



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-30
www.epa

Ineos USA LLC

9/17/2008



* D P G W I N E O S 9 1 7 2 0 0 8 *

September 17, 2008

CERTIFIED MAIL
91 7108 2133 3931 0972 7637

Mr. Patrick M. Conrath
Site Director
Ineos USA, LLC
1900 Fort Amanda Road
Lima, Ohio 45804

Re: Notice of Violation/Return to Compliance – August 27, 2008 High Surface Injection Pressure at WDW #1

Dear Mr. Conrath:

On September 4, 2008, Ineos USA, LLC (Ineos) verbally notified Ohio EPA that the surface injection pressure had exceeded the maximum allowable pressure at WDW #1. Ineos provided information concerning the August 27, 2008, water hammer. Based on the information provided, it appears that Ineos violated the high injection pressure requirement in Chapter 3745-34-38(A)(1) 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 high injection pressure limitation, Ohio EPA has determined that it did not pose a threat to the environment.

Based upon review of the data submitted, Ohio EPA is citing a Notice of Violation (NOV) for exceeding the maximum allowable surface injection pressure (MASIP) for 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 August 27, 2008, violation. Details of this violation are identified as follows:

Injection Pressure Requirement

As specified in OAC Rule 3745-34-38(A)(1) and Ineos' Class I Hazardous UIC Permit to Operate (PTO), Part II(C)(5) and Attachment D, the MASIP may not exceed 834 psi at any time.

As documented in Ineos' September 4, 2008, correspondence, the MASIP at WDW #1 was exceeded on August 27, 2008. The injection pressure exceeded the allowed 834 psi at approximately 17:44:33, August 27, 2008, due to a pressure surge that occurred while WDW #1

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

Mr. Patrick M. Conrath

September 17, 2008

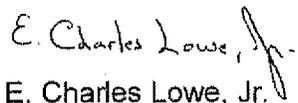
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was being shut-in and produced a water hammer effect. Ineos ceased injection in WDW #1 and the MASIP was re-established by approximately 17:44:35. Additional pressure surges did not exceed the MASIP. The MASIP exceeded the 834 psi maximum for approximately 2 seconds.

Ineos has notified Ohio EPA that the operating pressure set point will be reduced from 823 psi to 810 psi at the deepwells to prevent future potential MASIP incidents.

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

Sincerely,



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

IPnov8-08let

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