



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

Re: Arnold Machine Inc.  
 OHR000153395  
 Seneca County  
 Return to Compliance

August 8, 2013

Mr. Zach Arnold, President  
 Arnold Machine Inc.  
 19 Heritage Drive  
 Tiffin, Ohio 44883

Dear Mr. Arnold:

Thank you for your responses to Ohio EPA's February 20, 2013, Notice of Violation letter (NOV). Chad Woessner submitted the following information on your behalf:

- On February 7, 2013, via email, the Material Safety Data Sheets for your parts washing solvent and paint tones in use at the facility; information on the management of your fluorescent bulbs; information pertaining to the management of your paint booth filters and your xylene usage for 2011 and 2012;
- On March 29, 2013, via email, the analytical results (totals) from the sampling of your paint booth filters;
- On May 16, 2013, via email, the analytical results [Toxicity Characteristic Leaching Procedure (TCLP)] from the sampling of your paint booth filters.

My review of this information reveals that Arnold Machine Inc. has adequately demonstrated abatement of the violations discovered during the January 31, 2013, inspection as listed below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation	January 31, 2013	A.) February 7, 2013 B.) March 11, 2013 C.) May 16, 2013

On March 11, 2013, Mr. Woessner and I spoke via telephone and he stated that the facility is getting rid of the parts washer.

Based on the analytical Mr. Woessner submitted to me on March 29, 2013, your paint booth filters contained 9840 mg/kg of Barium (method SW-846/6010B- totals). I emailed Mr. Woessner on this day informing him that based on this information, your paint booth filters may be a hazardous waste [utilizing a screening tool of 20 times (9840/20=492)]. Based on this screening tool, the paint booth filters are above the regulatory limit of 100.00 mg/L. I also spoke with Lana Jackson at your lab (Alloway) and they were holding the filters to be reanalyzed if needed for TCLP.

Mr. Zach Arnold, President  
August 8, 2013  
Page 2

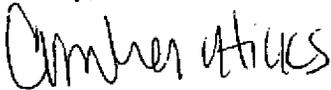
On May 16, 2013, Mr. Woessner submitted to me the analytical for your paint booth filters utilizing method SW-846/1311/6010B-TCLP. Based on this analytical, your paint booth filters contained 0.32 mg/L of Barium (which is below the regulatory limit for barium of 100.00 mg/L).

On May 17, 2013, I spoke with Ms. Jackson of Alloway inquiring if these results were taken from the same sample as the March results. She stated that they were not. Alloway had misplaced the original sample and Mr. Woessner had provided a new sample. I then spoke with Mr. Woessner on June 13, 2013. Mr. Woessner stated that the second sample (submitted at the end of April) was even "dirtier" than the first as the second sample was pulled from the same paint booth filter as the original sample. This filter was still in use in the paint booth (so the filter had six more weeks of use) and the sample was pulled from the middle/center of the filter which tends to be the dirtiest. Based on this, I stated that the analytical from May would suffice to evaluate your paint booth filters and thus based on this analytical dated May 15, 2013, your paint booth filters are non-hazardous.

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).

You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/dmwmrules.aspx>.

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/lr

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

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.