

## Ohio EPA Report - Environmental Citizens Advisory Committee

January 19, 2016

### **Lima Refining Company / Husky Energy**

#### Division of Surface Water

On May 7, 2015, a compliance evaluation inspection was conducted at the Lima Refining Company. No violations were noted at the time of the inspection.

#### Division of Materials and Waste Management

A hazardous waste compliance evaluation inspection was conducted on September 28, 2015. A Notice of Violation/ Return to Compliance letter was issued on November 18, 2015.

On November 10, 2015, Ohio EPA issued an Emergency Permit to Lima Refinery for the period of November 10, 2015 through December 11, 2015. The emergency permit allows the discharge and storage of D018 benzene contaminated waste waters into D-Pond in the event of a major rain event.

A class 1 permit modification was acknowledged on November 10, 2015. The permit modification included changes to the facility's letter of credit and financial assurance information as well as updated the post-closure and corrective action cost estimates for inflation.

A class 1 permit modification was acknowledged on November 10, 2015. The permit modification included changes to corrective action reporting frequency.

### **Ineos Nitriles USA LLC**

#### Division of Air Pollution Control

A Title V air compliance inspection was conducted on November 10, 2015. No violations were noted at the time of the inspection.

On October 22, 2015 INEOS USA LLC submitted a letter notifying Ohio EPA of the facility's name change effective January 1, 2016. INEOS USA LLC is now named Ineos Nitriles USA LLC.

#### Division of Materials and Waste Management

A hazardous waste compliance evaluation inspection was conducted on August 12, 2015 and August 17, 2015. No violations were noted at the time of the inspection and a Notice of Compliance letter was issued on September 8, 2015.

A class 1 permit modification was acknowledged on November 10, 2015. The permit modification included changes to facility emergency contacts and updates to closure cost estimate and financial assurance for inflation.

INEOS Barex® USA LLC

This facility has been separated from the rest of Ineos Nitriles USA LLC, since the Barex® plant is now under separate ownership.

Division of Air Pollution Control

A Title V air compliance inspection was conducted on November 10, 2015. On November 24, 2015, an NOV was issued for failure to comply with a flow indicator or a lock bypass line as required by 40 CFR, Part 63, Subpart JJJ. The facility submitted a letter to U.S. EPA requesting approval for an alternative monitoring plan in order to correct the violation and return to compliance.

**PCS Nitrogen Ohio, L.P.**

Division of Air Pollution Control

On January 12, 2016 a final Title V minor permit modification was issued to incorporate recently issued PTIs.

**ISP Lima LLC**

Nothing to report.

**Fort Amanda Specialties LLC (Akzo Nobel)**

Nothing to report.

**Acronyms**

AOGI - absorber offgas incinerator	BDO - butanediol
BP - British Petroleum	CEM - continuous emission monitor
CEMS - continuous emission monitors	CMS - corrective measures study
CO - Central Office	DAPC - Division of Air Pollution Control
DFFO's - director's final findings and orders	ECAC - Environmental Citizens Advisory Committee
LDAR - leak detection and repair	LIU - Lima integrated unit division of hazardous waste management
NOD - notice of deficiency	NOV - Notice of Violation
NWDO - Northwest District Office	OAC - Ohio Administrative Code
PTI - permit to install	PTO - permit to operate
SOGI - scrubber off-gas incinerator	
NESHAPS - national emission standards for hazardous air pollutants	
NSPS new source performance standards	
MACT maximum achievable control technology	
NPDES - national pollutant discharge elimination system	
WTE - water treatment plant	
ERAC - Environmental Review Appeals Commission	

Allen County Environmental Citizens Advisory Committee  
INEOS Lima Chemicals Status Report  
December 31, 2015

**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>	<u>2015</u>
OSHA Recordables	2	3	4	1	2	0	5	5	1	6
DAFW Injuries	0	0	1	0	1	0	2	1	0	0
RQ Releases	8	5	4	4	0	1	2	1	2	2
UIC Permit % Compliance	100%	100%	99.99%	100%	99.99%	99.99%	100%	100%	99.99%	99.99%
AOGI Service Factor	99.72%	99.8%	99.6%	99.7%	100%	100%	99.99%	99.99%	100%	99.9%

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

**Safety:**

- INEOS Lima incurred a recordable injury in October and another in December.
  - ✓ On 10/13/2015 an operator injured their wrist while operating manual valves.
  - ✓ On 12/22/2015 a contractor stepped over a pipe and tripped; stitches were required to forehead and cheek.
- Emergency Response refresher training was conducted mid-October.
- The 20 Principles internal audit was conducted in October, which includes behavioral and process safety.
- The Bureau of Explosives conducted an audit Nov. 4.
- Todd Truesdale, Shawnee Township Fire Chief, provided Incident Command Center Refresher Training for the Lima Leadership Team on December 9.
- An off-site Safety Summit was held on 12/16 which included Lima Management and the UAW Labor Committee; a joint 2016 Safety Plan was drafted.

**Environmental:**

- The semi-annual UIC inspection was conducted on Oct. 28; no violations were found.
- The biennial Ohio EPA Air inspection was conducted Nov. 10; there was one violation associated with the Barex Plant operations.

**PSM – Process Safety Management:**

- An internal PSM audit was conducted the week of October 5.
- A PSM / RMP audit was conducted the week of December 7 by ABS Consulting.
- On December 1 and 2, BSI conducted our annual ISO surveillance audit. The audit resulted in one minor non-conformance regarding lab calibration schedule.
- On December 15 Eli Lilly conducted a customer audit.

## 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	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)

**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.

	2012	2013	2014	2015
<b>Air Overall Excess Emission Compliance</b>	99.8%	99.2%	99.5%	99.3%
<b>SARA Reportables</b>	6	4	7	7
<b>CERCLA Reportables</b>	2	2	6	2
<b>NPDES Reportables</b>	5	2	4	1
<b>Agency Reportable Spills (including RCRA)</b>	0	0	1	3

**Reportable Release Summary**

Date	Release Type	Description	Emissions			
			SO <sub>2</sub> (tons)	H <sub>2</sub> S (tons)	H <sub>2</sub> SO <sub>4</sub> (tons)	NO <sub>x</sub> (tons)
10/7/15	SARA	The South Flare Gas Recovery System compressors were down. One compressor had a seal leak, and the alternate compressor motor was unable to be started.	0.8	NA	NA	NA

Reportable Quantities    SO<sub>2</sub> = 500 lbs    H<sub>2</sub>S = 100 lbs    H<sub>2</sub>SO<sub>4</sub> = 1,000 lbs    NO<sub>x</sub> = 1,000 lbs

**2. Permits/Projects**

No.	Description	Permit Application Type	Permit Issued Final
1	The Ohio EPA approved a request for a discretionary exemption to allow the FCCU to be operated with increased feed rate up to 50 MBPD, to evaluate the change in stack emissions during those conditions. The exemption allows for up to 6 months for the trial. They allowed a total of 60 operational days for the trial period.	Air	Yes
2	U.S. EPA Region V approved an Alternative Monitoring Plan (AMP) that was submitted to provide options to meet the compliance demonstration for monitoring the 3 refinery flares to comply with new regulatory requirements. The CEMS would have required dangerously high concentrations of H <sub>2</sub> S (50%) in order to calibrate the instruments, which posed safety concerns from the manufacturing of the gas cylinders, the transportation of the cylinders, and potential exposure to employees and the community. The Flare Management Plan was submitted as required by NSPS Ja.	Air	Yes
3	Request for Authorization to Conduct Scheduled Maintenance of the Refinery Steam and North Flare Gas Recovery Systems during the 2016 turnaround.	Air	Yes
4	Wastewater Permit-to-Install (PTI) for the installation of sewers for the new UPS Building in the SLIU.	Wastewater	Yes
5	Wastewater Permit-to-Install (PTI) for the installation of sewers for the Crude Furnace Steam Generation Project.	Wastewater	Yes
6	The Ohio EPA issued a written emergency hazardous waste permit for the overflow of stormwater from G-Tank to D Pond that occurred on 10/28/15. The permit was effective 11/10/15.	RCRA	Yes

### **Agency Inspections/Enforcement/Rulemaking**

1. The Ohio EPA issued a Notice of Violation (NOV) for the January 10, 2015 Isocracker Incident for excess emissions and CEMS downtime. Ohio EPA understands that Husky is working with U.S. EPA to address these issues; and has therefore referred these violations to U.S. EPA.
2. The Ohio EPA issued a Return to Compliance letter for the responses provided regarding the Notice of Violation (NOV) that was issued for the RCRA inspection conducted on 9/28/15. The violations involved fluorescent lamp container with an open lid and no accumulation date, and a used oil container in the automotive shop with no label.

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	NOx	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 <sub>2</sub>	Sulfur Dioxide
H <sub>2</sub> 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

**Allen County Environmental Citizen's Advisory Committee  
ISP Status Report (October 2015 – December 2015)**

19 January 2016

1. SAFETY/SECURITY

	2014	2015	2016 YTD
OSHA recordable – ISP	0	0	0
OSHA recordable - Contractors	0	0	0

2. RELEASES

- No RQ incidents (YTD = 0)

3. AIR

- On October 13, 2015, ISP completed a performance test on the scrubber off-gas boiler for carbon monoxide (CO). The hourly emissions rate was below our permit limit.
- The facility completed our Responsible Care 14001 internal audit (a program to achieve improvements in environmental, health, safety, security performance) in December. An external audit (by a third party auditor) is schedule for January for re-certification of RC14001 Certificate.

4. WATER

- Nothing to report

5. RESOURCE CONSERVATION AND RECOVERY ACT

- Nothing to report

6. OTHER

- ISP received the Silver Award for Improvement in the area of EH&S Operations from the Society of Chemical Manufacturers and Affiliates (SOCMA). SOCMA is a trade association dedicated to specialty chemical manufacturers, distributors and affiliated service providers.