LIMETREE BAY
REFINING, LLC

March 3, 2021

Mr. Austin F. Callwood, Director
Division of Environmental Protection
Department of Planning & Natural Resources
45 Mars Hill
Frederiksted, V.I. 00840-4474

SUBJECT: **No. 8 Flare Release – February 4, 2021**

Dear Mr. Callwood:

This letter is in response to the request from Ms. Verline Marcellin to provide documentation regarding the release that occurred from No. 8 Flare on February 4, 2021.

On February 4, 2021, the Coker unit was shut down for repairs. Operations was preparing to quench and open coke drum D-8504 as part of the normal shut down process. At approximately 02:30hrs, the Coker Drum D-8504 was being prepared to start the procedure for water quenching. The quench water control valve was 100% open, resulting in a large quantity of water entering the drum. The water evaporated quickly after contacting the hot coke. The system reacted as designed and the pressure safety valves opened to relieve pressure, protecting personnel and equipment. A mixture of oil and water vapor was sent to the containment system, exceeding its capacity and ultimately exiting through the No.8 flare. Operations immediately stopped water flow to coke drum D-8504, preventing further vapor generation and returning the system to within design conditions. At the time of the event, emissions were believed to have been contained within the refinery.

Around 14:30hrs, calls were received by the Limetree Command Center from residents in the Clifton Hill area complaining of oil droplets on their vehicles and homes. Thereafter, Limetree immediately activated its Incident Command Response to address the impact on the community. Verline Marcellin of DPNR was contacted at 17:32hrs as a courtesy and briefed on the incident. Complainants were contacted and told to disconnect their cistern from the roof spouts if possible. A total of 11 complaints were received on February 4, 2021. On February 5, 2021, Limetree teams were dispatched to follow-up with residents in person and confirmed the presence of oil droplets on cars and homes. Plans were put in place to clean residents' cars and roofs. Additional complaints were made in the following days.

Limetree began cleaning cars on February 5, 2021. The response plan included inspection and assessment of cars, roofs and properties and assisting in disconnecting cisterns from roofs. In addition, we retained a third party to sample cistern water for oil and grease, and this data is being analyzed in an EPA-certified lab in Florida (PACE Lab). To the residents whose cisterns were disconnected, Limetree provided drinking water on a daily basis delivered to their door (2 cases per residence per day). Limetree went door-to-door to all the residents in Clifton Hill and responded to all the complaints received. An area of impact was delineated on a map. The plan for cisterns is to empty, clean and refill with potable water all cisterns whose lab results show a detection. Residents whose lab results show non-detect, will have their cisterns topped off with potable water.

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Below is a status of the response as of 3/3/21:

- 213 residences were contacted/inspected
- 208 cars were washed
- 135 cisterns were sampled (as of 3/3, 63 detected the presence of oil and 58 were non-detect)
- 134 roofs were cleaned
- 15 cisterns cleaned (2 residents so far declined to have theirs cleaned)

Additional miscellaneous accommodations were made like cleaning of solar panels, replacement of fish ponds, cleaning of sheds, etc. It also should be noted that we have retained a local claims adjusting company, Crawford, to assist in the handling of some of the claims we have received.

If you have any questions or need additional information, please contact Catherine Elizee at (340) 692-3073.

Sincerely,

Robert Weldzius
Sr. Vice President, Operations
Limetree Bay Refining, LLC

cc: Verline Marcellin
(DPNR)