

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**MR JERRY PRICE  
COGNIS OLEOCHEMICALS LLC  
4900 ESTE AVE  
CINCINNATI OH 45232-1419**

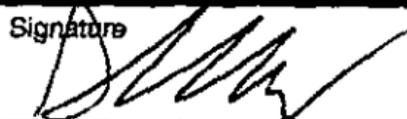
2. Article Number  
(Transfer from service label)

7006 2760 0003 0780 7762

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X


 Agent Addressee

B. Received by (Printed Name)

A.W. Schlicher

C. Date of Delivery

D. Is delivery address different from item 1?  YesIf YES, enter delivery address below:  No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

UNITED STATES POSTAL SERVICE

CINCINNATI OH 452



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

26 SEP 2005 PM 5:1

• Sender: Please print your name, address, and ZIP+4 in this box •

STATE OF OHIO EPA  
SOUTHWEST DISTRICT OFFICE  
ATTN: MARIANNE PIEKUTOWSKI-SURFACE WTR  
401 EAST FIFTH ST  
DAYTON OH 45402

U.S. Postal Service™

**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Fee)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

*MAILED* **OFFICIAL USE** *START 2008*

Postage \$

Certified Fee

Return Receipt Fee  
(Endorsement Required)

Restricted Delivery Fee  
(Endorsement Required)

FROM:  
MARIANNE  
PIEKUTOWSKI

Postmark SW  
Here DIV.

Total Postage

**MR JERRY PRICE**

Sent To

**COGNIS OLEOCHEMICALS LLC**

Street, Apt. No.,  
or PO Box No.

**4900 ESTE AVE**

City, State, ZIP+4

**CINCINNATI OH 45232-1419**

7006 2760 0003 0780 7762

## **Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

## **Important Reminders:**

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.** For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249  
[www.epa.state.oh.us](http://www.epa.state.oh.us)

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

September 25, 2008

Mr. Jerry Price  
Cognis Oleochemicals LLC  
4900 Este Avenue  
Cincinnati, Ohio 45232-1419

**RE: Cognis Oleochemicals LLC- Hamilton County- OH0137821;1IF00018\*AD  
NOTICE OF VIOLATION**

**CERTIFIED MAIL**

Dear Mr. Price:

This office has received the non-compliance notifications for the above referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of non-compliance and/or deficiencies were as follows:

**EFFLUENT LIMIT VIOLATIONS**

Station No. 1 IF00018007

Parameter	Code	Date	Permit Limit	Reported
Oil and Grease, Hexane	00552	6/3/2008	10	11.1

Station No. 1IF00018013

Parameter	Code	Date	Permit Limit	Reported
Oil and Grease, Hexane	00552	3/3/2008	10	39
Oil and Grease, Hexane	00552	4/4/2008	10	15
Oil and Grease, Hexane	00552	5/2/2008	10	17.4
Oil and Grease, Hexane	00552	6/3/2008	10	18.4
Oil and Grease, Hexane	00552	7/3/2008	10	31.1
Oil and Grease, Hexane	00552	8/5/2008	10	13.9



Mr. Jerry Price  
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Station No 11F00018018

Parameter	Code	Date	Permit Limit	Reported
Oil and Grease, Hexane	00552	5/2/2008	10	58.7
Oil and Grease, Hexane	00552	8/5/2008	10	30.6

**FREQUENCY VIOLATIONS**

Station No. 11F0001839

Parameter	Reporting Code	Violation Date	Sample Frequency	Expected	Reported
Zinc, Total (Zn)	01092	5/1/2008	4/6months	4	1
Zinc, Total (Zn)	01092	8/1/2008	4/6months	4	1

It appears the wrong sampling frequency is listed in the facility's permit. I will be looking into modifying the permit to have the frequency listed as "1/Quarter" instead of "4/6 Months).

On March 18, 2008 at approximately 11:00 pm, Cognis Oleochemicals discovered a release of process wastewater. Untreated process wastewater overflowed from the process sewer. The process wastewater then mixed with storm water due to heavy rainfall. This then overtopped the containment wall and overflowed into Mill Creek. The actual volume released into the creek is unknown. Immediate actions included the set up of portable pumps and steam siphons to collect the wastewaters from the streets into nearby tank farm dikes. By 2:30 am on March 19, 2008, the flow was stopped. With the forecast of an additional two inches of rain, five portable tanks with a total capacity of 82,000 gallons were rented as well as two 400 gpm capacity pumps.

This office has received written notification as the reasons for the above referenced violations. However, the violations are continuing. I would like to set up a meeting, at your earliest convenience, to go over the steps being taken to resolve the violations and what else can be done. The on-going violations must be resolved. The facility's discharges must be in compliance with its NPDES permit.

Please be advised that failure to comply with the effluent limitations, or to satisfy monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Mr. Jerry Price  
September 25, 2008  
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If you would have any questions regarding the above, please contact me at 937.285.6108.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marianne Piekutowski', followed by a long horizontal line extending to the right.

Marianne Piekutowski  
Environmental Specialist 2  
Division of Surface Water

Cc: Laura Clemmens, USAG  
Bruce Tolson, Cognis Corporation

