



State of Ohio Environmental Protection Agency

Southwest District Office

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

March 19, 2007

Mr. Ron Back
The Procter & Gamble Company
1 Procter & Gamble Plaza
Cincinnati, OH 45202-3315

Re: Notice of Violation, The Procter & Gamble Company-General Offices

Dear Mr. Back:

Ohio EPA has received your correspondence dated January 2, 2007 documenting the December 13, 2006 incident in which between 140 and 150 14.1 oz bottles of Dawn Direct Foam dishwashing liquid was inadvertently disposed of in your solid waste dumpster and transported to Rumpke for disposal. This material was deemed to be a D001 hazardous waste due to the ethyl alcohol content (5-10% alcohol) and water content being less than 50%.

Upon review of this information, it has been determined that Procter & Gamble has violated the following hazardous waste rules:

1. **Causing Hazardous Waste to be Transported to an Unpermitted Facility, ORC §3734.02(F)**: Procter & Gamble caused hazardous waste to be transported to a facility that is not permitted to accept hazardous waste. Please reference description of incident above.

In causing hazardous waste to be transported to Rumpke, Procter & Gamble also violated:

- OAC rule 3745-52-20: Failure to ship hazardous waste on a hazardous waste manifest;
- OAC rule 3745-52-34(A)(3): Failure to label with the words "hazardous waste."

Based upon discussions between Rumpke and Ohio EPA's Division of Solid and Infectious Waste Management and Division of Hazardous Waste Management no further action is needed to abate the violations noted above. Ohio EPA requests a response from P&G to document that all of the remedial actions described in the January 2, 2007 letter have been completed.

Should you have any questions, please feel free to contact me.

Sincerely,

Timothy C. Hill
Division of Hazardous Waste Management

cc: **File: Procter & Gamble-General Offices, Hamilton County,**

