



**Fort Amanda Specialties LLC**  
*(A joint venture of AkzoNobel and BASF Corporation)*

Brett Anderson  
HSE&S Manager

January 20, 2015

To: Environmental Citizens Advisory Council    Cc: T. Keating, B. Anderson, J. Hutton

Re: **ECAC Meeting January 20, 2015**

**General News**

- The plant is running at reduced rates following the refinery incident. Our main raw material comes from Ineos who get raw material feed from Husky.
- Limited production is continuing using stockpiled intermediate materials that have been built up and warehoused in case of such an interruption.
- Advantage is being taken of the downtime in our main processes by accelerating our vessel inspection program.
- 2014 was the highest production rate for the site since the formation of Fort Amanda Specialties joint venture in 2004.

**Environmental Systems**

- No operational excursions or releases.
- No new issues.

**Safety Performance**

- No injuries at the site during the quarter.
- Plant recognized for exceptional performance in December for safety, production and shipments.

**Security and Regulatory**

- 10 additional video surveillance cameras added for security and process monitoring which can be accessed off-site if necessary.
- No new issues.



## Lima Refining Company

A Husky Energy Inc. Subsidiary

---

1150 South Metcalf Street  
Lima, OH 45804-1145

Bus: (419) 226-2300

January 21, 2015

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 January 21, 2015.

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  
Russ Decker

Other

Roy Warnock - Husky  
Pat Conrath - Husky  
David Stein - Husky  
Paul Logsdon - Husky  
L.D. Pierce - Husky  
Sher Follett - Husky  
Claudio Ingaramo  
Amy Rode - Husky

**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.

	2011	2012	2013	2014
Air Overall Excess Emission Compliance	99.5%	99.8%	99.2%	99.5%
SARA Reportables	8	6	4	7
CERCLA Reportables	2	2	2	6
NPDES Reportables	2	5	2	4
Agency Reportable Spills (including RCRA)	0	0	0	1

**SARA/CERCLA Reportable Releases – Discussion Topic – Isocracker Fire**

**NPDES Reportable Releases**

**A. 11/19/2014 NPDES Wastewater Incident (TSS Violation)**

The treated effluent flow from the sand filter outlet was swung to the outfall through the bypass line while the composite sample was being collected, and the total suspended solids (TSS) concentration was high enough to result in an exceedance of the daily loading limit and an exceedance of the average monthly loading limit.

**B. 11/23/2014 NPDES Wastewater Incident (Oil Sheen/Oil and Grease/Foam Violations)**

The Wastewater Treatment Unit was found to be in an upset condition, which resulted in oil sheen being discharged to the Ottawa River on 11/24. The treated effluent flow was isolated from the river by impounding the water in C Pond, and the Oil Spill Contingency plan was implemented. All agency notifications were made as required and containment and absorbent booms were placed at downstream locations in the river. Subsequent measures to regain impounding capacity resulted in an exceedance of the oil and grease daily concentration limit, and a general effluent limit violation for foam to the river. By 11/28, treated effluent was being discharged to the river through the permitted outfall and sampled according to the permit.

**C. 12/31/2014 NPDES Permit Limit Exceedance Average Monthly BEHP Concentration**

Exceeded the NPDES Permit average monthly concentration limit of 8.5 ppb for bis (2-ethylhexyl) phthalate (BEHP). The average BEHP concentration for December was 9.25 ppb. Additional upstream samples and outfall samples were collected and analyzed to determine if BEHP was present. All results were non-detect.

<b>Permit Limit Exceedance or Unauthorized Discharge</b>	<b>Permit Limit</b>	<b>Date</b>
Daily Maximum Total Suspended Solids Loading Limit	730 kg/day	11/19/14
Monthly Average Total Suspended Solids Loading Limit	465 kg/day	11/30/14
Daily Maximum Oil and Grease Concentration Limit	10.0 mg/l	11/24/14
General Effluent Limitation – Oil Sheen to the River	No oil sheen	11/24/14
General Effluent Limitation – Foam to the River	No foam	11/24/14
Monthly Average BEHP Concentration Limit	8.5 ug/l	12/31/14

**RCRA Reportable Releases – Nothing to report**

**Agency Reportable Spills – Nothing to report**

**2. Air Permits/Projects**

- A. The Ohio EPA issued a modification of the Title V permit that incorporates the terms and conditions of the PTI for Tank 245 as it was converted from a Group 2 external floating roof tank to a Group 2 fixed roof tank. There were some outstanding discrepancies in the previously issued Title V permit modification that will be addressed.
- B. An inspector from USEPA Region V arrived at the refinery on the afternoon of 12/18 for an unannounced compliance inspection of the Coker. EPA has been gathering information pertaining to the operation of Coker Units and the material storage/handling practices at refineries and energy plants. The driver behind this enforcement initiative is the large coke piles in the Detroit and Chicago areas, whereby fugitive dust is blown around in the adjacent communities. The inspector was given an overview of the Lima Refinery process, followed by a walk-thru of the unit, including the area where the petroleum coke is stored. There were no compliance issues noted during the inspection, and EPA will prepare a report as such by the end of January 2015.

**3. Wastewater Permits/Projects**

Wastewater Permit-to Install (PTI) Applications

Description	PTI Application Submitted	PTI Issued Final
Installation of sewers for the Refinery Utility Sewer Project	Yes	Yes
Installation of sewers for the FCC Wet Gas Scrubber Project	Yes	Yes
Installation of sewers for the FCC Flash Drum Project	Yes	Yes
Installation of sewers for the Central Sewer Project	Yes	Yes
Installation of sewers for the Tank 72 Project	Yes	Yes
Installation of sewers for the Ditch Fill Project	Yes	Yes
Installation of sewers for the Outside Battery Limits Project	Yes	Yes
Installation of sewers for the NESHAP Sewer Relocation Project	Yes	Yes
Installation of sewers for the RO Building as part of the Water Reuse Project	Yes	Yes
Installation of rerouted sewers for the new Acid Gas Flare Project	Yes	Yes

- A. The Ohio EPA issued the modification of the NPDES Permit that incorporates the request for increased effluent limits (e.g., selenium) based on the construction of the Water Reuse Project. The permit modification also includes the discharge of once-through cooling water to Zurmehly Creek from LPG Cooler Project. There are separate effluent limits included for this new outfall.

**4. RCRA Permits/Projects**

- 1. The Ohio EPA Division of Underground Injection Control (UIC) has not received the comments from the Ohio Department of Natural Resources pertaining to the Permit-to Drill (PTD) Application that was submitted for the three Class 2 injection wells for the Water reuse Project. A meeting is scheduled for 2/13/15 to discuss newly proposed rules that may affect the PTD. The U.S. EPA issued the approval of the Quality Assurance Project Plan (QAPP) for the Deepwell Injection Project, with repeat mention of the requirement for a No Migration Petition that will need to be submitted eventually for the conversion to hazardous waste service.

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

January 13, 2015

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 fourth quarter of 2014.

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

Sincerely,

A handwritten signature in blue ink that reads "J. F. Bianco". The signature is written in a cursive style with a horizontal line extending to the right.

Joseph F. Bianco  
SHE Manager

cc: ECAC Members

Allen County Environmental Citizens Advisory Committee  
INEOS Lima Chemicals Status Report  
December 31, 2014

**Health, Safety and Environment Performance Summary**

<i>Ineos and PCS Nitrogen Facility*</i>	<u>2006</u>	<u>2007</u>	<u>2008*</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
OSHA Recordables	2	3	4	1	2	0	5	5	1
DAFW Injuries	0	0	1	0	1	0	2	1	0
RQ Releases	8	5	4	4	0	1	2	1	2
UIC Permit % Compliance	100%	100%	99.99%	100%	99.99%	99.99%	100%	100%	99.99%
AOGI Service Factor	99.72%	99.8%	99.6%	99.7%	100%	100%	99.99%	99.99%	100%

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

**Safety:**

- The 2014 annual Safety Training Day for all INEOS employees was completed as of Nov. 4. All employees received CPR / AED refresher training.
- Emergency Response Refresher Training was conducted on-site Sept. 30, Oct. 1 and Oct. 9. Craig Hohenbrink, INEOS Safety Engineer, Russ Decker, Homeland Security & Emergency Management, and Todd Truesdale, Shawnee Township Fire Chief, presented the training which included incident command, confined space rescue, Level A exercises, and a NIMS introduction.
- On Dec. 2-3-4 two employees attended the 24 hour ER training class at the Univ. of Findlay.
- The Chemtrec call out system was tested in November 2014.
- The Ohio Dept. of Health conducted the 3-year radiation audit 11/18/2014. There were no findings of non-compliance.

**Environmental:**

- On 9/29/2014 Lima received the draft renewal RCRA permit from both the federal and Ohio EPA for review. A public meeting was held Nov. 20, which was a non-event.
- On 10/22/2014 a valve was left open while filling a tank with crude acrylonitrile. This incident did not breach secondary containment or hit reportable quantities.
- The annual UIC inspection was conducted Monday 10/27/2014 with no issues.
- The quarterly LDAR audit for the Consent Decree was conducted in December; no issues.
- As of 12/16/14, the Acrylonitrile Compliance Plan for Industrial Hygiene was officially closed out. There will be additional personal monitoring in the future to ensure the engineered controls are still working, but the requirement for the additional PPE during these operations has been suspended.

**PSM – Process Safety Management:**

- Lima’s PSM Specialist attended 20 Principles training in Marina View in September.
- On November 10 and 11 the ISO three year re-certification audit was conducted. Lima received three minor non-conformances. The audit covered all operations as well as maintenance, procurement, training and document control.
- Five HAZOP's scheduled for 2014 were completed on time—Acrylo Reactor, Acrylo AOGI, Acrylo Recovery, Catalyst Plant and Barex Waste Treatment.

## 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
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	Occupational Exposure Limits
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)



# Allen County Environmental Citizen's Advisory Committee ISP Status Report (July 2014 – December 2014)

19 January 2015

## 1. SAFETY/SECURITY

	2013	2014	2015 YTD
OSHA recordable – ISP	0	1	0
OSHA recordable - Contractors	0	0	0

## 2. RELEASES

- No RQ incidents (YTD = 0)

## 3. AIR

- On August 15, 2014, our continuous emission monitoring system (CEMS) for nitrogen oxides (NOx) has successfully passed the Relative Accuracy Test Audit (RATA).
- On November 18, 2014, the Scrubber Off-gas Boiler (N006, a control device) was operating above the pound per hour allowance of carbon monoxide (CO) for a period of 93 minutes. Excess emissions have been conservatively estimated to be 457 pounds.
- On November 26, 2014, the Scrubber Off-gas Boiler (N006, a control device) was operating above the pound per hour allowance of carbon monoxide (CO) for a period of 88 minutes. Excess emissions have been conservatively estimated to be 687 pounds.
- The facility successfully passed our Responsible Care 14001 audit (a program to achieve improvements in environmental, health, safety, security performance) without a non-conformities (NC's) in December. This is our yearly audit by a third party auditor.
- ISP received two temporary exemptions from Permit to Install and Operate (PTIO) requirements in order to conduct trails for the following activities: (1) loading maleic acid into tanker trailers in September and (2) unloading succinic acid from tanker trailers in December.

## 4. WATER

- Nothing to report

## 5. RESOURCE CONSERVATION AND RECOVERY ACT

- Nothing to report

## 6. OTHER

- ISP has hired four new employees (i.e. Operating Specialists).