

January 30, 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:

Further to PHRT's January 20, 2023 letter, I am writing to provide proposed master schedules to complete the safe removal of each of the Materials. PHRT is providing separate proposed schedules for each Material, because PHRT now understands that U.S. EPA may approve removal options on a Material-specific basis. Along those same lines and considering safety, expediency, and technical feasibility, PHRT is proposing that ammonia from the Ammonia Storage Drum be removed first, followed by LPG from LPG Unit #3 and then amine solution and associated hydrogen sulfide from the Amine Units. Preparatory activities for the LPG and amine solution, however, will commence in advance of the actual removal of those Materials and while the steps necessary to safely remove the ammonia are underway.

The enclosed, proposed schedules are comprised of a series of projections, many or all of which are based on reasonable assumptions and anticipated timelines to complete various tasks. Circumstances beyond PHRT's and the contractors' control may impact these proposed schedules. In particular, there are unavoidable logistical complications associated with the Facility's location on an island in the Caribbean. Furthermore, to the extent that PHRT and the contractors can achieve efficiencies or make other adjustments that would allow the proposed timelines to be accelerated, without compromising safety, PHRT and the contractors may deem it appropriate to adjust these schedules. Therefore, PHRT reserves the right to propose revisions to these proposed master schedules should adjustments be required.

We look forward to U.S. EPA's response to the Reports submitted timely on January 20, 2023, and the enclosed proposed master schedules for safely removing the Materials.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Steinbauer", with a stylized, cursive script.

Gary Steinbauer

Enclosure

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

PROPOSED AMMONIA PROJECT				DATE		1	8	15	22	29	5	12	19	26	5	12	19	26	2	9	16	23	30	7	14	21	28
				20230130	COMPLETION TIMELINE	JAN					FEB				MAR				APR					MAY			
M		TASK	RESPONSIBLE	START	END	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
x	1	Order and purchase material and equipment	PHRT	1/4/2023	2/26/2023																						
x	2	Shipping Equipment Logistics (ISO containers)	PHRT	1/27/2023	3/18/2023																						
x	3	Engineering / planning (includes Management of Change and Process Hazard Review)	PHRT	2/19/2023	3/12/2023																						
x	4	Construction (piping tie-ins, equipment installation, inspections)	PHRT/SRS	3/6/2023	4/15/2023																						
x	5	Conduct Pre-Startup Safety Review	PHRT	3/26/2023	4/16/2022																						
x	6	Ammonia transfer and vapor depressurization	PHRT/SRS	4/2/2023	4/16/2023																						
x	7	SRS demobilizes equipment	SRS	4/16/2023	4/22/2023																						

																										Boiler Permit																			
PROPOSED AMINE DEINVENTORY SCHEDULE					DATE	1	8	15	22	29	5	12	19	26	5	12	19	26	2	9	16	23	30	7	14	21	28	4	11	18	25	2	9	16	23	30									
					20230130	COMPLETION TIMELINE					JAN					FEB					MAR					APR					MAY					JUNE					JULY				
M	ID	TASK	RESPONSIBLE	START	END	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	23	24	25	26	27	28	29	30	31	32	33	34	35									
X	1	Secure Temporary Boiler Pkg Permit	PHRT	2/12/2023	5/1/2023																																								
x	2	Order and purchase material and equipment (includes boiler, ISO container, HPC/VCM equipment)	PHRT	2/15/2023	3/5/2023																																								
x	3	Shipping Equipment Logistics (including boiler and ISO containers)	PHRT	2/19/2023	4/16/2023																																								
x	4	Engineering / planning (includes Management of Change and Process Hazard Review)	PHRT/HPC/VCM	1/1/2023	3/26/2023																																								
x	5	Construction (piping tie-ins, equipment installation, inspections)	PHRT	3/19/2023	4/30/2023																																								
x	6	Conduct Pre-Startup Safety Review	PHRT	4/30/2023	4/1/2023																																								
x	7	Deinventory/Degassing/Cleaning	HPC/VCM	5/7/2023	7/23/2023																																								
x	8	Shipping of Amine offsite	PHRT/HPC/VCM	5/28/2023	7/23/2023																																								
x	9	Management of condensate and rinse water (200,000 gallons) See Note 1	PHRT	5/7/2023	7/30/2023																																								
x	10	HPC/VCM Demobilization of Equipment	HPC/VCM	7/16/2023	7/30/2023																																								

Note 1: To be treated in WWTP or shipped offsite for proper disposal based on analytical results and discussions with U.S. EPA