United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	03/22/2023	
Media Program:	RCRA	
Regulatory Program(s)	RCRA Recycling	
Company Name:	**Dlubak Glass Company**	
Facility Name:	**Dlubak Glass Company**	
Facility Physical Location:	1018 W. 14th St.	
(city, state, zip code)	Okmulgee, OK 74447	
Mailing address:	Same as above	
(city, state, zip code)	Same as above	
County/Parish:	Okmulgee	
Facility Phone Number	918-752-0226	
Facility Contact:	Traci	Berry
	Tberry@dluback.com	
FRS Number:	NA	
Identification/Permit Number:	NA	
Media Identifier Number:	ODR000013417	
NAICS:	423930 – Recyclable Material Merchant	
SIC:	NA	

Personnel participating in inspection:		
Debra Pandak	EPA Region 6, ECAD	Lead Inspector
Gabe Salinas	EPA Region 6, ECAD	Inspector
Alicia Chen	ODEQ	Inspector

EPA Lead Inspector Signature/Date	DEBRA PANDAK Digitally signed by DEBRA PANDAK DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=DEBRA PANDAK, 0.9.2342.19200300.100.1.1=68001003655850 Date: 2023.04.11 15:36:59 -05'00'	
	Debra Pandak	Date
Supervisor Signature/Date	JEFFREY YURK Digitally signed by JEFFREY YURK Date: 2023.04.11 15:49:34 -05'00'	
	Jeffrey Yurk	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

On 03/22/2023, I, Debra Pandak, conducted an unannounced inspection of the Dlubak Glass Company located 1018 W. 14th Street in Okmulgee, Oklahoma for compliance with the Resource Conservation and Recovery Act (RCRA). I was assisted on this inspection by Environmental Protection Agency (EPA) inspector, Gabe Salinas, and Oklahoma Department of Environmental Quality (ODEQ) inspector, Alicia Chen. We arrived at Dlubak Glass at 12:10 p.m. and met with Traci Berry, manager of the Dlubak Okmulgee, OK location. Gabe and I presented our credentials to Ms. Berry and told her the purpose of the inspection was a follow-up to the investigations conducted by ODEQ. The scope of the inspection was to observe the cathode-ray-tube (CRT) glass received from the Dlubak Arizona and Texas facilities stored at the facility since 2016 and review any records associated with the CRT glass. Ms. Berry told us the CRT glass was no longer onsite. The glass was sold and shipped to the customer.

Gabe Salinas identified to Ms. Berry we would be taking photographs during the inspection, and if she had any concerns for Confidential Business Information (CBI), we would address it according to EPA's CBI protocols. This report serves as documentation of all onsite activities and observations during the inspection of the Dlubak facility. Photographs taken during the inspection to document onsite observations are included in Appendix 1. A summary of areas of concern identified during the inspection are provided in Section III.

FACILITY DESCRIPTION

Dlubak Glass Company (Dlubak) is a corporation with headquarters in Sandusky, Ohio. The Okmulgee Dlubak facility is located SW of downtown Okmulgee, OK. Dlubak processes (grinds) lighting, automotive, plate and container glass at this location. The Okmulgee location employs eight staff. The facility grounds are covered in a variety of glass piles separated by the type of glass. There are several buildings on site used for an office, maintenance, and glass processing and storage.

Dlubak was issued EPA ID# ODR000013417 and is registered as a non-generator of hazardous waste.

Section II - OBSERVATIONS

We conducted the onsite inspection during normal business hours on 03/22/2023. During the inspection, the facility staff were at lunch, but Ms. Berry said it was better to conduct the inspection while facility grinding, and traffic were not active. Ms. Berry provided a tour of the facility showing us the locations of all glass storage, processing areas, the rail line and truck weigh scale.

We began the tour of the facility heading west from the office along a facility road paved with crushed glass and rock. The point where the road curved south, was photographed (Appendix 1, photo 1 -3). This used to be another entrance to the facility but was closed off in 2019. Ms. Berry said there was no

CRT glass in this area. She said the facility never received whole CRTs, only broken glass. The glass would then be processed (grinded) to the requirements of the customer, usually 5/8" in size.

Continuing south, we arrived at a lightbulb storage area called a bunker, located immediately adjacent to a warehouse (later identified as the Bottle Shop Warehouse). We observed glass on the outside of the bunker (Appendix 1, photo 4). I asked how the glass gets outside the bunker. Ms. Berry directed our attention to the holes in the concrete blocks serving as walls and said glass can extend beyond the bunker by being carried in rainwater washing through the holes or from openings on the west side of the Bottle Shop Warehouse, during loading or unloading of the glass.

Continuing to the end of the Bottle Shop Warehouse, we arrived at the canopy structure used to contain the CRT glass. The canopy was empty (Appendix 1, photo 5). We walked along the west side and the back of the canopy and observed a pile of glass appearing to have moved out of the canopy via the same types of holes in the concrete block walls. Ms. Berry identified the greyish glass as the CRT glass. She also identified bottle glass along the back side of the canopy (Appendix 1, photos 6, 7).

Behind the Bottle Shop Warehouse, we observed a processor – grinder (Appendix 1, photo 8) . Ms. Berry said the glass being processed is light bulb glass. She said they have not processed/ground CRT glass for at least 5 years. I asked if they processed the CRT glass that was stored at the facility since 2016 and she said the glass was received processed/ground.

Entering the Bottle Shop Warehouse, we observed it to be empty except for a pile of light bulb glass at the north end of the warehouse (Appendix 1, photos 9, 10). This warehouse was used to store CRT glass as previously observed by ODEQ during their investigations. The CRT glass was sold and shipped to the customer. We observed the openings on the west side of the building where piles of glass from 2 openings cascaded down to the ground (Appendix 1, photos 11, 12). I asked if these piles could contain CRT glass and Ms. Berry said it was possible but would be on the bottom of the pile. She also said once glass is outside of its storage bunker, it is considered contaminated and can not be resegregated for sale based on mixing with other glass and other debris.

We walked to the northeast side of the facility to view the rail spur and truck weigh scale. Ms. Berry said the rail line is used infrequently and was last used to receive glass 3 years ago. Most glass is transported via truck.

We finished our tour and returned to the office to conduct a closing conference.

Section III – AREAS OF CONCERN

I, Debra Pandak conducted a closing conference at Dlubak Glass at 1:15 p.m. on 03/22/2023. During the closing conference, I reviewed our observations, in particular the CRT glass sold/removed from the facility. I asked for a sample of the shipping records of the sold CRT glass. I reviewed a shipping record dated 02/23/2023 with a weight of approximately 48,000 pounds. Ms. Berry said at least 100 truck

loads were required to remove all the CRT glass. Each load was approximately 50,000 pounds. Ms. Berry also said complete records of the sale of the CRT glass are maintained at the corporate office in Ohio and provided corporate contact information.

EPA's areas of concern during the inspection are the spill-over areas onto the ground on the backside of the canopy and the openings on the west side of the Bottle Shop Warehouse (Appendix 1, Photos 6, 7, 11 and 12). Per Ms. Berry, these piles may contain CRT glass within or under the piles.

Section IV – FOLLOW UP

I sent the following request for records to the Dlubak Glass corporate office related to the CRT glass stored at the Okmulgee, OK since 2016.

- Provide in writing the name of the customer(s) who purchased the material, the quantities sold per customer and the dates of sale.
- Provide records related to pursuit of customers for the CRT glass. These may include such items as communications (letters, emails), contract agreements or cancelation notices etc.
- Provide records related to the customer(s) who purchased the CRT glass. These may include such items as contract agreements, sales receipts, and shipping records such as bills of lading etc.
- Provide any documents related to the customer's intended use of the CRT glass and the resulting product/material. These may include communications (letter, emails, presentations etc.), company brochures, technical or research papers, etc.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 12 photos taken 3/22/2023

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0850.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken in landscape mode facing North on path/trail showing crushed glass. Near the Northwest corner of the facility.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0851.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken in portrait mode facing North on path/trail showing crushed glass. Near the Northwest corner of the facility.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0852.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)

Description:

Photo taken facing North of crushed pile of glass to the left of photo. This pile of glass appears to have increased in volume since ODEQ photo taken in 2020. The ODEQ photo in 2020 shows a cement culvert that has a certain length that is exposed from under the glass pile. This photo appears to show that same culvert with just the very end exposed. This indicates that more glass has piled on top of the culvert.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0853.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken facing South showing what the facility representative described as crushed flint (clear) glass piled up against this concrete barrier near the Bottle Shop Warehouse, just North of the CRT canopy storage area. The facility representative stated that this material was discharged out the storage area and onto the ground via the drain holes in the wall during rain events.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0854.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken facing South showing CRT storage canopy. The canopy is no longer storing CRT glass and is completely empty.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0855.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken facing North of crushed CRT glass (the white/gray pile near center of photo) that has discharged onto the ground outside the CRT storage canopy. The facility representative stated that this pile was discharged from the drains in the concrete wall during rain events.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0856.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)

Description:
Photo taken facing Northeast with a wider view of Photo 6. This photo shows the same pile of crushed CRT glass (near the center of this photo) that was taken in Photo 6. The facility representative stated that other piles of glass along this wall shown in this photo may also contain a mixture of CRT glass that has been discharged onto the ground outside the CRT storage canopy.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0857.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken facing Northeast of the glass processor that crushes glass. This unit is used to crush various types of glass received at the facility, including past CRT glass received. According to the facility representative, the processor has not been used to crush CRT glass for over 4 years.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0858.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken facing West in the Bottle Shop Warehouse. Previous ODEQ photos documented crushed CRT glass piles stored in this area. This photo shows that piles of crushed glass in this area have been removed and is now empty. There are only wooden pallets to the right of photo.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0859.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)
Description: Photo taken facing North in the Bottle Shop Warehouse. This photo shows this area as mostly empty of storage with exception of one pile of crushed light bulbs and tableware (food grade glass) at the far North end of the building.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0860.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)

Description:
Photo taken facing East showing the West side wall of the Bottle Shop Warehouse. The photo shows spillover described by the facility representative as tableware glass (food grade glass) that discharged onto the ground outside the Bottle Shop Warehouse building. The facility rep stated it is possible that there are residuals of crushed CRT glass underneath the pile shown in this photo.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Dlubak Glass		
City: Okmulgee	County/Parish: Okmulgee	State: Oklahoma

Photo #	DSCN0861.jpg
Date:	03/22/2023
Camera:	Nikon Coolpix AW120 (EPA)
Photographer:	Gabriel Salinas, EPA Inspector
Witness:	Debra Pandak (EPA), Alicia Chen (ODEQ), Traci Berry (Facility Rep)

Description:
Photo taken facing East showing the West side wall of the Bottle Shop Warehouse. This photo location is about 20 feet north of photo 11. This photo shows the same scenario as photo 11. There is spillover described by the facility representative as tableware glass (food grade glass) that discharged onto the ground outside the Bottle Shop Warehouse building. The facility rep stated it is possible that there are residuals of crushed CRT glass underneath the pile shown in this photo as well.