

**Allen County Environmental Citizens Advisory Committee  
PCS Nitrogen Ohio, L.P.  
March 31, 2017 Report**

**General**

1. The plant continues to run well.

**Health and Safety**

1. The site had 1 recordable injury during the last quarter. An employee suffered a laceration to a finger while attempting to make a structural steel connection at grade.

**PSM**

1. There have been no reportable quantity releases to date in 2017.
2. The site has had no NOV's to date in 2017.

**Environmental**

**AIR**

1. The 4th quarter Title V Deviation report was submitted.
2. The Semi-Annual Mon and LDAR reports were submitted.
3. The Annual GHG report was submitted.
4. Received PTI for a new prill bagger in the prill warehouse.
5. Submitted application and received a PTI to move loading of products from one loading area (T3/T4) to another loading area (T5/T6).

**WATER**

1. The December, January, and February DMRs were submitted.
2. The annual Free Cyanide PMP Report was submitted to OEPA.
3. The annual Mercury PMP Report was submitted to OEPA.
4. The annual Water Withdrawal Report was submitted to ODNR.
5. Exceeded the maximum daily Organic Nitrogen limit at the 603 Outfall on March 8<sup>th</sup>.
6. Received approval to use water treatment chemicals ChemTreat RL-9002, CL-5681, CL-5832.

**RCRA**

1. Completed a hazardous waste shipment in March.

**SARA**

1. The Tier II Chemical Inventory Report was 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

# Allen County Environmental Citizen's Advisory Committee ISP Status Report (January 2017 – March 2017)

18 April 2017

## 1. SAFETY/SECURITY

	2015	2016	2017 YTD
OSHA recordable – ISP	0	0	0
OSHA recordable - Contractors	0	0	0

## 2. RELEASES

- No RQ incidents (CY2017 = 0)

## 3. AIR

- The following reports were submitted to Environmental Protection Agency (EPA):
  - Emergency planning and hazardous chemical inventory
  - Greenhouse Gas

## 4. WATER

- Nothing to report

## 5. RESOURCE CONSERVATION AND RECOVERY ACT

- Nothing to report

## 6. OTHER

- An external Responsible Care 14001 audit (by a third party auditor) was completed in January with two minor non-conformities with recommendation to maintain our certificate upon closure of the corrective actions.



## Lima Refining Company

A Husky Energy Inc. Subsidiary

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1150 South Metcalf Street  
Lima, OH 45804-1145

Bus: (419) 226-2300

April 11, 2017

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 April 18, 2017.

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

Sincerely,

Gary Vonderembse  
Environmental Manager

### Attachments

cc: 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.

	2014	2015	2016	2017
<b>Air Overall Excess Emissions Compliance</b>	99.5%	99.3%	94.4%	<b>99.2%</b>
<b>SARA Reportables</b>	7	7	7	1
<b>CERCLA Reportables</b>	6	2	4	1
<b>NPDES Reportables</b>	4	1	2	1
<b>Agency Reportable Spills (including RCRA)</b>	1	3	0	0

**Reportable Release Summary**

**Emissions/Release**

Date	Release Type	Description	Chronic Toxicity (TUC)	SO <sub>2</sub> (tons)	NO <sub>x</sub> (tons)
2/1/17	NPDES Exceedance	Exceeded the chronic toxicity limit (4.4 TUC) for fathead minnows. A follow-up test was conducted, which demonstrated compliance with the permit limit.	6.4	NA	NA
2/4/17	CERCLA (NO <sub>x</sub> )	The Reformer Furnace Selective Catalytic Reduction (SCR) system was shut-down for scheduled maintenance to repair an oil leak. Authorization was requested and granted from the Ohio EPA prior to shutting down the system.	NA	NA	0.98
2/25/17	SARA (SO <sub>2</sub> )	An Isocracker compressor tripped off and could not be restarted. The Programmable Logic Controller (PLC) was found to have failed, and was replaced.	NA	0.36	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  
NA = Not Applicable

**2. Permits/Projects**

No.	Description	Permit Application Type	Permit Issued Final
1	Wastewater Permit-to-Install applications for the following projects: <ul style="list-style-type: none"> <li>• API Separator Sludge Pumps</li> <li>• Crude Oil Flexibility Sulfur Block Sewers</li> <li>• Install Two Iron Co-Precipitation Selenium Treatment Trailers</li> <li>• Reverse Osmosis Building West Area Sewer</li> </ul>	Water	Yes Yes Yes Yes
2	Request for Authorization to Install Temporary Control Equipment on the wastewater centrifuge system.	Air	No
3	The Ohio EPA issued a draft Permit-to-Drill for the Deepwell Injection Project. A public hearing is scheduled for April 20 <sup>th</sup> , which will be conducted by the Ohio EPA. The public comment period ends April 24 <sup>th</sup> .	UIC	No
4	The Ohio EPA issued a draft NPDES Renewal Permit that includes a commitment for installing the Water Reuse Project by the end of 2018. The public comment period for the draft permit ends April 30 <sup>th</sup> . This project commitment is tied to the Director's Final Findings and Orders issued March 7 <sup>th</sup> .	Wastewater	No

### Agency Inspections/Enforcement/Rulemaking

1. The Ohio EPA issued Notices of Violation (NOV) on February 17<sup>th</sup> and 22<sup>nd</sup> failure to conduct a timely performance test and CEMS downtime respectively. Separate responses were submitted March 17, 2017 for both NOV's.

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	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



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

Tel 419 226 1200  
Fax 419 226 1274

April 10, 2017

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 first quarter of 2017.

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. Bianco".

Joseph F. Bianco  
SHE Manager

cc: ECAC Members

## 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)



## **Water-Sewer Utility Consolidation Feasibility Study Board of County Commissioners & Allen Water District**

### **Historical Narrative:**

On October 12, 2013 the Allen Water District Trustees met with the Board of County Commissioners to discuss completing a Feasibility Study examining the feasibility of consolidating the Commissioner's Water and Sewer District (ORC 6103 & 6117) with the Allen Water District's Regional Water District (ORC 6119). The study was recommended to determine the merits of consolidating the two governmental utility organizations eliminating administrative and operational redundancies, improve efficiencies while developing a regionalized utility structure that could respond to economic development utility demands in a more effective and timely manner. Consolidation of the two utility organizations was proposed as a transfer of the Commissioner's utility organization to the Allen Water District's organization through filing a petition to Common Pleas Court changing the purpose of the Allen Water District to include oversight of all the Board of County Commissioners sanitary sewer and water utilities.

The study was proposed to be funded through a \$50,000 Local Government Innovative Fund (LGIF) grant from the State of Ohio, Development Services Administration (DSA). On June 5, 2014 the Commissioners approved Resolution 323-14A entering into a collaborative partnership with the Allen Water District Trustees making application to the State for a LGIF grant. The two were successful by receiving the grant on September 10, 2014 for funding the study in 2015. The Allen Water District was identified to be the administrative authority to oversee the study project.

The Allen Water District issued a letter on March 25, 2015 to Spitler and Huffman, LLP to begin drafting the Feasibility Study. Meetings were scheduled with all political subdivisions (townships, villages and cities) to explain why the study was being developed, and outlining the steps to be taken for completing the study in an effort to make this a community study project. A final draft of the study was issued to all political subdivisions on February 2, 2017 for review and comment. Subsequent meetings were scheduled with each political subdivision to entertain questions and build support for the consolidation concept with the next steps being development of a draft Implementation Plan for review and comment by the Township Trustees, Board of County Commissioners and Allen Water District Trustees. The draft Implementation Plan would establish governance for the Allen Water District Trustees overseeing the consolidated utility district along with changing the purpose of the district to include sanitary sewer responsibility and addressing other items to be included in the petition to the court.

A letter was prepared and a meeting was held on April 6, 2017 by the Board of County Commissioners with the Allen Water District Trustees to discuss the suspension of moving forward with development of a draft Implementation Plan to consolidate the utilities. The following were the main reasons cited for the suspension of the utility consolidation:

- Lack of overwhelming consensus of support from the political subdivisions and general public to consolidate the two utility organizations.
- No identified immediate need to consolidate the two utility organizations.

However, additional discussions during the April 6th meeting led to exploring alternative action items to enhance both of the utility systems organizational/operational structures and communications without having to consolidate the two utility systems. Some of the action items to be explored were part of the Feasibility Study's steps to be taken for completing consolidation of the utilities. The following are a few of the action items to explore for implementation:

- Combining the Allen Water District's and Board of County Commissioners water customer base under a single contract.
- Having the Allen Water District utilize the County as their Fiscal Agent.
- Reappoint the Sanitary Engineer to the Allen Water District Board of Trustees (complete).
- Develop and send a closeout letter to all political subdivisions.
- Modify the Allen Water District's petition to allow board representatives for the Townships to be selected from the entire Township.

## Historical Timeline Summary:

October 12, 2013	Initial meeting with BOCC and Allen Water District Trustees to discuss Utility Consolidation Feasibility Study
June 5, 2014	Commissioners approved Resolution 323-14A entering into a collaborative partnership making application to the State for a grant to complete the Utility Consolidation Feasibility Study.
June 2014	Grant application was filed with the State DSA for a \$50,000 grant to fund the Feasibility Study
September 10, 2014	State DSA released the funds for a 2015, \$50,000 grant to pay for the Feasibility Study
March 25, 2015	Consultant was hired to complete Study
August-September 2015	Meetings were held with all townships, villages and cities to discuss the nature of the Feasibility Study.
February 2, 2017	A final draft of the Feasibility Study was issued to all political subdivisions.
February 16, 2017	A presentation was made to the Allen Co. Township Association outlining next steps for generating support of the consolidation concept.
February-April 2017	Follow-up meetings were held with political subdivisions to answer question in regards to the study results and generate support for the concept of consolidating.
April 6, 2017	The BOCC met with representatives of the Allen Water District to communicate their position to shelve the full consolidation concept. However, the BOCC are willing to explore and implement other strategies outlined in the study that wouldn't cause a full transfer of assets.

## Ohio EPA Report - Environmental Citizens Advisory Committee

April 18, 2017

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

#### Division of Surface Water

1. On March 7, 2017, DFFOs were issued to the Lima Refining Company to establish a timeline for the installation and start-up of the water reuse project.
2. On March 20, 2017, a PTI was issued for the addition of two selenium treatment trailers to increase the refinery's ability to remove selenium from their wastewater during high flow events.
3. On March 31, 2017, the facility's draft NPDES permit was issued for 30-day public comment period.

#### Division of Air Pollution Control

1. On February 17, 2017, an NOV was issued for failure to conduct a timely performance test for NOx on the Ultraformer process heaters; and for exceeding the annual startup and shutdown NOx emission limitation at the LIU flare.
2. On February 22, 2017, an NOV was issued for excessive amount of CEMs downtime for the Isocracker stabilizer/splitter process heaters; Isocracker I & II process heaters; and the Ultraformer process heaters.

### **Ineos Nitriles USA LLC**

#### Division of Air Pollution Control

1. On March 21, 2017 Ineos submitted a Title V renewal air permit application.

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

#### Division of Surface Water

1. Ohio EPA conducted a compliance evaluation inspection on April 5, 2017. No violations of the NPDES permit terms and conditions were noted at the time of the inspection.

### **ISP Lima LLC**

1. Nothing to report.

## Fort Amanda Specialties LLC (Akzo Nobel)

1. 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	



## NEWS RELEASE

Public Interest Center (614) 644-2160

**FOR RELEASE:** April 7, 2017  
**MEDIA CONTACT:** Dina Pierce, (614) 644-2160  
**CITIZEN CONTACT:** Darla Peelle, (614) 644-2160

### **Ohio EPA Seeking Public Comments on New Injection Wells** *Public Meeting Scheduled April 20 in Lima*

Ohio EPA will hold a public information session and hearing on Thursday, April 20, 2017, to accept public comments about draft permits allowing Lima Refining Co. to drill three new Class 1 hazardous wastewater injection wells on the refinery property in Lima.

The public meeting will begin at 6 p.m. at City Council Chambers, Lima Municipal Center, 50 Town Square.

During the information session, Ohio EPA representatives will present details about the draft permits and answer questions. During the hearing, which will immediately follow the information session, the public can submit comments for the record regarding the permits.

If approved, the permits only would allow the company, located at 1150 South Metcalf St., Lima, to construct three injection wells. The permits would not authorize the company to use the wells for wastewater disposal without first obtaining additional permits from Ohio EPA to operate the wells.

Copies of the draft permits and related documents may be viewed at the Lima Public Library, 650 W. Market St., Lima; at Ohio EPA's Central Office, 50 W. Town St., Columbus, for an appointment, call (614) 644-2752; or at Ohio EPA's Northwest District Office, 347 North Dunbridge Road, Bowling Green, for an appointment, call (419) 352-8461.

Written comments on the draft permits will be accepted at the hearing or may be emailed to Jess Stottsberry at [Jess.Stottsberry@epa.ohio.gov](mailto:Jess.Stottsberry@epa.ohio.gov), or mailed to Ohio EPA, Division of Drinking and Ground Waters, Attn: Jess Stottsberry, P.O. Box 1049, Columbus, OH 43216-1049. Comments will be accepted until April 24, 2017.

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[www.epa.ohio.gov](http://www.epa.ohio.gov)

*The Ohio Environmental Protection Agency was created in 1972 to consolidate efforts to protect and improve air quality, water quality and waste management in Ohio. Since then, air pollutants dropped by as much as 90 percent; large rivers meeting standards improved from 21 percent to 89 percent; and hundreds of polluting, open dumps were replaced with engineered landfills and an increased emphasis on waste reduction and recycling.*