



**Environmental
Protection Agency**

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

Re: Schutz Container Systems, Inc.
Wood County
Complaint #3187
Hazardous Waste
NOV-RTC

September 12, 2012

Mr. Darin Booms
Schutz Container Systems Inc.
2105 South Wilkinson Way
Perrysburg, Ohio 43551

Dear Mr. Booms:

On August 29, 2012, you accompanied Brent Goetz and me during the Ohio Environmental Protection Agency's (Ohio EPA's) hazardous waste compliance evaluation inspection of your facility, Schutz Container Systems Inc., (hereafter referenced as Schutz) located at 2105 South Wilkinson Way in Perrysburg, Ohio.

Ohio EPA received a complaint alleging that Schutz allows plastic resin to wash down outdoor storm sewer drains. The complainant also alleged that used oil was not handled properly. For this reason, we inspected your facility 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. This letter will explain the violation we found.

Schutz is a facility that manufactures drums and intermediate bulk containers. Five blow mold machines are operated to form the containers. Metal forming and welding is also done on-site. Wastes generated include used oil, parts washer solvent (part of Safety Kleen's continued use program), and mop water. No spent lamps have been generated as of yet since the facility was recently re-lamped. Lamps were sent off-site as universal waste to Environmental Recycling. Schutz recycles scrap steel, cardboard and plastics. Any defective product is ground up (resin material) and reused. Shop rags are laundered by Cintas.

At the time of our inspection, you were operating as a non-generator of hazardous waste.

I found the following violation of Ohio's hazardous waste law:

1. OAC Rule 3745-279-22(C)(1), Used Oil Labeling:

Containers that are holding used oil, must be labeled with the words "Used Oil". Schutz had several containers which were not properly labeled "Used Oil".

On the day of the inspection, Schutz properly labeled the containers with the words "Used Oil" and emailed me photographs documenting this. Therefore, this violation is considered abated.

Mr. Darin Booms
September 12, 2012
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Ohio EPA will issue an EPA ID number to track our inspection activity at Schutz. Schutz cannot use this number for manifesting hazardous waste shipments. If Schutz wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, you must complete and submit a Notification of Regulated Waste Activity form (*EPA Form 9029 (Rev. 11/2002)*) to Ohio EPA. This form is available on our Web page at <http://www.epa.ohio.gov/dhwm> or Schutz can call the Division of Materials and Waste Management, Central Office, at (614) 644-2977 and we will mail you a copy.

Also, I gave you two fact sheets at the time of our inspection:

- Universal Waste Rules for Handlers of Lamps (included a lamp/ballast recycler list)
- The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil

Ohio EPA considers this complaint to be **closed**. We could not find any evidence to substantiate the complaint.

You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.ohio.gov/opp>.

The Division of Materials and Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at Web link <http://www.epa.ohio.gov/dhwm> (click on the hazardous waste links and then click on DMWM's Electronic News Service).

If you have any questions, please contact me by telephone at (419) 373-3114 or by email at wendy.miller@epa.ohio.gov.

Sincerely,



Wendy Miller
Division of Materials and Waste Management

/cg

Enclosures

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO (w/original checklist)

ec: Colleen Weaver, DMWM, NWDO
Wendy Miller, DMWM, NWDO
Brent Goetz, DMWM, NWDO

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	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.

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number:		Website: (Optional)					
	Name: Schuetz Container Systems		State: OH					
	Street Address: 2105 Wilkinson Way		Zip Code: 43551					
	City, Town, or Village: Perrysburg		County Name: Wood					
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"/>

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Darin		MI:	Last Name: Booms	
	Title: Plant Manager				
	Phone Number: 419-872-2477			Phone Number Extension:	
	E-Mail Address: darin.booms@schuetz.net				
	Fax Number:			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:				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:									
	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:									
City, Town or Village:										
State:				Country:					Zip Code:	

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input checked="" 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 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

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.

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) Brent Goetz	Name of Inspector(s) Wendy Miller	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 08/29/2012 10:15 am
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Comments:

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked Used Oil? [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more that	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	0.5 million BTU per hour?	
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		

OHIO EPA NWDO/DHWM

NUMBER: **3187**

COMPLAINT/CRO INVESTIGATION FORM

Updated: 8/22/2012

Complaint Received: 8/16/2012

DHWM Subdistrict: **2**

COMPLAINANT:

SUSPECTED SOURCE:

Schutz Container

Darin Booms
Plant Mgr.
43551

2105 S Wilkinson Way

Perrysburg

419-872-2477

USEPA ID NO:

Regulatory Status:

COUNTY:

Wood

CRO INFORMATION/STATEMENT OF COMPLAINANT:

Sloppy operations allow plastic resin materials to wash into storm drains during rain events. Used oil allowed to spill at various locations in and out of plant. Issues are chronic.

Schutz Container at 25875 ST RT 25 has ID #OHD 080 981 004.

*Used oil
- label totes
- drums
- UNN, waste reminder
warranty done*

Referred By: Holmes CO/ER

Other Related
Complaints:

INVESTIGATION SUMMARY:

Inspector(s):

Letters Sent:

Inspection Date:

RTC:

Follow-Up Work:

Complaint Closed:

ACTION/OBSERVATION/RECOMMENDATION:

** Reference as both Schuetz Container
or Schutz*

*RTC'd
Sent email pics 8/29/12*

Copies of this complaint information sent to:

CRO:

Investigation Status/Resolution:

Referred to:

Copy to file:



Emergency Response Section - Initial Pollution Incident Report (IPIR)

8/7/2012

Spill Id Number: 1208-87-1926//0

District: NW

3187

Reported By: ANONYMOUS	Reported: 08/06/2012 14:42
Title: CIT	Discovered: 08/06/2012 14:00
Telephone: (000) 000-0000 ext:	Occurred: 00/00/0000
Affiliation: CITIZEN	Chronic: Y

County: WOOD City/Township: PERRSBURG
 Did Spiller Report ? N Complaint ? Y
 Received By: HOLMES, CHRIS Priority: 4
 Local EPC ? N Did you tell the Spiller to Call the N.R.C ? N
 Business: N SARA Report: N

Suspected Spiller: SCHUTZ CONTAINER
Mailing Address: 2105 SOUTH WILKINSON WAY PERRYSBURG, OH 43551
Telephone: (419) 872-2477 ext:

Location: 2105 SOUTH WILKINSON WAY

Source: FIXED FACILITY - INDUSTRY - OTHER

Cause: SLOPPY OPERATIONS

Reason: DELIBERATE ACTION

Waterways Affected: STORM

Media Affected 1: LAND OR LAND SURFACE

Media Affected 2: SURFACE WATER/STORM SEWER: Media Affected 3:

Product(s) Spilled

Product	Amount	UOM	RQ	Size	Type	EHS
OIL USED	.0	UNK	.0	U	H	N
PLASTIC RESINS	.0	UNK	.0	U	C	N

Other Agencies Notified

Agency	Person	Date	Time
DHWM	NWDO	08/06/2012	14:48

Remark

SLOPPY OPERATIONS ALLOW PLASTIC RESIN MATERIALS TO WASH INTO THE STORM DRAINS DURING RAIN EVENTS. USED OIL IS ALLOWED TO SPILL AT VARIOUS LOCATIONS IN AND OUT OF THE PLANT. ISSUES ARE CHRONIC.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Schuetz Container Facility Type: NON, UO Date of Inspection: 8/29/2012 EPA ID#:

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 (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Maintenance/clean up	Parts Washer Solvent	20-40 g. every 6 mo.		Safety Kleen Continued Used Program		
2 Equipment Maintenance	Used Oil	585 gallons/approx. every 6 months		Also picked up by Safety Kleen, recycled		
3 Clean Up	Shop Rags, Non-Haz,	Varies due to maintenance		Cintas	Laundering	
4 Floor clean up	Mop Water	Varies, Non-haz	Mixed in with Used Oil			
5						