LIMETREE BAY
REFINING, LLC

March 15, 2021

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

SUBJECT: **Opacity from the East Incinerator – March 9 & 10, 2021**

Dear Mr. Callwood:

This letter is submitted in compliance with Section 2.4.5.1 of the Limetree Bay Title V permit as a written follow-up to the email notification to Ms. Verline Marcellin of the Division of Environmental Protection on March 9, 2021 at 5:19 PM and March 10, 2021 at 12:45 PM regarding opacity events at the East Incinerator (H-4745).

Section 204-22(a) and (b) of the Rules and Regulations of the Virgin Islands Air Pollution Control Act states that no person shall discharge into the atmosphere, from any stationary source, any air contaminants with opacity equal to or greater than 20 percent for any time period except for fuel burning facilities which are allowed to discharge no more than 40 percent opacity for no more than 3 minutes in any 30 minutes period. The opacity events at the East Incinerator were observed on March 9, 2021 from 9:42 AM to 9:48 AM and on March 10, 2021 from 9:15 AM to 9:20 AM.

An investigation determined that at approximately 9:39 AM on March 9th and 9:13 AM on March 10th, the acid gas feed pressure to the No. 4 Sulfur Recovery Unit (SRU4) considerably increased and the controls at the time were set for a much lower acid gas feed pressure. It took the control system several minutes to adjust appropriately, causing the incinerator to smoke on both occasions. The console operator immediately made adjustment on the O_2 to the incinerator to mitigate the opacity.

If you have any questions or need additional information, please contact Maria Aloyo at (340) 692-3781.

Sincerely,

Robert Weldzius

Robert Weldzius
Senior Vice President of Refining
Limetree Bay Refining, LLC

Electronic copy: Verline Marcellin (DPNR)

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REFINING, LLC

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