



State of Ohio Environmental Protection Agency  
Southwest District

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

October 17, 2008

Mr. Clint Herring  
INEOS ABS (USA) Corporation  
365 Three Rivers Parkway  
Addyston, Ohio 45001

Re: **INEOS ABS (USA) Corp. – OH0009946;1IF00001\*ID – CEI**  
**NOTICE OF VIOLATION**

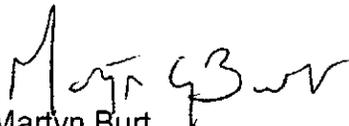
Dear Mr. Herring:

On September 24, 2008, Marianne Piekutowski of this office met with Jessica Reece and conducted a NPDES Compliance Evaluation Inspection (CEI) at INEOS ABS (USA) Corporation. The purpose of this inspection was to evaluate compliance with the terms of the NPDES permit. Please note that the report, by its format, tends to highlight negative areas.

As indicated in the attached CEI report, some areas received a Satisfactory rating. Two areas received a rating of Marginal. These reasons are included in the attached write up.

Thank you for the time extended during your inspection. If you would have any questions, please contact Ms Piekutowski at this office at 937.285.6108.

Sincerely,

  
Martyn Burt  
Environmental Supervisor  
Division of Surface Water

Enclosures

Cc: Jessica Reece, INEOS ABS (USA) Corp.





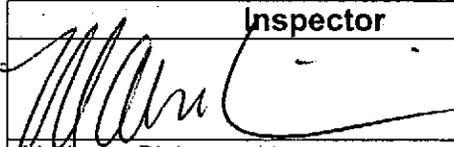
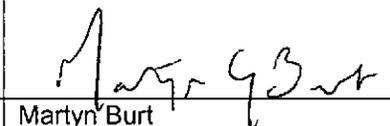
State of Ohio Environmental Protection Agency  
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
OH0009946	11F00001*ID	9/24/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
INEOS ABS Corporation 356 Three Rivers Parkway Addyston, Ohio 45501	10:00	8/1/2004
	Exit Time	Permit Expiration Date
	2:00	1/31/2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Jessica Reece/WWTP Engineer	513.467.2321	
Name, Address and Title of Responsible Official	Phone Number	
Clint Herring, Plant Manager INEOS ABS (USA) Corporation 356 Three Rivers Parkway Addyston, Ohio 45501	513.467.2400	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	
Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
16/17/08 Date	10/17/08 Date

Permit # : OH0009946  
NPDES #: 11F00001\*ID

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

**Section E: Permit Verification**

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... NA

Comments/Status:

a) There were three spills (2 latex, 1 foam) through 002 since the last inspection.

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator **X** or dual feed ..... Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Operator holds unexpired license of class required by permit..... NA  
 Class: 2 shifts/7 days per week
- (f) Routine and preventative maintenance schedule/performed  
 on time..... Y
- (g) Any major equipment breakdown since last inspection..... N
- (h) Operation and maintenance manual provided and maintained..... Y
- (i) Any plant bypasses since last inspection..... N
- (j) Regulatory agency notified of bypasses..... NA  
 On MORs  and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... Y

**Collection System:**

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... NA  
 (CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... NA
- (e) CSOs monitored and reported in accordance with permit..... NA
- (f) Portable pumps used to relieve system..... NA
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power  
 or equivalent..... NA
- (i) Is there an inflow/infiltration problem (separate sewer system),  
 or were there any major repairs to collection system since  
 last inspection..... NA
- (j) Any complaints received since last inspection of basement flooding NA
- (k) Are any portions of the sewer system at or near capacity..... NA

**Comments/Status:**

Treatment Works: (a) There is a dual feed into the facility and a generator at waste treatment.  
 [c] Spare clarifier that is not using for treatment.  
 (f) Preventative maintenance done by waste treat operators as well as in plant system.  
 (j) Latex spills were called in as required and follow reports submitted.  
 (k) There were TSS violations in February/March 2008. Ohio EPA was notified.

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
 Submitted date: 1992 Approval #: Not submitted  N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y  
 (Method: Landfill to Rumpke )
- (d) If sludge is incinerated, where is ash disposed of NA
- (e) Is sludge disposal contracted..... Y  
 (Name: Rumpke- Hughes Road)
- (f) Has amount of sludge generated changed significantly since  
 last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... NA
- (i) Records kept in accordance with State and Federal law..... Y
- (j) Any complaints received in last year regarding sludge..... N
- (k) Is sludge adequately processed (digestion, pathogen control)..... NA

**Comments/Status:**

c) Updated sludge profile for Rumpke.  
 f) The amount of sludge generated has gone down slightly. However, the drying bed waste was increased this year. The number of hold tank clean ups were up during the past year. They should go back down this year.  
 j) The odor complaints were with waste treat not sludge. The number of community complaints were down this year.

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary flow measuring device operated and maintained..... Y  
 Type of device: Ultrasonic & Parshall flume  Ultrasonic & Weir  Weir X  
 Calculated from influent  Other X (Specify: **Magmeter 001** ) **002**
- (b) Calibration frequency adequate ..... Y  
 (Date of last calibration: 9/21/08 Done Quarterly)
- (c) Secondary instruments operated and maintained..... NA
- (d) Flow measurement equipment adequate to handle full range  
 of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency  
 X Daily  Weekly  monthly  other

**Comments/Status:**

b) The temperature probe on 002 as calibrated on March 13, 2007.

**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
  - (i) Samples refrigerated during compositing..... Y
  - (ii) Proper preservation techniques used..... Y
  - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

**Laboratory:**

*General*

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y

Parameters analyzed by commercial lab:

Organics, TSS, BOD, NH3, Toxicity, pH for 001 & 002

Lab name:

Cardinal Labs

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: X Satisfactory  Marginal  Unsatisfactory

Date: 8/22/08 – TRC is only parameter done on-site. Satisfactory rating.

**Comments/Status:**

Sampling  
d)(ii) – Facility receives pre-preserved bottles from Cardinal Labs.  
Laboratory  
b) Still waiting on USEPA approval for the use of 8260 instead of 624.  
f) Did an audit of Cardinal Lab when initially went to them, but nothing since. Do send blanks, spikes, duplicates and standards.

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	NA	NA	NA	NA	NA	NA	NA
002	N	N	N	N	N	N	N

**Comments/Status:**

Outfall 001 uses a diffuser. Not visible from surface.

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**

e) The sauerkraut-type odor notified in past inspections was not as intense on the day of the inspection. This was at the aeration tanks, secondary DAF and the manhole prior to discharge to the diffuser. There was a slight musty wastewater odor.

Permit # : OH0009946  
NPDES # : 11F00001\*1D

**INEOS ABS (USA) CORPORATION  
NPDES COMPLIANCE EVALUATION INSPECTION  
DATE OF INSPECTION: September 24, 2008**

ITEMS FOR DISCUSSION:

The inspection is being conducted to review compliance at the facility. The inspection was also used to set up a date to meet regarding the facility's comments on its NPDES permit renewal. The meeting was scheduled for October 14, 2008.

COMPLIANCE EVALUATION:

The facility had the following permit violations in the past 12 months:

Outfall 11F00001001

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
TSS	00530	02/26/08	290	mg/L	135 mg/L
TSS	00530	02/26/08	922.5	kg/d	883 kg/d
TSS	00530	02/2008	44.5	mg/L	41 mg/L
TSS	00530	03/05/08	183	mg/L	135 mg/L
pH, Minimum	61942	08/26/08	4.94	SU	6.0 SU

The February 2008 concentration violations were addressed in a Notice of Violation dated March 11, 2008.

Outfall 11F00001002

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
Chlorine, TR	50060	05/06/08	0.17	mg/L	0.038 mg/L

It appears when SWIMS reports are run that 2,4-Dinitrophenol was not collected in the September 2007 sampling event. The parameter was collected and analyzed, and is present in the hard copy of the monthly operating report.

Since the last inspection, there have been three spills from the facility. These included a latex spill on February 27, 2008. This was addressed in the March 11, 2008 Notice of Violation. There were two additional spills in June 2008. These were on June 11, 2008 and June 20, 2008. The June 11 release was latex from a faulty pump that was discharged through outfall 002. The June 20 release was foam through outfall 002. The reasons for the releases and steps taken to prevent them from recurring were provided.

**INEOS ABS (USA) Corporation**  
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This letter will serve as the Notice of Violation for these events.

The following frequency items were noted:

<b><i>Outfall</i></b>	<b><i>Date</i></b>	<b><i>Parameter</i></b>	<b><i>Sample Frequency</i></b>	<b><i>Expected</i></b>	<b><i>Reported</i></b>
001	11/15/07	TSS	1/week	1	0
001	11/15/07	BOD	1/week	1	0
002	05/22/08	Water Temp	1/week	1	0
001	08/08/08	pH, Minimum	1/week	1	0
001	08/08/08	pH, Maximum	1/week	1	0
002	08/08/08	pH, Minimum	1/week	1	0
002	08/08/08	pH, Maximum	1/week	1	0

Please note that these items are related to what is defined as week in SWIMS. There were four samples taken in each month, but they were not in the defined weeks in SWIMS. In SWIMS, the weeks are defined as the following:

- Week 1 is Days 1 through 7;
- Week 2 is Days 8 through 14;
- Week 3 is Days 15 through 21; and
- Week 4 is Days 22 through 28.

Any samples collected on Day 29 through 31 are not counted. Please arrange future samples to accommodate these weeks instead of the calendar weeks. This will be defined in Part III of the facility's renewed NPDES permit.

Outfall 002 had a number of code flags for flow rates. These occurred on the following days:

- December 15-18, 2007;
- February 7-13, 2008;
- March 5-13, 19-26,29-30, 2008;
- April 5-8, 2008;
- May 16-19, 2008; and
- June 4-7, 2008.

On these dates, the Ohio River inundated outfall 002 and the facility was unable to determine the flow rate. Alternative flow sampling locations were discussed during the inspection. However, there does not appear to be an adequate location where an accurate flow reading can be obtained. The use of the "AF" code should continue since the weir is underwater when the Ohio River rises.

**INEOS ABS (USA) Corporation**  
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Because of the effluent violations and spills, the facility received a rating of marginal for Effluent/Receiving Waters.

OBSERVATIONS:

The coatings on the interior and exteriors of the tanks and clarifiers throughout waste treatment were peeling. The facility should consider recoating the tanks to protect them against corrosion. Because of this, the facility will receive a Marginal rating for Operation & Maintenance.

The divers were to check the diffusers on outfall 001 on July 22, 2008. Written confirmation was provided stating that this has been completed.

The aeration tanks are being operated at a higher pH and MLSS. The sauerkraut-type odors were not as strong as in previous inspections. A musty odor was noted at the aeration tanks. The final DAF had no appreciable odor on the day of the inspection. The facility tries to maintain a four to eight foot sludge blanket in the secondary clarifiers. This will vary. The clarifier center wells had solids in them. These are cleaned every two weeks. They were to be cleaned at the end of the week of the inspection.

The facility replaced the header from the blend/spill tank to the hydrosieves with stainless steel piping. In addition, the existing diaphragm valve was replaced with a ball valve. As part of this, there is a diversion available around the valve for the piping to allow for maintenance on the valve.

The outfalls were observed. Outfall 001 is underwater with a diffuser. Outfall 002 was flowing through the weir to the Ohio River.

The facility will be mothballing some of the processes over the next year. The biofilter is still on hold. The PTI expiration date was discussed, as were the procedures needed to obtain a one-time twelve month extension.

RECOMMENDED ACTION

INEOS should consider recoating the tanks and equipment in wastewater treatment to prevent corrosion from the wastewater from damaging the equipment. There has been additional peeling of the coatings. The facility needs to prevent corrosion of the metal in the treatment tanks.

