



**Environmental  
Protection Agency**

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

Re: Ashland, Inc.  
OHD 071 114 375  
Ashland County  
Hazardous Waste  
PRTC

March 3, 2011

Mr. Parashar Joshi, Facility Manager, Specialty Polymers & Adhesives  
Ashland, Inc.  
1745 Cottage Street  
Ashland, Ohio 44805

Dear Mr. Joshi:

Thank you for your December 17, 2010, response (received in this office on December 21, 2010) to Ohio EPA's December 3, 2010, Notice of Violation letter (NOV). The response included additional waste evaluation information and an LDR form.

My review of this documentation reveals that Ashland, Inc. (Ashland) has adequately demonstrated abatement of the following violations discovered during the November 3, 2010, inspection as listed below:

<b>Violation</b>	<b>Date Violation Observed</b>	<b>Date Violation Abated</b>
2.. OAC Rule 3745-52-11 Waste Evaluation.	November 3, 2010	December 21, 2010
3. OAC Rule 3745-52-20(A) Use of Hazardous Waste Manifest.	November 3, 2010	November 3, 2010
4. OAC Rule 3745-52-20(A) Use of Hazardous Waste Manifest – Completion of lines one through twenty.	November 3, 2010	November 5, 2010
5. OAC Rule 3745-52- 34(C)(1) Excess accumulation of a satellite container.	November 3, 2010	November 3, 2010
6. OAC Rule 3745-52- 34(C)(2) Excess accumulation date on satellite container.	November 3, 2010	November 3, 2010

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Violation	Date Violation Observed	Date Violation Abated
7. OAC Rule 3745-52-42(A)(1) Exception Report.	November 3, 2010	November 5, 2010
8. OAC Rule 3745-52-42(A)(2) Exception Report.	November 3, 2010	December 21, 2010
9. OAC Rule 3745-66-74 Container Storage Inspections.	November 3, 2010	December 2, 2010
10. OAC Rule 3745-270-07(A)(1)+(2) <sup>AM</sup> Land Disposal Restrictions, Notification Requirements.	November 3, 2010	December 21, 2010

In addition, the Area of Concern, Satellite Area was satisfied with your response submitted on December 21, 2010. Ohio EPA agrees that as it is operating, your satellite area is the best option for the processes and practices at your facility. Ashland has investigated several options for management of the satellite area and concluded that this is the best practice for managing this waste both in terms of safety and efficiency. Ashland utilizes many different product lines and chemistries in multiple lines throughout the production area. Having pails and buckets and/or drums for each of these waste streams permanently at the line would create a significant safety hazard at and between the lines and block access to the lines and safety equipment. Ashland's satellite area is under the control of various operators (3-5) who are all trained on the hazards of the waste streams, incompatibility of the waste streams and the proper management and addition of the wastes in the satellite area. These are the only personnel permitted to work in the mixer room. Ashland's satellite area is not causing any harm to human health and the environment as the satellite area is enclosed inside the south mixer room building, the facility does weekly inspections at the satellite area to ensure there are no spills or leaks, safety equipment is readily accessible and the satellite area is near to the production lines. Via an email on February 24, 2011, Mr. Todd Harris informed me that drums in the satellite area (depending on waste stream and production) remain in the satellite area before being moved to the container storage area from a couple of days to a couple of months. I would recommend that Ashland continue their current management practices of inspecting the satellite area weekly looking for leaks and spills.

Ohio EPA cited an additional violation in the December 3, 2010, NOV, to Ashland as listed below:

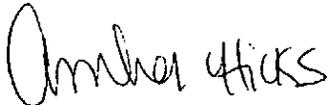
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Violation	Date Violation Observed
1. ORC Section 3734.02 (F) Unlawful transportation to an unpermitted facility.	November 3, 2010

Ashland is currently part of an administrative enforcement action being pursued by Ohio EPA's Central Office in Columbus, Ohio which encompasses the above violation. This violation will be resolved with Ohio EPA per the facility's administrative enforcement action. If you have any questions pertaining to this action, please contact Mitch Mathews in the Division of Hazardous Waste Management's Central Office at 614-644-2953.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks  
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
DHWM, NWDO, File: Ashland, Inc.

ec: Amber Hicks, DHWM, NWDO  
Mitch Mathews, DHWM, CO

**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.