



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kotleski, Director

Re: **Sunset Golf**
OHD987047586
Conditionally Exempt Small
Quantity Generator
Ashland County, NWDO
NOV

September 20, 2010

Mr. Dan Deighan, Vice President
Sunset Golf
326 North Water Street
Loudonville, Ohio 44842

Dear Mr. Deighan:

On August 24, 2010, I inspected Sunset Golf located at 326 North Water Street in Loudonville, Ohio. I inspected Sunset Golf to determine the facility's 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). My inspection included a tour of the facility as well as a review of facility records. I also helped Sunset Golf identify ways to prevent pollution by reducing waste the facility generates.

Sunset Golf is a manufacturer of new and used golf balls. Facility records reviewed during this inspection indicates that Sunset Golf generates approximately 10 gallons of F003/F005 spent paint/ solvent each month from cleaning painting lines, 5 gallons of F003/F005 spent ink/ solvent each month from cleaning printing heads and plates, and 5 gallons of spent ink/ solvent contaminated paper wipes each month from cleaning printing heads and plates. The spent inks, paints and solvents are managed as hazardous waste. The spent ink/ solvent contaminated rags are managed as solid waste. After the inspection, I obtained a Material Safety Data Sheet (MSDS) from the solvent manufacturer. The MSDS indicates that the virgin solvent contains 0%-15% methanol, 0%-20% acetone, 0%-20% toluene, and 0%-20% methyl ethyl ketone. Based on the MSDS, the spent solvent is classified as a F003/F005 listed hazardous waste. Sunset Golf also generates spent fluorescent lamps which are managed as solid waste.

Sunset Golf is a conditionally exempt small quantity generator of hazardous waste.

I found the following violations of Ohio's hazardous waste laws during the inspection. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

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..."
 - a. Sunset Golf has failed to evaluate the spent solvent contaminated paper wipes used to clean the printing heads and plates to determine if they are hazardous waste. Sunset Golf currently manages the spent solvent contaminated wipes as solid waste and disposes of the wipes in a solid waste dumpster.

To abate this violation, Sunset Golf must immediately evaluate the spent solvent contaminated paper wipes. The MSDS for the solvent used in the printing process indicates that the solvent contains methanol, acetone, toluene, and methyl ethyl ketone . Therefore, Sunset Golf must have the spent solvent contaminated rags analyzed for D035 Methyl Ethyl Ketone using SW-846 method 8260B. The laboratory should use the toxicity characteristic leaching procedure (TCLP) when analyzing the spent paper wipes. This analysis should be conducted within 30 days of receipt of this letter. Sunset Golf must provide me with a copy of the analysis after it is received by your facility.

In lieu of evaluating and disposing of the spent paper wipes, Sunset Golf should consider using cloth wipes. Cloth wipes that are laundered and reused are not considered waste and therefore are not regulated as hazardous waste.

- b. Sunset Golf has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Sunset Golf currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Sunset Golf must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Sunset Golf has the option of handling spent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

To abate this violation, Sunset Golf must choose one of the following options for the spent lamps:

i. Disposal Option:

Sunset Golf may manage the lamps as a hazardous waste. Sunset Golf must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Sunset Golf must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Sunset Golf must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

ii. Recycling Option:

In lieu of evaluating and disposing of the spent lamps, Sunset Golf may manage spent lamps as universal waste. Universal waste spent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "**Universal Waste Lamp(s)**", "**Waste Lamp(s)**", or "**Used Lamp(s)**". Sunset Golf must also track the accumulation of the spent lamps to ensure spent lamps are **not stored for greater than 365 days**. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first spent lamp is placed in the container).

No spent lamps were in storage at the time of the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Sunset Golf should choose the recycling option, you should submit to me the name of the recycling facility Sunset Golf intends to use.

I provided Sunset Golf with the following fact sheets at the time of the inspection: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated April 2008. These fact sheets are also enclosed

To abate this violation, Sunset Golf must identify how the facility intends to properly manage the facility's spent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

Mr. Dan Deighan, Vice President
September 20, 2010
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As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. If you can find a way to reduce your hazardous waste generation to less than 25 gallons per month you will reduce your regulatory requirements to those of a conditionally exempt small quantity generator. During the inspection, I observed the following potential pollution prevention (P2) opportunities associated with your operations:

1. Sunset Golf should consider using cloth wipes in lieu of the paper wipes. Cloth wipes may be laundered and reused. Wipes that are laundered and reused are not considered waste and therefore are not regulated as hazardous waste.
2. Sunset Golf should consider the use of water based paint in lieu of solvent based paint.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://development.ohio.gov/cdd/oe>

If you would like a free, no regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at the number listed below. Ohio EPA has helpful information about this at the following web address: <http://epa.ohio.gov/ocapp>

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (419-373-3056). You can find copies of the rules and other information on the division's web page at: <http://epa.ohio.gov/dhwm>

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

//lr

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
Harry Sarvis, Manager, CAS, DHWM, CO
DHWM, NWDO File-Sunset Golf, Ashland County ↗
ec: Gary Deutschman, DHWM, NWDO

| | | |
|--|---|-----------------------|
| Send to Central Office <input type="checkbox"/> | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|--|---|-----------------------|

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

| | | | | |
|---|---|------------------|---|--|
| Site EPA ID No. Site Name: | EPA ID Number: OHD987047586 | | Website: sunsetgolfballs.com (Optional) | |
| Site Location Information | Street Address: 326 North Water Street | | | |
| Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html | City, Town, or Village: Loudonville | State: OH | | |
| 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"/> | County Name: Ashland | | Zip Code: 44842 | |
| 339920 | | | | |

| | | | | | |
|---|---|--|-------------------------|---------------------------|--|
| Facility Representative: Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Dan | | MI: | Last Name: Deighan | |
| | Title: Vice President | | | | |
| | Phone Number: 419-994-5563 | | Phone Number Extension: | | |
| | E-Mail Address: ddeighan@sunsetgolfballs.com | | | | |
| | Fax Number: 419-994-3078 | | Fax Number Extension: | | |
| | Street or P.O. Box: | | | | |
| | City, Town or Village: | | | | |
| | State: | | Zip Code: | | |

| | | | | | |
|---|--|---|--|-----------------------------------|----------------------------------|
| 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: Guenther Andrews | | Date Became Owner (mm/dd/yyyy): 03/13/1987 | | |
| | 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: 1710 State Route 60 | | | | |
| | City, Town or Village: Ashland | | | | |
| | State: Ohio | | Owner Phone #: | | Country: USA |
| | 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: | | | | |
| | City, Town or Village: | | | | |
| | State: | | Operator Phone #: | | Country |
| | Zip Code: | | | | |

VIOLATIONS CITED? Yes No

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). Check the box for the applicable generator status and provide a comment. | <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 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 (accumulates 5,000 kg. or more) | |

| CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES | |
|--|--|
| <input type="checkbox"/> Batteries | |
| <input type="checkbox"/> Pesticides | |
| <input type="checkbox"/> Mercury containing equipment | |
| <input type="checkbox"/> Lamps | |

| USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)) | |
|--|--|
| <input type="checkbox"/> Used Oil Generator | |
| <input type="checkbox"/> Used Oil Transporter | |
| <input type="checkbox"/> Used Oil Transfer Facility | |
| <input type="checkbox"/> Used Oil Processor | |
| <input type="checkbox"/> Used Oil Re-refiner | |
| <input type="checkbox"/> Off-Specification Used Oil Burner | |
| <input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil | |
| <input type="checkbox"/> 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.

| | |
|---|--|
| <input type="checkbox"/> College or University | |
| <input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university | |
| <input type="checkbox"/> 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 D035 F003 F005

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: | Phil Whited |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | | |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | | |

| | | |
|----------------------|----------------------|--|
| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
|----------------------|----------------------|--|

Gary Deutschman 08/24/2010

Comments:
Facility intends to begin managing fluorescent lamps as universal waste.

**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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|----|--|------------------------------|--|------------------------------|

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"/> |
|----|--|---|-----------------------------|------------------------------|

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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|----|---|------------------------------|--|------------------------------|

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.

PROCESS, WASTE, P2 SUMMARY SHEET

| Facility Name: Gorman-Rupp Industries | | Facility Type: Conditionally Exempt Small Quantity Generator | | | Date Inspection: 8/24/10 | | of EPA ID #: OHD004154183 |
|--|--|--|--|--|---|---|-------------------------------------|
| Waste Generated | | | On- or Off-Site Management | | P2 Activities | | |
| Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc.)</small> | Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc. and EPA Waste Code, if applic.)</small> | QTY Generated per Month, Type of Accumulation <small>(container, tank, etc. and location of waste accumulation area)</small> | Type of On-Site Treatment <small>(incinerate, wwt, etc.)</small> | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities | P2 Opportunities | |
| 1 | Aluminum Oxide from polishing golf balls | Non-hazardous Aluminum Oxide Sludge | 20,000 lbs / year | | Sunbelt Industries, 540 East Mills Street, Little Falls, NY 13365 | Shipped off-site for Aluminum Oxide Reclamation | |
| 2 | Painting golf balls | D001/D035/ F003/ F005 Waste Paint and Spent Solvent | 10 gallons/ Month | | Chemical Solvents, 1010 Denison Avenue, Cleveland, Ohio 44109 | Recycled | |
| 3 | Printing Logos on golf balls | D001/D035/ F003/ F005 Waste Printing Ink and Spent Solvent | 5 gallons/ Month | | Chemical Solvents, 1010 Denison Avenue, Cleveland, Ohio 44109 | Recycled | |
| 4 | Printing Logos on golf balls | Spent Disposable Rags | 5 gallons/ Month | | Disposed as Solid Waste | | Recycling |

| | | | | | | | | |
|---|----------|-------------------------------------|--------|--|-------------------------|----|--|-----------|
| 5 | Lighting | Spent Fluorescent Light Bulbs | Varies | | Disposed Solid Waste | as | | Recycling |
|---|----------|-------------------------------------|--------|--|-------------------------|----|--|-----------|

REMARKS-GENERAL INFORMATION

General Process Information: Manufacturer of New and Used Golf Balls

Regulatory/Enforcement History (if applicable): Similar issues found during complaint investigation conducted by Eric Getz on March 9, 1995.

Additional P2 remarks and information: Anderson.

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

*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.ohio.gov/ocapp

Other: