

# Allen County Environmental Citizen's Advisory Committee ISP Status Report (January 2015 – March 2015)

21 April 2015

## 1. SAFETY/SECURITY

	2013	2014	2015 YTD
OSHA recordable – ISP	0	10	0
OSHA recordable - Contractors	0	0	0

## 2. RELEASES

- No RQ incidents (YTD = 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

- Nothing to report

April 15, 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 April 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.

	2012	2013	2014	2015
<b>Air Overall Excess Emission Compliance</b>	99.8%	99.2%	99.5%	98.2%
<b>SARA Reportables</b>	6	4	7	4
<b>CERCLA Reportables</b>	2	2	6	1
<b>NPDES Reportables</b>	5	2	4	0
<b>Agency Reportable Spills (including RCRA)</b>	0	0	1	0

**SARA/CERCLA Reportable Releases**

**Emissions**

<b>Date(s) 2015</b>	<b>Release Type</b>	<b>Description</b>	<b>SO<sub>2</sub> (tons)</b>	<b>H<sub>2</sub>S (tons)</b>	<b>H<sub>2</sub>SO<sub>4</sub> (tons)</b>	<b>NO<sub>2</sub> (tons)</b>
1/10 thru 1/24	SARA CERCLA	As a result of the Isocracker fire, various process units were shutdown or placed on circulation, which led to flaring emissions that exceeded the reportable quantities (RQ).	35.25	1.18	1.57	2.76
1/20 thru 1/23	SARA	The SRU Claus 1 and Tail Gas Treatment Unit (TGTU) were placed on standby for acid gas feed from the startup of process units.	4.70	NA	NA	NA
2/13 thru 2/15	SARA	A guy wire on an electrical pole snapped causing feeder cables to jump and short out. The power outage affected multiple process units resulting in flaring that exceeded the reportable quantity for sulfur dioxide.	2.49	NA	NA	NA
3/11	SARA	The LIU Vacuum Off-Gas compressor was shutdown to conduct scheduled maintenance of a pressure safety valve (PSV). In order to complete the work safely, the LIU flare gas recovery system was shutdown, which resulted in the flaring of the off-gas. This was reported to the Ohio EPA under the malfunction provisions of the rules.	0.60	NA	NA	NA

**NPDES Reportable Releases – Nothing to Report**

**RCRA Reportable Releases – Nothing to report**

**Agency Reportable Spills – Nothing to report**

**2. Permits/Projects**

No.	Description	Permit Application Type	Permit Issued Final
1	Isocracker Unit Rebuild	Air	Yes
2	Ultraformer Furnace Reconstruction	Air	No
3	Minor Title V Permit Modification to Incorporate Terms and Conditions of 5 Permits-to-Install for Various Emissions Units	Air	No
4	Installation of Sewers for the Reformer Work Area	Wastewater	Yes
5	Installation of Sewers for the LPG Railcar Loading Rack	Wastewater	Yes
6	Installation of rerouted sewers for the new Acid Gas Flare Project	Wastewater	Yes
7	Installation of Sewers for the New Crude Oil Furnace	Wastewater	Yes
8	Installation of Sewers for the Deaerator Charge Pump Drain Project	Wastewater	Yes
9	Submitted a request to the Ohio EPA to allow use of an additional chemical to treat the vegetative growth in Polishing Ponds A/B.	Wastewater	No
10	The Ohio EPA issued the modification of the NPDES Permit to incorporate terms and conditions for the future Water Reuse Project.	NPDES	Yes
11	The Ohio EPA issued the Final Renewal Hazardous Waste Facility Installation and Operation Permit for the site.	RCRA	Yes
12	The Ohio EPA issued the written emergency hazardous waste permit for the overflow dry weather flow from G-Tank to D Pond. The waste also carries the characteristic hazardous waste classification for benzene (D018 >0.5 ppm). The permit was issued for 90 days (4/10/15).	RCRA	Yes

**Notification of Potential Violations**

A meeting is scheduled for April 29<sup>th</sup> with U.S. Department of Justice and EPA Region V personnel to discuss the Notification of Potential Violations letter that was issued on February 11<sup>th</sup> pertaining to the Consent Decree, New Source Performance Standards (NSPS), Maximum Achievable Control Technology (MACT), and Permits.



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	NOx	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



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April 15, 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 first quarter of 2015.

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  
March 31, 2015

**Health, Safety and Environment Performance Summary**

<i>Ineos and PCS Nitrogen Facility*</i>	<i>2006</i>	<i>2007</i>	<i>2008*</i>	<i>2009</i>	<i>2010</i>	<i>2011</i>	<i>2012</i>	<i>2013</i>	<i>2014</i>	<i>2015</i>
OSHA Recordables	2	3	4	1	2	0	5	5	1	2
DAFW Injuries	0	0	1	0	1	0	2	1	0	0
RQ Releases	8	5	4	4	0	1	2	1	2	0
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%	100%

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

**Safety:**

- An additional Safety Absolute was added on lifting and hoisting.

*no unauthorized person to enter the defined danger zone where objects can fall.*

- INEOS Lima incurred two recordable injuries in February: both incidents involved slips on ice and resulted in fractured elbow / arm.
- Husky Lima Refinery fire / explosion response that occurred in January will take the place of the Allen County combined drill this year.

**Environmental:**

- OSHA conducted a surprise site inspection on January 21. They requested information regarding safety, operations, inspection, environmental, PSM and instrumentation. OSHA returned for a follow-up visit on March 18 to discuss the February 11 AOGI outage and conduct interviews.
- On February 11 a power supply failure resulted in an AOGI and Acrylo 'B' turbine motor trip.
- Lima received an NOV / Return to Compliance from the Ohio EPA for a permit violation due to high injection pressure on #1 deep well February 20. This incident was weather related – a frozen gauge.
- The new RefTek 130S seismic monitoring replacement station has been reviewed and approved by the Ohio EPA.
- A third party LDAR audit was conducted the week of March 9. The only findings were 2 OELs.

**PSM – Process Safety Management:**

- A mini-PHA was conducted in January for Catalyst 59 and the new transport system to #1 calciner.



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## 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)



## Ohio EPA Report - Environmental Citizens Advisory Committee

April 21, 2015

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

#### Division of Air Pollution Control

- On February 18, 2015, a PTI modification was issued final to address repair/replacement and upgrades of process components damaged during the fire at the refinery.
- A PTI modification application was submitted on March 5, 2015 to address the reconstruction of the ultraformer furnace involving replacement of radiant furnace modules, tubes and headers.

#### Division of Materials and Waste Management

- On March 13, 2015, a final Ohio Hazardous Waste Facility Installation and Operation Permit Renewal permit was issued. The final permit allows Lima Refining Company to continue Post-Closure and Corrective Action activities.
- On January 16, 2015, an Emergency Permit was issued for the period of January 16, 2015 through April 10, 2015 for D-pond in the event of a major rain event.

### **Ineos USA LLC**

Nothing to report.

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

#### Division of Surface Water

- On March 5, 2015, a compliance evaluation inspection was conducted at PCS Nitrogen. No violations were noted at the time of the inspection.

#### Division of Air Pollution Control

- A Title V renewal permit was issued draft on March 27, 2015.

### **ISP Lima LLC**

Nothing to report.

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

Nothing to report.

### **Lima Energy**

Nothing to report.