

OCT 25 2006

Northwest District Office

DIV. OF HAZARDOUS

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WASTE MGT

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

October 20, 2006

Mr. Jean Phaneuf, Facility Manager
Ineos
1900 Fort Amanda Road
Lima, Ohio 45804**Re: Hazardous Waste Permit Modification
Modification Classification Determination & Class 1A Approval
BP Chemicals, Inc.
U.S. EPA ID# OHD 042 157 644 / Ohio Permit # 03-02-0450**

Dear Mr. Phaneuf:

On August 29, 2006, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification (tracking number - OHD042157644-060829-1A-1) from Ineos located at 1900 Fort Amanda Road, Lima, Ohio. Ohio EPA has evaluated the permit modification classification using the criteria found in paragraph (E)(2) of Ohio Administrative Code (OAC) Rule 3745-50-51 and in accordance with OAC Rule 3745-50-51(E)(1)(b) has determined that the permit modification meets the criteria of a class 1 permit modification requiring prior approval of the director. In addition, with this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to OAC Rule 3745-50-51.

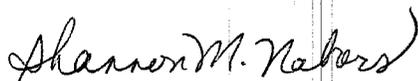
The following modification has been made to your December 20, 2002, Ohio Hazardous Waste Facility Installation and Operation Permit. Also, the records of Ohio EPA have been changed accordingly:

This permit modification extends Ineos's Permit expiration date from December 20, 2007, to December 20, 2012, pursuant to changes to OAC Rule 3745-50-54 which became effective on July 11, 2005.

Enclosed is a copy of the revised permit terms and conditions. This has been included to ensure that all involved parties have written confirmation of the changes.*

If you have any questions concerning this permit modification classification or this action, please contact Kara Reynolds at (419) 373-3065.

Sincerely,

Shannon M. Nabors
District Chief

*Also, in accordance with Ohio Administrative Code Rule 3745-50-51(D)(1)(a)(ii), Ineos shall send a notice within 90 days of an approved Class 1A Modification to all persons on the Agency mailing list. An updated mailing list can be obtained by contacting Pamela Allen at (614) 644-2917, or by e-mail at pam.allen@epa.state.oh.us.

/cs
Enclosure
pc:Pamela Allen, Manager, RIS, DHWM, CO
~~Jeremy Carroll, Supervisor, Engineering Unit, DHWM, CO~~
Gary Deutschman, DHWM, NWDO
DHWM, NWDO File - Ineos Permit File
DHWM, NWDO File - Ineos Permit Terms and Conditions (enclosures only)ec: John Pasquarette, DHWM, NWDO
Ed Merriman, DHWM, NWDO
Gary Deutschman, DHWM, NWDO
Kara Reynolds, DHWM, NWDO

OHIO ENVIRONMENTAL PROTECTION AGENCY

**OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT RENEWAL**

Permittee: O&D USA, Inc.

Mailing Address: O&D USA, Inc.
1900 Fort Amanda Road
Lima, Ohio 45802-0628

Owner: BP America
150 W. Warrenville Road
Naperville, IL 60566-7011

Operator: O&D USA, Inc.
P.O. Box 628
Lima, Ohio 45802-0628

Location: O&D USA, Inc.
1900 Fort Amanda Road
Lima, Ohio 45802-0628

Ohio Permit No.:	03-02-0450
US EPA ID:	OHD 042 157 644
Issue Date:	December 20, 2002
Effective Date:	December 20, 2002
Expiration Date:	December 20, 2012

AUTHORIZED ACTIVITIES

In reference to the application of O&D USA, Inc. 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:

- ◆ S01: Container Storage
- ◆ S02: Tank Storage
- ◆ T01: Tank Treatment
- ◆ T04: Other Treatment - Filter Press
- ◆ Corrective Action
- ◆ Closure/Post Closure

A.2. Permit Actions
OAC Rule 3745-50-58(F)

This permit may be modified, revoked, suspended, or renewed as specified by Ohio law. The filing of a request for a permit modification, revision, revocation, suspension, or renewal or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of 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 December 20, 2012.

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 shall 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 the rules adopted thereunder and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.