



**Allen County Environmental Citizens Advisory Committee
PCS Nitrogen Ohio, L.P.
September 30, 2016 Report**

General

1. The plant continues to run well. We anticipate the start up of a new boiler by the end of November.

Health and Safety

1. The site had 1 recordable injury during the last quarter. An electrician cut his hand while stripping some wire. We have had 5 recordable injuries and one lost time injury for the year.
2. The site had a third party environmental audit.

PSM

1. There have been no reportable quantity releases during 2016.
2. The site has had no NOV's for the year.

Environmental

AIR

1. The second quarter Title V Deviation report was submitted.
2. The semi-annual LDAR report was submitted.
3. The semi-annual MON report was submitted.
4. New railcar loading, J002, for urea solutions was completed and operational, and work continues to install #3 boiler, these projects were a part of the expansion project.
5. Annual tune ups complete on boilers and load heater.

WATER

1. The June, July, and August DMRs were submitted.
2. The results for DMR-QA Study 36 were submitted to Ohio EPA.
3. The Proposed Final NPDES Permit was submitted by Ohio EPA to USEPA in September. USEPA is currently reviewing the Proposed Final NPDES Permit.
4. Received approval from Ohio EPA to begin a wastewater treatment pilot study using reverse osmosis.
5. Received approval from Ohio EPA for Linde to switch from ChemTreat cooling water treatment chemicals to Nalco cooling water treatment chemicals.

RCRA

1. Completed a hazardous waste shipment in August.

SARA

1. The TRI report was submitted.
2. The annual continuous emission releases was completed.

TSCA

1. The Form U was completed and submitted.

Acronyms

CEMS	Continuous Emission Monitor System
DEF	Diesel Emission Fluid
DMR	Discharge Monitoring Report
GHG	Green House Gas
HAZOPS	Hazard and Operable Study
LDAR	Leak Detection and Repair
LEPC	Local Emergency Planning Committee
MON	Miscellaneous Organic NESHAP
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
OEPA	Ohio Environmental Protection Agency
PMP	Pollutant Minimization Program
PSM	Process Safety Management
PTI	Permit to Install
RATA	Relative Accuracy Test Audit
RCRA	Resource Conservation and Recovery Act
RQ	Reportable Quantity
SERC	State Emergency Response Commission
TRI	Toxic Release Inventory



Fort Amanda Specialties LLC

(A joint venture of AkzoNobel and BASF Corporation)

Joseph Hutton
Environmental Safety Specialist

October 18, 2016

To: Environmental Citizens Advisory Council Cc: T. Keating, J. Armstrong

Re: **ECAC Meeting October 18, 2016**

General News

- The plant is running at slightly reduced rates due to raw material availability.
- The Current HSE Manager Jeff Armstrong will be moving into the Corporate HSE People Safety position within AKZONOBEL. Site is currently recruiting for his replacement.

Environmental Systems

- The 2015 TRI (Toxics Release Inventory) was reported to the EPA.
- Energy Assessment Complete with our parent company BASF, we found potential energy savings, projects to come in the future.

Safety Performance

- 0 recordable injuries year to date and minimal first aid incidents.
- At the end of September we have recorded 1,357,498 hours since the last lost time injury.

Security and Regulatory

- Improved lighting project is complete; all areas are clearly visible for security purposes.
- Security Assessment complete, addressed all actions coming from that assessment.



Lima Refining Company

A Husky Energy Inc. Subsidiary

1150 South Metcalf Street
Lima, OH 45804-1145

Bus: (419) 226-2300

October 13, 2016

Ms. Kathy Luhn
Allen County Environmental Citizens Advisory Committee
C/o Allen County Health Department
P.O. Box 1503
Lima, OH 45802

SUBJECT: Husky - Lima Refinery Highlights

Dear Ms. Luhn:

Attached is the Husky Lima Refinery status report for our meeting on October 18, 2016.

If you have any questions regarding this report, please give me a call at (419) 226-2562.

Sincerely,

Gary Vonderembse
Environmental Manager

Attachments

xc: ECAC

Michael D. Edmiston, PhD
Gary Sheely
Eric Getz - OEPA
Steve Kayatin
William Kelly, RS
Michael Wildermuth
Connie J. Miller
Tom Berger

Husky

Jerry Miller
Pat Conrath
David Stein
Paul Logsdon
L.D. Pierce
Sher Follett
Claudio Ingaramo
Amy Rode
Will Ratliffe

**Allen County Environmental Citizens' Advisory Committee
Husky - Lima Refinery Status Report**

1. EXCEEDANCES/RELEASES

The table below summarizes the last four years of environmental performance.

	2013	2014	2015	2016
Air Overall Excess Emissions Compliance	99.2%	99.5%	99.3%	98.0%
SARA Reportables	4	7	7	5
CERCLA Reportables	2	6	2	3
NPDES Reportables	2	4	1	1
Agency Reportable Spills (including RCRA)	0	1	3	0

Reportable Release Summary

Emissions/Release

Date	Release Type	Description	SO ₂ (tons)	NO _x (tons)	H ₂ S (tons)
8/10/16	SARA	SRU Claus 2 shut down on low air flow due to the north air blower going down. Acid gas was swung to Claus 1 until Claus 2 could be restarted. The upset caused the tail gas treater amine regenerator tower to over-pressure, resulting in acid gas being sent to the acid gas flare.	0.34	NA	NA
8/13/16	SARA CERCLA	During the startup of the Isocracker, the South Flare Gas Recovery System was shutdown, resulting in the RQ for H ₂ S to be exceeded at the LIU Flare.	NA	NA	0.16
9/5/16	SARA (SO ₂) CERCLA (both)	HDS compressor tripped off causing liquid to get into the LIU Fuel Gas system resulting in opacity (black smoke) from multiple furnace stacks, and exceeded RQ for NO _x and SO ₂ .	8.74	1.51	NA

Reportable Quantities SO₂ = 500 lbs H₂S = 100 lbs H₂SO₄ = 1,000 lbs NO_x = 1,000 lbs
NA = Not Applicable

2. Permits/Projects

No.	Description	Permit Application Type	Permit Issued Final
1	Wastewater Permit-to-Install for a new sludge thickener tank at the Wastewater Treatment Unit	Water	Yes
2	Wastewater Permit-to-Install for a groundwater pump discharge line into G-Tank.	Water	Yes
3	Emergency Hazardous Waste Permit from the Ohio EPA for the overflow of storm water from G-Tank to D Pond.	RCRA	Yes
4	Title V Renewal Operating Permit	Air	No
5	Request for Authorization to Conduct Performance Trials to Evaluate the Maximum Feed Rate of the KHT	Air	Yes

Agency Inspections/Enforcement/Rulemaking

- Submitted a response to the Notice of Violation (NOV) issued July 6th by the Ohio EPA pertaining to exceedances of the ammonia injection limit at the FCC earlier in the year, and failure to submit an application to make a minor modification to the Title V permit to incorporate the terms and conditions for 3 tank PTIs. The ammonia exceedances were found not to have occurred, as the discrepancy was due to an incorrect algorithm setting in PI to compress the data. The Ohio EPA issued a Resolution of Violation (ROV) for the 3 tanks as the required Title V minor permit modification to incorporate the terms and conditions into the operating permit was submitted.

- The Ohio EPA was on-site August 18th and 19th to conduct the annual RCRA Hazardous Waste inspection for the refinery. The inspection consisted of a field walk-thru of various areas of the plant where wastes are managed, along with a detailed records review. There were a few deficiencies noted pertaining to labeling and training. A partial resolution of violation letter was issued by the Ohio EPA, and the additional information requested by the agency was submitted prior to the 9/30/16 deadline.

Acronyms			
AFE	Authorization for Expenditure	MBPD	Thousand barrels per day
AFU or DAF	Air Flotation Unit (Dissolved Air Flotation)	mg/L	Milligram per liter
AWWTP	Advanced Wastewater Treatment Plant	MSOR	Maximum Source Operating Rate
BDO	Butanediol	NESHAP	National Emission Standards for Hazardous Air Pollutants
BEHP	Bis(2-ethylhexyl) Phthalate	NOV	Notice of Violation
Btu	British Thermal Unit	NO _x	Nitrogen Oxides
CEMS	Continuous Emission Monitor System	NPDES	National Pollution Discharge Elimination
CERCLA	Comprehensive Environmental, Response, Compensation and Liability Act	NSPS	New Source Performance Standard
CO	Carbon Monoxide	OEPA	Ohio Environmental Protection Agency
DHT	Diesel Hydrotreater	PSV	Pressure Safety Valve
DMRQA	Discharge Monitoring Report Quality Assurance	PTI	Permit to Install
EHS	Environmental, Health & Safety	RCFA	Root Cause Failure Analysis
EPA/USEPA	Environmental Protection Agency	RQ	Reportable Quantity
EPCRA	Emergency Planning and Community Right-to-Know Act	RCRA	Resource Conservation and Recovery Act
ERAC	Environmental Review Appeals Commission	SARA	Superfund Amendments and Reauthorization Act
ESP	Electrostatic Precipitator	SCR	Selective Catalytic Reduction
FCCU	Fluidized Catalytic Cracking Unit	SGP	Saturated Gas Plant
HDS	Hydro-Desulfurization	SO ₂	Sulfur Dioxide
H ₂ S	Hydrogen Sulfide	SRU	Sulfur Recovery Unit
LIU	Lima Integrated Unit	TRI	Toxic Release Inventory
KHT	Kerosene Hydrotreater	TSCA	Toxic Substance Control Act
LDAR	Leak Detection and Repair	VOC	Volatile Organic Compound



1900 Fort Amanda Road, Lima, OH 45804
P. O. Box 628, Lima, OH 45802

Tel 419 226 1200
Fax 419 226 1274

October 14, 2016

Ms. Kathy Luhn
Allen County Environmental Citizens Advisory Committee
c/o Allen County Health Department
P. O. Box 1503
Lima, Ohio 45802

Dear Ms. Luhn:

Attached is the INEOS Lima Chemicals' status report update for the third quarter of 2016.

If you have any questions regarding the report, please contact me at (419) 226-1351.

Sincerely,

A handwritten signature in black ink, appearing to read "J.F. Bianco".

Joseph F. Bianco
SHE Manager

cc: ECAC Members

Allen County Environmental Citizens Advisory Committee
INEOS Lima Chemicals Status Report
September 30, 2016

Health, Safety and Environment Performance Summary

<i>Ineos and PCS Nitrogen Facility*</i>	<u>2007</u>	<u>2008*</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>
OSHA Recordables	3	4	1	2	0	5	5	1	6	0
DAFW Injuries	0	1	0	1	0	2	1	0	0	1
RQ Releases	5	4	4	0	1	2	1	2	2	0
UIC Permit % Compliance	100%	99.99%	100%	99.99%	99.99%	100%	100%	99.99%	99.99%	100%
AOGI Service Factor	99.8%	99.6%	99.7%	100%	100%	99.99%	99.99%	100%	99.9%	99.99%

** Beginning 2008, statistics are for the INEOS facility only. PotashCorp data is reported separately since INEOS is no longer their Agent.*

INEOS Lima Chemicals welcomed a new Site Director, **Phil Popovec**, on October 1. He replaces Marcy Boone who has elected to retire.

The Barex Production unit has produced the last volume of product. It will be packaged and the unit will be shut down and isolated from the rest of the plant. Once the plant has been cleaned and all hydrocarbons are removed, a contractor will be brought in to demolish the unit. The closure work is expected to take 6 months.

Safety:

- A Safety Culture Assessment was conducted by Haztek July 12-14—a safety management system gap analysis. Overall, the site SHE culture and safety program at the INEOS Nitriles facility in Lima, OH was considered to be a top quartile level program; however, several opportunities for improvement were noted. Haztek leadership training was conducted on-site July 28-29.
- On August 8 while making rounds an operator noticed a small tarp fire near 'B' Reactor. He immediately notified the control room, and a board operator made a call to Shawnee Fire Department. Operations responded and extinguished the fire before Shawnee arrived.
- Working with Allied Barton (our security contractor) and Husky Lima Refinery on protocol for active shooter.
- A test of the ChemTrec emergency call out list was conducted September 13.
- 3-day initial ERT training classes were conducted September 20-22 and October 4-6. The training was conducted by the University of Findlay and will strengthen our ability to respond to an on-site incident.
- Random contractor drug testing was conducted on September 26. Of the 50 contractors tested, one was removed from the site.
- A Bureau of Explosives audit was conducted the week of September 26.

Environmental:

- The Public Hearing for the *draft* UIC (deep well) permit renewals was held July 12. The Ohio EPA presented information about the draft permits and answered questions. No testimony or comments were given.
- On July 19 Ohio EPA's Underground Injection Control (UIC) staff conducted its semi-annual inspection of the Lima facility to determine compliance with our four Class I hazardous UIC permits to operate. The Ohio EPA concluded that Lima is in compliance with the applicable UIC rules and regulations.

- The final issuance of the four Class I Hazardous Underground Injection Control permits to operate were issued on August 22, 2016 and will be valid for six years.

PSM – Process Safety Management:

- The Ohio EPA conducted a detailed inspection of Lima's Risk Management Plan on Tuesday, July 19. The inspection was very detailed and focused on chemical inventories, procedures, training, operating limits, MOCs and Emergency Response. The inspector was generally complimentary of our programs.

Acronyms

AOGI	Absorber Off Gas Incinerator
BSI	British Standard Institute
BST	Behavioral Science Technology
CAPU	Continuous Acetonitrile Purification Unit
CEM	Continuous Emission Monitor
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CGA	Cylinder Gas Audit
CWC	Chemical Weapons Convention
DAFW	Days Away From Work
DCS	Distributed Control System
DHS	Department of Homeland Security
EBA	Emergency Breathing Apparatus
EMA	Emergency Management Agency
FOV	Finding of Violation
FRC	Flame Resistant Clothing
HAZOP	Hazard and Operability Study
ISO	International Organization of Standardization
LASER	Lima Area Security and Emergency Response Team
LDAR	Leak Detection and Repair
LEPC	Local Emergency Planning Committee
LOPA	Layers of Protection Analysis
LOTO	Lock Out Tag Out
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
OAC	Ohio Administrative Code
OCTC	Ohio Chemistry Technology Council
ODH	Ohio Department of Health
OEL	Open Ended Line
OEPA	Ohio Environmental Protection Agency
OSHA	Occupational Safety and Health Administration
MIT	Mechanical Integrity Test
MOC	Management of Change
NIMS	National Incident Management System
OEL	Open Ended Lines
PHA	Process Hazard Analysis
PPE	Personal Protective Equipment
PSM	Process Safety Management
PSV	Pressure Safety Valve
PTI	Permit to Install
RATA	Relative Accuracy Test Audit
RCRA	Resource Conservation and Recovery Act
RQ	Reportable Quantity
SARA	Superfund Amendments and Reauthorization Act
SCBA	Self Contained Breathing Apparatus
SERC	State Emergency Response Commission
SHE	Safety, Health & Environmental
SIL	Safety Integrity Level
SWMU	Solid Waste Management Unit
TAR	Turnaround
UIC	Underground Injection Control
VOC	Volatile Organic Compounds
WDW	Waste Disposal Well (Deepwell)