



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

VIA Electronic Mail – nmorgan@lbenergy.com & jhersperger@lbenergy.com

Jeffrey Hersperger, Senior Vice President
Limetree Bay Terminals, LLC
1 Estate Hope
Christiansted, VI 00820
jhersperger@lbenergy.com

Neil Morgan, Vice President, Refinery and General Manager
Limetree Bay Refining, LLC
1 Estate Hope
Christiansted, VI 00820
nmorgan@lbenergy.com

Re: Request to Provide Information Pursuant to the Clean Air Act,
Reference Number: CAA-02-2021-1462

Dear Messrs. Morgan and Hersperger:

The U.S. Environmental Protection Agency (EPA), Region 2 is requiring Limetree Bay Terminal, LLC & Limetree Bay Refining, LLC (Limetree) to submit certain information about your facility at 1 Estate Hope, Christiansted, VI 00820 (the Facility). Enclosure 1, Part I provides the instructions needed to answer this information request, including instructions for electronic submissions. Enclosure 1, Part III specifies the information and monitoring that you must submit and conduct as well as the reporting schedule.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. This authority has been delegated to the Director of the Enforcement and Compliance Assurance Division. Limetree owns and operates emission sources at the Facility.

Limetree must send all required information to:

Robert Buettner, Chief
Air Compliance Branch
U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, New York 10007
Buettner.Robert@epa.gov

Limetree must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Limetree to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Harish Patel in the EPA Region 2 Air Compliance Branch at patel.harish@epa.gov or by phone at 212-637-4046.

Sincerely,

Dore LaPosta, Director
Enforcement and Compliance Assurance Division
Environmental Protection Agency – Region 2

Enclosures

Cc: Catherine Elizee, Environmental Superintendent
Limetree Bay Terminals LLC and Limetree Bay Refining LLC
celizee@lbenergy.com

Jean-Pierre Oriol, Commissioner
US Virgin Islands Department of Planning and Natural Resources
JP.Oriol@dpr.vi.gov

Austin Callwood, Director of Environmental Protection
US Virgin Islands Department of Planning and Natural Resources
Austin.Callwood@dpr.vi.gov

Verline Marcellin, Air Quality Program Manager
US Virgin Islands Department of Planning and Natural Resources
Verline.Marcellin@dpr.vi.gov

ENCLOSURE 1

INFORMATION REQUEST PURSUANT TO SECTION 114 OF THE CLEAN AIR ACT

The U.S. Environmental Protection Agency (EPA) requires the submittal of information regarding operations and compliance of the Limetree facility located at 1 Estate Hope, Christiansted, St. Croix, VI.

Part I: Instructions

In preparing your responses, please refer to the following instructions:

1. A complete and separate response must be provided for each numbered information request paragraph below. Identify each response with the same paragraph number to which it corresponds.
2. Provide all supporting documentation for each response. Supporting documentation includes, but is not limited to, company records (such as logs, receipts, ledgers, etc.), notifications or reports that have been submitted to EPA and/or the Virgin Islands Department of Planning and Natural and Resources (VIDPNR), manufacturer's equipment specifications and equipment certifications, and other similar types of documents. For each document submitted, indicate the paragraph number to which it responds.
3. Provide as precise and complete a response as possible, even if the information sought was never documented in writing, or if the written documents are no longer available. Consult with all present and past employees and agents whom you or other employees or officers have reason to believe may be familiar with the matter to which the question pertains. Provide the name of each person responding to each information request paragraph, along with the names of all persons consulted in the preparation of each response.
4. If the requested information or documentation cannot be made available, state the reason(s) why it cannot be made available, and provide all information that could lead to obtaining it. If you cannot provide a precise answer to a question, please approximate, but in any such instance, state the reason for your inability to be specific.
5. In response to each question below, please provide, in detail, all relevant information. Please submit your responses to the EPA electronically. You may submit your responses electronically using any of the following methods: a) via electronic mail sent to Robert Buettner at the following address: buettner.robert@epa.gov; b) by providing the EPA with a link to the file sharing service of your preference where we may download the documents; or c) by requesting a link from the EPA to our file sharing service where you may upload the documents. If the information requested is not in existence or is not available, submit a statement certifying that fact, along with an explanation supporting such certification.
6. Pursuant to Section 114 of the Clean Air Act (the Act), Limetree must supply the requested information. The requested information must be submitted in accordance with the schedules in Part III, Specific Information Request, unless EPA grants, in writing, an extension of time to respond.

Part II: Definitions

All terms used in this Information Request will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. § 7401 *et seq.*, and its implementing regulations. Where reference is made to the EPA regulatory provisions only, however, you should also apply the applicable federally approved state provisions when appropriate. Specific terms are defined as follows:

- A. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these.
- B. The term “Facility” shall mean the Limetree Bay Refining, LLC and Limetree Bay Terminals, LLC facility located at 1 Estate Hope, Christiansted, St. Croix, VI 00820.
- C. The terms “you,” “your” or “Limetree” means the following: the addressees of this Information Request, Limetree Bay Refining, LLC and Limetree Bay Terminals, LLC.

Part III: Specific Information Request

Information Request

1. Within fifteen (15) days of receipt of this Request, Limetree shall submit for EPA review and approval an ambient air monitoring plan that includes the operations of sulfur dioxide (SO₂) and hydrogen sulfide (H₂S) monitors at the five existing air monitoring sites and an additional four offsite monitoring sites identified in Table A below (the Limetree Monitoring Plan). The SO₂ monitoring must be performed using an EPA approved methodology. Approved methodologies for SO₂ monitoring are available in the List of Designated Reference and Equivalent Methods: https://www.epa.gov/sites/production/files/2019-08/documents/designated_reference_and_equivalent_methods.pdf. The minimum specifications for the H₂S monitor are: minimum detection level of 3 parts per billion (ppb), maximum span of 1000 ppb, and an accuracy factor of +/- 15-20 percent.

Table A

Monitor Number	AQS Address	Coordinates
Site 1	West Gate Martin Marietta	17.706014 -64.781737
Site 2	Estate Anguilla, The Ruins	17.717197 -64.774590
Site 3	Plot 25 Estate Clifton Hill	17.718683 -64.776514
Site 4	Plot 487 Estate Barren Spot	17.732244 -64.765214
Site 5	Plot 214 Estate Ruby	17.736911 -64.751889
Site 6	Approx. 3.75 miles NNW of refinery	17.7697 -64.7800
Site 7	Good Hope Country Day School 2.25 North of refinery	17.7518 -64.7659
Site 8	St. Croix Educational Complex High School -2.50 miles WNW of refinery	17.7223 -64.7985
Site 9	School of Good Shepherd 5.00 miles WSW of refinery	17.7008 -64.8350

2. Limetree shall follow all monitoring, siting, and quality assurance criteria in 40 CFR Part 58.
3. EPA will review the Limetree Monitoring Plan and approve it, approve it with specified changes, or require Limetree to make changes to it and submit the revised version to EPA for review and approval. If EPA requires Limetree to make changes to the Limetree Monitoring Plan and submit the revised version to EPA, Limetree shall do so within seven (7) days of receiving such communication from EPA. Limetree shall implement the plan once it is approved by EPA.
4. Limetree shall commence monitoring at Sites 1-5 within thirty (30) days of the date of this Information Request. Limetree shall commence monitoring at Sites 6-9 within ninety (90) days of the date of this Information Request.
5. Limetree shall also follow the operating procedures identified in the “Quality Assurance Handbook for Air Pollution Measurement Systems, Volume II, Ambient Air Quality Measurement Program (EPA-454/B-17-001, January 2017)”, located at <http://www.epa.gov/amtic/ambient-air-monitoring->

[quality-assurance#documents](#), 40 CFR Part 58, Appendix A, and any specified procedures in the manufacturer's maintenance manual for the units used to monitor SO₂ and H₂S.

6. Limetree shall be responsible for all operation and maintenance associated with the SO₂/H₂S monitors. Maintenance shall include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer's maintenance manual and the EPA requirements as specified in the items above.
7. All monitoring shall take place for as long as the refinery operations remain in service.
8. Limetree shall re-install a meteorological tower at the Facility within thirty (30) days of the date of this Information Request and shall operate and maintain it. At a minimum, the meteorological tower must be comprised of instrumentation that continuously measures and records wind speed and wind direction at one-hour average intervals throughout the entire ambient monitoring period. Limetree shall correlate 1-hr ambient SO₂/H₂S measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on SO₂/H₂S concentrations. The meteorological tower must also include calibrated ambient temperature and pressure instrumentation for purposes of determining corrected (actual) SO₂/H₂S concentrations as recorded by the monitors. Limetree shall maintain and submit reports and records in accordance with the reporting requirements in this Information Request.
9. With respect to the meteorological tower, Limetree shall follow the "Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final)" (EPA -454/DB-068-0012), located at https://www.epa.gov/sites/production/files/2020-10/documents/volume_iv_meteorological_measurements.pdf, and the "Meteorological Monitoring Guidance for Regulatory Modeling Applications" (EPA-454/R-99-005), located at https://www.epa.gov/sites/production/files/2020-10/documents/mmgrma_0.pdf.
10. The internal clocks of all SO₂/H₂S analyzers, data loggers, and the wind speed and wind direction data logger shall be synchronized to within 60 seconds of each other (local time and not adjusted for Daylight Savings Time) and shall be checked against a calibrated reference clock at least once every thirty (30) days. Instrument clocks that are not within 60 seconds from the reference clock shall be reset to within 60 seconds of the reference clock. Each of these inconsistencies and each reset time shall be noted in the study log.
11. Limetree shall be responsible for all operation and maintenance associated with the meteorological tower. Maintenance shall include, at a minimum, the replacement of any equipment and cleaning on a schedule specified in the manufacturer's maintenance manual.
12. Within 30 days of EPA approval of the Limetree Monitoring Plan, Limetree shall submit a Quality Assurance Project Plan (QAPP) to the EPA. The guidance document for writing a QAPP is "U.S. EPA Guidance for Quality Assurance Project Plans," EPA QA/G-S, EPA/600/R-02/009 - December 2002. The guidance is available at <https://www.epa.gov/quality/guidance-preparing-quality-assurance-project-plan>. Any measures identified by this Information Request should be incorporated into the QAPP.
13. Limetree shall provide the EPA and VIDPNR access to the monitor sites and expeditiously respond to any inquiries from the EPA and/or VIDPNR regarding monitor siting, operations, or maintenance.

In the event that an EPA and/or VIDPNR inspector or auditor identifies problems, Limetree shall take appropriate corrective actions.

14. Limetree shall keep a daily log and monthly reports (Calibration/Maintenance Reports) of the following information:
 - a. Each site visit and operator activities at the monitors;
 - b. Any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken; and
 - c. Any calibration data provided by the manufacturer or performed by Limetree.
15. EPA will provide additional written instructions to Limetree regarding the reporting, submittal, uploading, and posting of data and reports gathered or compiled pursuant to this Information Request, and Limetree shall comply with those instructions.
16. Limetree shall retain all records related to this Information Request for as long as the refinery operations remain in service.

ATTACHMENT 1 TO ENCLOSURE 1

CERTIFICATION OF RESPONSE

State/Territory of _____:

County of _____:

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in response to the Information Request and all documents submitted with this response, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted with this response are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that for one year from the date of the Information Request, I am under an obligation to supplement my response to the Information Request if any additional information relevant to the matters should become known or available to me.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this ___ day of _____, 2021

Notary Public