



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Interstate Bakeries Corporation  
OHD 987 019 312  
Hazardous Waste  
Wood County  
Partial Return to Compliance

November 2, 2009

Ms. Jamie Hatfield, Environmental Affairs Coordinator  
Interstate Bakeries Corporation  
8071 Wales Road  
Northwood, Ohio 43619

Dear Ms. Hatfield:

Thank you for your response to Ohio EPA's July 22, 2009, Notice of Violation letter (NOV). On August 20, 2009, Ohio EPA received a universal waste management training plan and additional information pertaining to the pit with hydraulic lift and the waste from this pit that was shipped off-site on February 5, 2009.

My review of this documentation reveals that Interstate Bakeries Corporation (IBC) has adequately demonstrated abatement of the violation discovered during the July 1, 2009, compliance evaluation inspection (CEI) as outlined below:

Violation	Date Violation Observed	Date Violation Abated
1.OAC Rule 3745-273-16 Employee training for small quantity handlers of universal waste (SQUWH)	July 1, 2009	August 20, 2009

However, Ohio EPA has additional questions based on your response to the Area of Concern noted in the July 22, 2009, NOV. Please provide answers to the following questions based on your letter of response dated August 18, 2009 within 30 days of receipt of this letter:

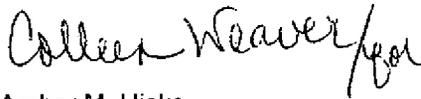
- A. In your response pertaining to the pit with hydraulic lift, Number 2.a.: When the lift was removed in August 2009 was the hydraulic fluid still in place? If so, how was this fluid managed?
- B. In your response pertaining to the pit with hydraulic lift, Number 3a.: How did IBC determine there was no contamination of the soil (did you perform sampling and analysis, visual inspection, etc.)?
- C. In your response pertaining to the waste generated from the pit, Number 1.a.: How was the "dirt material from cleaning floor drains which may have contained oily residue" exactly recycled?
- D. In your response pertaining to the waste generated from the pit, Number 2.a.: If the water traveled into the pit and mixed with oil residue, is it possible that oil was released from the pit via the same conduit the water used to travel into the pit? If so, how did IBC determine that no contamination of oil outside of the pit occurred (no soil contamination) as stated in 3.a (that there was no ground contamination at removal)?

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- E. In your response pertaining to the waste generated from the pit, Number 3.a.: Did IBC perform any type of waste evaluation (use of generator knowledge or sampling and analysis) on the waste in question (per your response waste was dirt material that was not used oil that was recycled)? If so, please provide documentation.

I will be out of the office on vacation for the next month. If you should have any questions, please feel free to call Mitch Mathews at (614) 644-2953.

Sincerely,



Amber M. Hicks  
Division of Hazardous Waste Management

/lb

pc: Colleen Weaver, DHWM, NWDO  
Cindy Lohrbach, DHWM, NWDO  
~~DHWM, NWDO File Interstate Brands Corporation, Woodville Road (OHD-987-019-312)~~

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.