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State of Ohio Environmental Protection Agency

Southwest District

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Dayton, Ohio 45402-2911

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

CERTIFIED MAIL

July 31, 2007

Mr. Brian Kellogg
Quaker Chemical Corporation
30150 Telegraph Road, Suite 205
Bingham Farms, MI 48025

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

Dear Mr. Kellogg:

On July 24, 2007, I met with Trisha Dicken to conduct a return to compliance inspection at Quaker Chemical Corporation in Middletown, Ohio. Additionally, I received your responses to the notice of violations, the most recent being dated July 06, 2007. Totes that had been on-site during the last inspection have since been removed. Labels have been placed on containers, and procedures have been changed to meet hazardous waste requirements. I also received a follow up email on July 27, 2007, from Ms. Dicken which contained images of the universal waste labels.

After review of your responses and conducting the July 24, 2007 inspection, I have determined that the following violations have been corrected.

- OAC 3745-52-41(A), Annual Report**
- OAC 3745-52-34; ORC § 3734.02(E) & (F); Accumulation of waste without a permit**
- OAC 3745-52-20(A), Waste Manifests**
- OAC 3745-52-40, Waste Manifests**
- OAC 3745-52-42(A)(1) and (2), Waste Manifests**
- OAC 3745-65-16(A)(2), (B), and (C), Personnel Training**
- OAC 3745-66-73(A), Management of Containers**
- OAC 3745-52-34(A)(2) and (3), Hazardous Waste Labels**
- OAC 3745-66-74, Weekly Inspections**
- OAC 3745-279-22(C), Used Oil**
- OAC 3745-279-22(D), Used Oil**
- OAC 3745-52-11, Waste Evaluation**
- OAC 3745-270-07, Land Disposal Restrictions**
- OAC 3745-270-09(A), Land Disposal Restrictions**

Mr. Brian Kellogg

July 31, 2007

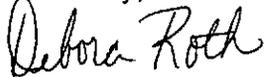
Page 2

Outstanding Violations and Issues

- A. **OAC 3745-65-52(D) and (E), OAC 3745-65-53, OAC 3745-65-54, Contingency Plan.** We are still awaiting the final draft of the contingency plan.
- B. The initial violation letter explained the potential requirement for closure and corrective action at the facility due to the violation of ORC §3734.02(E) and (F). As we discussed, these issues will be addressed in the future during the enforcement negotiations between Ohio EPA and Quaker Chemical.
- C. I questioned you on what happened to the excavated soil from around the used oil storage tank. You had the understanding it was still on site, and while I was on site on July 24, 2007, Ms. Dicken reported the bins had been removed. You stated you would follow up on the whereabouts of the soil. Please notify me when you have information on where the soil was disposed.
- D. I had additional questions on the non-hazardous waste shipment from December 14, 2006 (manifest number 12146). The profile number referenced was #AD34995. I requested the profile of the material from that shipment, since it appeared to be the same caustic waste stream that is also sometimes being shipped out as a hazardous material. You said you would check on that again and provide me with additional information if you found it.
- E. I also questioned why there was only one documented shipment of the caustic waste stream from 2005. The manifest was dated February 11, 2005, number 21105. You were going to check with personnel for possible reasons for having only one shipment. Please forward to me any information you are able to obtain.

Please forward me the information as it is obtained so that I can ensure our enforcement team is kept up to date on your resolutions to these issues. If you have questions, please contact me at (937) 285-6080.

Sincerely,



Debora Roth

Environmental Specialist

Division of Hazardous Waste Management

cc: ;Dinah Crawford SWDO/File 1

Kitty Strang, Quaker Chemical Corporation, Certified Mail
Trisha Dicken, Quaker Chemical Corporation, Certified Mail

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August 16, 2007

Mr. Brian Kellogg
Quaker Chemical Corporation
30150 Telegraph Road, Suite 205
Bingham Farms, MI 48025

**Re: Quaker Chemical Corporation, 3431 Yankee Road, Middletown,
Butler County, OHD 101486116, Large Quantity Generator, Return to
Compliance**

Dear Mr. Kellogg:

I received your email on August 2, 2007 with a copy of the updated contingency plan. I also received your letter dated August 8, 2007, responding to the outstanding concerns regarding the hazardous waste management at the Quaker Chemical facility in Middletown, Ohio.

As a result, I have determined that the following violations have been corrected.

**OAC 3745-65-52(D) and (E), Contingency Plan
OAC 3745-65-53, Contingency Plan
OAC 3745-65-54, Contingency Plan**

As such, Quaker Chemical is now in compliance with the hazardous waste violations noted in my May 4, 2007 letter. You will be contacted soon by our enforcement division of our central office regarding the civil penalties resulting from the hazardous waste violations.

If you have questions, please contact me at (937) 285-6080.

Sincerely,

Debora Roth
Environmental Specialist
Division of Hazardous Waste Management

Mr. Brian Kellogg
August 16, 2007
Page 2

cc: Dinah Crawford SWDO/File

Kathryn Strang, CHMM, Quaker Chemical Corporation
Trisha Dicken, Quaker Chemical Corporation