

**Environmental
Protection Agency**

John Kasich, Governor
Debra Riffe, Lt. Governor
Richard Kolosionek, Director

August 19, 2011

CERTIFIED MAIL

Mr. Thomas Steib
Operations Manager
Detrex Corporation
110 State Road
Ashtabula, OH 44004

Subject: August 11, 2011, response to July 29, 2011, Notice of Violation (NOV)

Dear Mr. Steib:

This office has received your response addressed to Richard Kolosionek of this office regarding the July 29, 2011, Notice of Violation (NOV) letter sent to Detrex. Your letter indicated that at no time were you aware of anyone positively identifying the "catlike urine/ammonia" type odors as odors from your facility.

While conducting complaint investigations and odor surveillance patrols, Ohio EPA staff have on a number of occasions identified Detrex as the source of the odors, and has notified company officials of that fact. Listed below are the specific instances when either you or your staff was notified of positive confirmation of the subject odors coming from your facility.

July 7, 2011 – Bob Princic and Bob Bechtel of this office documented the subject odors while on after-hours odor surveillance patrol, and notified the Detrex personnel at that time. That instance was followed up with a telephone conversation by Mr. Princic and me with you the following morning (July 8).

July 22, 2011 - Richard Kolosionek and Chris Williams of this office documented the subject odors while on odor surveillance patrol, and met with you on site at that time where they informed you of the odors in your parking lot and in the lobby of the Detrex offices. While you stated that you did not smell the odors, both Ohio EPA inspectors noted the odor in front (i.e. downwind) of Detrex, in the parking lot and in the lobby facility.

There were three other days that the subject odor was noted since the NOV was issued which our inspectors attributed to your facility: July 30, August 5 and August 11.

Further, in your response, you indicated there was no discussion with Detrex of our concerns of the odors before this office issued the NOV. I was on a call with you and Bob Princic on July 8 to discuss the odors noted by our staff on the evening of July 7, during which those concerns were expressed.

MR. THOMAS STEIB
AUGUST 19, 2011
PAGE 2

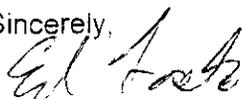
Your letter indicated that no materials that Detrex purchases, makes, ships or otherwise handles, contains compounds that would generate the subject odor. A list of the (chemicals and chemical compounds present in Detrex's raw materials, products and wastes) materials that Detrex purchases, makes, ships and discharges would be helpful in our investigation. Please submit this list to this office in 14 days of the receipt of this letter.

Finally, your letter indicates that Detrex will continue to evaluate potential odor sources at the facility. I appreciate your review of the sources of H₂S; does Detrex have a written plan as to how the evaluation of other sources will be conducted? Does this include potential odors from water discharges or other environmental media? Does it consider the atmospheric combining or various discharges which could result in a compound that normally would not be expected to be emitted from your facility? The July 29 NOV specifically requests a written plan as explaining how Detrex plans to deal with the odors which we have documented and informed you or your representative of. We still anticipate the receipt of this plan.

Please be advised that acceptance by Ohio EPA of any compliance plan does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3745.06. The determination to pursue further action will be determined by Ohio EPA at a later date.

Should you have any questions regarding this notice, or wish to meet with us in order to address these issues, please contact the undersigned at 330-963-1161 of the Northeast District Office.

Sincerely,



Ed Fasko
Environmental Manager
Division of Air Pollution Control

EF:bo

ec: Kurt Princic, District Chief, NEDO
Richard Kolosionek, DAPC, NEDO
Bob Princic, DAPC, NEDO
Christine McPhee, DAPC, NEDO
Misty Koletich, DAPC, NEDO
Tim Fischer, DAPC, NEDO
Tom Kalman, DAPC, CO
Paul Koval, DAPC, CO