



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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

June 5, 2009

**COSHOCTON COUNTY  
GENERAL FILE  
(EXCELLO FABRIC FINISHERS INC.)  
DHWM/SEDO  
OHD004308094**

Mr. Kevin Lee, Owner  
Excello Fabric Finishers Inc.  
800 South Second Street  
Coshocton, Ohio 43812

Dear Mr. Lee:

On May 28, 2009, Ohio EPA inspected Excello Fabric Finishing ("Excello") in Coshocton, Ohio. The purpose of the inspection was 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). Excello was represented by Mr. Carey Walters. This letter will explain violations I found, general concerns I have, and what you need to do to respond to my general concerns and any pollution prevention opportunities I identified.

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

- (1) ***OAC Rule 3745-52-11, Waste Evaluation:*** Any person who generates a waste in the state of Ohio must evaluate the waste to determine if it is a hazardous waste.

During the inspection, Excello was unable to identify the contents of an open drum of that was one quarter full of waste in the indoor storage area. This drum appeared to be leaking slightly on the concrete floor. Excello also could not identify the contents of a drum in the outdoor product storage area. This drum had no identifying markings, unlike all other drums in the product storage area.

Several days after the inspection, Excello identified the contents of the first drum as a solvent based flame retardant that would be repackaged and manifested offsite as a hazardous waste during the company's next shipment. The second drum was determined to be a vinyl stiffener that would be reused in the next several months. As a result, Excello has now abated this violation.

**General Comments**

- (a) Excello currently disposes of plastic wrap. Recycling of this material may be possible. The following is a list of plastics recyclers in Ohio:

<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp;jsessionid=Bn4bKngLXsYL1jFJQsG74YDnw2q2KGXdj08vcVp5Dj7yxV6QTgQ!-652717638>

- (b) Excello may wish to recycle spent pallets by contacting an Ohio pallet recycler on this list:

<http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp>

- (c) Excello uses Philips Ecolux fluorescent lamps and disposes of them as solid waste when they are spent. Ohio EPA encourages recycling of these lamps. The following is a list of lamp recyclers:

<http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>

Enclosed, you will find a copy of the checklists that were completed as a result of the inspection. Should you have any questions, please feel free to call me at (740) 380-5293. 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,



Donna Goodman  
District Representative  
Division of Hazardous Waste Management

DG/mlm

Enclosure

**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  
 McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD004308094								
3. Site Name	Name: Excello Fabric Finishers Inc.				Website: (Optional)				
4. Site Location Information	Street Address: 806 S. Second St.								
	City, Town, or Village: Coshocton				State: OH				
	County Name:				Zip Code:				
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>	31332								
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: Carey			MI:	Last Name: Walters				
	Phone Number: 740-622-7444				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:				State:		Country:		Zip Code:
	Name of Site's Legal Owner: Excello Fabric Finishers Inc.								
Date Became Owner (mm/dd/yyyy):									
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	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:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:								
	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:									
City, Town or Village:				Operator Phone #:					
State:				Country:		Zip Code:			
9. Violations Cited?	<input 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	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:
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)
Donna Goodman			5/28/2009
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)

**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:  $\geq 1,000$  Kg. (~300 gallons) of waste in a calendar month or  $\geq 1$  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**

The contents of two drums could not be identified during the inspection. One was in the outdoor drum storage area and the other was in the storage room.

## PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: *Excello Fabric Finishers Inc.* Facility Type:  CESQG Date of Inspection: 05/28/09 EPA ID#: OHD004308094

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	Cleanup from coating lines  Waste rags, fabric threads and filters  Doo1/F001	1 drum per 6 mos		Giant Resource Recovery, Sumpter, S.C Incineration		Switch to non-MEK solvent?
2						
3						
4						
5						
6						
7						
8						

9							
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**REMARKS&GENERAL INFORMATION**

**General Process Information:** Excello Fabric Finishers is an industrial finishing company that receives rolls of fabrics and coats them with a variety of coatings and colors (PVC, acrylic, flame retardant, mildew resistant, water repellent, etc.) They have one solvent-based coating line and one aqueous-based coating line. When lines are cleaned, waste is generated. Waste from the aqueous line is reused as raw material. Waste from cleaning the solvent line is filtered and recycled as raw material. Rags used in cleanup and misc. scrap threads and filters are placed in a drum, accumulated until full and then manifested offsite. After coating, the fabric is sent through a curing oven to set the finish onto the cloth. The finished fabric is then re-rolled, packaged and shipped.

An outdoor storage yard contains drums of product that were not completely used up, and can be reused in the future. Drums are labeled with the date and color. Any drum older than two years that has not yet been reused is transferred into a new drum. The yard is inspected monthly.

**Regulatory/Enforcement History** (if applicable):

Previous inspection occurred on 12/10/02.

**Additional P2 remarks and information:**

Empty drums are scrapped. The company can use information on pallet recycling. Spent lamps (GE Ecolux) are not recycled. Some cardboard generated onsite is reused to pack rolls which are shipped.

Company may be able to use a solvent that does not contain MEK for cleanup of the solvent-based coating line. Also, industrial laundering of rags may be possible.

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](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**