



Environmental
Protection Agency

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

January 9, 2012

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

Re: INEOS ABS (USA) Corporation -- OH0009946;1IF00001*JD -- NOTICE OF VIOLATION AND SNC DETERMINATION

CERTIFIED MAIL

Dear Mr. Herring:

This office has received the non-compliance notifications for the above referenced facility. Our review indicates violations of the conditions of your NPDES permit. The specific instances of non-compliance and/or deficiencies were as follows:

EFFLUENT LIMIT VIOLATIONS

Station No. 1IF00001002

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
Total Residual Chlorine	50060	11/8/11	0.07	mg/L	0.038 mg/L

The facility also had a Total Residual Chlorine violation on July 5, 2011 of 0.07 mg/L at outfall 1IF00001002. Since both of these values are more than a 20% exceedence two or more months during the two consecutive quarter review period, the facility is in significant non-compliance. Follow up sampling on November 12, 2011 shows the facility returned to compliance.

In addition, the following code violations were noted:

<i>Outfall</i>	<i>Parameter</i>	<i>Date</i>	<i>Code</i>
1IF00001601	BOD	11/22/2011	AJ
1IF00001002	Flow Rate	11/24-30/2011	AF

Outfall 1IF00001002 is subject to flooding when the Ohio River rises. Alternate sites have been investigated, but a suitable alternative has not been found.

January 9, 2012

Page 2

Please be advised that failure to comply with the effluent limitations, or to satisfy monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

This office has received written notification as the reasons for the above referenced violations, as well as the actions taken or proposed to prevent any further violations.

If you would have any questions regarding the above, please contact me at 937.285.6108.

Sincerely,



Marianne Piekutowski
Environmental Specialist 2
Division of Surface Water

Cc: Jessica Reece, INEOS ABS
Mark Mann, DSW/CO