



State of Ohio Environmental Protection Agency

Northeast District Office

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

April 20, 2009

RE: HENKEL CORPORATION  
OHD 004 156 063  
CUYAHOGA COUNTY  
RETURN TO COMPLIANCE

Cheryl Hutson-Law  
Henkel Corporation  
18731 Cranwood Parkway  
Cleveland, OH 44128

Dear Ms. Hutson-Law:

Thank you for your March 27, 2009 response to Ohio EPA's January 6, 2009 Notice of Violation (NOV). Your response was received on April 10, 2009. The documentation you submitted included the following:

1. A photograph showing the hazardous waste drum in the EB/UV room was properly closed and an explanation that Henkel's hazardous waste training has been modified to better ensure compliance with this rule in the future.
2. A photograph showing that the used oil drum in the cardboard bailing area was properly labeled.
3. An explanation that the red flammable can in the laboratory has been removed to prevent its use as a satellite accumulation container.

I have reviewed your documentation and determined that you have sufficiently corrected the violations cited in the NOV:

1. **Management of Containers**  
OAC 3745-66-73(A)
2. **Used Oil Storage Requirements for Generators (Labels)**  
OAC 3745-279-22(C)
3. **Labeling of Containers (Satellite Accumulation)**  
OAC 3745-52-34 (C)(1)(b)

No response to this letter is required.

Failure to list specific deficiencies in this communication does not relieve Henkel Corporation from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,

Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

ec: Natalie Oryshkewych, DHWM, NEDO  
Frank Popotnik, DHWM, NEDO

