluation documentation for the spent sandblasting material (black diamond grit). DES has historically disposed of this spent material as a non-hazardous/solid waste via Modern Disposal. DES must immediately cease disposing of the spent sandblasting material as non-hazardous waste until a proper waste evaluation has been completed.

DES must obtain a representative sample of the spent sand blast media and have it analyzed for Resource Conservation and Recovery Act (RCRA) TCLP metals using method SW-846/1311. TCLP is an acronym for Toxicity Characteristic Leachate Procedure, which will simulate your waste in a landfill and will determine if it is considered hazardous or not. This will test for Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver which may have come off of the metal pieces you are sandblasting.

DES is currently collecting the spent sand blast media inside the sandblast unit. Obtaining a sample for TCLP analysis is not possible at this time, due to the lack of enough spent sandblast material available. To abate this portion of the violation, DES must submit a statement to Ohio EPA that indicates that prior to disposing of any spent sand blast material in the future, a proper waste evaluation will be conducted. At the time of our inspection, DES was given a fact sheet on how to properly evaluate your waste and a partial list of analytical laboratories who offer TCLP waste analysis services. Do not dispose of sandblast media in the solid waste dumpster until you determine if it is hazardous or not.

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."

DES had one 5-gallon bucket of used oil that was not properly labeled "Used Oil".

DES must properly label the 5-gallon bucket with the words "Used Oil" and submit photographic documentation to demonstrate compliance. A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to you at the time of our inspection. Please review this information and contact me if you have any questions.

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/>.

Mr. Martin Shaffer, General Manger  
October 12, 2012  
Page 4

Enclosed you will find a copy of the checklists that were completed during the inspection.

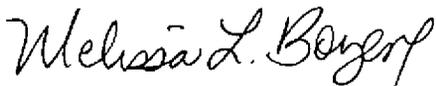
DES needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **14 days** of receipt of this letter, DES is requested to provide documentation to this office including the steps taken to abate the violations cited above.

Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [melissa.boyers@epa.ohio.gov](mailto:melissa.boyers@epa.ohio.gov).

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, DES is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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 Materials and Waste Management

//lr

Enclosures

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

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO

**Notice:**

Ohio's 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.

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHR000008672</b>		Website: (Optional)
<b>Site Location Information</b>	Name: <b>Dillin Engineered Systems</b>		
<b>Site Land Type</b> (check only one)	Street Address: <b>8030 Broadstone Road</b>		
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	City, Town, or Village: <b>Perrysburg</b>		State: <b>OH</b>
	County Name: <b>Wood</b>		Zip Code: <b>43551</b>
	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"/>	

<b>Facility Representative</b>	First Name: <b>Martin</b>		MI:	Last Name: <b>Shaffer</b>	
Additional names can be recorded in number 12	Title: <b>General Manager</b>			Phone Number Extension: <b>135</b>	
Only provide address information if it is different than the site address	Phone Number: <b>419-666-6789</b>			E-Mail Address:	
	Fax Number:			Fax Number Extension:	
	Street or P.O. Box:			City, Town or Village:	
	State:			Zip Code:	

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):						
	Owner Type:	Private <input 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:			Owner Phone #:					
	City, Town or Village:			State:		Country:		Zip Code:	
	Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Operator Type:	Private <input 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:			Operator Phone #:					
	City, Town or Village:			State:		Country:		Zip Code:	

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Hazardous Waste Transfer Facility              | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Underground Injection Control Facility        |
| <input type="checkbox"/> 72-Hour Recycler                               | <input type="checkbox"/> Receives Hazardous Waste from Off-site        |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED**

(CHECK ALL BOXES THAT APPLY)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste                         | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

**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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**D001                  D005                  D006                  D035                  D039                  F003                  F005**

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced       Yes       No      Additional Facility Representatives:  
Tanks               Yes       No  
Containers         Yes       No

Name of Inspector(s)  
**Melissa Boyers**

Name of Inspector(s)  
**Wendy Miller**

Date of Inspection/Time  
(mm/dd/yyyy) (hh:mm)  
**9/27/2012 12:30**

**Comments:**

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Dillin Engineered Systems

**Facility Type:** LQG/SQG/CESQG/TSD

**EPA ID#:** OHR000008672

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation / Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.
1	Lighting	Spent Fluorescent Bulbs				None in storage at time of the inspection.	Currently managed as universal waste. Recycled at Environmental Recycling in Bowling Green, OH.
2	Sandblasting	Spent Sandblasting Material	52-11 Cited	Unknown		None in storage. Spent material is currently collecting in the sandblast unit.	Spent material has not been evaluated. Facility will collect the spent material and evaluate a representative sample.
3	Punch Press & Brake Press Operations	Used Oil		varies	5-gallon bucket	Stored on the overspill pallet located the painting area.	Generate very little used oil. Safety Kleen picks up the used oil for recycling.  Burned for Energy Recovery
4	Painting	Spent Solvent from Line Flushing	D001, D005, D006, D035, F003, F005	3 to 5 gallons	55-gallon drum	Stored on the overspill pallet located the painting area.	Safety Kleen. Last two pick-ups were on 10/21/11 and 9/20/12.  Fuels Blending/Recycled

5	Painting	Spent Paint Booth Filters		Booth Filters changed when meter indicates a change is needed.				Currently managing as a solid waste. Facility dumpster is picked up by Modern Disposal.
6	Paint Gun Cleaning	Spent Solvent from gun cleaning unit	D001, D018, D035, D039, F003, F005	5 to 10 gallons			Located in the paint mixing area.	Safety Kleen. Last pick-up of three gallons was on 7/9/12.  Fuels Blending/Recycled
7								
8								
9								

**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] Paint Booth Filters & Spent Sandblasting Material	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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)] Safety Kleen	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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.

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>