

Ohio EPA Report - Environmental Citizens Advisory Committee

January 16, 2018

Lima Refining Company / Husky Energy

Division of Air Pollution Control

1. On January 8, 2018, Ohio EPA responded to a reported release of an oily mist at the refinery. It was estimated that 336 gallons of oil/diesel was released from a flare. Ohio EPA's emergency response worked with the facility and local officials during the remediation of the release. Ohio EPA's DAPC is gathering additional information on the incident.
2. On November 3, 2017, an NOV was issued for failure to conduct a timely performance test for NOx on the B&W Boiler.
3. On November 20, 2017, a maintenance bypass request was issued allowing the facility to conduct work on the selective catalytic reduction control devices bypass stack dampers while still operating the Isocracker Furnaces and Ultraformer Furnace.

Ineos Nitriles USA LLC

Division of Air Pollution Control

1. The Title V renewal permit was issued final on December 15, 2017.

PCS Nitrogen Ohio, L.P.

Division of Air Pollution Control

1. The Title V air compliance inspection was conducted on October 19, 2017. No violations were noted during the inspection.

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	



Lima Refining Company

A Husky Energy Inc. Subsidiary

1150 South Metcalf Street
Lima, OH 45804-1145

Bus: (419) 226-2300

January 15, 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 January 16, 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

**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
Air Overall Excess Emissions Compliance	99.5%	99.3%	94.4%	99.5%
SARA Reportables	7	7	7	5
CERCLA Reportables	6	2	4	2
NPDES Reportables	4	1	2	3
Agency Reportable Spills (including RCRA)	1	3	0	3

Reportable Release Summary

Emissions/Release

Date	Release Type	Description	Oil Released (lbs)	SO ₂ (lbs)
10/10/17	RCRA and CERCLA	Approximately 34.2 gallons of benzene product was spilled at the benzene loading rack. The reportable quantity (RQ) for benzene = 10 lbs.	34.2	NA
12/15/17	SARA (SO ₂)	The pilots on the absorber stripper safety valve at the SGP froze, causing the safety to open to the flare.	NA	1,117

Reportable Quantities

SO₂ = 500 lbs. H₂S = 100 lbs. H₂SO₄ = 1,000 lbs. NO_x = 1,000 lbs. Benzene = 10 lbs.
NA = Not Applicable

Agency Inspections/Enforcement/Rulemaking

1. The U.S. District Court for the Western District of Texas issued an order granting joint motion to terminate the 2007 Consent Decree. The new Consent Decree was entered in the United States District Court for the Northern District of Ohio on November 7th.
 - a. All 44 consent decree compliance tasks that had 2017 deadlines were completed (compliance achieved 9 days early).
 - b. Submitted payment totaling \$1MM for civil/stipulated penalties for CD2 as follows:

i.	Agency	Penalty Type	Amount
1.	DOJ/EPA	Civil	\$706,982
2.	DOJ/EPA	Stipulated	\$146,509
3.	State of Ohio	Stipulated	\$146,509
 - c. Paid \$300M in stipulated penalties split equally between the U.S. EPA and Ohio EPA for the LDAR propane loading rack compliance issue.
2. Paid \$500 to the Ohio EPA for the unauthorized discharge of treated effluent from B Pond that contained chemicals used to treat the vegetation.
3. Responses were submitted to the Ohio EPA pertaining to the following Notices of Violation.
 - o Failures to obtain a Title V permit modification prior to commencing operation of the new Crude Heater and new Acid Gas Flare. The response noted that Husky complied with the terms and

conditions of the Permit-to-Install (PTI) for these EUs as the modification for the Title V permit application was submitted in the proper time frame as prescribed in the PTI.

- Failure to conduct the initial performance test to demonstrate compliance with the NOx emission limitation for the B&W Boiler. The performance tests were conducted November 14th and 15th.

2. Permits/Projects

No.	Description	Permit Application Type	Permit Issued Final
1	Wastewater Permit-to-Install applications for the Water Reuse Project. Phase 1 Submitted Phase 2 Submitted Phase 3 Submittal Pending	Wastewater	Yes Yes No
2	Submitted the Quality Assurance Project Plan/Sampling and Analysis Plan as required by the terms and conditions of the NPDES Permit for approval by the Ohio EPA. The plan outlines the protocols for conducting fish tissue, eggs, and ovary sampling/analysis for selenium. The work must be completed by 12/31/2020, and the final report is to be submitted by 12/31/2021.	Wastewater	No
3	The Ohio EPA approved the use of new chemicals for the Boiler House and Air Compressor Building cooling towers.	Wastewater	Yes
4	The Ohio EPA issued the wastewater Permit-to-Install (PTI) for the construction of the Amine 1 sewer modifications.	Wastewater	Yes
5	The Ohio EPA issued the wastewater Permit-to-Install (PTI) application for the LIU Cooling Tower Water Pump Wash Slab Sewer Tie-in.	Wastewater	Yes
6	Submitted the Request for Approval of Ashland BDO Cooling Tower Chemical Additives to the Ohio EPA.	Wastewater	No
7	Submitted the air Permit-to-Install (PTI) for the second set of modifications for the COF Project, including changes to the following sources. <ul style="list-style-type: none"> ○ Decanted Oil/Sulfur/Caustic rail Rack ○ Sulfur Recovery Unit ○ New Molten Sulfur Storage ○ Coke handling System ○ Boilerhouse Cooling Tower ○ FCC Furnace 	Air	No
8	The Ohio EPA approved the Request for Authorization to Conduct Scheduled Maintenance to repair the TGTU trim heater.	Air	Yes
9	Received the final approved air Permit to Install (PTI) from the Ohio EPA for the reconstruction of the Northside Cooling Tower.	Air	Yes
10	The Ohio EPA issued authorized the request to conduct scheduled maintenance to continue to operate the Iso and Reformer furnaces to work on the SCR units.	Air	Yes
11	Received the Open Burn Permit for the Fire Training Grounds from the Ohio EPA.	Air	Yes

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 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



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

General

1. The plant completed a maintenance outage in 3Q 2017. The site completed development of an environmental risk ranking tool for all work within the facility.

Health and Safety

1. Year to date, the site has 4 recordable injury (a pinched finger).
2. The site had a third party safety audit

PSM

1. There was one reportable quantity release during 2017.
2. In March a leak within the facility resulted in the release of some ammoniated water. The site ERT responded and secured the leak. No RQ.

Environmental

Air

1. The 3Q17 Deviation report was submitted
2. Ohio EPA was in for an air inspection in October, receive a letter that no violations were discovered during the inspection. Also submitted a permit application for some minor permitting, per Ohio EPA's request after the inspection.

Water

1. The September – November DMRs were submitted.
2. Still negotiating the draft NPDES Permit from Ohio EPA.
3. Received wastewater PTI for the T-5 Truck Loading Project – Phase 3.
4. Received approval from OEPA to use boiler cleaning chemical ChemTreat BL-6012.

RCRA

1. Completed a hazardous waste shipments in October and December.

SARA

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

**Allen County Environmental Citizen's Advisory Committee
ISP Status Report (July 2017 – September 2017)**

17 October 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

- In August, our continuous emission monitoring system (CEMS) for nitrogen oxides (NOx) has successfully passed the Relative Accuracy Test Audit (RATA).
- Ohio EPA is currently reviewing our Title V renewal application.

4. WATER

- Nothing to report

5. RESOURCE CONSERVATION AND RECOVERY ACT

- Nothing to report

6. OTHER

- ISP plans to hire four new employees (i.e. Operations Specialists) in the coming weeks.



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

January 15, 2018

Dear Ms. Luhn:

Attached is the INEOS Lima Chemicals' status report update for the fourth quarter of 2017.

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

Sincerely,

Joseph F. Bianco
SHE Manager

cc: ECAC Members

Allen County Environmental Citizens Advisory Committee
INEOS Lima Chemicals Status Report
Third Quarter 2017

Health, Safety and Environment Performance Summary

<i>Ineos and PCS Nitrogen Facility*</i>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>
OSHA Recordable' s	1	2	0	5	5	1	6	2	1
DAFW Injuries	0	1	0	2	1	0	0	1	0
RQ Releases	4	0	1	2	1	2	2	0	0
UIC Permit % Compliance	100%	99.99%	99.99%	100%	100%	99.99%	99.99%	100%	99.9%
AOGI Service Factor	99.7%	100%	100%	99.99%	99.99%	100%	99.9%	99.99%	100%

Safety:

Environmental:

- OEPA was onsite to observe the semiannual ground water sampling event. The two representatives spent the day in the field with our consultant and had no comments or concerns with the method or the wells.
- The Ohio EPA was onsite Tuesday November 21 for their semi-annual deepwell inspection. There were no issues identified.
- Lima received the final USEPA RCRA Air permit covering the RCRA regulated units.
- Lima received the new Title V permit. We have until January 5th to review and submit any questions or comments. So far it appears that the suggested changes will be limited to typographical errors.

PSM – Process Safety Management:

- PHA meeting are complete for the HCN Storage equipment. The final report will be completed 1st quarter 2018.

General

- Ineos completed a security system upgrade project in 2017. All thermal cameras have been replaced and several new cameras have been added to the system.
- The ISO audit against the 2015 standards was November 6th and 7th. The ISO certification was awarded at the completion of the audit. There were no substantial findings.
- December 12th the Ohio EMA will be onsite to discuss railcar response and emergency planning. All of the complex partners were represented.
- Contractor Drug Testing was completed on December 12, 2017 (284 contractors on site, 69 tested with 2 issues).

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)



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

Brady Brown
HSE and Security Manager

January 16, 2018

To: Environmental Citizens Advisory Council

Cc: B. Ankone, J. Hutton

Re: **ECAC Meeting January 16, 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 day 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.
- Site General Manager Bouke Ankoné, of AkzoNobel has transitioned into the GM role, and Lisa Goodin BASF is transitioning to the role of Operations Manager. This is in line with 3 year leadership rotation in Joint Venture agreement between AkzoNobel and BASF.
- 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 Injuries	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.
- FAS removed Acetaldehyde tank from service, removing a Highly Hazardous Substance from 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
- Site has made major improvements in the employee driven Behavior Based Safety Observation Program.

Security and Regulatory

- Site has implemented enhanced information cyber security protocols.