LIMETREE BAY
REFINING, LLC

May 12, 2021

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

SUBJECT: **East Fuel Gas H_2S Exceedance – May 5, 2021**

Dear Mr. Callwood:

This letter is submitted in compliance with Condition No. 2.4.5.1 of the Limetree Bay Title V permit as a follow-up to the email notification to Ms. Verline Marcellin of the Division of Environmental Protection on May 5, 2021 at 6:18 PM regarding the H_2S exceedance event at the east fuel gas system.

The Continuous Monitoring System (CMS) recorded H_2S concentrations in the fuel gas in excess of 0.1 gr/dscf (162 ppm) based on a 3-hr rolling average (ref. Title V permit condition 3.2.2.1.11) from 3:00 PM to 8:59 PM on May 5, 2021.

The following table provides 3-hr H_2S data during the event.

Source		EASTFGDR
Parameter Unit		H2SPPM (PPM)
05/05/21	14:00	149
05/05/21	15:00	351
05/05/21	16:00	633
05/05/21	17:00	819
05/05/21	18:00	716
05/05/21	19:00	426
05/05/21	20:00	197
05/05/21	21:00	91

On the afternoon of May 5th, Operations was working on bringing the No. 4 Amine Regeneration Unit (4ARU) online. The No. 5 Amine Regeneration Unit (5ARU) was already online. While trying to balance the load between both units, 5ARU was under high pressure and therefore the system relieved the pressure to 4ARU. However, 4ARU was not at the adequate operating parameters to properly regenerate the rich amine laden with H_2S to lean amine. As a result, the amine that circulated to the gas recovery unit was unable to remove additional H_2S from the fuel gas. Operations immediately placed the No. 7 Distillate Desulfurizer Unit (DD7) on circulation to reduce the load to the amine units.

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

Sincerely,

Neil Morgan
VP, Refinery and General Manager
Limetree Bay Refining, LLC

cc: Verline Marcellin (DPNR) via email