



State of Ohio Environmental Protection Agency
Southwest District

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Dayton, Ohio 45402-2911

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

December 12, 2008

Mr. Jay Taylor
Cognis Oleochemicals, LLC
4900 Este Avenue
Cincinnati, Ohio 45232

Re: Cognis Oleochemicals, LLC – OH0137821;1IF00018*AD – RI

NOTICE OF VIOLATION

Dear Mr. Taylor:

On December 8, 2008, Marianne Piekutowski of this office met with Jerry Price, Mike Groh, and yourself, and conducted a Reconnaissance Inspection (RI) as a follow up to the September 25, 2008 Notice of Violation. Please note that the report, by its format, tends to highlight negative areas.

As indicated in the attached RI report, the only area that was evaluated was the "Effluent/Receiving Waters". This received a rating of Marginal because of the Oil & Grease violations. Additional details on this rating are provided in the attached report.

If you would have any questions regarding this inspection, please contact Ms. Piekutowski at this office at 937.285.6108.

Sincerely,

~~Martyn G. Burt~~
Environmental Supervisor
Division of Surface Water

Enclosures

Cc: Mike Groh, Cognis Oleochemicals, LLC
Jerry Price, Cognis Oleochemicals, LLC





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NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IF00018*AD	OH0137821	12/8/2008	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Cognis Oleochemicals, LLC 4900 Este Avenue Cincinnati, Ohio 45232	10:00am	3/1/2008
	Exit Time	Permit Expiration Date
	12:05pm	2/28/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jerry Price, Environmental Specialist Mike Groh, SH&E Manager	513.482.3568 513.482.2425	
Name, Address and Title of Responsible Official	Phone Number	
Jay Taylor, Operations Director Cognis Oleochemicals, LLC 4900 Este Avenue Cincinnati, Ohio 45232		

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
N	Permit	N	Flow Measurement
N	Records/Reports	N	Laboratory
N	Operations & Maintenance	M	Effluent/Receiving Waters
N	Facility Site Review	N	Sludge Storage/Disposal
N	Collection System	N	Pretreatment
			Compliance Schedule
			Self-Monitoring Program
			Other

Section D: Summary of Findings (Attach additional sheets if necessary)

The facility was rated as Marginal for Effluent/Receiving Waters because the facility is having Oil & Grease violations. This RI will serve as the documentation of a meeting to discuss the steps being taken to resolve the violations. This report will also serve as the Notice of Violation.

Additional information is provided on the following pages.

Inspector	Reviewer
12/12/08 Date	12/12/08 Date
Mariagne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office



EFFLUENT LIMIT VIOLATIONS

Parameter	Outfall	Code	Date	Reported	Limit
Oil & Grease	013	00552	09/05/08	23 mg/L	10 mg/L (D)
Oil & Grease	039	00552	11/13/08	14.2 mg/L	10 mg/L (D)

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.

The steps being taken to resolve these violations were provided in the document dated December 5, 2008. The facility should continue to update Ohio EPA on the status of the line replacements and other action items.

Additional Items

- The NPDES outfall signage required in the facility's permit has been installed.
- The leaking steam line noted in the last CEI report (dated December 3, 2007) has been repaired.

