Ohio EPA
40 years and moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Allen County
INEOS USA LLC
Construction Storm Water
Facility ID No. 2GC03178*AG

August 5, 2013

Mr. Chad Ulm
INEOS USA LLC
P.O. Box 628
Lima, Ohio 45802

Mr. Glen Renner
Peterson Construction Company
P.O. Box 2058
Wapakoneta, Ohio 45895

Mr. Tom McCoellan
Jones Site Development Ltd.
9520 Harrod Road
Harrod, Ohio 45850

Dear Messrs. Ulm, Renner, and McCoellan:

On July 17, 2013, Zachary Titkemeier and Tom Wilkins inspected INEOS USA LLC on 1900 Fort Amanda Road, Lima (photos taken). The purpose of the visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Mr. Chad Ulm, Environmental Specialist for INEOS, was present to provide information on the project.

As a result of the inspection, we have the following comments:

1. At the time of inspection, construction at the site was nearing completion. A finished building and paved drives were present. The curbs and sidewalks had been poured but final landscaping was not yet underway. A temporary sediment pond reportedly had been installed near the southwest corner of the site but was recently filled back in and leveled out to an even grade with the nearby pavement. Silt fence and dandy bags were being used to protect the catch basins. The remaining construction work involved the building's interior. The project was expected to be completed in November of 2013.

2. All of the site's storm water runoff was being directed into a sluice gate that discharged into an existing fire water retention pond west of the site. According to the storm water pollution prevent plant (SWP3), the pond discharges directly to PCS Outfall 001 and into the Ottawa River. According to Mr. Ulm, this pond was pre-approved for the site's storm water discharges and it meets the post-construction storm water management requirements. Sufficient information was not available in those portions of the SWP3 received by Ohio EPA to demonstrate how the post construction storm water management requirements have been met. Practices must be designed to treat the Water Quality Volume (WQv). The entire drainage area tributary to the practice must be used to determine WQv. For a retention pond, the permanent wet pool must hold 0.95 *WQv. The extended detention volume (EDv) must equal 0.75*WQv. The outlet must be designed to release the EDv over 24 hours with no more than the first half of the EDv being released in the first eight hours.

3. All temporary or permanent stabilization has not been established. Based on our staff's conversation with Mr. Ulm during the inspection, it appears that the timeframe for stabilization had not been exceeded, as the ground had last been disturbed on Monday July 15. Please keep in mind, however, that any bare areas that will remain idle for 21 days or longer must be stabilized within the first seven days.

Within 10 days of the date on this letter, please submit for each post construction storm water management control: the calculations of WQv, a detail drawing of the structure with relevant elevations, stage-storage tables, and release rate calculations. Please include a drawdown table or curve that demonstrates that no more than one-half of the required EDv volume is released in the first third of the required drawdown time. If there are any questions, please contact me at (419) 373-3009.

Sincerely,

Lynette Hablitzel, P.E.
Division of Surface Water
Storm Water Program

/jlm

ec: Kirk Niemeyer, City of Lima, City Engineer
Joe Gearing, City of Lima, Stormwater Manager
Tracking