



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Dayton, Ohio 45402

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

DL  
File  
004

**CERTIFIED MAIL**

June 12, 2007

Mr. Brian Michel  
Quaker Chemical Corporation  
3431 Yankee Road  
Middletown, Ohio 45044

**Re: Quaker Chemical Corporation, 3431 Yankee Road, Middletown, Butler County, OHD 101486116, Large Quantity Generator, Notice of Violation**

Dear Mr. Michel:

On June 11, 2007, Tom Ontko and I visited your facility to conduct a return to compliance inspection. During our initial discussion, you stated that you had not received our initial violation letter to you dated May 4, 2007. We provided you with a copy of the letter and the checklists on June 11, 2007, during our visit.

You also stated that when you questioned your superior as to whether you should contact me about the expected letter since you had not received it and I had explained when to expect it, your superior stated to not contact me at that time.

As discussed, since you stated you did not receive a copy of the notice of violation, we will extend the timeline for you to correct the violations. Referencing the May 4, 2007 letter, you will have until Friday June 22, 2007 to complete the items with the initial May 17<sup>th</sup>, 2007 deadline, and you will have until Wednesday, June 27, 2007, to complete the items with the initial May 30<sup>th</sup>, 2007 deadline.

These new deadlines will apply as follows:

- June 22, 2007 deadline for the following violations: #2, #9, #10 and #14.
- June 27, 2007 for the following violations: #1, #3, #5 to #8, #11 to #13, and General Concern A.
- Violation #4 and #15 are expected to be done by June 27, 2007 as well, as we discussed that you would be sending your waste off site by that time.

You may provide Ohio EPA a written response or photos to show these violations are corrected.

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**Alternate use for the caustic waste stream**

We discussed your possible plan to find a beneficial use for the caustic waste. Should you find someone who is able to use the caustic material as a product, that waste stream would fall out of the hazardous waste cycle, since it would no longer be considered a waste. You will need to provide a copy of the agreement with the user you found, and the agreement should explain how the user would be utilizing the material.

**Generator Closure**

You will still be required to go through generator closure at each of the locations that were utilized as <90 day accumulation areas: the area at the caustic cleaner area, the area at the loading dock, and the area under the overhang where the majority of totes were stored.

**Corrective Action**

You are also subject to corrective action at the facility since you have stored the hazardous waste at the facility for greater than 90 days, as is discussed in the May 4, 2007 letter.

**Enforcement**

Due to the number of violations found at your facility, Quaker Chemical will be referred to our central office for enforcement consideration.

I have included as attachments copies of the original notice of violation, checklists, and fact sheets. If you have questions, please contact me at (937) 285-6080.

Sincerely,



Debora Roth  
Environmental Specialist  
Division of Hazardous Waste Management

Enclosures - inspection checklists, Hazardous Waste Generator Categories and Episodic Generation Guidance, Universal Waste Rules for Handlers of Lamps Guidance, Generator Treatment.

cc: Dinah Crawford SWDO/File  
Derrick Samaranski, U.S. EPA  
Kitty Strang, Quaker Chemical Corporation with 5/4/07 letter, checklists and factsheets, **certified mail**

DR/br