

Ohio EPA Report - Environmental Citizens Advisory Committee

April 17, 2018

Lima Refining Company / Husky Energy

Division of Air Pollution Control

1. On March 9, 2018, a Title V renewal permit was issued draft. The 30-day public comment period ended April 13, 2018. DAPC/NWDO is currently reviewing and addressing the comments submitted.

Ineos Nitriles USA LLC

Division of Air Pollution Control

1. On February 1, 2018, an NOV was issued for failing to continuously monitor and record the CO and NOx emissions. On February 14, 2018, an ROV was issued after the facility submitted documentation that the CEMS was repaired and is continuously monitoring NOx and CO emissions.

PCS Nitrogen Ohio, L.P.

Nothing to report.

ISP Lima LLC

Division of Air Pollution Control

1. On February 13, 2018, the Title V air compliance inspection was conducted. On February 16, 2018, a combined inspection NOV/ROV was issued after the facility submitted information confirming that a cylinder gas audit was completed and that the technicians were retrained to ensure the audit requirements are met.

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	ROV - resolution of violation
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	



Allen County Environmental Citizens Advisory Committee
PCS Nitrogen Ohio, L.P.
April 17, 2018 Report

General

1. The plant has some operational issues that have caused some rate reductions.

Health and Safety

1. Year to date, the site has no recordable injuries.

PSM

1. There have been no reportable quantity releases in 2018.

Environmental

Air

1. The 4Q17 Deviation report was submitted.
2. The 2H17 LDAR report was submitted.
3. The 2H17 MON report was submitted.
4. The Annual Greenhouse Gas Report was submitted.
5. Received a Permit to Install (PTI) from OEPA to rebuild a tank for UAN.
6. Received an extension from OEPA for the reformer stack test.

Water

1. The December, January, and February DMRs were submitted.
2. Received the new NPDES Permit (2IF00004*KD).
3. Received approval from OEPA to use cooling water treatment chemical ChemTreat CL-6854
4. Submitted the annual free cyanide PMP Report to OEPA.
5. Submitted the annual Mercury PMP Report to OEPA.
6. Submitted the annual Water Withdrawal Report to ODNR.

RCRA

1. Submitted the Bi-Annual Hazardous Waste Report to OEPA.

SARA

1. Submitted the Tier II Chemical Inventory Report.

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
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



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

Tel 419 226 1200
Fax 419 226 1274

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

April 10, 2018

Dear Ms. Luhn:

Attached is the INEOS Lima Chemicals' status report update for the First quarter of 2018.

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". 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
First Quarter 2018

Health, Safety and Environment Performance Summary

<i>Ineos and PCS Nitrogen Facility*</i>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
OSHA Recordable' s	2	0	5	5	1	6	2	1	1
DAFW Injuries	1	0	2	1	0	0	1	0	0
RQ Releases	0	1	2	1	2	2	0	0	0
UIC Permit % Compliance	99.99%	99.99%	100%	100%	99.99%	99.99%	100%	99.9%	98%
AOGI Service Factor	100%	100%	99.99%	99.99%	100%	99.9%	99.99%	100%	100%

Safety:

- The 2017 OSHA logs have been posted reflecting one OSHA recordable injury in 2017. The site has gone 2 years without a lost time injury.
- A Contractor was brought on site to help with the significant Geese problem. Dogs were used to haze the geese so that they would leave the plant.
- The first of two safety training days for all Ineos employees has been completed with 100% attendance.
- A breathing air project was completed in an effort to provide breathing air via permanent lines to different height of the Heads Column. This reduces the need to carry air packs while doing certain tasks.
- Ineos responded to CSX railyard located on Robb Ave in Lima regarding three Acrylo cars that had been struck by a derailed string of hopper cars. There was extensive damage to the outer shells of the Acrylo rail cars and they could not be moved without repairs. There were no leaks.

Environmental:

- #3 deepwell began to lose annulus fluid (salt water with corrosion inhibitor) on February 4th. The well was shut down immediately and heavy fluid was pumped down the well to ensure it would not back flow while the issue was investigated. Pressures indicated that the failure was in the casing not in the pipe that carries the wastewater to the injection zone. A workover rig was brought in and the injection pipe was removed from the well. After several different tests, Ineos has determined that the 5½ inch casing has failed near the surface. The 5 ½ inch casing is the inner most casing. There is a 7 inch casing and a 10 ¾ inch casing with cement between each layer protecting the ground water from this type of casing failure. The well will remain out of service and monitored until repairs are completed and testing confirms that the well has mechanical integrity. The loss of Mechanical Integrity resulted in a Notice of Violation from the OEPA.
- Ineos submitted the 4th quarter Title V deviation report which detailed AOGI CEMS downtime due to the stack flow meter malfunction for approximately 10% of the 4th quarter. OEPA issued a notice of violation for that period of downtime and a resolution of violation soon afterwards since the flow meter had already been repaired.
- An AOGI compliance test and CEMS RATA was completed on Thursday 3/15. The OEPA witnessed the test which demonstrated compliance with the CO and NOx emission limits by a large margin.
- The annual Greenhouse Gas Report for the Ineos facility has been submitted.

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)

Allen County Environmental Citizen's Advisory Committee ISP Status Report (January 2018 – March 2018)

17 April 2018

1. SAFETY/SECURITY

	2016	2017	2018 YTD
OSHA recordable – ISP	0	0	0
OSHA recordable - Contractors	0	0	0

2. RELEASES

- No RQ incidents (CY2018 = 0)

3. AIR

- The following reports were submitted to Environmental Protection Agency (EPA):
 - Emergency planning and hazardous chemical inventory
 - Emissions inventory
- The facility received a “notice-of-violation” from Ohio EPA for missing a quarterly gas audit by 9 days.

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, 5.5 auditor days) was completed in January with zero findings with recommendation to issue RC14001®:2015 / ISO 14001:2015 certificate.



Lima Refining Company

A Husky Energy Inc. Subsidiary

1150 South Metcalf Street
Lima, OH 45804-1145

Bus: (419) 226-2300

April 17, 2018

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 17, 2018.

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
Michael Caprella
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
Marcus Ruscio
Matt Elkins

**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.

	2015	2016	2017	2018
Air Overall Excess Emissions Compliance	99.3%	94.4%	99.5%	98.8%
SARA Reportable Releases	7	7	5	1
CERCLA Reportable Releases	2	4	2	0
NPDES Reportable Releases	1	2	3	0
Agency Reportable Spills (including RCRA)	3	0	3	1

Reportable Release Summary

Emissions/Release

Date	Release Type	Description	Oil Released (gallons)	SO ₂ (lbs)
1/7/18	Agency Reportable Spill – Oil Sheen to Navigable Water	Diesel fuel was released from the LIU Flare during a process unit upset. Oily material was deposited between the Ottawa River and Ft. Amanda Road/Collett Street, approximately 0.5 mile to the north of the refinery. There are drainage swales in this area, which are considered navigable waters in Ohio. All agency notifications were made, and cleanup efforts were made as required. The Ohio EPA issued a Notice of Regulatory Response and Interest (NRRRI).	12	NA
2/20/18	SARA Reportable (SO ₂)	A safety relief valve on one of the HDS furnace passes opened to the flare, and the flare gas recovery compressors were shutdown, resulting in a exceedance of the reportable quantity for sulfur dioxide	NA	1,114

Reportable Quantities

SO₂ = 500 lbs. H₂S = 100 lbs. H₂SO₄ = 1,000 lbs. NO_x = 1,000 lbs. Benzene = 10 lbs.

NA = Not Applicable

2. Permits/Projects

No.	Description	Permit Application Type	Permit Issued Final
1	Wastewater Permit-to-Install applications for the Water Reuse Project. Phases 1, 2 and 3 Submitted Phase 4 Pending	Wastewater	Yes No
2	The Ohio EPA issued comments on the Quality Assurance Project Plan/Sampling and Analysis Plan as required by the terms and conditions of the NPDES Permit. The plan outlines the protocols for conducting fish tissue, eggs, and ovary sampling/analysis for selenium.	Wastewater	Comment Responses Due April 13 th

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 System
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
DMROA	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



Fort Amanda Specialties LLC

(A joint venture of AkzoNobel and BASF Corporation)

Brady Brown
HSE and Security Manager

April 11, 2018

To: Environmental Citizens Advisory Council

Cc: B. Ankone, J. Hutton

Re: **ECAC Meeting April 17, 2018**

General News

- Site performance goals include leading indicators that are designed to prevent process safety and occupational safety incidents from occurring. Current year to date performance is exceeding the site HSE goals.
 - 90% of incident investigations completed within 30 days
 - 90% of action items completed on time
 - 90% of training completed on time.
- FAS remain healthy in regards to HSE performance. Zero recordable injury for three years. See Summary Below.

	2015	2016	2017	2018
OSHA Recordable Injuries	0	0	0	0
Lost Time Injures	0	0	0	0
RQ Releases	0	0	0	0

Environmental Performance

- 0 Reportable Environmental Incidents or permit deviations
- HSE Department has ongoing projects scoped to reduce Hazardous Waste streams generated at the site.

Safety Performance

- 0 recordable injuries year to date and minimal first aid incidents.
- 0 Major Process Safety Incidents
- Occupational and Process Safety Near miss reporting rates are trending positively
- In the last Qtr. there has been 2 outages completed with zero injuries.

Security and Regulatory

- Site has implemented enhanced information cyber security protocols.