



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Allen County
INEOS USA LLC
Premise # 0302020371
Return to Compliance

March 15, 2011

Mr. Patrick Conrath, Plant Manager
INEOS USA LLC
P. O. Box 628
Lima, Ohio 45802

Dear Mr. Conrath:

This letter is to inform INEOS USA LLC that the following actions were completed in response to the Notice of Violation (NOV) that was issued by the Division of Air Pollution Control on September 24, 2010. The NOV was issued for the facility failing to conduct stack testing on emission unit P035 – acrylonitrile plant No. 2, reactor and absorption section by July 3, 2009, as required in the facility's Title V permit.

The stack test was completed on July 8, 2010. In addition, repeat stack testing was necessary for volatile organic compound emissions, which was subsequently completed on January 20, 2011. Since all testing requirements have been satisfied, and emissions rates were in compliance with respective Title V permit limitations, the company has met its requirements during these two stack tests.

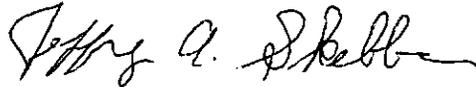
The NOV also required the company to submit revised Title V deviation reports and annual Title V compliance certification report to document the testing delay. These reports were received on October 27, 2010 in Air Services and found to be complete.

Based on the company's response to the NOV, and the action plan provided, we have determined that the compliance plan is acceptable. The actions taken have corrected the violations and this emission unit is now being operated in compliance with the permit requirements. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Mr. Patrick Conrath, Plant Manager
March 15, 2011
Page 2

Should you have any questions or comments concerning this letter, please feel free to contact me at the above address or call (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Division of Air Pollution Control

//lr

pc: Tom Kalman, DAPC/CO
William McDowell, U.S. EPA-Region V
~~DAPC-NWDO-File~~

ec: Jennifer Jolliff, DAPC-NWDO