



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8488
www.epa.ohio.gov

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

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

February 8, 2010

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

Dear Ms. Howey:

On December 15, 2009, I inspected Motion Controls Robotics' facility located at 1500 Walter Avenue in Fremont, Ohio. I inspected Motion Controls Robotics 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 Motion Controls Robotics identify ways to prevent pollution by reducing waste the facility generates. I also visited the facility on January 28, 2010 and again on February 3, 2010.

Motion Controls Robotics is a robotics integration facility which provides engineering and maintenance operations out of a facility located at 1500 Walter Avenue in Fremont, Ohio. Facility records reviewed during this inspection indicate that Motion Controls Robotics has been generating approximately 1 to 2 gallons per month of (D001/F003/F005) spent paint gun cleaning solvent in the robotics repair area. Motion Controls Robotics also generates non-hazardous parts washer solvent and hydraulic grease. Paint booth filters and spent fluorescent and metal halide light bulbs are also generated at the facility.

All wastes currently generated at the facility are managed as solid waste. However, during my inspection, I determined that Motion Controls Robotics is operating as a conditionally exempt small quantity generator of hazardous waste.

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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 30 days*** of your receipt of this letter:

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

Motion Controls Robotics cleans the facility paint gun using American Finishes Gun Wash Solvent. A small amount of solvent is used to clean the paint gun cup and gun tip. The spent solvent is accumulated in a five gallon container.

The material safety data sheet provided by your facility indicates that the solvent contains 10%-30% methanol and 10%-30% toluene. Because of these constituents, the solvent is considered a F003/F005 hazardous waste after it is used. Any sludge build up in the container would also be considered an listed hazardous waste.

On December 15, 2009, I observed one 5 gallon container of spent gun cleaning solvent outside the facility paint boot. I also spoke with Jerry Huff, Floor Supervisor, and reviewed facility records available at the time of the inspection. According to Mr. Huff, the facility generates approximately one to two gallons of spent solvent each month. However, disposal records reviewed during the inspection did not identify any recorded disposal of the spent solvent. Mr. Huff indicated that the spent solvent may have been disposed of with the waste grease. Disposal Records reviewed during the inspection indicate that the waste grease was last disposed in 2007 at a solid waste disposal facility. Therefore, Motion Controls caused the spent gun cleaning solvent to be unlawfully transported to other than a permitted hazardous waste treatment storage or disposal facility.

On January 28, 2010 I spoke with Scott Lang, Motion Controls President, to confirm the spent solvent generation rate and the absence of disposal records. On February 1, 2010, Mr. Lang provided me with billing records from the company that supplies paint gun cleaning solvent to the facility. These records indicate that Motion Controls Robotics purchased 39 gallons of gun cleaning solvent in 2008 and 65 gallons of gun cleaning solvent in 2009. On February 3, 2010, Wendy Miller and I observed one 5 gallon container of spent solvent and approximately five unopened 5 gallon containers of new solvent outside the facility paint booth. Therefore, it appears that Motion Controls Robotics may generate up to five gallons of hazardous waste spent gun cleaning solvent per month.

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To abate this violation, Motion Controls Robotics must immediately begin managing the spent paint gun cleaning solvent as F003/F005 hazardous waste. The spent solvent should be stored in a closed container marked or labeled with the words "Hazardous Waste". Motion Controls Robotics must provide me with a short written plan on how the facility will manage the spent solvent and where it will be disposed.

I have enclosed some fact sheets for your use. Motion Controls Robotics may want to consider the use of water based paints and non-hazardous solvents to reduce your treatment and disposal costs as well as regulatory requirements.

Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation, Ohio EPA may require clean up action pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site.

2. 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. Motion Controls Robotics has failed to evaluate the spent paint gun cleaning solvent to determine if it is hazardous waste. Motion Controls Robotics currently manages the spent paint gun cleaning solvent as solid waste. Motion Controls Robotics has no record of how the spent gun cleaning solvent has been disposed.

To abate this violation, Motion Controls Robotics must immediately begin managing the spent paint gun cleaning solvent as F003/F005 hazardous waste. The spent solvent should be stored in a closed container marked or labeled with the words "Hazardous Waste". Motion Controls Robotics must provide me with a short written plan on how the facility will manage the spent solvent and where it will be disposed.

- b. Motion Controls Robotics has failed to evaluate the paint filters from the paint booth to determine if they are hazardous waste. Motion Controls Robotics currently manages the spent paint filters as solid waste and disposes of the spent filters as solid waste. The solid waste dumpster located outside the facility indicates that the solid waste generated at the facility is disposed of by FSI Disposal.

To abate this violation, Motion Controls Robotics must analyze a representative sample of the spent paint filters for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. On February 3, 2010, Ohio EPA obtained a sample of the spent paint filters used in the facility paint booth. The paint filter is being analyzed for total volatile organic compounds (VOC's) and Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846. Motion Controls Robotics should not dispose of any spent paint filters until analysis of the samples has been received.

- c. Motion Controls Robotics has failed to evaluate the spent fluorescent and metal halide lamps used throughout the facility to determine if they are hazardous waste. Motion Controls Robotics currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Motion Controls Robotics 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.

Motion Controls Robotics 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, Motion Controls Robotics must choose one of the following options for the spent lamps:

- i. **Disposal Option:**

Motion Controls Robotics may manage the lamps as a hazardous waste. Motion Controls Robotics must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Motion Controls Robotics must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Motion Controls Robotics 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, Motion Controls Robotics 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)". Motion Controls Robotics 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 Motion Controls Robotics should choose the recycling option, you should submit to me the name of the recycling facility Motion Controls Robotics intends to use.

During the inspection I provided you with the following fact sheets on spent lamps: 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 for your use.

To abate this violation, Motion Controls Robotics 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.

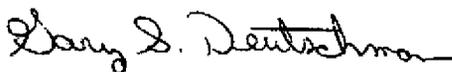
As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, we observed potential pollution prevention (P2) opportunities associated with your operations. Recycling the fluorescent and metal halide lamps as well as paint and solvent substitution are potential P2 opportunities. Ohio EPA did observe that your facility has begun replacing your metal halide fixtures with T-5 fluorescent light fixtures. Mr. Lang indicated that this pollution prevention opportunity should pay for itself in one and one-half years.

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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>.

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

/lb

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
~~DHWM, NWDO File - Sandusky County General~~
Ron Nabors, Compliance Assistance and Pollution Prevention, NWDO
Harry Sarvis, Manager, DHWM, CO

ec: Gary Deutschman, DHWM, NWDO

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 kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

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: OHD054164397 Name: Motion Controls Robotics Website: motioncontrolsrobotics.com (Optional)
	Street Address: 1500 Walter Avenue City, Town, or Village: Fremont County Name: Sandusky State: OH Zip Code: 43420 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"/> 4238
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Yvette MI: L. Last Name: Howey Phone Number: 419-334-5886 Phone Number Extension: 211 E-Mail Address: Yvette@motioncontrolsrobotics.com Fax Number: 419-334-5639 Fax Number Extension: Street or P.O. Box: 1500 Walter Avenue City, Town or Village: Fremont State: Ohio Zip Code: 43420
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: Fremont IOM Properties, LTD.. Date Became Owner (mm/dd/yyyy): 10/1/2000 Owner 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"/> Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Owner Phone #: Country: Zip Code: Name of Site's Operator: Motion Controls Robotics Date Became Operator (mm/dd/yyyy): Owner 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"/> Type: <input checked="" type="checkbox"/> <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State: Operator Phone #: United States Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER— A MINIMUM OF ONE BOX MUST BE CHECKED

<input type="checkbox"/> Not a HW Generator <input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<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"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

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. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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	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: Scott Lang, President; Jerry Huff, Floor Supervisor
Tanks	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other Comments:
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		12/15/2009

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: \leq 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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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"/>
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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"/>
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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.

#1 – Motion Controls Robotics must evaluate the used paint filters and spent fluorescent and mercury halide lamps to determine if they are hazardous waste.

#3 – Motion Controls Robotics has been managing D001/ F003/ F005 spent paint gun cleaning solvent as solid waste.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:	Facility Type: CESQG	Date of Inspection: 12/15/09	EPA ID #: OHD054164397
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Motion Controls Robotics

<i>Waste Generated</i>			<i>On- or Off-Site Management</i>		<i>P2 Activities</i>	
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>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Parts Cleaning Non-haz Simple Green Spent Solvent	5 gallons / year		Disposed as Solid Waste		
2	Lighting Spent Fluorescent and Metal Halide Light Bulbs	Varies		Disposed as Solid Waste		Recycling
3	Robotic Grease Change Out Non-haz Spent Grease	5 gallons / month		Disposed as Solid Waste		
4	Paint Booth Paint Booth Filters	Changed out Annually		Disposed as Solid Waste		

5	Paint Cup Cleaning	D001/F003/F005 Spent Solvent /Paint Sludge	1-2 gallons / month		Disposed as Solid Waste		Solvent Substitution- Latex Paint Substitution
6							

REMARKS-GENERAL INFORMATION

General Process Information: Motion Controls Robotics is a robotics integration and repair facility. Maintenance is conducted on robotics equipment including changing out grease from fittings and painting.

Regulatory/Enforcement History (if applicable): None known.

Additional P2 remarks and information: Motion Controls Robotics should consider recycling the fluorescent and metal halide lamps, evaluate the substitution of latex paint a water based solvent for the solvent based paint and solvent based thinner used to clean the paint gun cups.

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 <http://epa.ohio.gov/ocapp>

Other: