

February 7, 2023

Submitted Via Email

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Re: In the Matter of Port Hamilton Refining and Transportation, LLLP (PHRT)
Administrative Order on Consent (Consent Order)
Index No. CAA-02-2023-1003

Dear Mr. Harrington and Ms. Regna:

We are writing in response to the e-mail from Ms. Regna that was received by PHRT on February 3, 2023. Paragraph 42.e. of the Consent Order, provides that the Options Report was to include “a thorough assessment of options for the safe removal of the Materials from the[] three systems and from the Facility, including the performance of any repairs or other actions that need to be taken to safely remove the materials from the three systems, as determined by the assessment.” Well in advance of the deadline to submit the full Options Report and after consulting with EPA, PHRT provided the results of its approved contractor’s mechanical integrity assessments on January 6, 2023. These mechanical integrity assessments included recommended repairs to components and portions of the systems comprising the Ammonia Storage Drum and Amine Recovery Units.

The detailed mechanical integrity assessment of the system comprising the Amine Recovery Units included eight recommended repairs. After receiving the mechanical integrity contractor’s recommended repairs for the systems comprising the Amine Recovery Units, PHRT determined that several repairs could be performed quickly and effectively in the field. The majority of these repairs were completed on January 2 and 4, 2023, with two of the remaining repairs completed on January 11 and 13, 2023. We have enclosed tracking report, along with pictures documenting several of these repairs are also enclosed. In addition, rather than monitoring corrosion on certain equipment as recommended by the mechanical integrity assessment, PHRT eliminated the need for such recommended monitoring by removing certain equipment from service and isolate these areas. Mr. Harrington, who first arrived at the refinery on January 16,

2023 and was on-site for more than one week, was escorted by PHRT personnel to observe amine repairs.

Regarding the Ammonia Storage Drum system, the approved mechanical integrity contractor recommended four categories of repairs. On January 9, 2023, PHRT provided a proposed schedule to EPA for the recommended repairs to the Ammonia Storage Drum system. Since providing that schedule, PHRT has completed the fabrication of piping spools to be replaced and secured valves and gaskets. PHRT later communicated to EPA personnel on-site at the refinery that there were delays in securing necessary materials to complete certain repairs, including the replacement of four sections of piping, as recommended by the mechanical integrity contractor. While PHRT has since secured the necessary materials and fabricated replacement piping to complete these repairs, PHRT believes it would be best for the approved removal contractor to complete these repairs prior to commencing ammonia removal. There are several reasons for this revised approach, including the need to remove ammonia from these sections of pipe prior to completing the repairs, the fact that approximately 10,000 gallons of aqueous ammonia will be created when the anhydrous ammonia is removed from these piping sections, and the need for the approved removal contractor to handle and manage this aqueous ammonia.

After further review of the system and for the reasons identified above, PHRT has approached Specialized Response Solutions, a U.S. Ecology company, and SRS has confirmed that it will complete these outstanding repairs prior to the ammonia removal process. The overall removal schedule for ammonia will include completing listed repairs as part of the construction component of the ammonia removal project.¹ More specifically and as reflected in the letter that is enclosed, SRS expects to begin the work to complete the repairs within five (5) days of its crew arriving at the refinery and complete the repairs within seven (7) days assuming that necessary supplies will be available. An updated version of the proposed schedule to remove the ammonia in the Ammonia Storage Drum, specifically listing these repairs as part of the construction component, is enclosed.

In the interim, PHRT has isolated each of the sections of piping that are the subject of the recommended repairs, and as EPA knows, there are nearby monitors, equipped with alarms, to measure any ammonia in the ambient air.

As for LPG Unit #3, PHRT's January 16, 2023 letter to EPA stated that the mechanical integrity contractor did not recommend any repairs to this system. This has not changed and PHRT has no reason to question the approved mechanical integrity contractor's assessment of the LPG Unit #3 system.

Lastly, Ms. Regna's February 3, 2023 email requests confirmation of repairs completed on the facility's electrical system. As requested, PHRT encloses documentation demonstrating the completion of the repairs identified as part of the electrical area classification inspection.

As outlined above, PHRT has been communicating daily with on-site EPA representatives about the Materials that are the subject of the Consent Order, and many of the questions asked in

¹ The repairs to the Ammonia Storage Drum system referenced in the enclosure are the *only* outstanding repairs identified in the mechanical integrity contractor's reports.

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Ms. Regna's February 3, 2023 email were asked by EPA representatives on-site and answered by PHRT representatives. PHRT has devoted significant time and resources to accommodate and be responsive to the EPA representatives on-site at the facility. As an example, PHRT provided EPA representatives with private offices within the refinery, has committed to give EPA representatives 24-hour access to the facility, and has escorted EPA representatives to observe various areas of the refinery on multiple occasions.

We look forward to continuing to comply and work with EPA to implement the requirements of the Consent Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Steinbauer", with a stylized flourish at the end.

Gary Steinbauer

Enclosures

cc: Fermin Rodriguez
Matthew Morrison, Esq.
Julie Domike, Esq.