From:	Lantner, Murray
To:	Bakun, George:
Cc:	Coleman, Andrew; Nolan, Meghan E; Modigliani, Justine
Subject:	EPA and NJDEP Response to Phillips 66 April 3, 2020 response to USEPA Feb. 2020 Inspection Report - Phillips 66 Bayway Refinery
Date:	Thursday, June 25, 2020 10:51:00 AM

Dear George:

We hope that you are all doing ok and thank you for your comprehensive April 3, 2020, response to EPA's inspection report from last year's joint NJDEP/EPA inspection. As a follow up to your April 3, 2020 response which I've discussed with Andrew Coleman of NJDEP we had the following comments.

1. Relative to Table 1 of the Letter, which includes the Action Plan for USEPA Potential Noncompliance Items and Areas of Concern, please provide us (EPA and NJDEP) with the status of projects that were scheduled for 2nd quarter and 3rd quarter 2020 (but also subject to Covid Limitations) by October 30, 2020 and an update on remaining projects by January 30, 2020.
2. For EPA Item II.B.4.a – when is the next turnaround for the clarifier scheduled when the permanent fix for weir plate will be done?
3. For Items Line 4 Outfall 004 AOC, II.B.7.a and 8.a (Including 4/3/20 Attachment 1, Deficiency 2) – for the Clam Trol Application and foaming issue related to Condenser sewer overflows and foaming at Outfall 004, and BMPs for Clam-Trol application. During Clam-Trol applications and until foaming subsides a vactor truck needs to be stationed at Outfall 004 to vacuum up foam accumulating behind the boom. Additionally, specify what measures will be taken to eliminate the condenser sewer overflows?
4. Bayway 4/3/20 response II.B.8.b and Attachment 1, Deficiency 3 in Phillips April 3, 2020, response to EPA was related to process sewer overflows during wet weather. It has been identified that the process sewer tributary to the Wastewater Treatment Plant Outfall 002, overflows to Outfall 004 during large wet weather events. Outfall 004 is listed as a Cooling Water Ditch. Process sewer overflows and discharges to a different outfall other than 002, are not authorized and constitute unpermitted discharges which must be corrected. Please submit a plan of action to eliminate process sewer overflows.
5. Attachment 1 – corrective Action No. 1 - Polypropylene Area O&M Plan included in Attachment 1 – Attachment A. EPA and NJDEP had the following comments/questions/concerns with the O&M Plan for the Polypropylene Area
    a. P66 must report on whether the trial use of covers over roll-off receiving baghouse exhausts will be part of the final O&M Plan
    b. Trial use of cover over the separator outlet pipe designed to act as a second underflow baffle. – Status of Trial and will it be part of Final O&M Plan.
    c. There is a concern about the polypropylene fluff material that enters the resin

separator. Does the fluff float like the pellets, or does some of it get suspended in the water column? Is the resin separator effective in removing fluff? If not, additional treatment options should be included.

d. The draft O&M Manual mentions a cover over the separator outfall pipe. Please provide details on what this cover is. How does this cover act as a secondary underflow baffle?
e. The draft O&M Plan also mentions removal of plastic material between the separator baffle and outfall pipe cover? Please explain how this is done.
f. Has P66 considered constructing a second, primary baffle in the resin separator? Such a baffle could trap the majority of pellets. The space between the primary and secondary could be there to trap any pellets not stopped by the primary.
g. Does P66 have the ability to close the outfall pipe completely to allow cleaning of the resin separator so that no pollutants are discharged during cleaning or maintenance operations.
h. Does P66 have provisions to heat the water in this separator during extreme cold weather events to prevent freezing, and the potential interruption of the separator effectiveness?

6. Note that for Item II.B.9 note that EPA Region 2's laboratory has approved some non 40 CFR 136 methods over the years, but our laboratory confirmed that the methods listed in the lab reports (for those parameters noted in the inspection report) were not on the EPA Region 2 approved list either. If P66 needs contacts at EPA's lab to determine if there were separate approvals for certain analytical methods please let us know.

7. Valve Maintenance Program – Line No. 3 Outfall 017A AOC – Valve Head – valve head under repair see Att. 2 Deficiency No. 6 and 11.
   Based on an email from NJDEP - The oil water separators in operation at P66 are treatment works who's design was likely approved by the Department or another regulatory agency before construction. All the components of the treatment works should be exercised and in working order. Past Department inspections have often identified valves that do not properly work. P66 should not wait until an emergency to open or close valves.

Please respond back to EPA and NJDEP on the above **items within 30 days.** Also, if you need additional time due to Covid or other concerns please let us know. Thanks again for your time and effort both during the inspection and in the follow up. It is much appreciated.

Sincerely,

Murray Lantner, P.E., Environmental Engineer
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From: Bakun, George: <george.bakun@p66.com>
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To: Lantner, Murray <Lantner.Murray@epa.gov>
Cc: Coleman, Andrew <Andrew.Coleman@dep.nj.gov>; Nolan, Meghan E <meghan.e.nolan@p66.com>
Subject: Response to USEPA NJPDES Inspection Report

The response to USEPA's NJPDES inspection report for Bayway Refinery is being mailed today. I am also going to try and email it in 4 parts to you due to email size limitations. The first part is the response letter and action status table. The remaining 3 parts will be the 3 associated NJDEP inspection report responses that are used as references in the USEPA response.