



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  
PRTC

April 26, 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 February 8, 2010, Notice of Violation (NOV) letter via e-mail on February 26, 2010, March 3, 2010, March 22, 2010, and March 24, 2010. The documentation you submitted included information regarding the management of your spent gun cleaning solvent and spent fluorescent lamps.

My review of this documentation reveals that Motion Controls Robotics has adequately demonstrated abatement of the following violations discovered during the December 15, 2009, inspection:

1. **Unlawful Transportation, ORC § 3734.02(F)**  
Your March 22, 2010, e-mail indicates that Motion Controls Robotics has contracted with Safety-Kleen Company, Toledo, Ohio, to pick up and properly dispose of the F003/F005 hazardous waste spent gun cleaning solvent on a yearly basis.
2. **OAC Rule 3745-52-11, Hazardous Waste Determination:**
  - a. Your March 22, 2010, e-mail indicates that Motion Controls Robotics has contracted with Safety-Kleen Company, Toledo, Ohio, to pick up and properly dispose of the F003/F005 hazardous waste spent solvent on a yearly basis.
  - c. Your March 22, 2010, e-mail indicates that Motion Controls Robotics has contracted with Environmental Recycling, Bowling Green, Ohio, to recycle your spent fluorescent lamps as universal waste on a yearly basis.

Motion Controls Robotics has failed to submit documentation demonstrating the proper evaluation of the spent paint filters generated at the facility.

2. **OAC Rule 3745-52-11, Hazardous Waste Determination**

- 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.

Ohio EPA obtained a sample of the paint filters on February 3, 2010. Analysis of the spent paint filters indicates that the filters contain a total 3000 mg/kg Barium. The regulatory level for Barium is 100 mg/l using the toxicity characteristic leaching procedure (TCLP). The analysis of the paint filters indicates that the filters contain 165 mg/l Barium using the TCLP. However, Barium does not appear to be a major constituent in the paint or solvent used by Motion Controls Robotics. Therefore, Motion Controls Robotics must either manage the spent paint filters as D005 (Barium) hazardous waste or have a representative sample of the spent paint filters analyzed for Resource Conservation and Recovery Act (RCRA) TCLP metals using methods as outlined in U.S. EPA's SW-846. If Motion Controls Robotics chooses to analyze the spent paint filters the facility should not dispose of any spent paint filters until analysis of the samples has been received. Motion Controls Robotics should respond to this violation within 30 days of receipt of this letter.

**GENERAL COMMENTS**

Ohio EPA has noted that Motion Controls Robotics has replaced all of the metal halide lamps used within the facility with high efficiency motion activated fluorescent lamp fixtures.

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

//lr

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, Supervisor, DHWM, NWDO  
'DHWM'; NWDO; File = Sandusky County General; Δ

ec: Gary Deutschman

**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.