



Environmental
Protection Agency

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

INTEROFFICE MEMORANDUM

TO: Tag Chemical, Inc.

FROM: Ed Pulido 

DATE: April 1, 2011

SUBJECT: Former Tag Chemicals, Inc. – OHD980569875
100 Edwin Drive, Toledo, Lucas County, Ohio – Return to
Compliance

Tag Chemical, Inc. (TAG) operated at 100 Edwin Drive, Toledo, as a discount wholesaler of industrial chemicals. TAG distributed used chemical stock to other direct users and chemical processors. TAG generated waste from their operations, generally from the clean out of transfer lines at the facility. TAG generator status fluctuated between an LQG and an SQG. On March 14, 2002, Ohio EPA received a Cessation of Regulated Operations (CRO) 90-day form. During a CRO final inspection conducted on June 13, 2002, Ohio EPA discovered several CRO rule violations. On August 27, 2002, Ohio EPA issued a Notice of Violation letter (NOV) regarding deficiencies on the following regulations: ORC Section 3752.06 -- Duties of Owner/Operator within 90 Days of Cessation, OAC Rules 3745-352-20(B) and 3745-352-20(C) – requirements during a CRO, and OAC Rule 3745-66-11 – Generator Closure. On November 8, 2002, after receiving documentation to satisfy violations previously cited, Ohio EPA issued a final certification letter that all violations has been corrected and that the facility was in full compliance with the CRO rules.

On July 20, 2006, Ohio EPA conducted a compliance evaluation inspection/complaint investigation (#2569) regarding the mismanagement of waste at the site. On August 7, 2006, Ohio EPA returned to the site and sampled several containers suspected of being hazardous waste. On December 8, 2006, Ohio EPA issued an NOV citing several violations of Ohio hazardous waste rules. No response to this NOV has ever been received by Ohio EPA. On June 24, 2009, Ohio EPA sent a letter describing TAG's corrective action obligations. At the time, Ohio EPA was made aware that the facility not longer exists. All building structures, tanks, and containers have been removed. Only an empty lot, overgrown with vegetation remained. According to the Lucas County Auditor's office, the current owner is Louisville Title Agency for NW Ohio, Inc., Trustee as of June 2, 2004.

Based on the facts currently known, the outstanding violations outlined in the December 8, 2006, NOV are therefore not resolvable as follows: OAC Rule 3745-52-11, OAC Rule 3745-52-12, OAC Rule 3745-52-34(A)(2), OAC Rule 3745-52-34(A)(3), OAC Rule 3745-270-07(A)(1), OAC Rule 3745-270-09(A), OAC Rule 3745-34(D)(5)(a), OAC Rule 3745-34(D)(5)(b), OAC Rule 3745-34(D)(5)(c), OAC Rule 3745-65-37(A), OAC Rule 3745-66-73(A), OAC Rule 3745-66-73(B), OAC Rule 3745-66-74, OAC Rule 3745-65-32, OAC Rule 3745-65-33.

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Colleen Weaver, DHWM, NWDO

ec: Ed Pulido, DHWM, NWDO