



CERTIFIED MAIL

September 30, 2013

Ineos ABS (USA) Corporation
356 Three Rivers Parkway
Addyston, OH 45001-0039

Re: Ohio Hazardous Waste Permit Renewal
EPA ID No: OHD 004 233 003

Dear Sir or Madam:

Here is the renewed Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) for Ineos ABS (USA) Corporation. No comments were received during the comment period for this Permit. The Permit is effective today, September 30, 2013. The date-stamped, page-numbered copy of the Part B permit application is enclosed.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

Ineos ABS (USA) Corporation
Page 2

If you have any questions concerning compliance, please contact Jeff Smith of Ohio EPA's Southwest District Office at (937) 285-6357.

Sincerely,



Georgia Frakes, Management Analyst
Division of Hazardous Waste Management

Attachments

cc: Shawn Sellers, DMWM, CO
Scott Hester, DMWM, CO
Ruthanne Flottman, DMWM, RCRA
Ed Lim, DERR, CO
Todd Anderson, Legal
Darla Peelle, PIC
Jeff Smith, DMWM, SWDO
Randy Kirkland, DERR, SWDO
Tim Hull, DERR, SWDO
George Strobel, DMWM, SWDO
Russ Brown, DMWM, SWDO



ITS Programming

PUBLIC NOTICE RECORD

Notification Type: HAZARDOUS WASTE FACILITY PERMIT ACTION

Entity Info

Name: Ineos ABS (USA) Corporation

Address: 356 Three Rivers Parkway

City/Township/Zip: Addyston, OH 45001-0039 **County:** Hamilton

Description: Hazardous Waste

Notice Info

Weekly Review

Public Notice

Date Of Action: 09/30/2013

Notification Number: 18403

Receiving Waters:

Meeting Details:

Standard Remark:

Other Remark:

On September 30, 2013, the director of Ohio EPA issued a final Hazardous Waste Installation and Operation Permit (Permit) Renewal to Ineos ABS (USA) Corporation (Ineos) for its facility located at 356 Three Rivers Parkway, Addyston, Ohio, EPA ID facility number OHD004233003. Ineos operates as a large quantity generator, which produces acrylonitrile-butadiene-styrene (ABS) and styrene-acrylonitrile (SAN) plastics. The renewal permit authorizes Ineos to address corrective action requirements in accordance with Ohio Administrative Code (OAC) rule 3745-54-101. To issue this final permit, Ohio EPA determined that the Permit application is complete and meets appropriate standards and that the applicant has a history of compliance with relevant environmental laws. This authorization is subject to all the rules, regulations, and specified conditions.

OHIO E.P.A.

SEP 30 2013

OHIO ENVIRONMENTAL PROTECTION AGENCY

ENTERED DIRECTOR'S JOURNAL

OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: **INEOS ABS (USA) Corporation**

Mailing Address: 356 Three Rivers Parkway
Addyston, Ohio 45001-0039

Owner: INEOS ABS (USA) Corporation
2600 South Shore Boulevard, Suite 250
League City, Texas 77573

Operator: INEOS ABS (USA) Corporation
356 Three Rivers Parkway
Addyston, Ohio 45001-0039

Location: 356 Three Rivers Parkway
Addyston, Ohio 45001-0039

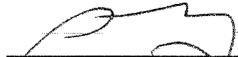
Ohio Permit No.: 05-31-0604
US EPA ID:OH OHD 004 233 003
Issue Date: September 30, 2013
Effective Date: September 30, 2013
Expiration Date: September 30, 2023

AUTHORIZED ACTIVITIES

In reference to the application of **INEOS ABS (USA) Corporation** for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

- **Address Corrective Action Requirements per OAC Rule 3745-54-101**

PERMIT APPROVAL



Scott J. Nally, Director
Ohio Environmental Protection Agency

This permit approval is based upon the record in this matter which is maintained at the offices of the Ohio Environmental Protection Agency. The Director has considered the application, accompanying information, inspection reports of the facility, a report regarding the facility's compliance or noncompliance with the terms and conditions of its permit and rules adopted by the Director under this chapter, and such other information as is relevant to the operation of the facility. The Director has determined that the facility under the existing permit has a history of compliance with ORC Chapter 3734, rules adopted under it, the existing permit, or orders entered to enforce such requirements that demonstrate sufficient reliability, expertise, and competency to operate the facility henceforth under this chapter, rules adopted under it, and the renewal permit.

Entered into the Journal of the Director this 30th day of September, 2013.



By _____ of the Ohio Environmental Protection Agency.

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: Dmg Casater Date: 9-30-13

MODULE A - GENERAL PERMIT CONDITIONS

A. GENERAL PERMIT CONDITIONS

A.1 Effect of Permit

ORC Sections 3734.02 (E) and (F) and 3734.05
OAC Rule 3745-50-58(G)

- (a) The Permittee is authorized to proceed with Corrective Action activities in accordance with the terms and conditions of this Ohio hazardous waste permit (hereinafter "permit"), ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act (RCRA), as amended, and the permit application. The permit application, as submitted to Ohio EPA on January 9, 2013 is hereby incorporated into this permit. In the instance of inconsistent language or discrepancies between the above, the language of the more stringent provision shall govern.
- (b) Any management of hazardous waste not authorized by this permit is prohibited, unless otherwise expressly authorized or specifically exempted by law. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or invasion of other private rights. Compliance with the terms and conditions of this permit does not obviate Permittee's obligation to comply with other applicable provisions of law governing protection of public health or the environment including but not limited to the Community Right to Know law under ORC Chapter 3750.

A.2 Permit Actions

OAC Rule 3745-50-58(F)

This permit may be modified or revoked as specified by Ohio law. The filing of a request by the Permittee for a permit modification, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay any permit term or condition.

A.3 Permit Effective/Expiration Date

OAC Rule 3745-50-54

The effective date of this permit is the date the permit is entered into the Director's Journal. The permit expiration date is ten years after the date of journalization of this permit.

SEP 30 2013

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A.4 Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

A.5 Duty to Comply
OAC Rule 3745-50-58(A)

The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application, or other appropriate action.

A.6 Duty to Reapply and Permit Expiration
OAC Rules 3745-50-40(D), 3745-50-58(B), and 3745-50-56 and ORC Section 3734.05(H)

- (a) If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must submit a completed permit application for a hazardous waste facility installation and operation permit renewal and any necessary accompanying general plans, detailed plans, specifications, and such information as the Director may require, to the Director no later than one hundred eighty (180) days prior to the expiration date of this permit, unless a later submittal date has been authorized by the Director upon a showing of good cause.
- (b) The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:
 - (i) the Permittee has submitted a timely and complete permit application for a renewal permit under OAC Rule 3745-50-40; and
 - (ii) through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of this permit.

SEP 30 2013
Ohio EPA DMW

- (c) The Corrective Action obligations contained in this permit will continue regardless of whether the facility continues to operate or ceases operation and closes. The Permittee is obligated to complete facility-wide Corrective Action under the conditions of this permit regardless of the operational status of the facility. The Permittee must submit an application for permit renewal at least 180 days before the expiration date of this permit pursuant to OAC Rule 3745-50-40(D) unless a) the permit has been modified to terminate the Corrective Action schedule of compliance and the Permittee has been released from the requirements for financial assurance for Corrective Action; or b) a later submittal date has been authorized by the Director.

A.7 Need to Halt or Reduce Activity Not a Defense
OAC Rule 3745-50-58(C)

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce a permitted activity in order to maintain compliance with the conditions of this permit.

A.8 Duty to Mitigate
OAC Rule 3745-50-58(D)

The Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with this permit.

A.9 Proper Operation and Maintenance
OAC Rule 3745-50-58(E)

The Permittee must at all times properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

SEP 30 2013

Ohio EPA, CWR

A.10 Duty to Provide Information
OAC Rule 3745-50-58(H)

The Permittee must furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying or revoking, or to determine compliance with, this permit. The Permittee must also furnish to the Director, upon request, copies of records required to be kept by this permit.

A.11 Inspection and Entry
OAC Rules 3745-50-58(I), 3745-49-03 and 3745-50-30 and ORC Section 3734.07

- (a) The Permittee must allow the Director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification, to:
- (i) enter, at reasonable times, upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of this permit;
 - (ii) have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;
 - (iii) inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the terms and conditions of this permit; and
 - (iv) sample, document, or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder, any substances or parameter at any location.
- (b) Any record, report, or other information obtained under the hazardous waste rules or ORC Chapter 3734 shall not be available to the public upon the Permittee's timely submittal of a trade secret claim and satisfactory showing to Ohio EPA that all or part of the information would divulge methods or processes entitled to protection as trade secrets pursuant to Ohio Trade Secret Law and OAC Rules 3745-49-03 and 3745-50-30.

SEP 30 2013

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A.12 Monitoring and Records
OAC Rule 3745-50-58(J)

- (a) Any sample and measurement taken for the purpose of monitoring must be representative of the monitored activity. Further, a sample must be a representative sample, as such term is defined and used in the Ohio hazardous waste rules. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of OAC Rule 3745-51-20, Laboratory Methods. Laboratory methods must be those specified in Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods, EPA Publication SW-846, Third Edition (November 1986), as amended by Updates I (dated July 1992), II (dated September 1994), IIA (dated August 1993), IIB (dated January 1995), III (dated December 1996), and IIIA (dated April 1998), and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater: Twentieth Edition, 1999; or an equivalent method as specified in the approved waste analysis plan, or as this term is defined and used in the Ohio hazardous waste rules.
- (b) Records of monitoring information must specify the:
- (i) date(s), exact place(s), and time(s) of sampling or measurements;
 - (ii) individual(s) who performed the sampling or measurements;
 - (iii) date(s) analyses were performed;
 - (iv) individual(s) who performed the analyses;
 - (v) analytical technique(s) or method(s) used; and
 - (vi) results of such analyses.

A.13 Signatory Requirement and Certification of Records
OAC Rules 3745-50-58(K) and 3745-50-42

All applications, reports, or information must be properly signed and certified in accordance with OAC Rule 3745-50-58(K).

SEP 30 2013

Ohio EPA DMW

A.14 Retention of Records and Information Repository

OAC Rules 3745-50-40(G), 3745-50-58(J), 3745-50-58(M), and 3745-50-58(N)

- (a) The Permittee must retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, the certification required by OAC Rule 3745-54-73(B)(9), and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, certification, or application.
- (b) The record retention period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility.
- (c) The Permittee must maintain, in accordance with the Ohio hazardous waste rules, records of all data used to complete the permit application and any amendments, supplements, or modifications of such application. The Permittee must retain a complete copy of the current application for the effective life of the permit as indicated in Permit Condition A.3.
- (d) The Permittee must maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- (e) Corrective Action records must be maintained at least three (3) years after all Corrective Action activities have been completed.

A.15 Planned Changes

OAC Rules 3745-50-51 and 3745-50-58(L)(1)

The Permittee must give notice to the Director as soon as possible of any planned physical alterations or additions to the facility. All such changes must be made in accordance with OAC Rule 3745-50-51.

A.16 Waste Shipments

OAC Rules 3745-52-12 and 3745-53-11 and ORC Section 3734.15(C)

The Permittee must only use properly registered transporters of hazardous waste to remove hazardous waste from the facility, in accordance with all applicable laws and rules.

SEP 30 2013

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A.17 Anticipated Noncompliance
OAC Rule 3745-50-58(L)(2)

The Permittee must give advance notice to the Director of any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of this permit. Such notification does not waive the Permittee's duty to comply with this permit pursuant to Permit Condition A.5.

A.18 Transfer of Permits
OAC Rules 3745-50-52, 3745-50-58(L)(3), and 3745-54-12

- (a) The permit may be transferred to a new owner or operator only if such transfer is conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder. This permit may be transferred by the Permittee to a new owner or operator only if the permit has been modified under OAC Rule 3745-50-51. Before transferring ownership or operation of the facility, the Permittee must notify the new owner or operator in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder (including all applicable Corrective Action requirements).
- (b) The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements.

A.19 Compliance Reports
OAC Rules 3745-50-58(L)(5) and 3745-50-50

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule (developed in accordance with OAC Rule 3745-50-50) of this permit must be submitted to the Director no later than fourteen (14) days following each scheduled date.

A.20 Immediate Reporting of Noncompliance
OAC Rule 3745-50-58(L)(6)

- (a) The Permittee must report orally to Ohio EPA's Division of Environmental Response and Revitalization within twenty-four (24) hours from the time the Permittee becomes aware of any noncompliance with this permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment, including:

SEP 30 2013

Ohio EPA DMWM

- (i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
 - (ii) any information of a release or discharge of hazardous waste or a fire or explosion from the hazardous waste facility, which could threaten the environment or human health outside the facility.
- (b) The report must consist of the following information (if such information is available at the time of the oral report):
- (i) name, address, and telephone number of the owner or operator;
 - (ii) name, address, and telephone number of the facility;
 - (iii) date, time, and type of incident;
 - (iv) name and quantity of material(s) involved;
 - (v) the extent of injuries, if any;
 - (vi) an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
 - (vii) estimated quantity and disposition of recovered material that resulted from the incident.

A.21 Follow-Up Written Report of Noncompliance
OAC Rule 3745-50-58(L)(6)(c)

- (a) A written report must also be provided to Ohio EPA's Division of Environmental Response and Revitalization and the Division of Materials and Waste Management Southwest District Office within five (5) days of the time the Permittee becomes aware of the circumstances reported in Permit Condition A.20.
- (b) The written report must address the items in Permit Condition A.20 and must contain a description of such noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and, if not, the anticipated time it is expected to continue; and steps taken or planned to minimize the impact on human health and the environment and to reduce, eliminate, and prevent recurrence of the noncompliance.

- (c) The Permittee need not comply with the five (5) day written report requirement if the Director, upon good cause shown by the Permittee, waives that requirement and the Permittee submits a written report within fifteen (15) days of the time the Permittee becomes aware of the circumstances.

A.22 Other Noncompliance

OAC Rules 3745-50-58(L)(10) and 3745-50-58(L)(4)

The Permittee must report to the Director all other instances of noncompliance not provided for in Permit Conditions A.19 and A.20. These reports must be submitted within thirty (30) days of the time at which the Permittee is aware of such noncompliance. Such reports must contain all information set forth within Permit Condition A.20.

A.23 Reserved

A.24 Other Information

OAC Rule 3745-50-58(L)(11)

If at any time the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information to the Director, the Permittee must promptly submit such facts, information, or corrected information to the Director.

A.25 Confidential Information

OAC Rules 3745-49-03 and 3745-50-30

In accordance with ORC Chapter 3734 and the rules adopted thereunder, the Permittee may request confidentiality for any information required to be submitted by the terms and conditions of this permit, or any information obtained by the Director, or an authorized representative, pursuant to the authority provided under Permit Condition A.11.

A.26 Reserved

A.27 Reserved

SEP 30 2013

Ohio EPA DMVM

A.28 Information to be Maintained at the Facility
OAC Rule 3745-54-74

- (a) Corrective Action reports and records, as required by Conditions E.5, E.8, E.9, E.10, and E.11 of this permit, must be maintained for at least 3 years after all Corrective Action Activities have been completed.

A.29 Reserved

SEP 30 2013

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MODULE B - GENERAL FACILITY CONDITIONS

B. GENERAL FACILITY CONDITIONS

B.1 Design and Operation of Facility OAC Rule 3745-54-31

- (a) The Permittee must design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground water, or surface waters which could threaten human health or the environment.
- (b) The Permittee shall not accept any hazardous waste from off-site sources.

B.2 Reserved

B.3 Reserved

B.4 Security OAC Rule 3745-54-14

The Permittee must comply with the security provisions of OAC Rule 3745-54-14(B)(1) or (2) and (C)

B.5 Reserved

B.6 Reserved

B.7 Reserved

B.8 Reserved

B.9 Reserved

B.10 Reserved

B.11 Reserved

SEP 30 2013

OH EPA DMM

B.12 Reserved

B.13 Reserved

B.14 Reserved

B.15 Reserved

B.16 Reserved

B.17 Reserved

B.18 Reserved

B.19 Reserved

B.20 Reserved

B.21 Reserved

B.22 Reserved

B.23 Reserved

B.24 Manifest System

OAC Rules 3745-54-70, 3745-54-71, 3745-54-72, and 3745-54-76

In managing waste at the facility, the Permittee must comply with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72, and 3745-54-76 with regard to the manifest system.

SEP 30 2013

Ohio EPA DMMW

B.25 Biennial Report and Additional Reports
OAC Rules 3745-54-75 and 3745-54-77

The Permittee must comply with the report requirements set forth in OAC Rule 3745-54-75 and the additional report requirements set forth in OAC Rule 3745-54-77.

B.26 Reserved

B.27 Reserved

B.28 Reserved

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B.30 Reserved

B.31 Reserved

B.32 Reserved

B.33 Reserved

B.34 Reserved

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B.36 Reserved

B.37 Reserved

B.38 Reserved

SEP 30 2013

Ohio EPA DMWM

B.39 Incapacity of Owners or Operators, Guarantors, or Financial Institutions
OAC Rule 3745-55-48

The Permittee must comply with the requirements set forth in OAC Rule 3745-55-48 regarding the incapacity of owners or operators, guarantors, or financial institutions.

B.40 General Requirements for Land Disposal Restrictions
OAC Chapter 3745-270

The Permittee must comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270.

SEP 30 2013

Ohio EPA DMM

MODULE C – RESERVED

SEP 30 2013

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MODULE D - RESERVED

SEP 30 2013

Ohio EPA DMM

MODULE E - CORRECTIVE ACTION REQUIREMENTS

The facility's hazardous waste container and tank storage activities underwent closure on December 19, 2005. In correspondence dated May 25, 2006, Ohio EPA concurred that the hazardous waste container storage area and both hazardous waste storage tanks had been closed in accordance with the approved closure plan and OAC rules 3745-55-11 through 3745-55-15. There is no hazardous waste storage of greater than 90 days at this facility effective December 19, 2005. The site currently operates as a large quantity generator (LQG). The sole purpose of this permit is to address Corrective Action under OAC Rule 3745-54-101. The facility submitted an RFI workplan on June 29, 2005. As a result of these investigations, it was determined that a Phase 2 RFI workplan was warranted. Revisions to this workplan are currently pending.

E.1 Corrective Action at the Facility OAC Rules 3745-50-10 and 3745-54-101

In accordance with OAC Rule 3745-50-10, "waste management unit" means any discernible unit at which solid waste, hazardous waste, infectious waste (as those terms are defined in ORC Chapter 3734), construction and demolition debris (as defined in ORC Chapter 3714), industrial waste, or other waste (as those terms are defined in ORC Chapter 6111) has been placed, at any time, irrespective of whether the unit was intended for the management of waste or hazardous waste. Such units include any area at a facility at which wastes have been routinely and systematically released. For the purpose of Corrective Action, "facility" is defined as all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. The terms Interim Measure (IM), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS), and Corrective Measure Implementation (CMI) are defined in U.S. EPA's Corrective Action Plan (CAP) (OSWER Directive 9902.3-2A, May 1994).

The Permittee must institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any waste management units (WMUs) at the Facility, regardless of the time at which waste was placed in such units.

E.2 Corrective Action Beyond the Facility Boundary OAC Rule 3745-54-101

The Permittee must implement Corrective Action beyond the Facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of Ohio EPA that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all

SEP 30 2013

Ohio EPA DMMW

responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary on a case-by-case basis.

E.3 Identification of WMUs
OAC Rules 3745-50-44(D) and 3745-54-101

Please see Section J of the approved permit application.

E.4 Reserved

E.5 RCRA Facility Investigation (RFI)
OAC Rule 3745-54-101

The Permittee must conduct an RFI to thoroughly evaluate the nature and extent of the release of hazardous wastes and hazardous constituents from all applicable WMUs identified in Permit Condition E.3 above and Permit Condition E.10. The major tasks and required submittal dates are shown below. The scope of work for each of the tasks is found in U.S. EPA's CAP.

(a) Phase 2 RFI Workplan

The Permittee must submit a written Phase 2 RFI Workplan to Ohio EPA within 90 days after the effective date of this permit or, in the case of a newly discovered waste management unit, on a time frame established by Ohio EPA.

- (i) Within 45 days of receipt of any Ohio EPA comments on the Phase 2 RFI Workplan, the Permittee must submit either an amended or new Phase 2 RFI Workplan that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new Phase 2 RFI Workplan. The Phase 2 RFI Workplan, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved Phase 2 RFI Workplan must be authorized by Ohio EPA.

SEP 30 2013

(b) RFI Implementation

The Permittee must implement the Phase 2 RFI Workplan according to the terms and schedule in the approved Phase 2 RFI Workplan.

(c) RFI Final Report

Within 60 days after the completion of the RFI, the Permittee must submit an RFI Final Report to Ohio EPA. The RFI Final Report must describe the procedures, methods, and results of the RFI. The Final Report must contain adequate information to support further decisions concerning Corrective Action at the Facility.

(i) Within 45 days of receipt of any Ohio EPA comments on the RFI Final Report, the Permittee must submit either an amended or new RFI Final Report that incorporates Ohio EPA's comments.

(ii) Ohio EPA will approve or modify and approve, in writing, the amended or new RFI Final Report. The RFI Final Report, as approved or as modified and approved, shall be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved RFI Final Report must be authorized by Ohio EPA.

E.6 Interim Measure (IM)

Based on the RFI Final Report or other information documenting a release of hazardous waste or constituents to the environment, Ohio EPA may require (or the Permittee may propose) the development and implementation of an IM (this may include an IM Workplan) at any time during the life of the permit to mitigate or eliminate a threat to human health or the environment. The Permittee must implement the IM upon a time frame established by Ohio EPA.

E.7 Determination of No Further Action

(a) Permit Modification

Based on the results of the completed RFI and other relevant information, the Permittee may submit an application to Ohio EPA for a permit modification under OAC Rule 3745-50-51 to terminate the Corrective Action tasks of the Schedule of Compliance. Other tasks identified in the Schedule of Compliance shall remain in effect. This permit modification application must conclusively demonstrate that there are no releases of

SEP 30 2013

Ohio EPA DMWA

hazardous waste or constituents from WMUs at the Facility that pose an unacceptable risk to human health and the environment.

If, based upon review of the Permittee's request for a permit modification, the results of the completed RFI, and other information, Ohio EPA determines that releases or suspected releases which were investigated either are nonexistent or do not pose an unacceptable risk to human health and the environment, Ohio EPA will approve the requested modification. Decisions regarding the completion of RCRA Corrective Action and no further action may be made for the entire Facility, for a portion of the Facility, or for a specific unit or release.

(b) Periodic Monitoring

A determination of no further action shall not preclude Ohio EPA from requiring continued or periodic monitoring of air, soil, ground water, or surface water, if necessary to protect human health and the environment, when site-specific circumstances indicate that a potential or an actual release of hazardous waste or constituents exists.

(c) Further Investigations

A determination of no further action shall not preclude Ohio EPA from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or potential release from a WMU at the Facility may pose an unacceptable risk to human health or the environment. In such a case, Ohio EPA shall initiate a modification to the terms of the permit to rescind the determination made in accordance with Permit Condition E.7(a). Additionally, in the event Ohio EPA determines that there is insufficient information on which to base a determination, the Permittee, upon notification, is required to develop a Work Plan and, upon Ohio EPA approval of that Work Plan, perform additional investigations as needed.

E.8 Corrective Measures Study (CMS)

If Ohio EPA determines, based on the results of the RFI and any other relevant information, that corrective measures are necessary, Ohio EPA will notify the Permittee in writing that the Permittee must conduct a CMS either as described below or as described in Ohio EPA's notification to the Permittee. The purpose of the CMS will be to develop and evaluate the corrective action alternative(s) and to outline one or more alternative corrective measure(s) that will satisfy the performance objectives specified in Permit Condition E.9.

SEP 30 2013

Ohio EPA DMMW

(a) CMS Workplan

The Permittee must submit a written CMS Workplan to Ohio EPA within 90 days from the notification by Ohio EPA of the requirement to conduct a CMS.

- (i) Within 45 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Workplan that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Workplan. The CMS Workplan, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Workplan must be authorized by Ohio EPA.

(b) CMS Workplan Implementation

The Permittee must implement the CMS Workplan according to the terms and schedule in the approved CMS Workplan.

(c) CMS Final Report

Within 90 days after the completion of the CMS, the Permittee must submit a CMS Final Report to Ohio EPA. The CMS Final Report must summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative.

- (i) Within 45 days of receipt of any Ohio EPA comments, the Permittee must submit either an amended or new CMS Final Report that incorporates Ohio EPA's comments.
- (ii) Ohio EPA will approve or modify and approve, in writing, the amended or new CMS Final Report. The CMS Final Report, as approved or as modified and approved, must be incorporated into this permit and become an enforceable condition of this permit. Subsequent changes to the approved CMS Final Report must be authorized by Ohio EPA.

SEP 30 2013

Ohio EPA DMWM

E.9 Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Permittee must implement one or more of the Corrective Measures authorized by Ohio EPA. Ohio EPA will authorize one or more of the Corrective Measures in the CMS, and will notify the Permittee in writing of the decision. The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; (2) attain media cleanup standards; (3) control the source(s) of releases so as to reduce or eliminate further releases of hazardous waste(s) (including hazardous constituent[s]); and (4) comply with all applicable standards for management of wastes.

If two or more of the Corrective Measures studied meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility, or volume of contamination; (3) the Corrective Measure's short-term effectiveness; (4) the Corrective Measure's implementability; and (5) the relative cost associated with the alternative.

(a) Permit Modification

Ohio EPA will initiate a permit modification, as provided by OAC Rule 3745-50-51, to require implementation of the corrective measure(s) authorized.

The Permittee must not implement the corrective measure(s) until the permit is modified pursuant to OAC Rule 3745-50-51.

(b) Financial Assurance
OAC Rule 3745-54-101

As part of the modification of this permit to incorporate CMI, the Permittee shall provide financial assurance in the amount necessary to implement the corrective measure(s) as required by OAC Rule 3745-54-101(b) and (c).

Within 30 days after receiving approval of the CMI Work Plan, the Permittee must provide a third party, itemized cost estimate which outlines the tasks required to implement the corrective measure(s). Within 30 days of Ohio EPA approval of the cost estimate, the Permittee shall provide financial assurance in the amount equal to the approved cost estimate. A financial assurance mechanism which meets the requirements of OAC

Rules 3745-55-47 through 3745-55-51 is sufficient to comply with this financial assurance requirement. With prior approval by Ohio EPA, the Permittee may, on any date, reduce the amount of financial assurance maintained so that the amount is equal to the estimated costs of completing the corrective measure(s).

E.10 Newly Identified WMUs or Releases
OAC Rule 3745-54-101

(a) General Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, the following information regarding any new WMU identified at the Facility by Ohio EPA or the Permittee:

- (i) The location of the unit on the site topographic map;
- (ii) Designation of the type of unit;
- (iii) General dimensions and structural description, including any available drawings; and
- (iv) When the unit was operated.

(b) Release Information

The Permittee must submit to Ohio EPA, within 30 days of discovery, all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing WMU.

E.11 Corrective Action for Newly Identified WMUs and Releases
OAC Rule 3745-54-101

If Ohio EPA determines that an RFI is required for newly identified WMUs, the Permittee must submit a written RFI Workplan to Ohio EPA upon a time frame established in written notification by Ohio EPA in accordance with Permit Condition E.5. This determination will be made based on the information submitted in accordance with Permit Condition E.10.

Further investigations or corrective measures will be established by Ohio EPA.

The Permittee must make such submittal in accordance with time frames established by Ohio EPA.

E.12 Completion of Corrective Action
OAC Rule 3745-54-101

After completing Corrective Action as necessary to protect human health and the environment for all releases of hazardous wastes or hazardous constituents from any WMUs at the Facility, the Permittee shall submit a Corrective Measures Completion of Work (CMCW) Report. The CMCW Report shall document that Corrective Action construction is complete, cleanup objectives and standards have been met, and any releases of hazardous waste or constituents no longer pose an unacceptable risk to human health and the environment. The CMCW Report may be submitted for any part of the Facility for which corrective measures are complete, or for the entire Facility. The CMCW Report must be submitted as a request for permit modification pursuant to OAC Rule 3745-50-51.

E.13 Documents Requiring Professional Engineer Stamp
ORC Section 4733.01

Preparation of the following Corrective Action documents constitutes the "practice of engineering" as defined by ORC Section 4733.01:

- (i) Final Interim Measures Report;
- (ii) Corrective Measures Final Design;
- (iii) Corrective Measures Construction Completion Report;
- (iv) Corrective Measures Attainment of Groundwater Performance Standards Report; and
- (v) Corrective Measures Completion of Work Report.

As such, the Permittee must ensure that these documents, as submitted to Ohio EPA, are stamped by a Professional Engineer licensed to practice in the State of Ohio.

Submitted January 9, 2013

RECEIVED
JAN 10 2013
Ohio EPA - DMWM

RESOURCE CONSERVATION AND RECOVERY ACT

RE-SUBMITTAL OF PART B PERMIT APPLICATION

for

INEOS ABS (USA) Corporation

Addyston, Ohio

U.S.EPA ID No.: OHD 004 233 003
Ohio ID No.: 05-31-0604

Submitted to:

Ohio Environmental Protection Agency

January 9, 2013

000001

Submitted January 9, 2013

TABLE OF CONTENTS

Section A	Part A Application (Latest Revision)
Section B	Facility Description
Section J	Corrective Action for Solid Waste Management Units
Section K	Other Federal Laws
Section L	Part B Certification

000007

Submitted January 9, 2013

Section A. Part A Permit Application:

The INEOS ABS (USA) Corporation in Addyston, Ohio (Hamilton County), operates two (2) hazardous waste storage tanks and one (1) container storage area under Generator Status in accordance with applicable hazardous waste regulations as outlined in Ohio Administrative Code (OAC) 3745-52 – Generator Standards. The site operates as a large quantity generator (LQG.)

The site submits this application for the sole purpose of addressing Corrective Action under AOC 3745-54-100. Accordingly, this application includes only those sections pertinent to Corrective Action and general facility information as follows:

Section A: Part A Permit Application
Section B: Facility Description
Section J: Corrective Action for Solid Waste Units
Section K: Other Federal Laws
Section L: Certification

In addition to the Hazardous Waste Permit Information Form, additional information is required by OAC 3745-50-43 (A) through (O).

- (A) This application is for a Part B permit to reflect only Corrective Action at this site under OAC 3745-55-100.
- (B) INEOS ABS (USA) Corporation
356 Three Rivers Parkway
Addyston, Ohio 45001-0039

Latitude: N 39 degrees 07' 56"
Longitude: W 84 degrees 42' 45"
- (C) NAICS 325211
- (D) See Hazardous Waste Permit Information Form in Appendix A-1.
- (E) See Hazardous Waste Permit Information Form in Appendix A-1.
- (F) Reserved.
- (G) See Hazardous Waste Permit Information Form in Appendix A-1.
- (H) See Appendix A-1 for maps and photographs.
- (I) There is no hazardous waste storage greater than 90 days as December 19, 2005. This facility is operated in accordance with OAC 3745-52.
- (J) See Hazardous Waste Permit Information Form in Appendix A-1.
- (K) See Hazardous Waste Permit Information Form in Appendix A-1.
- (L) See Hazardous Waste Permit Information Form in Appendix A-1.

The INEOS ABS (USA) Corporation Addyston, Ohio facility is located on the Ohio River in Addyston, Ohio, 12 miles west (downstream) of Cincinnati, Ohio, in Hamilton County. The principal products are acrylonitrile-butadiene-styrene (ABS) and styrene-acrylonitrile (SAN) plastics. Styrene-maleic anhydride resins are also manufactured at this facility. Wide diverse end uses are served such as automotive, appliances, house wares, toys, paints, luggage, and packaging.

Submitted January 9, 2013

(M) Not applicable.

(N) See Hazardous Waste Permit Information Form in Appendix A-1.

Submitted January 9, 2013

Appendix A-1

C0005

SEP 30 2013

Ohio EPA DMMW

MAIL THE COMPLETED FORM TO: Ohio EPA, DMWM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION		For Ohio EPA Use Only	
1. Reason for Submittal	Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report for the year			
2. Site EPA ID No.	EPA ID Number: OHD 004 233 003			
3. Site Name	Name: INEOS ABS (USA) CORPORATION			
4. Site Location Information	Street Address: 356 THREE RIVERS PARKWAY City, Town, or Village: ADDYSTON County: HAMILTON State: OHIO Country: USA Zip Code: 45001			
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			
6. North American Industry Class. System (NAICS) Code(s) for the Site	A. (Primary) 325211	B.	C.	D.
7. Site Contact Person:	First Name: MARK MI: W Last Name: TOWNSEND Title: SR. ENVIRONMENTAL SPECIALIST Street or P.O. Box: SAME AS ABOVE City, Town or Village: State: Country: Zip Code: 45001 E-mail: Phone & Ext.: 513-467-2352 Fax: 513-467-2241			
8. Legal Owner and Operator of the Site Additional Owners and/or Operators should be listed in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: INEOS ABS (USA) CORPORATION		Date Became Owner (mm/dd/yyyy): 10 '01 '2007	
Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				
Street or P.O. Box: SAME AS ABOVE				
City, Town, or Village:		Phone: 513-467-2400		
State:		Country: Zip Code:		
B. Name of Site's Operator: INEOS ABS (USA) CORPORATION		Date Became Operator (mm/dd/yyyy): 10 '01 '2007		
Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other				
Street or P.O. Box: SAME AS ABOVE				
City, Town, or Village:		Phone:		
State:		Country: Zip Code:		

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. Hazardous Waste Activities

For Items 3 through 7, check all that apply:

1. **Generator of Hazardous Waste**
(choose only one of the following three categories or leave blank if not applicable)
- a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
 - b. **Small Quantity Generator (SQG):**
100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste; or
 - c. **Conditionally Exempt Small Quantity Generator (CESQG):**
Less than 100 kg/mo of non-acute hazardous waste
- In addition, indicate other generator activities (check all that apply)
- d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
 - e. United States Importer of Hazardous Waste
 - f. Mixed Waste (hazardous and radioactive) Generator

3. **Transporter of Hazardous Waste**
- a. Transporter
 - b. Transfer Facility (at your site)
4. **Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
5. **Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- a. 72-hour Recycler
6. **Exempt Boiler and/or Industrial Furnace**
- a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting and Refining Furnace Exemption
7. **Underground Injection Control**
8. **Receives Hazardous Waste from Off-site**

2. **Hazardous Waste Report Generator Status**
(choose one if a Reason for Submittal is the Hazardous Waste Report)
- a. **Large Quantity Generator (LQG):**
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste was generated at the site in any one month. or
 - b. **Small Quantity Generator (SQG)**
In one or more months the site generated greater than 100kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste, or
 - c. **Conditionally Exempt Small Quantity Generator (CESQG):**
The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.
 - d. **Non-Generator**
The site did not generate any hazardous waste during the calendar year.

B. Universal Waste Activities

1. **Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more). Indicate types of universal waste managed at your site. (check all boxes that apply):**
- | | |
|---------------------------------|--------------------------|
| | <u>Managed</u> |
| a. Batteries | <input type="checkbox"/> |
| b. Pesticides | <input type="checkbox"/> |
| c. Mercury Containing Equipment | <input type="checkbox"/> |
| d. Lamps | <input type="checkbox"/> |
2. **Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. **Used Oil Transporter**
Indicate Type(s) of Activity(ies)
- a. Transporter
 - b. Transfer Facility (at your site)
2. **Used Oil Processor and/or Re-refiner**
Indicate Type(s) of Activity(ies)
- a. Processor
 - b. Re-refiner
3. **Off-Specification Used Oil Burner**
4. **Used Oil Fuel Marketer -**
Indicate Type(s) of Activity(ies)
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories – Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to OAC rules 3745-52-200 through 3745-52-216

1. Opting into or currently operating under OAC rules 3745-52-200 through 3745-52-216 for the management of hazardous wastes in laboratories. Mark all that apply:
- a. College or University
 - b. Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 - c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university
2. Withdrawing from OAC rules 3745-52-200 through 3745-53-216 for the management of hazardous waste in laboratories

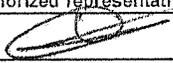
10. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D018	D035	F003
F005	U009	U140	U154			

11. Comments

Blank space for comments.

12. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	ERIC CASSISA	1/27/13

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

- A. **PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.
- B. **PROCESS DESIGN CAPACITY** – For each code entered in Item 7.A; enter the capacity of the process.
 1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.
- C. **PROCESS TOTAL NUMBER OF UNITS** – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity	Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal			Treatment (Continued) (for T81 – T94)		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour;
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
Storage			T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
S99	Other Storage	Any Unit of Measure Listed Below	T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Treatment			Miscellaneous (Subpart X)		
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below

Unit of Measure	Unit of Measure Code	Unit of Measure	Unit of Measure Code	Unit of Measure	Unit of Measure Code
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Short Tons Per Day	N	Cubic Meters	C
Gallons Per Day	U	Metric Tons Per Hour	W	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	X	Hectare-meter	F
		Million BTU Per Hour	X	BTU Per Hour	I

00010

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES														
	(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))														
X	1	K	0	5	4	900	P	T	0	3	D	8	0								
X	2	D	0	0	2	400	P	T	0	3	D	8	0								
X	3	D	0	0	1	100	P	T	0	3	D	8	0								
	4	D	0	0	2																Included With Above

Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)												
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES								
				(1) PROCESS CODES (Enter Code)					(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))			
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
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10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements. *SEE ATTACHMENTS.*

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

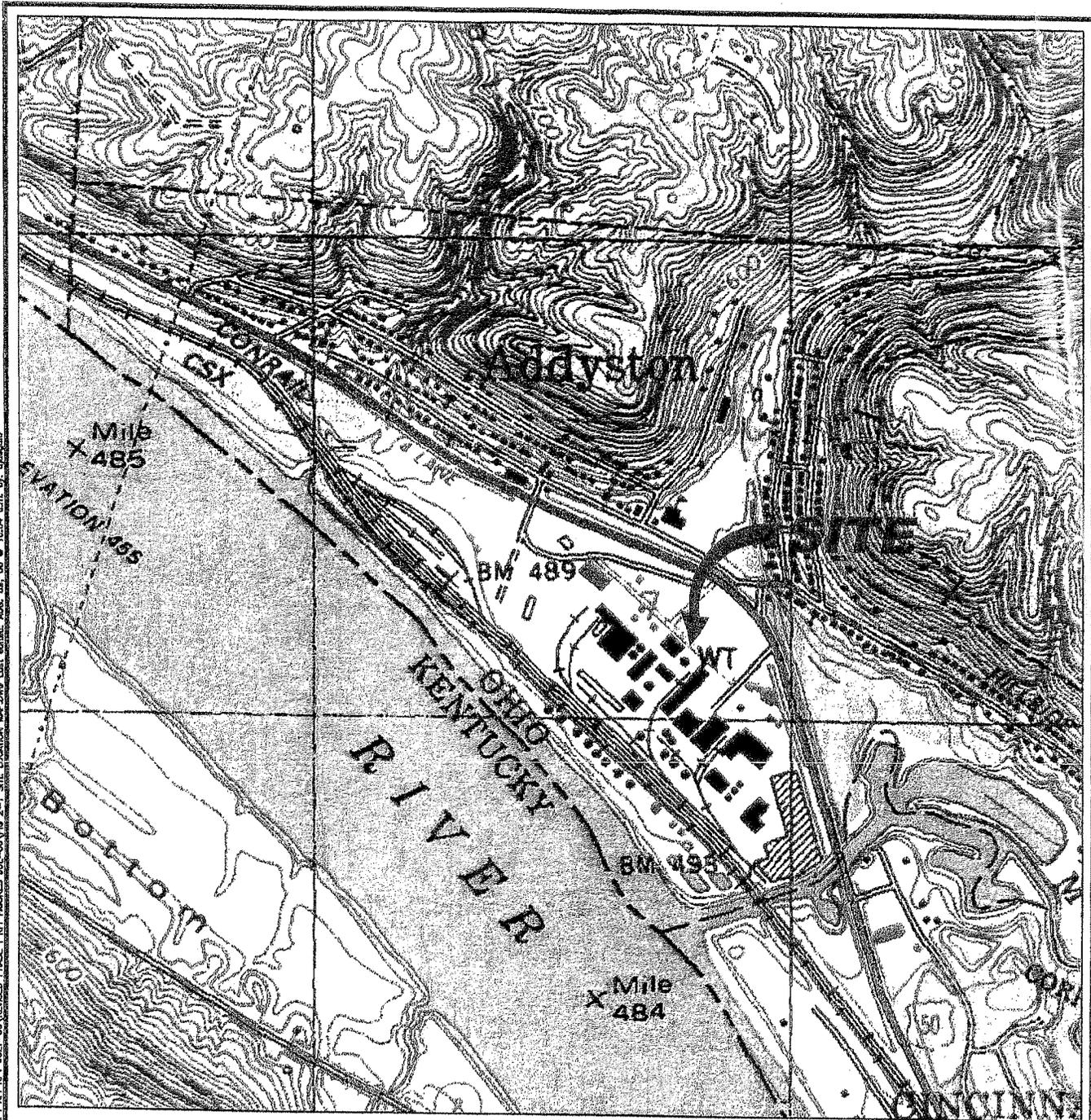
See attachments.

12. Photographs

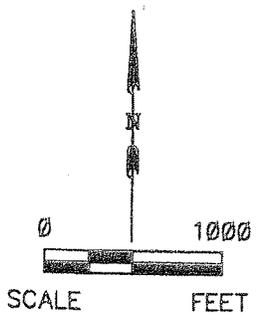
All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail). *SEE ATTACHMENTS.*

13. Comments

FILE: ENVIRONMENTAL... SERVICES... PHASE I... SITE LOCATION MAP... DATE: 08/06 @ 10:04 a.m. by: dflange



SOURCE: MAP TAKEN FROM ELECTRONIC USGS DIGITAL RASTER GRAPHIC 7.5 MINUTE TOPOGRAPHIC MAP OF ADDYSTON, OHIO, KENTUCKY REVISED 1996



INEOS ABS

00015

SEP 30 2013

Ohio EPA DMM

30/2/11

East Property Boundary 1,200 ft.

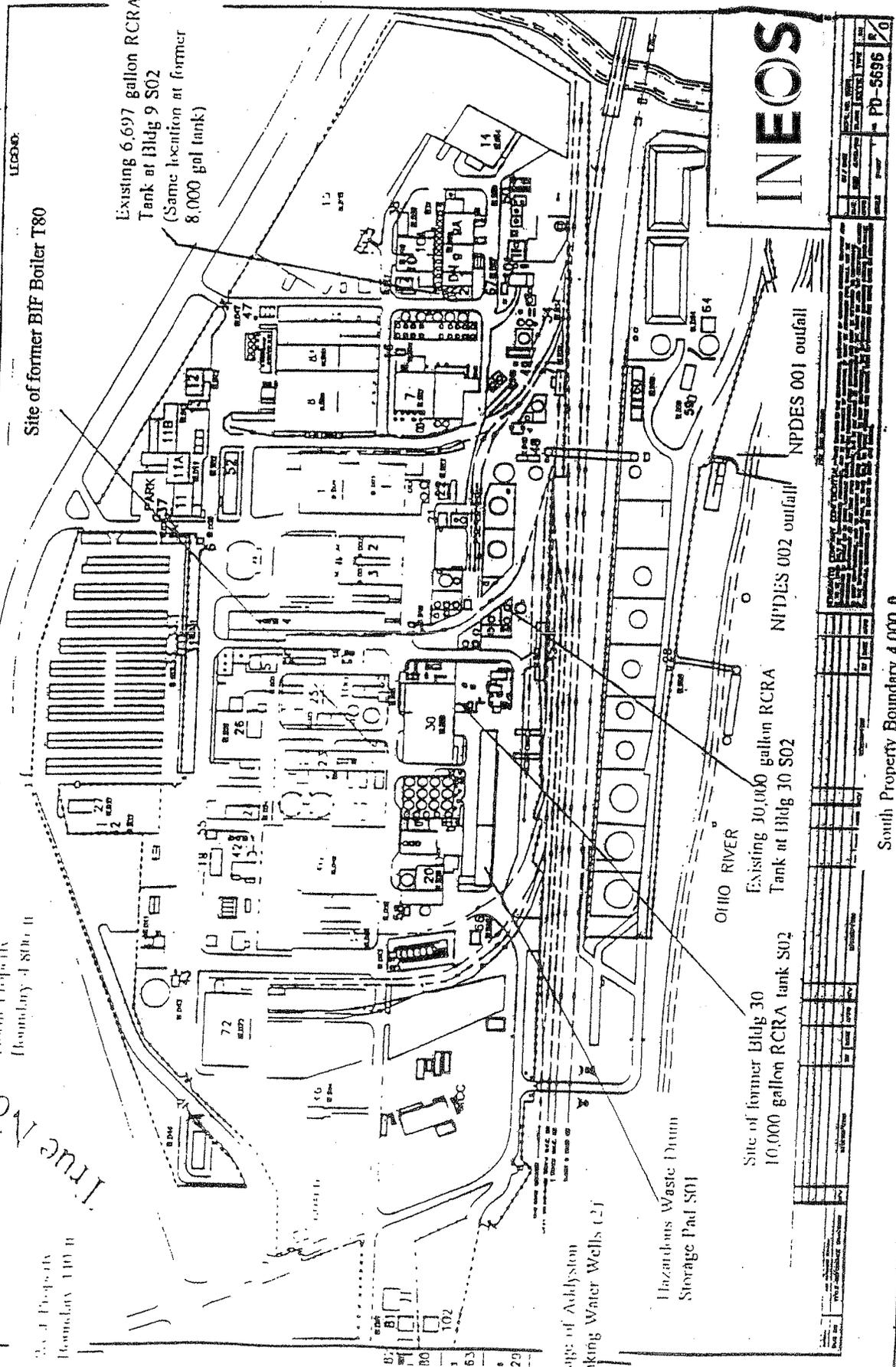


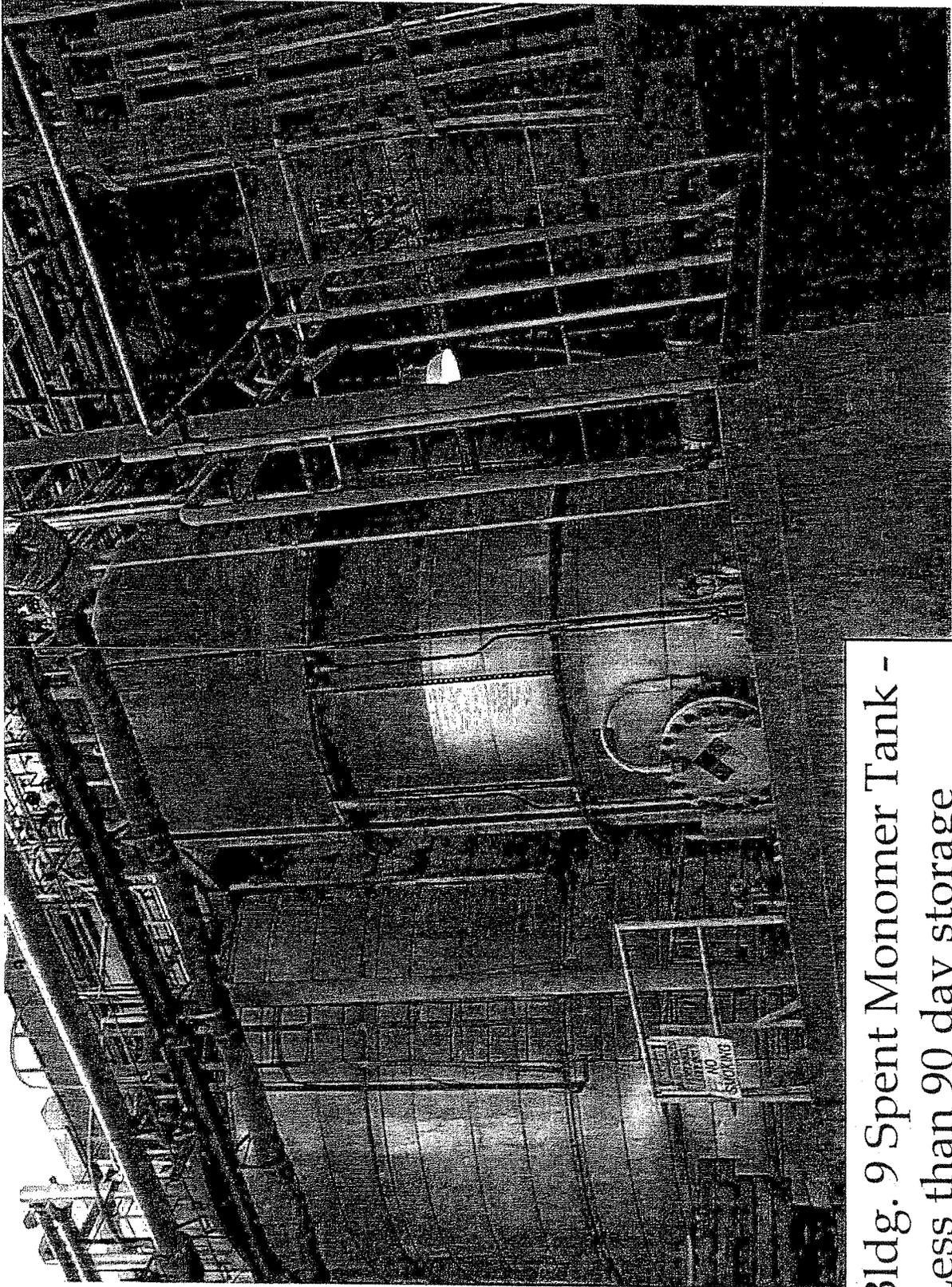
Figure 2.

South Property Boundary 4,000 ft.

00016

SEP 30 2013

OHIO EPA DMMAN

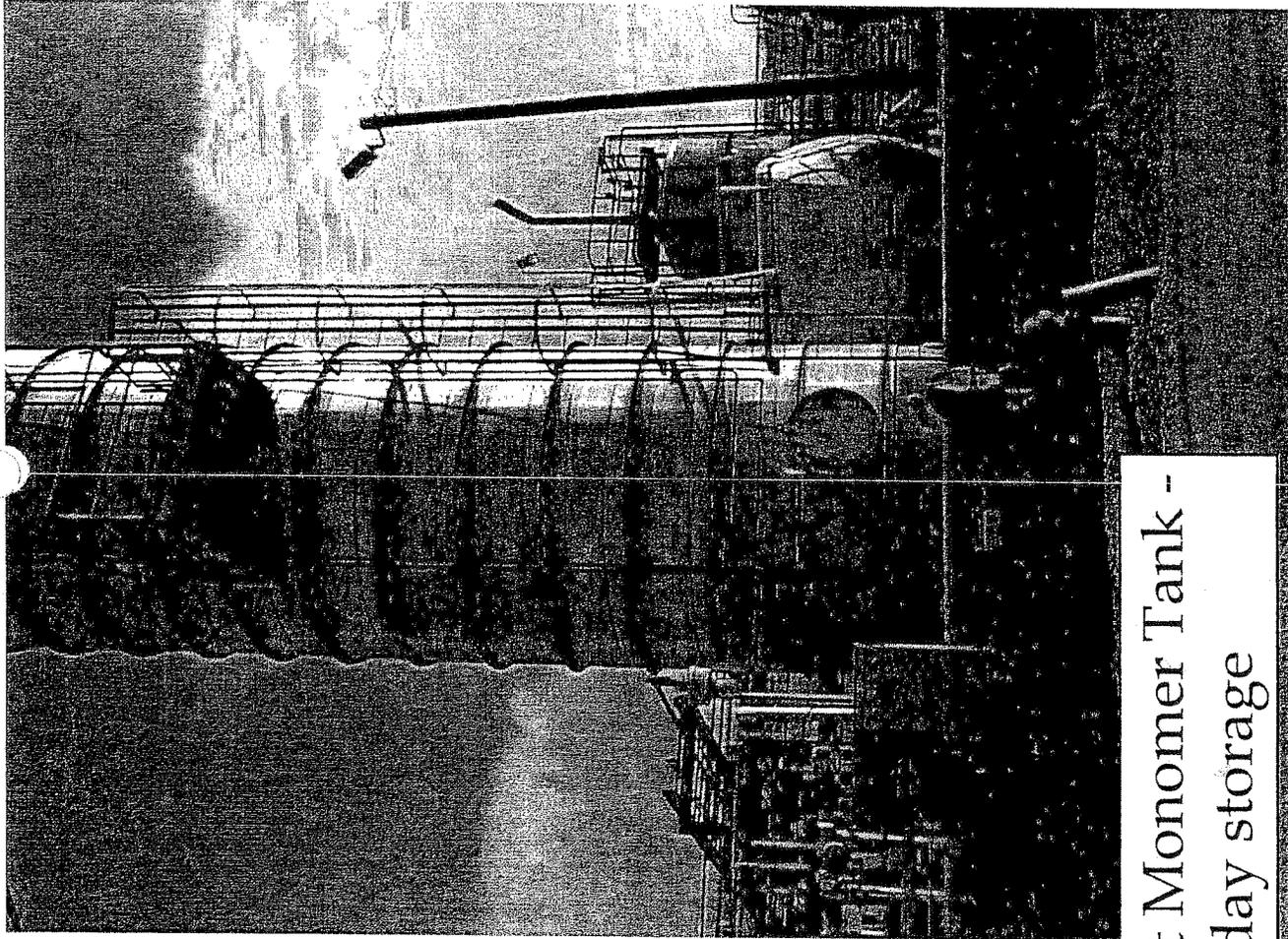


Bldg. 9 Spent Monomer Tank -
Less than 90 day storage

00017

SEP 30 2013

Ohio EPA DMW



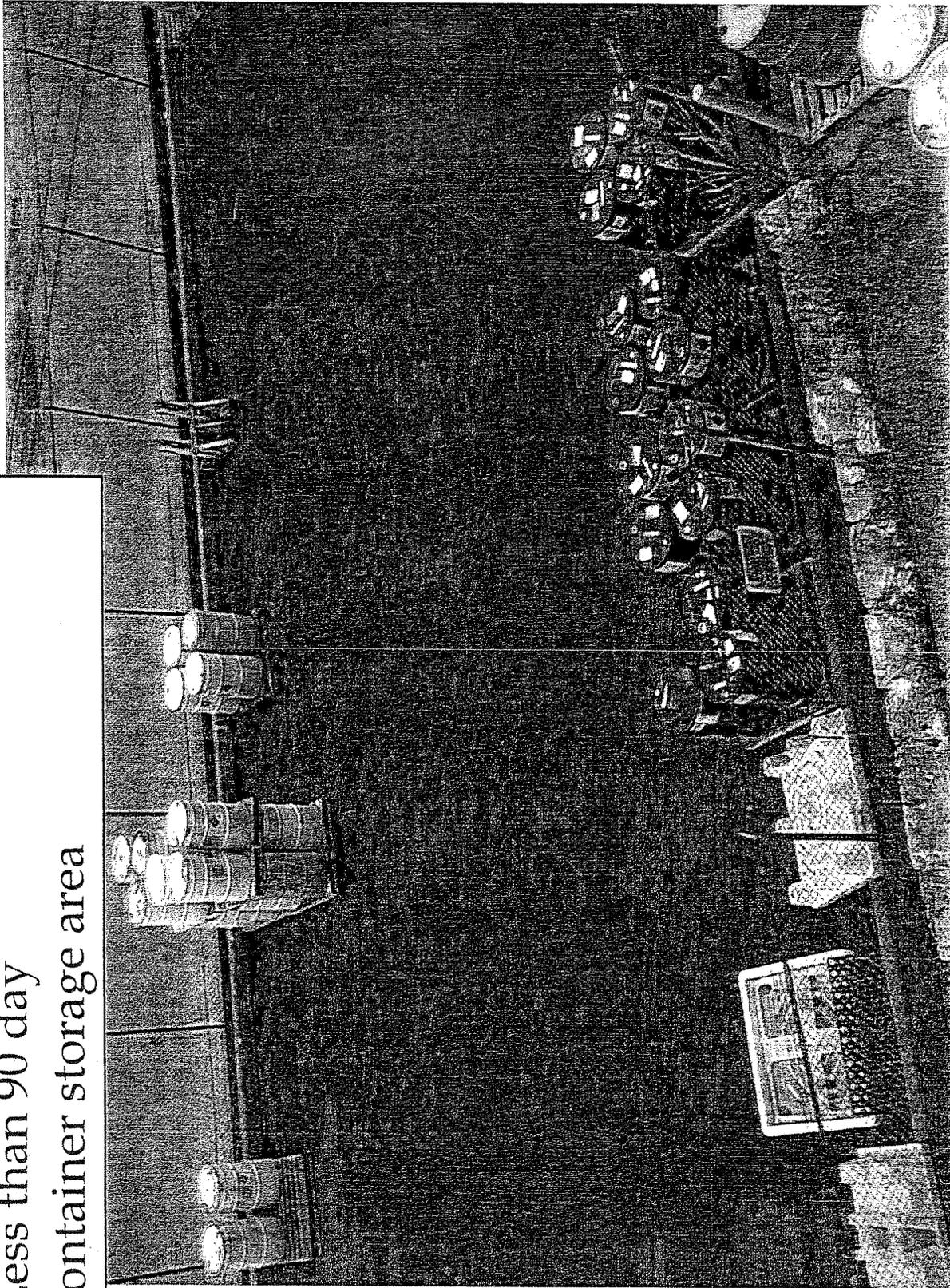
Bldg 30 Spent Monomer Tank -
Less than 90 day storage

00018

SEP 30 2013

OHIO EPA DMV

Less than 90 day
container storage area



00019

SEP 30 2013

Submitted January 9, 2013

B. FACILITY DESCRIPTION

B-1 General Description: 270.14(b)(1), OAC 3745-50-44(A)(1)

B.1.a. Site Description

The INEOS ABS (USA) Corporation Addyston, Ohio facility is located on the Ohio River in Addyston, Ohio, 12 miles west (downstream) of Cincinnati, Ohio, in Hamilton County. The principal products are acrylonitrile-butadiene-styrene (ABS) and styrene-acrylonitrile (SAN) plastics. Styrene-maleic anhydride resins are also manufactured at this facility. Wide diverse end uses are served such as automotive, appliances, house wares, toys, paints, luggage, and packaging.

The INEOS site manages hazardous waste in accordance with Ohio Administrative Code (OAC) 3745-52, including applicable container and tank management, disposal reporting, training, and contingency plan requirements.

See Section A Appendix A-1 for site maps.

B.1.b. Hazardous Waste Accumulation

On November 10, 2005, the Ohio Environmental Protection Agency approved the revised closure plan addressing the hazardous waste container storage area and the two (2) hazardous waste storage tanks.

On December 19, 2005, LANXESS (the owner/operator at that time) conducted closure of all three hazardous waste storage units. Consequently, as of December 19, 2005, the site's "Facility" status ceased and hazardous waste accumulated in accordance with OAC 3745-52 commenced, i.e., the site's status became that of "Generator".

On February 20, 2006, LANXESS (the owner/operator at that time) submitted the certification of closure report.

On May 15, 2006, LANXESS (the owner/operator at that time) received documentation that the Final Facility Closure Certification had been reviewed and accepted by the Ohio Environmental Protection Agency (Ohio EPA).

On October 1, 2007, INEOS ABS (USA) Corporation became the owner/operator of this site.

Submitted January 9, 2013

Section J

CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

J-1 Solid Waste Management Units: OAC-3745-54-100

In September, 1988, the Monsanto Port Plastics Plant in Addyston, Ohio submitted a RCRA Part B permit application to the OEPA and the USEPA Region 5 that identified eleven (11) areas that qualified as solid waste management units.

In January 1, 1996, this site became the Bayer Corporation - Polymers Division Addyston Facility.

On July 1, 2004, this site became the LANXESS Corporation.

On October 1, 2007, this site became the INEOS ABS (USA) Corporation.

At the time of the September, 1988 submittal the solid waste management units (SWMU's) were as follows:

- Area 1 - West Pond
- Area 2 - Butadiene Flare Stack Area
- Area 3 - East Pond
- Area 4 - Waste Water Treatment Plant Lagoons (Historical)
- Area 5 - Waste Water Treatment Plant Sand Filters
- Area 6 - Northeast Pond
- Area 7 - Northwest Pond
- Area 8 - Phosphoric Acid Plant
- Area 9 - Non-hazardous Waste Segregation Station
- Area 10 - Waste Water Treatment Plant (Current)
- Area 11 - Fill Dirt Area - West Property

In July of 1989, A. T. Kearney, Inc., subcontracted by USEPA Region 5, conducted a RCRA Facility Investigation / Visual Site Inspection (RFI/VSI). This investigation identified forty-eight (48) solid waste management units (SWMU's) and ten (10) Areas of Concern (AOC's). Of the 48 SWMU's and 10 AOC's, the USEPA compiled a list of seventeen (17) SWMU's for which further action was suggested. See Tables 1-1 and 1-2 in Appendix J-1 of this section for the lists all SWMU's and AOC's and the 17 SWMU's with suggested further actions. All of the original 11 SWMU's listed in the September, 1988 Part B permit application were included in the list of 48 SWMU's. The new numbers are listed below opposite the original 1988 numbers.

<u>1988 Designation</u>	<u>USEPA Designation</u>
Area 1 - West Pond	Unit 1 Former West Pond
Area 2 - Butadiene Flare Stack Area	Unit 20 Flare Stack Unit 21 Flare Overflow Basin
	Unit 22 Filter Wash Area Unit 23 Waste Pipe and Tank

Submitted January 9, 2013

Area 3 - East Pond	Unit 2 Former East Pond
Area 4 - Waste Water Treatment Plant Lagoons (Historical)	Unit 9 Former Wastewater Settling Basin Unit 10 Secondary Holding Basin
Area 5 - Waste Water Treatment Plant Sand Filters	Unit 7 Former Sand Filter/ Sludge Drying Bed Area Unit 8 Filter Area Waste Holding Basin
Area 6 - Northeast Pond	Unit 4 Former Northeast Pond with Drainage Ditch
Area 7 - Northwest Pond	Unit 3 Former Northwest Pond
Area 8 - Phosphoric Acid Plant	Unit 5 Former Phosphoric Acid Plant Waste Area
Area 9 - Non-hazardous Waste Segregation Station	Unit 13 Non-Hazardous Waste Segregation Station
Area 10 - Waste Water Treatment Plant (Current)	Unit 48B through 48O Chemical Wastewater Treatment System (WWTS)
Area 11 - Fill Dirt Area - West Property	Unit 11 West Seep Area

On January 22, 1993 Monsanto (now LANXESS) submitted the RCRA Facility Investigation Work Plan to the U.S. EPA. The document discussed all 48 SWMU's and the 10 Areas of Concern, with emphasis on the 17 SWMU's for which the U.S. EPA suggested further action.

On June 3, 1996, the Bayer Addyston facility (formerly Monsanto and now LANXESS) received comments on the RFI Work Plan from U.S. EPA Region 5.

On September 26, 1997, the Bayer Addyston facility submitted a revised RFI Workplan to USEPA Region 5 and also to the Ohio EPA Southwest District Office. During reviews of the RFI Workplan, it was discovered that the 30,000 gallon Building 30 hazardous waste storage tank was not included on the list of SWMU's found in Appendix J-1. Unit 36 in Table 1-2 referred to the former 10,000 gallon Building 30 hazardous waste storage tank that had already undergone closure. Table 1-3 has been added to Appendix J-1 and lists the current Building 30 hazardous waste storage tank which was designated as Unit 49.

Please note that the Bldg. 30 hazardous waste storage tank mentioned above, the Bldg. 9 hazardous waste storage tank, and the hazardous waste container storage area are all still active and are regulated under OAC 3745-52.

A Revised RFI Workplan was submitted to the U.S. and Ohio EPA on August 6, 2003, and June 10, 2004. The RFI Workplan was subsequently approved by the Ohio EPA on August 31, 2004.

In-field implementation of the Ohio EPA approved RFI Workplan began October 25, 2004. This work resulted in the RFI Report being submitted on June 29, 2005, to the Ohio EPA. The RFI Report focused on the SWMU's and AOC's listed in Table 1-4 in Appendix J-1 and shown on the two accompanying maps. The Ohio EPA reviewed and commented on this submittal. Based on these comments, a Final Phase 1 RFI Report was submitted in August of 2006.

INEOS ABS submitted Addendum 2 to the Final Phase 1 RCRA Facility Investigation Report in December, 2007.

This revision of Section J was necessary to reflect the addition of two (2) areas of concern (AOC). The first one being the Styrene AOC and the second area of concern being the Tar-like Substance AOC.

Submitted January 9, 2013

In December of 2008, INEOS ABS submitted the Phase 2 Workplan which is under review at the time of this submittal.

Submitted January 9, 2013

Appendix J-1

00024

SEP 30 2013
Ohio EPA DMM

Table 1-1 Solid Waste Management Units Identified in PR/VSI Report, Facility Background Report. Monsanto Port Plastics Plant, Addyston, Ohio

UNIT NUMBER	UNIT TITLE	UNIT STATUS
1	Former West Pond	Inactive
2	Former East Pond	Inactive
3	Former Northwest Pond	Inactive
4	Former Northeast Pond with Drainage Ditch	Inactive
5	Former Phosphoric Acid Plant Waste Area	Inactive
6	Former Urea Formaldehyde Polycondenser Area	Inactive ¹
7	Former Sand Filter/Sludge Drying Bed Area	Inactive
8	Filter Area Waste Holding Basin	Active
9	Former Wastewater Settling Basins	Inactive
10	Secondary Holding Basin	Active
11	West Seep Area	Inactive
12	Drummed Cuttings Holding Area	Inactive ¹
13	Non-Hazardous Waste Segregation Station	Active
14	Fome-Cor [®] Waste Area	Active
15A, 15B, 15C	Scrap Metal Yards (3)	Active
16	Drummed Waste Oils Pad	Active
17A, 17B, 17C, 17D	Satellite Waste Drum Storage Areas (4)	Active
18	Hazardous Waste Drum Storage Pad and Sump	Active
19	Drummed Hazardous Waste Loading Area	Active
20	Flare Stack	Active
21	Flare Overflow Basin	Active
22	Filter Wash Area	Active
23	Waste Pipe and Tank Area	Active
24	Small Vent System	Active
25A, 25B	Butadiene Scrubbers	Active
26	Knockout Pots	Active
27	Butadiene Flare Vent System	Active
28	Phase Separator	Active
29	Building 9 Hazardous Waste Storage Tank and Feedlines	Active
30	Hazardous Waste Drum-In Station	Active
31	Building 9 Wastewater Catch Basin	Active

This SWMU has been dismantled and removed.

Table 1-1 Solid Waste Management Units Identified in PR/VSI Report, Facility Background Report, Monsanto Port Plastics Plant, Addyston, Ohio

UNIT NUMBER	UNIT TITLE	UNIT STATUS
32	Plastic Waste Disposal Area	Active
33	Former Underground Spent Monomer Tank Area	Inactive
34	Former Hazardous Waste Storage Tanks (2)	Inactive
35	Organic Vapor Trap	Active
36	Building 30 Spent Monomer Tank and Feedlines	Inactive ¹
37	Building 30 Wastewater Catch Basin	Active
38	Process Area Scrubbers (2)	Active
39	Building 8 DAF Unit/Solids Slurry Bin	Active
40	Distillation Tower	Active
41	Formaldehyde/Water Tank	Active
42	Distilled Bottoms Tank	Active
43	Copoly Presses (2)	Inactive ¹
44	Copoly Press Drippings Areas (2)	Inactive ¹
45	Waste Acetone Area	Inactive ¹
46	Clean Water Sewers	Active
47	Clean Water Catch Basin	Active
48A	Chemical Sewers	Active
48B thru 48O	Chemical Wastewater Treatment System (WWTS)	Active

AREA OF CONCERN	TYPE OF SPILL	LOCATION	DATE
Spill A	150 Gallons ABS latex	Unknown	9/19/81
Spill B	100 Gallons ABS latex	Unknown	10/4/81
Spill C	115 Gallons Phenol	Unknown	11/19/81
Spill D	1300 lbs. Phenol	Ohio River	4/14/83
Spill E	5 Gallons Acrylonitrile	WWTS	5/19/83
Spill F	200-500 Gallon 400 BX latex	Ohio River	5/17/83
Spill G	50 Gallons Styrene Monomer	Ohio River	8/28/83
Spill H	8500 Gallons Waste latex	Unknown	5/20/84
Spill I	500-1000 Gallons Styrene Monomer	Tank G-6	1/20/85
Spill J	3500 Gallons Acrylonitrile	Tank A-13	6/19/85

¹This SWMU has been dismantled and removed.

00026

SEP 30 2013

Table 1-2 Solid Waste Management Units Suggested for Further Action By U.S. EPA, Facility Background Report, Monsanto Port Plastics Plant, Addyston, Ohio

UNIT NUMBER	UNIT TITLE	UNIT STATUS
1	Former West Pond	Inactive
2	Former East Pond	Inactive
3	Former Northwest Pond	Inactive
4	Former Northeast Pond with Drainage Ditch	Inactive
5	Former Phosphoric Acid Plant Waste Area	Inactive
6	Former Urea Formaldehyde Polycondenser Area	Inactive
7	Former Sand Filter/Sludge Drying Bed Area	Inactive
9	Former Wastewater Settling Basins	Inactive
10	Secondary Holding Basin	Active
11	West Seep Area	Inactive
21	Flare Overflow Basin	Active
22	Filter Wash Area	Active
23	Waste Pipe and Tank Area	Active
33	Former Underground Spent Monomer Tank Area	Inactive
39	Building 8 DAF Unit/Solids Slurry Bin	Active
46	Clean Water Sewers	Active
48A	Chemical Sewers	Active

MONSANTO/FPI/TAB 11-2

00027

GERAGHTY & MILLER, INC

SEP 30 2013

Ohio EPA DMV

Submitted January 9, 2013

Table 1-3		Additional Solid Waste Management Units and Areas of Concern (AOC)		
Unit Number	Unit Title			Unit Status
49	Building 30 Spent Monomer Tank (30,000 gallons) and ancillary equipment.			Active
AOC	Styrene AOC			Active
AOC	Tar-like Substance AOC			Active

00028

SEP 30 2013

Ohio EPA DMW

Submitted January 9, 2013

Table 1-4		RCRA Facility Plan (RFI) SMWU's and AOC's			
SMWU/AOC	Description				
SMWU 1	Former West Pond				
SWMU 2	Former East Pond				
SWMU 3	Former Northwest Pond				
SWMU 4	Former Northeast Pond and Ditch				
SWMU 5	Former Phosphoric Acid Plant Waste Area				
SWMU 7	Former Sand Filter/Sludge Drying Bed Area				
SWMU 9 & 10	Wastewater Treatment Area of Investigation				
SWMU 11	West Seep Area				
SWMU's 21, 22, 23	Flare Stack Area of Investigation				
SWMU 33a & b	Former Spent Monomer Tanks				
SWMU 48a	Chemical Sewers				
AOC's C & D	Historic Phenol Spills, South Weigh Station Tank				
AOC G	Historic Styrene Monomer Spill near Therminol Furnace Control Shed				
AOC I	Historic Styrene Monomer Spill near Tanks C-6				
AOC J	Historic Acrylonitrile Spill near Tank A-13				

00029

SEP 30 2013

Submitted January 9, 2013

K OTHER FEDERAL LAWS: OAC 3745-50-44(A)(20)

It is the belief of the INEOS ABS (USA) Corporation Addyston, Ohio facility that this facility is in compliance with the following:

- (a) The Wild and Scenic Rivers Act,
- (b) The National Historic Preservation Act/1966,
- (c) The Endangered Species Act,
- (d) The Coastal Zone Management Act, and
- (e) The Fish and Wildlife Coordination Act.

It is the understanding of this facility that where these federal laws are applicable, the procedures must be followed and the Regional Administrator is duty-bound to ascertain that these laws are in effect.

Submitted January 9, 2013

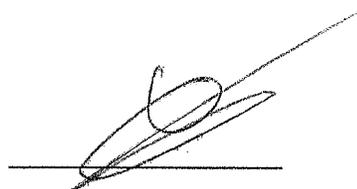
Section L

PART B CERTIFICATION

In accordance with OAC 3745-50-42(D)(1):

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature



Eric Cassisa, Site Manager

Date

01/07/13