UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT Cenovus Lima Refining Company (LRC), Lima, Ohio
FROM:	Laura Steel, Environmental Engineer AECAB (MI/WI)
THRU:	Sarah Marshall, Section Supervisor AECAB (MI/WI)
TO:	File

BASIC INFORMATION

Facility Name: Cenovus Lima Refining Company (LRC)

Facility Location: 1233 S Metcalf St., Lima, OH 45804

Date of Inspection: June 27-30, 2022

EPA Inspector(s):

1. Constantinos Loukeris, Environmental Engineer
2. Veronica Fischer, Environmental Engineer
3. Laura Steel, Environmental Engineer
4. Scott Hamilton, Environmental Scientist
5. Katherine Haile, Physical Scientist
6. Diana Degen, Life Scientist

Other Attendees:

1. Jim Fain, Senior Environmental Manager
2. Claudio Ingaramo, VP U.S. Refining – General Manager
3. Gary Vonderembse, Senior Environmental Engineer
4. Eric Wireman, Senior Operations Manager
5. Matt Elkins, Environmental Manager
6. Anthony Milianti, Senior Environmental Manager
7. Amy Rahrig, Operations Manager
8. Doug Knapke, Process Engineering Manager
9. Sierra Slusser, Environmental Technologist
10. Emily Kerber, Senior Environmental Technologist (QQQ/wastewater)

11. Melanie Reese, Environmental Analyst
12. Marta Mata, Senior Environmental Engineer
13. Amanda Richey, Environmental Engineer
14. Bailey Lininger, Air Compliance Co-Op
15. Alex Lause, Co-Op
16. Nathan Turner, LRC Personnel
17. Collin Wurth, LRC Personnel
18. Vincent Ruscio, LRC Personnel
19. Greg Phillips, LRC Personnel
20. Chad Ulm, LRC Personnel

Contact Email Address: Jim.Fain@cenovus.com

Purpose of Inspection: To assess compliance with requirements of NESHAP Subpart FF, NSPS QQQ, and LRC's Consent Decree

Facility Type: Refinery

Regulations Central to Inspection: National Emission Standards for Hazardous Air Pollutants for Benzene Waste Operations (BWON) at 40 C.F.R. Part 61, Subpart FF and New Source Performance Standards for VOC Emissions from Petroleum Refinery Wastewater Systems (QQQ) at 40 C.F.R. Part 60, Subpart QQQ

Arrival Time: 2:20 PM ET on June 27, 2022
Departure Time: 11:30 AM ET on June 30, 2022

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
☒ Provided CBI warning to facility

The following information was obtained verbally from LRC representatives unless otherwise noted.

Company Ownership: LRC's ownership changed from Husky Energy to Cenovus Energy in 2021.

Process Description:
LRC provided EPA an overview of their equipment and sewers/drains subject to BWON and QQQ. The facility consists of 13 process units, including three flares and twelve tanks (ten slop oil tanks – 26, 28, 72, 77, 84, 78, 79, 256, 255, 253 – and two off spec wastewater tanks – 172, 173). All tanks have an internal floating roof (IFR) except 72 and 84, which have a closed vent system and fixed roof to flare gas recovery. LRC uses piping and instrumentation diagrams (P&IDs) to track BWON and QQQ-applicable refinery elements. The refinery has two different sewer systems that are controlled. BWON sewers start at the facility's sulfur recovery units (SRUs) and continue through 2 induced nitrogen gas floats, 2 corrugated plate interceptor units (CPIs), three American Petroleum Institute (API) separators, and the tank farm. The combined sewer collects storm water and process water; however, in 2014, the hydrotreater systems were segregated into storm drains, process drains, and closed drains. The controlled streams from the combined sewer are to two "off-spec" water tanks. The streams from the BWON tanks and off-spec water tanks are then fed into aeration basins. The sludge from the off-spec water tank is processed by a third party that is located onsite. The benzene extraction unit has its own closed-vent system with a tetralin glycol scrubber, and its sewer is not controlled.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
EPA conducted leak detection and repair monitoring using a Toxic Vapor Analyzer Model 2020 (TVA 2020) flame ionization detector on LRC's BWON sewer system components that are required to be designed to operate with no detectable emissions (NDE), which is indicated by an instrument reading of less than 500 ppm. Several pieces of equipment were missing LDAR tags (hatch on PR100036, 3 gate valves near CPIs). EPA was unable to perform Method 21 monitoring at the West IGFU due to significantly high background readings (greater than 1000 ppm). There was also a visible pool of liquid at plate 1 on the West IGFU, as well as a strong odor. EPA Region 5's Air & Radiation Division (ARD) mobile monitoring van conducted ambient air monitoring along access roads within the refinery. The mobile monitoring van detected toluene and benzene near the CPIs and aeration basin, hydrogen sulfide next to a loading asphalt truck, and toluene near Tank 108. Suma canisters (6L) were taken by ARD from the following: one of the pressure relief valves on the CPI, the aeration basin, and API C. In addition, EPA visually inspected drain hubs and other QQQ equipment, including the BWON drain in the Gasoline Distillate Unit, drains in the Boilerhouse, and drains and junction boxes in the Crude Unit.

LRC's total annual benzene (TAB) typically amounts to 40-80 Megagrams (Mg) controlled and 3 Mg uncontrolled. LRC normally conducts end-of-line (EOL) sampling monthly and increases to weekly when the facility detects high levels of benzene. The facility's QQQ program is managed through LeakDAS®. LRC conducts quarterly visual monitoring and annual "no detectable emissions" (NDE) monitoring with EPA Method 21, and monthly visual inspections on QQQ drains. LRC personnel stated that when performing Method 21 monitoring, the valves themselves are not monitored—only capped ends or second valves. The facility employees

approximately 125 embedded contractors with approximately 450-500 FTE and is currently using Hydro Chem as a leak detection and repair contractor, as they have been since 2019.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were taken during this inspection.

The table below summarizes EPA's TVA 2022 monitoring results:

Component ID	Equipment Type	EPA's Reading (ppm)	LRC's Reading (ppm)	Additional Notes
Tag 19194	East CPI	43,000	>50,000	See Image 2
Tag 19151	West CPI	45,000	>50,000	See Image 3, two busted gaskets
Tag 179159	Southeast CPI cover plate	6,800	5,838	See Image 4
Tag 97542	Northeast CPI cover plate	1,280	6,850	See Image 5
Tag 97551	Cover plate sight glass	100,000	104,501	See Image 6
Tag 97528	Cover plate sight glass	3,371	80,116	See Image 7
Tank 35191433	Tank 35 glycol flange	1,497	-	See Images 8 and 9
API A	Seal on PRV	25,262	-	-
API A	Seal	1,800	860	-
API B	Uncapped OEL, double block closed	25,266	-	-
API B	Southwest corner	6,732	-	-
API B	Southwest seam	11,400	-	-
API B	Southwest seam	1,376	-	-
API B	South seam	6,300	-	-
API B	Northwest seam	2,283	-	-
API B	Northwest seam corner	1,400	-	-
API B	Northwest seam	3,413	-	-
API B	Northwest seam	13,800	-	-
API B	Northwest inner corner seam bolt	3,300	-	-
API B	Sampling drain	250	688	-
API C	Northwest seam	25,278	-	-
API C	Vent seam	3,100	-	-
Inlet sump to APIs	Center manhole cover (MH 13 36")	670	-	-

Inlet sump to APIs	East manhole cover (MH 14 36”)	5,100	-	-
Inlet sump to APIs	Southwest plate (MH 12)	680	-	Opening of manhole
Inlet sump to APIs	MH 15	2,200	-	2 openings, no seal
Inlet sump to APIs	MH 5A East 48” opening	2,300	-	-
WWTP	CB-1 drain	710,500	-	Dry drain
WWTP E-1	In-ground lift station	4,600	-	Door opening to lift station weir
WWTP E-1	In-ground lift station	650	-	Cracked caulk on side panels of lift station
Tank 1	Gage arm	533	-	-
Top of Tank 84	Conservation vent 1	16,000	-	Vent numbering for all tanks starts at the vent to the right of the stairwell moving counterclockwise
Top of Tank 84	Conservation vent 2	5,000	-	-
Top of Tank 84	Conservation vent 3	13,000	-	-
Sample Box 90784	Door (open)	1,500	-	No water seal
Top of Tank 100173	Vent 1	1,070	-	-
Top of Tank 100173	Vent 2	1,024	-	-
Top of Tank 100173	Vent 3	805	-	-
Top of Tank 100173	Vent 4	975	-	-
Top of Tank 100173	Vent 6	540	-	-
Sample Box next to TK 100173	Door	22,000	-	-
Top of Tank 100172	Vent 2	732	-	-
Top of Tank 100172	Vent 3	760	-	-

Top of Tank 100172	Vent 4	700	-	-
Top of Tank 100172	Vent 5	700	-	-
Top of Tank 100172	Vent 6	950	-	-
Top of Tank 100172	Center vent	677	-	-
Top of Equalization Tank	Conservation vent 1	970	8,720	-
Top of Equalization Tank	Conservation vent 2	85,000	-	-
Top of Equalization Tank	Conservation vent 3	22,000	-	-
Top of Equalization Tank	Vacuum breaker	580	-	-

The table below summarizes the number of visual inspections completed by EPA by process unit:

Process Unit/Equipment Type	Number Visually Inspected	Notes
Drains	40	
Open-ended lines (OELs)	22	7 OELs with no cap, 2 were fixed during the inspection
Valves	63	
Tanks	34	

The table below summarizes the visual inspection observations identified by EPA in the GDU (BWON), Boilerhouse (QQQ), and Crude (QQQ) process units:

Component ID	Equipment Type	Observation
CB-2	Drain	Oily sheen on top of water and around drain cover/no seal
MH-1	Manhole	Rocks and debris on top of manhole cover, cracking on the outside of its seal, CPC to make sure
MH-2	Manhole	Rocks and debris on top of manhole cover
MH-3	Manhole	Rocks and debris on top of manhole cover
P-111	Drain	Caulk around drain is peeling up/no seal
P-110	Drain	Can’t see down the drain to verify water seal
P-109	Drain	Oily residue around covered drain/no seal—lots of debris inside, difficult to see

HUB-2	Manhole	Caulk around drain is peeling up/no seal (see Image 80)
P-106	Drain	Oily residue around covered drain, lots of debris
Not identified in LRC's QQQ program	Drain	Covered drain next to CB-011—oily sheen on top of water/no seal
CB-3-LIU	Drain	Oily residue around covered drain, lots of debris
CB-4-LIU	Drain	Oily sheen on top of water/no seal
CB-7	Drain	Oily residue around covered drain
CB-6	Drain	Oily residue around covered drain
CB-8	Drain	Oily residue around covered drain
CB-9	Drain	Oily residue around covered drain
C-1-LIU	Manhole	Sewer sample point, covered. 10.5 ppm benzene detected, not a sealed drain (see Image 86)
T-6-A	Drain	Covered in rocks
T-6-B	Drain	No cap or water seal
T-6-F	Drain	No water seal
T-6-D	Drain	Covered in rocks, completely buried drain (see Images 92 and 93)
T-6-C	Drain	Drain covered in rocks/not visible (see Image 91)
T-6-E	Drain	No water seal, dry drain
T-6-G	Drain	Cap off
T-6-J	Drain	No water seal
CO-6-A	Drain	Not sealed, clean out drain
CO-6-B	Drain	Open clean out
CO-buried	Drain	Condensate drip drain, completely buried
T-6-G	Drain	Uncapped, LRC needs to figure out if it is in service
Manhole near froth tank	Manhole	Partially buried
Manhole 12	Manhole	No seal and opening
Manhole 15	Manhole	No seal and 2 openings
Sample box 90784	Manhole	No seal
100173 Dike	Manhole	No seal and 6 bolt openings
HUB-5	Manhole	Caulk around drain is peeling up/no seal (see Image 79)
CB-5-LIU	Drain	Oily sheen on top of water/no seal (see Images 82 and 83)
T-6-H	Drain	No water seal, dry drain (see Image 95)
LDAR 14626 drain hub	Manhole	Caulk around drain is peeling up/no seal (see Images 102 and 103)
LDAR 14993 drain hub	Manhole	Caulk around drain is peeling up/no seal (see Image 104)
Grated drain next to Recycle Comp KO Drum (PR160116)	Drain	Oily sheen on top of water/no seal, debris (see Images 105-107)

RECORDS REVIEW

1. P&ID of BWON equipment and drains/sewers
2. P&ID of QQQ drains/sewers
3. Daily sign-in sheets for Cenovus meetings and debriefs (6/27 afternoon, 6/29 morning and afternoon, and 6/30 afternoon)
4. BWON Quarterly Reports

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

1. BWON Quarterly Reports (2019 – 2021)
2. BWON Annual Inspection Reports (2019 – 2021)
3. BWON Annual Certifications and TAB Reports (2019 – 2021)
4. NSPS Subpart QQQ Semi-Annual Inspection Reports (2019 – 2021)
5. LeakDAS® backup data for BWON and QQQ
6. Engineering Design Documentation for the Controlled Waste Management Units
7. Emails from Jim Fain on July 4, 10, and 18, 2022: EPA Audit Follow-up
8. P&ID of BWON equipment and drains/sewers
9. P&ID of QQQ drains/sewers

LRC provided the requested documents above via a Microsoft OneDrive link provided by EPA to LRC, except for #5, 8, and 9.

Concerns:

BWON:

- Numerous units (e.g. CPIs, API, IGFU) had detectable emissions above 500 ppm across BWON waste management units complying with the BWON control requirements;
- The West IGFU Top North Mixer was unable to be inspected/approached due to high background (detected by TVA);
- The BWON stream from the equalization tank became open to atmosphere prior to being sent for further control in the aeration basins;
- Numerous units (e.g. CPI's, API, IGFU) had detectable emissions above 500 ppm across BWON waste management units complying with the BWON control requirements
- Fixed roof and floating roof tanks with venting from safety devices above detectable emissions;
- The current Method 21 program needs to be reviewed and updated to include tanks/portions of tanks in the BWON program;
- Subpart FF-applicable manhole cover was found to be unsealed with benzene emissions of 10.5 ppm detected near the cover; and
- No engineering design documentation as specified in BWON § 61.356(d) for any waste management units.

QQQ:

- Numerous QQQ drains were found without a water seal, LRC has not identified all drains associated with each QQQ junction box as part of the program, LRC's QQQ maps were missing information, grated drains did not have manhole covers.

DIGITAL SIGNATURES

Report Author: Steel, Laura Digitally signed by Steel, Laura Date: 2022.08.24 08:37:52 -05'00'

Section Supervisor: SARAH MARSHALL Digitally signed by SARAH MARSHALL Date: 2022.08.24 08:42:17 -05'00'

APPENDIX A: DIGITAL IMAGE LOG

Inspector Name: Veronica Fisher, Laura Steel	**Archival Record Location:** OneDrive: *https://usepa-my.sharepoint.com/:f:/r/personal/fischer_veronica_epa_gov/Documents/Cases/Cenovus/Cenovus%20Lima?csf=1&web=1&e=Mue0PM*

Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0007.JPG	6/28/22 10:21 AM ET	Uncovered/unsealed hazardous waste tank, TVA reading of ~3 ppm
2	IMG_0008.JPG	6/28/22 10:57 AM ET	East CPI
3	IMG_0009.JPG	6/28/22 10:58 AM ET	West CPI
4	IMG_0010.JPG	6/28/22 11:15 AM ET	IGFU Southeast CPI cover plate
5	IMG_0011.JPG	6/28/22 11:20 AM ET	IGFU Northeast CPI cover plate, broken seal
6	IMG_0012.JPG	6/28/22 11:24 AM ET	IGFU cover plate sight glass (5th leak)
7	IMG_0013.JPG	6/28/22 11:31 AM ET	IGFU cover plate sight glass (6th leak)
8	IMG_0014.JPG	6/28/22 11:57 AM ET	Glycol flange (7th leak)
9	IMG_0015.JPG	6/28/22 11:57 AM ET	Glycol flange (7th leak)
10	IR_0327.jpg	6/28/22 1:58 PM ET	East CPI
11	MOV_0328.mp4	6/28/22 1:59 PM ET	Hydrocarbon emissions imaged from the East CPI PRV
12	MOV_0329.mp4	6/28/22 2:02 PM ET	Hydrocarbon emissions imaged from the West CPI PRV
13	MOV_0330.mp4	6/28/22 2:12 PM ET	Hydrocarbon emissions imaged from the West IGFU plate 1 and agitator
14	MOV_0331.mp4	6/28/22 2:14 PM ET	Hydrocarbon emissions imaged from the West IGFU plate 2 and agitator
15	MOV_0332.mp4	6/28/22 2:15 PM ET	Hydrocarbon emissions imaged from the West IGFU plate 3 and agitator
16	MOV_0333.mp4	6/28/22 2:17 PM ET	Hydrocarbon emissions imaged from the West IGFU plate 4 and agitator

17	MOV_0334.mp4	6/28/22 2:21 PM ET	Hydrocarbon emissions imaged from the West IGFU plate 4, agitator, and tank seam
18	IMG_0016.JPG	6/28/22 2:46 PM ET	Manhole cover outside IGFU
19	IMG_0017.JPG	6/28/22 4:58 PM ET	In-ground Lift Station Sump
20	IMG_0018.JPG	6/28/22 4:58 PM ET	In-ground Lift Station Sump
21	IMG_0019.JPG	6/28/22 4:58 PM ET	In-ground Lift Station Sump
22	IMG_0020.JPG	6/28/22 4:59 PM ET	Sump junction box 2 cover
23	IMG_0021.JPG	6/28/22 4:59 PM ET	Sump junction boxes 1 and 2 covers
24	IMG_0022.JPG	6/28/22 4:59 PM ET	Sump junction box 3 cover
25	IMG_0023.JPG	6/28/22 4:59 PM ET	Manhole near sump
26	IMG_0024.JPG	6/28/22 4:59 PM ET	Manhole near sump
27	IMG_0025.JPG	6/28/22 5:04 PM ET	Manhole in road near sump
28	IMG_0026.JPG	6/28/22 5:05 PM ET	Manhole in road near sump
29	MOV_0335.mp4	6/29/22 9:09 AM ET	Hydrocarbon emissions imaged from the southwest corner of API C
30	MOV_0336.mp4	6/29/22 9:11 AM ET	Hydrocarbon emissions imaged from the west side of API C
31	MOV_0337.mp4	6/29/22 9:13 AM ET	Hydrocarbon emissions imaged from the sample drain on API C
32	MOV_0338.mp4	6/29/22 9:15 AM ET	Hydrocarbon emissions imaged from the northwest corner of API C
33	MOV_0339.mp4	6/29/22 9:18 AM ET	Hydrocarbon emissions imaged from the north side of API C
34	MOV_0340.mp4	6/29/22 9:23 AM ET	Hydrocarbon emissions imaged from the northeast corner of API C
35	MOV_0341.mp4	6/29/22 9:24 AM ET	Hydrocarbon emissions imaged from the east conservation vent on API C
36	MOV_0342.mp4	6/29/22 9:25 AM ET	Hydrocarbon emissions imaged from the southeast corner of API C
37	MOV_0343.mp4	6/29/22 9:27 AM ET	Hydrocarbon emissions imaged from the south side of API C
38	MOV_0344.mp4	6/29/22 9:30 AM ET	Hydrocarbon emissions imaged from the west conservation vent on API C

39	MOV_0345.mp4	6/29/22 9:32 AM ET	Hydrocarbon emissions imaged from the northwest corner of API A
40	MOV_0346.mp4	6/29/22 9:34 AM ET	Hydrocarbon emissions imaged from the sample drain on API A
41	MOV_0347.mp4	6/29/22 9:39 AM ET	Hydrocarbon emissions imaged from the east conservation vent on API A
42	MOV_0351.mp4	6/29/22 10:03 AM ET	Hydrocarbon emissions imaged from the in-ground Lift Station Sump
43	MOV_0354.mp4	6/29/22 10:28 AM ET	Hydrocarbon emissions imaged from the CPI PRV
44	MOV_0355.mp4	6/29/22 10:29 AM ET	Hydrocarbon emissions imaged from the CPI PRV
45	MOV_0356.mp4	6/29/22 10:46 AM ET	Hydrocarbon emissions imaged from the Tank 79
46	MOV_0357.mp4	6/29/22 10:52 AM ET	Hydrocarbon emissions imaged from the Tank 79
47	MOV_0358.mp4	6/29/22 10:54 AM ET	Hydrocarbon emissions imaged from the Tank 78 conservation vent
48	MOV_0361.mp4	6/29/22 11:03 AM ET	Hydrocarbon emissions imaged from the sample station near Tank 79
49	MOV_0362.mp4	6/29/22 11:41 AM ET	Hydrocarbon emissions imaged from the above ground junction boxes into aeration basin
50	MOV_0363.mp4	6/29/22 11:44 AM ET	Hydrocarbon emissions imaged from the above ground junction boxes into aeration basin
51	MOV_0364.mp4	6/29/22 11:47 AM ET	Hydrocarbon emissions imaged from the conservation vent on equalization tank
52	MOV_0365.mp4	6/29/22 11:50 AM ET	Corrupted file
53	IMG_0027.JPG	6/29/22 2:10 PM ET	Flare visible from aeration basin
54	IMG_0028.JPG	6/29/22 2:10 PM ET	Flare visible from aeration basin
55	IMG_0029.JPG	6/29/22 2:11 PM ET	Flare visible from aeration basin
56	MVI_0030.MP4	6/29/22 2:11 PM ET	Flare visible from aeration basin
57	MVI_0031.MP4	6/29/22 2:16 PM ET	Flare visible from aeration basin
58	MVI_0032.MP4	6/29/22 2:17 PM ET	Flare visible from aeration basin
59	MOV_0366.mp4	6/29/22 2:18 PM ET	Hydrocarbon emissions imaged from the above ground concrete basins into aeration basin

60	MOV_0367.mp4	6/29/22 2:21 PM ET	Hydrocarbon emissions imaged from the above ground concrete basins into aeration basin
61	MOV_0368.mp4	6/29/22 2:40 PM ET	Tank 77 sample station
62	MOV_0369.mp4	6/29/22 2:42 PM ET	Tank 77 sample station
63	MOV_0370.mp4	6/29/22 2:46 PM ET	Hydrocarbon emissions imaged from Tank 173
64	MOV_0371.mp4	6/29/22 2:48 PM ET	Hydrocarbon emissions imaged from Tank 173
65	MOV_0372.mp4	6/29/22 2:49 PM ET	Hydrocarbon emissions imaged from Tank 173
66	MOV_0373.mp4	6/29/22 2:50 PM ET	Hydrocarbon emissions imaged from Tank 173
67	MOV_0374.mp4	6/29/22 3:01 PM ET	Hydrocarbon emissions imaged from Tank 173
68	MOV_0375.mp4	6/29/22 3:03 PM ET	Hydrocarbon emissions imaged from Tank 172
69	MOV_0376.mp4	6/29/22 3:04 PM ET	Hydrocarbon emissions imaged from Tank 172
70	MOV_0377.mp4	6/29/22 3:06 PM ET	Hydrocarbon emissions imaged from Tank 172
71	MOV_0378.mp4	6/29/22 3:08 PM ET	Hydrocarbon emissions imaged from Tank 172
72	MOV_0379.mp4	6/29/22 3:09 PM ET	Hydrocarbon emissions imaged from Tank 172
73	MOV_0380.mp4	6/29/22 3:34 PM ET	Hydrocarbon emissions imaged from Tank 72
74	MOV_0381.mp4	6/29/22 3:37 PM ET	Hydrocarbon emissions imaged from Tank 72
75	MOV_0382.mp4	6/29/22 3:40 PM ET	Hydrocarbon emissions imaged from Tank 72
76	MOV_0383.mp4	6/29/22 4:03 PM ET	Hydrocarbon emissions imaged from Veolia's Oily Sludge Tank Conservation Vent
77	MOV_0384.mp4	6/29/22 4:06 PM ET	Hydrocarbon emissions imaged from Veolia's Oily Sludge Tank Conservation Vent
78	IMG_0033.JPG	6/30/22 8:49 AM ET	MH-1
79	IMG_0034.JPG	6/30/22 8:53 AM ET	HUB-5
80	IMG_0035.JPG	6/30/22 9:00 AM ET	HUB-2

81	IMG_0036.JPG	6/30/22 9:15 AM ET	Grounding rod access point with accumulated oily liquid
82	IMG_0037.JPG	6/30/22 9:21 AM ET	CB-5-LIU
83	IMG_0038.JPG	6/30/22 9:21 AM ET	CB-5-LIU
84	IMG_0039.JPG	6/30/22 9:34 AM ET	Amine tank
85	IMG_0040.JPG	6/30/22 9:34 AM ET	Amine tank
86	IMG_0041.JPG	6/30/22 9:41 AM ET	C-1-LIU, Sewer sample point
87	IMG_0042.JPG	6/30/22 9:46 AM ET	Manhole cover with debris
88	IMG_0043.JPG	6/30/22 10:02 AM ET	T-6-B
89	IMG_0044.JPG	6/30/22 10:03 AM ET	T-6-A
90	IMG_0045.JPG	6/30/22 10:04 AM ET	T-6-F
91	IMG_0046.JPG	6/30/22 10:04 AM ET	T-6-C
92	IMG_0047.JPG	6/30/22 10:05 AM ET	T-6-D
93	IMG_0048.JPG	6/30/22 10:06 AM ET	T-6-D
94	IMG_0049.JPG	6/30/22 10:10 AM ET	T-6-E
95	IMG_0050.JPG	6/30/22 10:10 AM ET	T-6-H
96	IMG_0051.JPG	6/30/22 10:13 AM ET	CO-6-B
97	IMG_0052.JPG	6/30/22 10:22 AM ET	GDU Sump LDAR tag
98	IMG_0053.JPG	6/30/22 10:22 AM ET	GDU Sump LDAR tag
99	IMG_0054.JPG	6/30/22 10:22 AM ET	GDU Sump LDAR tag
100	IMG_0055.JPG	6/30/22 10:24 AM ET	GDU manhole
101	IMG_0056.JPG	6/30/22 10:24 AM ET	GDU manhole
102	IMG_0057.JPG	6/30/22 10:25 AM ET	LDAR 14626 drain hub
103	IMG_0058.JPG	6/30/22	LDAR 14626 drain hub

		10:26 AM ET	
104	IMG_0059.JPG	6/30/22 10:30 AM ET	LDAR 14993 drain hub
105	IMG_0060.JPG	6/30/22 10:33 AM ET	Grated drain next to Recycle Comp KO Drum (PR160116)
106	IMG_0061.JPG	6/30/22 10:33 AM ET	Grated drain next to Recycle Comp KO Drum (PR160116)
107	IMG_0062.JPG	6/30/22 10:34 AM ET	Grated drain next to Recycle Comp KO Drum (PR160116) with tote