



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

**Re: Motion Controls Robotics**  
OHD054164397  
Conditionally Exempt Small  
Quantity Generator  
Sandusky, NWDO  
NOV-RTC

June 28, 2010

Ms. Yvette L. Howey, Accounting Manager/Human Resources  
Motion Controls Robotics  
1500 Walter Avenue  
Fremont, Ohio 43420

Dear Ms. Howey:

I received your responses to my April 26, 2010, Partial Return to Compliance (PRTC) letter on May 20, 2010, and May 28, 2010. The documentation you submitted included analytical data for the paint filters generated at your facility and a description of how they are now being managed.

The April 26, 2010, PRTC letter previously notified Motion Control Robotics that the facility had abated the following violations.

1. **ORC § 3734.02(F) – Unlawful Transportation:** spent paint gun cleaning solvent
2. **OAC Rule 3745-52-11, Hazardous Waste Determination:**
  - a. spent paint gun cleaning solvent
  - c. spent fluorescent lamps

My review of your May 20, 2010 and May 28, 2010 documentation reveals that Motion Controls Robotics has adequately demonstrated abatement of the following violation discovered during the December 15, 2009, inspection:

2. **OAC Rule 3745-52-11, Hazardous Waste Determination**
  - b. Spent paint filters (RTC 5-28, 2010)

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**As a result of the analysis for the spent paint filters received by Ohio EPA on May 28, 2010, Motion Controls Robotics is also in violation of the following law:**

3. **Unlawful Transportation, ORC § 3734.02(F)**

Motion Controls Robotics has unlawfully caused the transportation of (D005) Barium contaminated spent paint filters to a solid waste disposal facility.

At the time of the December 15, 2009, compliance evaluation inspection, Motion Controls Robotics was managing the spent paint filters as solid waste and disposing of the spent filters as solid waste in the solid waste dumpster located outside the facility. The writing on the solid waste dumpster indicates that the contents of the dumpster are disposed of by FSI Disposal.

Ohio EPA analysis dated March 22, 2010 and Motion Control Robotics analysis dated April 30, 2010 (received by Ohio EPA on May 28, 2010), confirms that the spent paint filters exhibit the hazardous waste characteristic for (D005) Barium.

Your May 20, 2010, e-mail indicates that Motion Controls Robotics has contracted with Safety-Kleen Company, Toledo, Ohio, to pick up and properly dispose of the D005 hazardous waste spent paint filters. Therefore, this violation has been abated.

If you should have any questions, please feel free to contact me at (419)373-3056.

Sincerely,



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

/lb

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO

~~DHWM, NWDO File - Sandusky County General~~

**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.