



**Environmental  
Protection Agency**

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

Re: Arclin  
OHR000111609  
Lucas County  
Hazardous waste  
Complaint # 3120  
NOV/RTC

January 29, 2012

Ms. Robyn Sigler, Health, Safety & Environmental Coordinator  
Arclin  
6175 American Road  
Toledo, Ohio 43612

Dear Ms. Sigler:

Thank you for your January 9, 2012, and January 10, 2012, responses to Ohio EPA's December 23, 2011, Request for Information letter. You submitted a copy of your facility contingency plan and a copy of the certified mail receipts from sending your contingency plan to local emergency authorities. These responses were received on January 9 & January 10, 2012, respectively.

My review of this documentation reveals that Arclin has incurred the following violation of Ohio's hazardous waste laws from the inspection conducted on December 14, 2011:

**1. Contingency Plan – a copy shall be submitted to local authorities.  
OAC Rule 3745-65-53 (B)**

A copy of the contingency plan and all revisions to the plan shall be submitted to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams that may be requested to provide emergency services.

Arclin could not provide documentation during the December 14, 2011, compliance evaluation inspection (CEI) that they had submitted their contingency plan to all local police departments, fire departments, hospitals, and Ohio EPA and local emergency response teams that may be requested to provide emergency services.

- ***On January 10, 2012, via email Arclin submitted a copy of the certified mail receipts from sending your contingency plan on January 6, 2012, to local emergency authorities. Thus, this violation is abated.***

### Complaint

I have completed my review of information that you submitted regarding your paraformaldehyde drums. You submitted this information during the CEI on December 14, 2011, and via email on December 16 & 20, 2011.

Ohio EPA has determined that Arclin had expected to recycle the paraformaldehyde as product to be re-introduced back into their process. Arclin had the ability to recycle (and has records of this recycling) and had expected to do so. Thus, this complaint is considered closed and no further action pertaining to this issue is necessary.

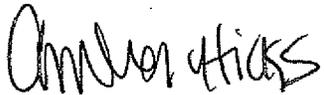
However, Ohio EPA would like to caution Arclin that if they generate paraformaldehyde in the future that they ensure to make a more diligent effort in the recycling and reuse of this material. Based on information you submitted pertaining to recycling, Arclin recycled only approximately 11% of the waste that was generated from the two tank clean-outs on October 28, 2010, and November 10, 2010. Ohio EPA estimates that roughly 251 drums of paraformaldehyde were generated by the clean-out of tanks. Arclin had waste pick-ups on June 16, 2011, of approximately 67 drums and December 5 & 7, 2011, of 156 drums. Ohio EPA likewise estimates that Arclin recycled 28 drums of paraformaldehyde from the time of the clean-out to the final waste being shipped off-site in December of 2011. Ohio EPA is concerned that roughly 67 drums were on-site for over six months and roughly 156 drums were on-site for over a year and only approximately 28 drums were recycled (total of the 251) with the rest being sent off-site for disposal as hazardous waste. Arclin needs to develop a better system and practices to recycle this material more efficiently.

In addition, Arclin stated during the CEI, that they have been experimenting with a caustic/hot water wash which they introduce to their formaldehyde tanks. This wash essentially dissolves the paraformaldehyde on the edges of the tank where the agitator is unable to reach. When the paraformaldehyde dissolves, it returns back to formaldehyde (useable product). Arclin hopes to utilize this process to prevent generation of paraformaldehyde in the formaldehyde tank (thus prevent the generation of paraformaldehyde for recycling or as a waste). You stated this process has been very successful in trials you conducted in October and November of 2011 and, thus in the future, Arclin plans to not generate paraformaldehyde (as long as this dissolution process continues to be successful).

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No response to this letter is necessary. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO  
Colleen Weaver, DMWM

ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, DMWM, 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.**