

**Environmental
Protection Agency**

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



October 13, 2011

CERTIFIED MAIL
91 7108 2133 3937 1501 3056

Ms. Marcelyn Boone
Site Director
Ineos USA, LLC
1900 Fort Amanda Road
Lima, Ohio 45804

Re: Notice of Violation/Return to Compliance – October 3, 2011 Low Differential Pressure at WDW #1

Dear Ms. Boone:

On October 3, 2011, Ineos USA, LLC (Ineos) verbally notified Ohio EPA that the differential pressure at WDW #1 had dropped below the required 50 psi minimum requirement. Ineos submitted written information dated October 6, 2011, concerning the differential pressure loss. Based on the information provided, it appears that Ineos violated the differential pressure requirement in Chapter 3745-34-56 (C) of the Ohio Administrative Code (OAC) and Ineos' Class I Hazardous Underground Injection Control (UIC) permits to operate, Part II (C) (5) and Attachment D. While this event did cause a violation of the differential pressure limitation, Ohio EPA has determined that it did not pose a threat to the environment since WDW #1 was injecting water in preparation for the required mechanical integrity test (MIT).

Based upon review of the data submitted, Ohio EPA is citing a Notice of Violation (NOV) for not maintaining the required minimum differential pressure at WDW #1. Ineos responded appropriately and in a timely manner to identify and report the incident as required by rule and permit. With this Notice of Violation, Ineos is considered Returned to Compliance (RTC) for the October 3, 2011, violation. Details of this violation are identified as follows:

Differential Pressure Requirement

As specified in OAC Rule 3745-34-56 (C) and Ineos' Class I Hazardous UIC Permit to Operate (PTO), Part II (C) (5) and Attachment D, the minimum differential pressure must be greater than 50 psi at all times.

As documented in Ineos' October 6, 2011, correspondence, the minimum differential pressure requirement for WDW #1 was violated on October 3, 2011. WDW #1 was injecting hot water in preparation for the temperature decay log passes when a well head gasket failed. Ineos identified the cause of the pressure leak and replaced the gasket.

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The differential pressure was less than the required 50 psi minimum for approximately 1 hour 53 minutes and declined to zero psi while the gasket was replaced. Ineos restored the differential pressure at 14:47 and resumed injection in continuation of the MIT.

If you have any questions regarding this letter, please contact me at (614) 644-2752.

Sincerely,

E. Charles Lowe, Jr.

E. Charles Lowe, Jr.
Geologist, UIC Section
Division of Drinking and Ground Waters

DiffPressNOV10-11let

cc: Shannon Nabors, Chief, NWDO
Lindsay C. Taliaferro III, UIC Manager, DDAGW
Central File--Correspondence