



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020
www.epa.s

Ineos USA LLC

8/18/2010



August 18, 2010

CERTIFIED MAIL
91 7108 2133 3931 0971 8888

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

Re: Notice of Violation/Return to Compliance – July 29, 2010 Low Differential Pressure at WDW #4

Dear Mr. Conrath:

On August 12, 2010, Ineos USA, LLC (Ineos) verbally notified Ohio EPA that the differential pressure at WDW #4 had dropped below the required 50 psi minimum requirement on July 29, 2010. Ineos also submitted written information dated August 12, 2010, 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 #4 was not in operation during the time.

Based upon review of the data submitted, Ohio EPA is citing a Notice of Violation (NOV) for not maintaining the required minimum differential pressure for WDW #4. 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 July 29, 2010, 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' August 12, 2010, correspondence, the minimum differential pressure at WDW #4 was violated on July 29, 2010. WDW #4 was shut-in and the annulus tank isolated in preparation for maintenance work. The annulus pressure declined steadily, but maintained a 50

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



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psi required minimum differential pressure until 09:47. The differential pressure was then less than 50 psi for 2 hours 55 minutes with a decline to zero psi for approximately 1 hour 55 minutes of the time period. Ineos restored the annulus pressure at 12:41 and WDW #4 was returned to service at 16:18 on July 29, 2010.

Ineos has notified Ohio EPA that they are investigating the operating personnel response to the loss of differential pressure. Ohio EPA requests that Ineos submit a letter documenting the findings when the investigation is completed.

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

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