

October 6, 2017

Report to EPA on Limetree Bay Terminals Status

Storm Planning

Limetree Bay Terminals has a detailed Hurricane Preparedness Plan and takes extensive precautions prior to tropical storms and hurricanes in accordance with this plan to protect persons, property and the environment. Additionally, the structures at Limetree Bay Terminals have been built with significant wind resistance and have proved capable of withstanding hurricane force winds. These structures include housing and an administration building built to act as shelters in hurricane conditions.

Hurricane Maria

As you all know, the eye of Category 5 Hurricane Maria passed over the southwest tip of St. Croix bringing hurricane winds during September 19 and 20, 2017. Sustained winds were measured at 185 mph with higher gusts registering over 200 mph and heavy rains fell during this time period.

Damage is not major

Limetree Bay Terminals is pleased to report that although damage did occur in Hurricane Maria, the damage was not major and that all employees and contractors are safe and accounted for.

- Three idled refinery process unit stacks were blown over and the terminal office building had windows blown out. A small number of tanks will be taken out of service for further inspection and repair.
- Telephonic and electronic communications have been partially restored at the facility, but cell phone communications are spotty.
- Power distribution was disrupted in some locations during and immediately after the hurricane, but was quickly restored in most areas. Power generation was never disrupted. Limetree Bay Terminals is still experiencing some reliability issues in distribution. Sensitive electronics are the most affected.
- Desalination and water distribution facilities are functioning and allow a safe supply of water to those working at Limetree Bay Terminals.
- The wastewater treatment plant suffered no material damage other than an electricity loss and main outfall monitoring station damage. Limetree Bay Terminals performed a controlled shutdown of the Wastewater Treatment Plant before evacuation of employees was necessary. The wastewater was held in the collection tanks during that period. After damage assessment and some electrical repairs, the plant was re-started. There were no releases to the water in excess of permit limits. Limetree Bay Terminals has a permit requirement to continuously monitor flow and pH, but is unable to do so until main outfall monitoring station can be repaired. Limetree Bay Terminals is currently using a handheld meter to record this data every 4 hours. There was an overflow from an API separator due to rain and electricity constraints, but the overflow was contained on site.
- There were small oil spills that were contained on site. Limetree Bay Terminals is not aware of any discharge of oil to navigable waters from the facility.
- Insulation was blown off of idled refinery process unit structures. As per OSHA regulations, Limetree Bay Terminals is required to assume most of this insulation contains asbestos, but only testing will confirm that. Insulation is being kept damp and removal/disposal operations are

underway. Access to areas where insulation is present have been restricted and proper PPE is required. Employees have been informed of this condition.

- The storm and recovery efforts disrupted some environmental inspections and sampling. For example, Limetree Bay Terminals could not complete all of the 3rd quarter BWON inspections prior to September 30th due to delays from both hurricanes Irma and Maria.
- Operational status
- The truck loading rack that is used to distribute fuels on St. Croix is operating and is able to meet demand for liquid fuels and propane product to date. There was a brief malfunction of the VOC CEMs.
- Jet fuel supply has continued as needed
- Product stored at Limetree Bay Terminals belongs to our customers, but demand is typically small on St. Croix relative to storage capacity. Limetree Bay Terminals does not expect significant local supply problems at this time. Limetree Bay Terminals has not assessed the need for potential fuel waivers, although EPA may wish to look at whether any are needed.
- The harbor and terminal operations have resumed, although not at all docks. This allows product movement both in and out, for supply to affected regions. Tankers of fuel are being loaded and sent to St. Thomas and possibly other affected areas.
- Limetree Bay Terminals has assisted with restoring safe navigation to the area and is working with Virgin Islands Port Authority to provide tug and pilot assistance for container port traffic. The container port is the primary marine supply hub on St. Croix for essential supplies.
- Limetree Bay Terminals is working to lease office space to FEMA for ongoing response efforts.
- Limetree Bay Terminals is continuing cleanup and restoration efforts at the site, which will take some time.

United States and Virgin Islands Support

Limetree Bay Terminals will continue to cooperate with and support Virgin Islands and United States responders to provide assistance and information where needed. The presence of this facility on St. Croix and its ability to quickly resume operations has contributed considerably to response efforts and to energy security in the Virgin Islands in the wake of Maria and Irma.

Limetree Bay Terminals has been visited by EPA and DPNR for damage assessment on a few occasions after Hurricane Maria. An initial visit was made to the facility to verify the drinking water systems were operational. On October 2, Dwayne Harrington and Bob Finke, Response and Prevention branch, were at Limetree Bay Terminals to determine the need for clean-up and restart assistance. They toured the facility and had the opportunity to meet with Limetree Bay Terminals staff to inquire about what damages we suffered from the storm. Limetree Bay Terminals believes that those who have visited the facility have been impressed by the response to date.

Best Regards,



Darius Sweet
Chief Executive Officer
Limetree Bay Terminals, LLC