

Suncor Energy (U.S.A) Update Commerce City – City Manager's Report November 2, 2020 (submitted 10/26/2020)

Enhanced Engagement with City Council

Suncor is currently scheduled to present at the October 26 study session on a variety of topics, including: environmental goals and metrics for improvement; corrective actions and preventative measures completed in response to recent air emissions exceedances; air emissions; community air monitoring; Sand Creek recent work; refinery integrity; refinery capital investment plan to drive environmental performance; and the CDPHE settlement agreement progress. We also plan to provide an overview of the October 21 event, summarized below.

October 21 Incident Summary

On October 21, the Commerce City refinery experienced a power issue in one of Suncor's internal transformers. The power loss impacted a portion of the facility and caused increased flaring. Refinery staff immediately responded to the situation and there were no injuries.

During the next 48 hours, we took the refinery units offline to complete the transformer repair. We launched an investigation to determine the exact cause of the transformer failure and will address any immediate corrective actions prior to a safe re-start of equipment.

While portions of Plants 1 and 3 will be offline during maintenance, Plant 2 continues safe operations. Suncor will notify stakeholders in advance of refinery start-up. We have notified the required regulatory agencies and continue to keep them updated on the situation.

As a precautionary measure, Suncor conducted community air monitoring beginning on Wednesday at 4:50 p.m. and continued to do so through Friday afternoon at 4:42 p.m. Our community air monitoring results have shown no detectible levels of the measured constituents (O2, CO, H2S, SO2, LEL and VOCs).

To conduct community monitoring, Suncor staff use a calibrated Industrial Scientific MX6 iBrid 6-gas monitor capable of detecting oxygen (O2), carbon monoxide (CO), hydrogen sulfide (H2S), sulfur dioxide (SO2), flammable/combustible vapors (LEL), and volatile organic compounds (VOCs). Monitoring is based on wind speed and direction and is conducted by Suncor personnel who drive through the community – both around the refinery and in locations up- and down-wind – and stop periodically to take readings and assess air conditions.

If Suncor's community air monitoring data were to show an exceedance of the applicable standards, Suncor's Emergency Operations Center (EOC) would notify ADCOM, and together determine any further required actions.

Suncor also monitors CDPHE's community air monitoring stations, which monitor at ppb levels. The state's air quality monitoring data can be found at: <u>https://www.colorado.gov/airquality/report.aspx</u>.

The CDPHE monitors located near the refinery include La Casa, Globeville, Swansea and Welby.



Environmental Performance Data for October 1 through October 26 (10 a.m.), 2020

During the period of Oct. 1 through Oct. 26 (10 a.m.) the Commerce City refinery experienced 2 events that resulted in 28 environmental exceedances (land, air, water) that required us to notify CDPHE or the EPA. This includes:

• 28 exceedances related to air emissions (1 from the Tail Gas Unit process upset and 27 from the C-17 Transformer failure)

CCR environmental performance through the morning of Oct. 26 last year vs. this year:

- 2019 (through October 26) 401 exceedance periods
- 2020 (through October 26) 139 exceedance periods

Current permit parameters are as follows:

Parameter
1 FCCU CO 0% Consent Decree Limit - 1 Hour Average (500)
#1 FCCU COMS Opacity - State Permit Limit (20%)
#1 FCC Min Velocity, Startup & Shutdown MACT UUU (20 ft/sec)
#1 FCCU COMS Opacity - Federal Permit Limit (20%) 3-hr Rolling
H-25 SO2 Hourly Permit Limit - Hourly Lbs (15.68)
H-25 CEMS SO2 0% 12 Hour Avg Permit Limit (250)
Refinery Wide SO2 24-Hr Rolling Total EPCRA RQ- Limit (500lb)
Plant 1 Flare H2S CEMS 3 Hr. Rolling Average 162 ppm
P1 Flare - Visible Emissions >5 minutes in 2-hour period
GBR Flare - Visible Emissions >5 minutes in 2-hour period
B-6 CO Emission Factor CD Limit - 24 Hour (0.060)