EXECUTIVE SUMMARY - ENFORCEMENT MATTER DOCKET NO.: 2005-1839-AIR-E TCEQ ID: RN102535077 CASE NO.: 26897 RESPONDENT NAME: BP Products North America Inc.

Page 1 of 3

1660 AGREED ORDER X FINDINGS AGREED ORDER AMENDED ORDER IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER SHUTDOWN ORDER _FINDINGS DEFAULT ORDER EMERGENCY ORDER CASE TYPE: AGRICULTURE X AIR INDUSTRIAL AND HAZARDOUS WASTE MUNICIPAL SOLID WASTE OCCUPATIONAL CERTIFICATION PETROLEUM STORAGE TANKS PUBLIC WATER SUPPLY RADIOACTIVE WASTE MULTI-MEDIA (check all that apply) UNDERGROUND INJECTION CONTROL USED OIL SEWAGE SLUDGE USED OIL FILTER _WATER QUALITY

SITE WHERE VIOLATION(S) OCCURRED: BP Products North America Texas City, 2401 5th Avenue South, Texas City, Galveston County

TYPE OF OPERATION: Refinery

ORDER TYPE:

SMALL BUSINESS: ____Yes ___X_No

OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.

INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.

COMMENTS RECEIVED: The Texas Register comment period expired on April 17, 2006. No comments were received.

CONTACTS AND MAILING LIST:

TCEQ Attorney/SEP Coordinator: None

TCEQ Enforcement Coordinator: Ms. Suzanne Walrath, Enforcement Division, Enforcement Section II, MC 219, (512) 239-2134; Mr. Steven Lopez, Enforcement Division, MC 219, (512) 239-1896

Respondent: Mr. Colin Maclean, Business Unit Leader, BP Products North America Inc., P.O. Box 401, Texas City, Texas 77592-0401 **Respondent's Attorney:** Not represented by counsel on this enforcement matter

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RESPONDENT'S NAME: BP Products North America Inc. DOCKET NO.: 2005-1839-AIR-E

Page 2 of 3

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
Type of Investigation: Complaint X Routine	Total Assessed: \$130,625 to y Spinish Provide Control of the second sec	Corrective Actions Taken The Executive Director recognizes that BP Products has implemented the following corrective measures at the Plant:
Dates of Investigations Relating to this Case: July 12, and August 4, 2004, April 5, June 1, August 4, and 11, 2005. Dates of NOEs Relating to this Case: August 30, September 1,	Financial Inability to Pay 1971 ALEA AZOR ALEA INDUSTRIAL CONTRACTOR AND ALEAN AND ALEAN AND ALEAN AND ALEAN AND ALEAN AND ALEAN AND A SEP Conditional Offset: \$0	a. On August 18, 2003, concerning Incident No. 25606 which occurred on August 8, 2003, BP Products installed new heat exchanger bundles in the fluid catalytic cracking unit 2 ("FCCU2"), and unit technicians replaced faulty wiring on November 30, 2004;
15, and 16, 2005. (NOE) Background Facts: This was a routine investigation. Three	Total Paid to General Revenue: \$130,625	b. On November 30, 2003, concerning Incident No. 17651 which coccurred on March 18, 2003, BP Products re-routed the sour water
violations were documented.	Person Compliance History Classification:HighX_AvgPoor Major Source: _X_YesNo	tank vent at the FCCU3 to the low-pressure refinery fuel gas system. The gas is now recovered, scrubbed to remove hydrogen sulfide, and used in various combustion sources at the refinery;
1) Failed to prevent the unauthorized release of air contaminants into the atmosphere, and failed to maintain opacity at 30% averaged over a six-minute period [30 TEX. ADMIN. CODE \$\$ 111.111(a)(1)(A), 116.115(c); Air Permit Nos. 8810 and	Applicable Penalty Policy: September 2002 Findings Order Justification: The Respondent has been issued 30 NOVs	c. On November 11, 2004, concerning Incident No. 49293 which occurred on November 10, 2004, BP Products repaired the faulty level alarm on the vessel that overflowed on the UU3;
PSD-TX-402M2, C-18706, 18707, 19599 and PSD-TX-023, Special Condition No.1, and Tex. Health & Safery Code § 382.085(b)].	with same or similar violations, 12 NOVs without same or similar violations, one 1660 Order, and four Findings Orders.	d. On November 30, 2004, concerning Incident No. 49566 which occurred on November 17, 2004, BP Products replaced the faulty wiring in the Resid Hydrotreater Unit ("RHU");
115.352(4), and 40 CODE OF FEDERAL REGULATIONS	nen in de la composition de la composit Recentration de la composition de la comp	e. On January 4, 2005, concerning Incident Nos. 51878 and 51879 which occurred on January 4, 2005, BP Products replaced the float in the liquid level controller on the 506-E depropanizer tower;
 § 63.167(a)(1), and TEX. HEALTH & SAFETY CODE § 382.085(b)]. 3) Failed to prevent the unauthorized release of air contaminants 	172717228174174174172127281741 	f. On March 31, 2005, concerning Incident No. 49944 which occurred on November 24, 2004, BP Products replaced the level transmitter in the RHU during unit turnaround;
into the atmosphere [30 TEX. ADMIN. CODE § 116-116(a), and TEX. HEALTH AND SAFETY CODE § 382.085(b)].	an oon gaare Ternesseraatie voor gaareess Systemies	g. On May 4, 2005, concerning Incident Nos. 54083 and 54088 which occurred on February 16, 2005, plant shift personnel responsible for proper functioning of plant equipment were instructed to check every
		-shift for water in the instrument header at the FCCU3;

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Attachment: Site Compliance History

execsum/5-17-04/execsum.wpd

RESPONDENT'S NAME: BP Products North America Inc. DOCKET NO.: 2005-1839-AIR-E

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
		h. On June 1, 2005, BP Products placed a plug on the open-ended line (tag no. 16333) at the FCCU3;
		i. On June 22, 2005, concerning Incident No. 55147 which occurred on February 25, 2005, BP re-trained all plant shift personnel responsible for proper functioning of the levels of the Pipestill 3A;
		j. On August 12, 2005, concerning Incident Nos. 58226, 58227 and 58231 which occurred on May 12, 2005, shift personnel responsible for proper flow and functioning of the light cat cycle oil ("LCCO") were re-trained, and the valve on the FCCU3 was closed and locked;
		k. On September 15, 2005, concerning Incident No. 54786 which occurred on March 3, 2005, BP Products implemented computer controller changes, and changes to startup procedures at the RHU;
		1. On September 28, 2005, concerning Incident Nos. 55442 and 55443 which occurred on March 17, 2005, the valve was repaired at the electrostatic precipitator;
		m. On September 28, 2005, concerning Incident Nos. 55487 and 56049 which occurred on March 18, 2005, the valve was repaired at the FCCU3; and
		n. On November 18, 2005, BP Product's notarized certification of compliance was received at the TCEQ.

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Page 1 of 8 03/06/06 C:\WINNT\Temp\BPprodREV	/qpw
Penalty Calculation Worksheet (PC	SW)
Policy Revision 2 (September 2002)	PCW Revision May 19, 2005
TCEQ	-
DATES Assigned 06-Sep-2005 PCW 07-Feb-2006 Screening 12-Sep-2005 EPA Due 23-Jun	2006
PCW 07-Feb-2006 Screening 12-Sep-2005 EPA Due 23-Jun	
RESPONDENT/FACILITY INFORMATION	· · · · · · · · · · · · · · · · · · ·
Respondent BP Products North America Inc.	
Reg. Ent. Ref. No. RN102535077	
Facility/Site Region 12-Houston < Major/Minor Se	ource Major Source
CASE INFORMATION Enf./Case ID No. 26897 No. of Viola	tions 3
	Type Findings
	inator Suzanne Walrath
	Team Enforcement Team 4 <
Admin. Penalty \$ Limit Minimum \$0 Maximum \$10,000	
Penalty Calculation Section	
TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1 \$32,500
	a gala a segura de la completa de la
ADJUSTMENTS (+/-) TO SUBTOTAL 1	, set i suit a suit
Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percent	subtotals 2, 3, & 7 \$92,625
Compliance History 285% Enhancement	
The respondent has been issued 30 NOVs with same or similar	
violations, 12 NOVs without same or similar violations, one 1660 on Notes and four Findings Orders. The respondent also submitted three le	order,
Notes and four Findings Orders. The respondent also submitted three le notifying of an audit, and disclosed violations three times with resp	ect to
those audits.	
Culpability No < 0% Enhancement	Subtotal 4 \$0
Interest.	
Notes The respondent does not meet the culpability criteria.	
n na hanna an hanna a	
Good Faith Effort to Comply 10% Reduction	Subtotal 5 -\$3,250
Before NOV NOV to EDPRP/Settlement Offer	
Extraordinary	
N/A (mark with a small x)	<u> </u>
The facility achieved compliance on 9/28/05 which is the last day t	hat all
Notes repairs were completed at the plant concerning the unauthoriz emission exceedances in this enforcement action.	eu
Economic Benefit 50% Enhancement*	Subtotal 6 \$16,250
Total EB Amounts \$447,301 *Capped at the Total EB	
Approx. Cost of Compliance \$3,345,795	
SUM OF SUBTOTALS 1-7	Final Subtotal \$138,125
OTHER FACTORS AS JUSTICE MAY REQUIRE	Adjustment \$0
Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g30 for -30%.)	
Notes	
F	inal Penalty Amount \$138,125
STATUTORY LIMIT ADJUSTMENT Fin	al Assessed Penalty \$130,625
	A alternation of the second seco
DEFERRAL 0% Reduct	
Reduces the Final Assessed Penalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction	on.)
No deferral offered as this is a findings order.	·
PAYABLE PENALTY	\$130,625

		Page 2 of 8 03/06/06 C:\WINNT\Temp\BPprodREVqpw			
		ing Date 12-Sep-2005 Docket No. 2005-1839-AIR-E			PC
4.2 1		pondent BP Products North America Inc.		sion 2 (Sep	
		e ID No. 26897	PC	N Revision	May 19,
Reg.		nce No. RN102535077			· •, '
		Statute] Air Quality			
	Ent. Coo	rdinator Suzanne Walrath	· · · · · · · ·	Africa I.	19. st
				an dar tur. An saint	
	24 A.	Compliance History Worksheet		en ser ser ser	
>> C	ompliance His	tory Site Enhancement (Subtotal 2)		Graden (S. 1997) Graden (S. 1997)	na fato forma
		The Composition of the Composition and the Composition of the Composit	Number Here	Adjust.	
		Written NOVs with same or similar violations as those in the current	30	150%	1
	NOVs	enforcement action (number of NOVs meeting criteria)		and other	. 654
	and write in the state of the s	Other written NOVs Any agreed final enforcement orders containing a denial of liability	12	24%	
		(number of orders meeting criteria)	199 1-19 10-1	20%	4
	Orders	Any adjudicated final enforcement orders, agreed final enforcement orders			-
		without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the	4	100%	
			1.12 € 2		
	· · ·	Any non-adjudicated final court judgments or consent decrees containing a			~
	Judgments	denial of liability of this state or the federal government (number of	0,	0%	• •
	and Consent	judgements or consent decrees meeting criteria) Any adjudicated final court judgments and default judgments, or			1.
	Decrees	non-adjudicated final court judgments or consent decrees without a denial	0	0%	12
	ļ	of liability, of this state or the federal government	1	N.N	-
	Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%	
	Emissions	Chronic excessive emissions events (number of events)	0	0%	1
		Letters notifying the executive director of an intended audit conducted			-
	1	under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were	3	-3%	
	Audits	Disclosures of violations under the Texas Environmental, Health, and	ب د شعبه	<u> </u>	- 19 M
		Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for all	3	-6%	
	L	which violations were disclosed)	ter Yes or No		
		Environmental management systems in place for one year or more	No	0%	٦.
	-	Voluntary on-site compliance assessments conducted by the executive	No	0%	
	Other	director under a special assistance program Participation in a voluntary pollution reduction program	No	0%	-
		Early compliance with, or offer of a product that meets future state or	No	0%	
		federal government environmental requirements	NO	0%	1
		Adjustment Percen	tage (Su	btotal 2)	28
>> R	epeat Violator		ere i		8
			ganda aya na 1999 ya		1
	No	Adjustment Percen	tage (Su	btotal 3)	
>> <u>C</u>	ompliance His	tory Person Classification (Subtotal 7)	unoo te te b	X-146A	
·	Average Perf	ormer Adjustment Percen	tage (Su	btotal 7)	
>> C	a second and a second and a second at	story Summary	Andraitach	A CAREBOR	the states
- 5 (- - 743	upotiente e tite				7
	Compliance	The respondent has been issued 30 NOVs with same or similar violations same or similar violations, one 1660 order, and four Findings Orders. Th			1
I	History Notes				
4.4		those audits.			
	n na ser di s Ser di ser di				
		Total Adjustment Percentage (Subt	otals 2,	3, & 7)	28
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					194

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Screening Date	12-Sep-2005		Docket No. 2005-1839-AIR-E	PCW
Respondent	BP Products N	North Americ	a Inc.	Policy Revision 2 (September 2002)
Case ID No.	26897			PCW Revision May 19, 2005
Reg. Ent. Reference No.	RN102535077	7		
Media [Statute]				
Enf. Coordinator	Suzanne Walı	rath		
Violation Number	· 			
	Permit No:	s. 8810 and I	111.111(a)(1)(A), 116.115(c), and T(PSD-TX-402M2, C-18706, 18707, 19 <-023, Special Condition No. 1	
Primary Rule Cite(s)			Ith & Safety Code § 382.085(b)	
Secondary Rule Cite(s)			authorized release of air contaminant	s into the
Violation Description	atmospher six-minute p	e, and failed eriod. Please e demonstrat	to maintain opacity at 30% averaged e see attached table for details. The tion criteria necessary to present an a for the unauthorized emissions.	during a events did
			Ba	ase Penalty \$10,000
				25 m. Store
Environmental, Propried State		Human ne Harm		
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Potentia	I		Percent 25%	6
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Falsification	n Major M	oderate Mi	inor Percent	7
tati L	<u></u>			
Matrix Notes amount	ts of pollutants	which do not	t has been exposed to insignificant t exceed levels that are protective of eceptors as a result of the violation.	
			Adjustmer	nt -\$7,500
			Base Pena	Ity Subtotal \$2,50
Violation Events			Base Pena	Ity Subtotal \$2,50
Violation Events Number of Viola	ition Events	11	Base Pena	Ity Subtotal \$2,50
<pre>////////////////////////////////////</pre>	ition Events	11	Base Pena	Ity Subtotal \$2,50
<pre>////////////////////////////////////</pre>	daily monthly e quarterly x semiannual	11		
Number of Viola mark only one	daily monthly e quarteriy x semiannual annual			
Number of Viola mark only one use a small	daily monthly e quarterly x semiannual annual single event	x are recomme		
Number of Viola mark only one use a small	daily monthly e quarterly x semiannual annual single event	x are recomme	Violation B anded for the eleven emission events	
Number of Viola mark only on use a small	daily monthly e quarterfy semiannual single event single event single events a (s	x are recommended to the set of t	Violation B ended for the eleven emission events table for details).	ase Penalty \$27,50
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Respondent			nc.		₩.₩rs/dtrs/ob/hr	adri Aliza - Elsa Aliza - E	н. I
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Reg. Ent. Reference No.	,				5. S. (1977		
Media [Statute]				÷ .	1.2 C - 1	Percent	Years of
Violation No.					14 A. A. A. A.	Interest	Depreciation
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ltem	Cost	Required	Date	115	Saved	Costs	Amount
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Delayed Costs		naposta antisona di	an an a'	1997 1997 - 1997		にに用いる理解を	ġitagarat ^e j
Equipment			الإيدانية المحافظ المحافظ	0.0	\$0	\$0.	\$
Buildings		in and a second data statistics (second second s		0.0	\$0	\$0	\$
Other (as needed)			n o caraca a cominenta	0.0	\$0	\$0	\$
Engineering/construction	in a stip bit.		2 ¹	0.0	\$0	\$0	nicesenit \$
Land		the second s	n a sua recordo a sector de la companya de la comp Esta de la companya de	0.0	\$0	n/a	\$
Record Keeping System		المعربين مغربين معربين مربعين الرقور در المعالي معرفين مربع	AU ON CONTRACTOR	0.0	\$0	n/a	\$
Training/Sampling			PRINCIPAL STREET, NO. 1713	0.0	\$0	n/a	\$
Remediation/Disposal				0.0	\$0	n/a	\$
Permit Costs	<u> </u>		1	0.0	\$0 \$0	n/a	\$
Other (as needed)	\$3,345,595	18-Mar-2003	18-Nov-2005	2.7	\$447,301	n/a	\$447,30
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Saraani	na Data	Page 5 of				PprodREVq		PCW
	ng Date				et no. 20	05-1839-AIR-		
	oondent e ID No.		ts North An	nerica inc.			-	sion 2 (September 2002)
Reg. Ent. Refere			077				PC	V Revision May 19, 2005
•	Statute]							
Enf. Coo						•		
	Number	2 2 3uzanne v	vanaun					
Ficialio	(Number	 30 Tex. A	dmin. Cod	e §§ 101.20(2), 115,352(4), and 40 Co	de of Federal	
Primary Ru	le Cite(s)				s § 63.167(a			
Secondary Ru			Tex.	. Health & Sa	fety Code §	382.085(b)		
		Failed to	equip an c	open-ended li	ne (tag no.	16333) in the	fluid catalytic	
Violation De	escription			unt of fugitive			a second valve. s open ended	
	L						Base Penalty	\$10,000
> Environme	intal, Pro	perty an	d Humar _{Harm}	ו Health M	atrix			
	Release	Major	Moderate	Minor				
R	Actual			X				
	Potential				F	ercent	25%	
Programm				Minor				
	Falsification	Major	Moderate	Minor	F	ercent		
		<u></u>	<u> </u>	ll-contraction of the second s				
Matrix Notes	amounts	s of pollutar	nts which d	lo not exceed	levels that	to insignificar are protective of the violation	of	
······································				·····	·	Adjust	ment -\$7,500]
						Base P	enalty Subtotal	\$2,50
Violation E	Events							
	er of Violat	ion Events daily monthly quarterly			. •	Violatio	n Base Penalty	\$2,50
	use a small x	semiannual annual single event] monded for t	he event wh	ich occurred		
	6/1/05	, as docum	nented by th	he inspection	which occu	rred on 6/1/0	5.	
	D			ation	5	tatutory Li	mit rest	
Economic	Benefit	(EB) for	this viole					
	Benefit stimated E			-			al Penalty Tota	\$10,62

Respondent E Case ID No. 2	BP Products N	the second product of the second s	Senefit Wor nc.		An and the		
Reg. Ent. Reference No. F							/
Media [Statute] A						Percent	Years of
Violation No. 2) 					Interest	Depreciation
				د. مارور الأل	Ļ	5.0	16
	ltem	Date	Final	Yrs	Interest	Onetime	EB
ltem	Cost	Required	Date	and 2016 2017 - 1016	Saved	Costs	Amount
Description N	lo commas or \$	ste et et villagilier i	nan an	2040.546			i state i
Delayed Costs	a prederati	ie geneiner				yann una	800000
Equipment		i an an an an an Arthree an Arthre Arthree an Arthree an Ar		0.0	\$0	\$Ó	\$
Buildings		1.1.1.1.C(10.1.1)		0.0	\$0	\$0	\$
Other (as needed)		an a	Carl Carl	0.0	\$0	\$0	\$
Engineering/construction			17.24 B	0.0	\$0	\$0	\$
Land				0.0	\$0	n/a	\$
Record Keeping System				0.0	<u>\$0</u>	n/a	\$
Training/Sampling				0.0	\$0	n/a	\$
Remediation/Disposal				0.0	\$0	n/a _{ana} ,	\$
Permit Costs				0.0	\$0	n/a 🚲	\$
Other (as needed)	\$100	01-Jun-2005	01-Jun-2005	0.0	\$0	п/а	\$
Notes for DELAYED costs			amount to repai discovered, and				
Avoided Costs	ANNU	IALIZE [1] avoide	id costs before en	tering ite	em (except for on	e-time avoided c	osts)
Disposal			r de l'écles en la com	0.0	\$0	\$Ö	\$
Personnel	e anna tha anna an anna anna an an an an an an an			0.0	\$0	\$0	\$
nspection/Reporting/Sampling				0.0	\$0	\$0	\$
Supplies/equipment		an ang dipakan ng pananan ang		0.0	\$0	\$0	\$
Financial Assurance [2]				0.0	\$0	<u>\$0</u>	\$
ONE-TIME avoided costs [3]	taling and and a solution			0.0	\$0	\$0	\$
Other (as needed)		L		0.0	\$0	\$0	\$
Notes for AVOIDED costs	$\theta_{1} \approx \frac{1}{1 + 1} + \frac{1}{1 + 1} = 0$						

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	Page 7 o	f 8 03/06/06	C:\WINNT\Temp\BPprodREVqpw		
Screening	Date 12-Sep-20	05	Docket No. 2005-1839-AIR-E	F	vCW
	ndent BP Produc		a Inc.	Policy Revision 2 (Septen	nber 2002)
Case I	D No. 26897			PCW Revision Ma	y 19, 2005
Reg. Ent. Reference	e No. RN10253	5077			
Media [St	atute] Air Quality	,			900 FTT
Enf. Coord	inator Suzanne	Nalrath			
Violation N					1. No.
Primary Rule			x. Admin. Code § 116.116(a)		
Secondary Rule Violation Desc	Failed to atmosphe to the blo full, ar released of benze atmo	o prevent the un re from the UU3 wydown system ad as a result, it liquid. The spill ne, 28 lbs. of tol osphere. The ev	alth & Safety Code § 382.085(b) authorized release of air contaminant . Specifically, an operator failed to cl in the UU3 (Incident No. 49293). The overflowed to the blowdown stack whi ed liquid vaporized, and released sev uene, and 904 lbs. of unauthorized V0 rents did not meet the demonstration of t an affirmative defense for the unauth emissions.	ose a valve drum was ch then en pounds DCs to the criteria	
			Ba	se Penalty	\$10,000
	al, Property ar Release Major Actual	Harm Moderate M	linor X		
	Potential]	Percent25%	6	1.00
. Dreative man	la Matuix '				
>> Programmat	Isification Major	Moderate M	linor		Billion the Manual Ma
			Percent		
Matrix Notes	amounts of polluta	nts which do no	t has been exposed to insignificant t exceed levels that are protective of eceptors as a result of the violation.		
			Adjustmer		<u> </u>
			Base Pena	ity Subtotal	\$2,500
Violation Ev	ents	······			
Number	of Violation Events	/ 			
8	ronthiy coniy one quarterly a small x semiannua annua single even		Violation B	ase Penalty	\$2,500
	One single even		ed for the one emission event which on 11/10/04.		
Economic B	enefit (EB) for	this violatio	n Statutory Limit	Test	· · · · · · · · · · · · · · · · · · ·
Esti	mated EB Amoun	t \$0	Violation Final P	enalty Total	\$10,625
		This violati	on Final Assessed Penalty (adjuste	d for limits)	\$10,000

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	Ec	onomic B	enefit Wo	rkshe	et	an a	Light and
	BP Products N	lorth America lı	nc.	n (sector)	sign -	1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	
Case ID No.						1	
Reg. Ent. Reference No.		•				an <u>a</u> n an an an an	1. hou h-chasains€.
Media [Statute]						Percent	Years of
Violation No.	3 	din sister (Constant	an taga taga			Interest	Depreciation
	stanti Real and Salah Usang Peri	슬픔을 가 가 다				5.0	15
	Item	Date	Final	Yrs	Interest	Onetime	EB
Item	Cost	Required	Date		Saved	Costs	Amount
Description	No commas or \$	alle sandra bara	and the second second	- A		se) di territte	station of the
Delayed Costs		nederation consistent in the second se		Carto e	·	an in a ma	en e
Equipment		<u>ala, telepidenization</u> II		0.0	\$0	\$0	\$0
Buildings	line and the second	tere and the second		0.0	\$0 \$0	\$0	\$0 \$0
Other (as needed)	minore white an and a			0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	A set of the second method for the second second set of the second se	h		0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal	henending in the start	energia en compositore e	i i su kur sen sen sen se	0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	un/a since	\$0
Other (as needed)	\$100	10-Nov-2004	11-Nov-2004		\$0	n/a	\$0
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Notes for DELAYED costs		beginning on th					
	,			epaired.	· · · · · · · · · · · · · · · · · · ·		
	and the second					na vite	, ,
Avoided Costs	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	JALIZE [1] avoide	d costs before en	tering iter	m (except for o	ne-time avoided o	osts)
Disposal		<u>,</u>		0.0	\$0	\$0	\$0
Personnel	AND AND THE REPORT OF A DESCRIPTION OF A D			0.0	\$0	. \$0	\$0
Inspection/Reporting/Sampling		1	and and the state of	0.0	\$0	\$0	\$0
Supplies/equipment		<u> </u>		0.0	\$0	\$0	\$0
Financial Assurance [2]			1	0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]	namenar men brukpan und	are arransistatener i.e. oa	pana ananapini se verga	0.0	\$Ŏ	\$0	\$0
Other (as needed)	hanna colorida de colorida e de	han an a	figuite — announcean an Antolo n	0.0	\$0	\$0	\$0
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Notes for AVOIDED costs						1-	
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- 18 M	the second se						
Approx. Cost of Compliance	\$100	1				TOTAL	\$0

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	BP Products North America Inc. RN102535077 Docket No. 2005-1839-AIR-E										
Incident No.	Violation No. 1 - Date/ Permit No./ Cause	Unauthorized Emissions	Incident No.	Date/Permit No./Cause	Unauthorized Emissions						
17651	3/18 - 3/19/03 - New Source Review ("NSR") Permit No. 18707: BP failed to prevent the over pressure of Tank Nos. 159 and 161 at the fluid catalytic cracking unit 3 ("FCCU3"), and it began venting to the atmosphere. (19 hrs.)	3,989 lbs. of Volatile Organic Compounds ("VOCs")	55147	2/25/05 - NSR Permit No. 19599 and PSD-TX- 023: The light feed to the Pipestill 3A unit resulted in a pressure surge which caused a release from relief valve no. 189 to the atmosphere. (22 min.)	45 lbs. of butane, 2,512 lbs. of hexane, 9 lbs. of isobutane, 1,710 lbs. of isopentane, 1,238 lbs. of pentane, 81 lbs. of benzene, and 20 lbs. of H_2S						
25606	8/8 - 8/18/03 - NSR Permit C-18706: BP failed to prevent a heat exchanger leak which occurred at the fluid catalytic cracking unit 2 ("FCCU2") cooling tower. (247 hrs.)	14,260 lbs. of VOCs	54786	3/3/05 - NSR Permit No. 8810 and PSD-TX- 402M2: BP failed to prevent an increase in system pressure at the RHU, which caused a pressure controller to relieve to the CRPII Flare (EPN No. 501). (5 hrs., 50 min.)	2,368 lbs. of SO ₂ , and 215 lbs. of CO						
49566	11/17/04 - NSR Permit No. 8810 and PSD-TX- 402M2: The electrical relay failed on the switchgear cubicle to the 557J light hydrocarbon compressor, causing the 557J compressor to trip and flare at the CRPII Flare[Emission Point No. ("EPN") No. 501] at the Resid Hydrotreating Unit ("RHU"). (40 min.)	1,765 lbs. of sulfur dioxide ("SO ₂ "), 0.39 lbs. of nitrogen dioxide ("NO ₂ "), 3 lbs. of nitrogen oxide ("NOx"), and 37 lbs. of carbon monoxide ("CO")	55442 & 55443	3/17/05 - NSR Permit No. 18707 - BP failed to prevent a malfunction of a north upper slide valve which caused high differential pressure between a regenerator and a reactor at the FCCU3, and also caused an unplanned shutdown of the electrostatic precipitator ("ESP"). This resulted in an 87% opacity for 6 min.	18 lbs. of alumina silica catalyst fines, and a 87% opacity for 6 minutes						
49944	11/24/04 - NSR Permit No. 8810 and PSD-TX- 402M2: The L2467 A & B level transmitters at the RHU failed and caused the 201-E High Pressure Amine Absorber oil side to become full of liquid. This caused increased pressure to the system, and the 207-F flash drum pressure controller opened to the CP II flare (EPN No. 501). (9 hrs., 24 min.)	7,696 lbs. of SO ₂ , 59 lbs. of NOx, 7 lbs. of NO ₂ and 711 lbs. of CO	55487 & 56049	3/18/05 - NSR Permit No. 18707: BP failed to prevent a slide valve failure at the FCCU3 which caused a decrease in reactor pressure and inlet , temperature. The decrease in pressure and temperature caused a low plug valve malfunction which shutdown the unit and resulted in emissions from Flare No. 5 to the atmosphere. (2 hrs., 55 min.)	2,211 lbs. Of VOCs						
51878 & 51879	1/4/05 - NSR Permit No. 18707: BP failed to prevent the malfunction of a liquid level controller (L4834) on the 506-E depropanizer tower, which resulted in emissions from Flares No. 3 and 5 to the atmosphere. (13 hrs. 36 min.)	2100 lbs. of VOCs, and 27 lbs. hydrogen sulfide ("H ₂ S")	58226, 58227, & 58231	5/12/05 - NSR Permit No. 18707: BP failed to properly direct the flow of Light Cat Cycle Oil ("LCCO") from a loading dock during an oil movements line-up procedure. The LCCO was inadvertently routed to FCCU3, which resulted in an increase in reactor pressure and the shutdown of the unit. The shutdown of the unit resulted in the release of unauthorized emissions from the ESP stack to the atmosphere. This also resulted in an 89% opacity for 6 minutes. (14 hrs., 16 min.)	4,028 lbs. of VOCs, 13.44 lbs. of H ₂ S, 15.42 lbs. of alumina silica catalyst fines, and an 89% opacity for 6 minutes.						
54083 & 54088	2/16/05 - NSR Permit No. 18707 - BP failed to prevent excessive water from collecting in an instrument air header which caused an increase in reactor pressure that resulted in venting to Flare No. 3 at the FCCU3, and also caused an unplanned shutdown of the ESP. This resulted in a 59% opacity for 6 minutes. (6 min.)	62 lbs. of alumina silica catalyst fines, and a 59% opacity for 6 minutes									

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Compliance History

Customer/Respondent/Owner-Operator:	CN600866800	BP Products North Am	erica Inc.	Classification: AVERAGE	Rating: 1.48
Regulated Entity:	RN102535077	BP PRODUCTS NOR TEXAS CITY	TH AMERICA	Classification: AVERAGE	Site Rating: 4.88
ID Number(s):	AIR NEW SOURCE		PERMIT		1940
	AIR NEW SOURCE	E PERMITS	PERMIT		2231
	AIR NEW SOURCE	E PERMITS	PERMIT		2315
	AIR NEW SOURCE	E PERMITS	PERMIT		2529
	AIR NEW SOURCE	E PERMITS	PERMIT		2608
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	AIR NEW SOURCE PERMITS REGISTRATION	75507		
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	AIR NEW SOURCE PERMITS AFS NUM	0001		
	AIR NEW SOURCE PERMITS PERMIT	PSDTX981		
	AIR NEW SOURCE PERMITS PERMIT	56136		
	AIR NEW SOURCE PERMITS PERMIT	70427		
	AIR NEW SOURCE PERMITS EPA ID	PSDTX649		
	AIR NEW SOURCE PERMITS PERMIT	71839		
	AIR NEW SOURCE PERMITS REGISTRATION	72163		
	AIR NEW SOURCE PERMITS PERMIT	55478		
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	AIR NEW SOURCE PERMITS EPA ID	PSDTX981		
	AIR NEW SOURCE PERMITS REGISTRATION	76550		
	AIR NEW SOURCE PERMITS EPAID	PSDTX402		
	UNDERGROUND INJECTION CONTROL PERMIT	WDW080		
÷ 1	UNDERGROUND INJECTION CONTROL PERMIT	WDW127		
	UNDERGROUND INJECTION CONTROL PERMIT	WDW128		
	UNDERGROUND INJECTION CONTROL PERMIT	WDW214		
	UNDERGROUND INJECTION CONTROL PERMIT	WDW215		
	INDÚSTRIAL AND HAZARDOUS WASTE EPA ID GENERATIÓN	TXD008080533		
	INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # GENERATION (SWR)	30139		
	GENERATION (SWR) INDUSTRIAL AND HAZARDOUS WASTE PERMIT	50255		
	GENERATION			
, i	WASTE WATER GENERAL PERMIT	WQ0000443000		
	WASTE WATER GENERAL PERMIT	TXG670029		
	WASTEWATER	WQ0000443000		
	WASTEWATER	TPDES0003522		
	AIR OPERATING PERMITS	2657		
	AIR OPERATING PERMITS	GB0004L		
	AIR OPERATING PERMITS	1541		
	AIR OPERATING PERMITS	2328		
	INDUSTRIAL AND HAZARDOUS WASTE	50255		
10 ° 4	STORAGE			
	IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION #	30139		
)	(SWR)			
Location:	2401 5TH AVE S, TEXAS CITY, TX, 77590 Rating Date: September 0	1 05 Repeat Violator:		
TCEQ Region:	REGION 12 - HOUSTON			
Date Compliance History Prepared:	November 02, 2005	<u></u>		
	a historia. La filia de la Servicia de la Servi			
Agency Decision Requiring Compliance History:				
	November 02, 2000 to November 02, 2005			
TCEQ Staff Member to Contact for Additional Infor				
Name: Suzanne Walrath	Phone: 512/239-2134			

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14)	Site Corr	npliance History Components	
1. Has the site been in existence and/or operation for	the full five year complia	ance period? Yes	
2. Has there been a (known) change in ownership of t	he site during the compl		
3. If Yes, who is the current owner?	1.11	NA THE TRANSPORT	
4. if Yes, who was/were the prior owner(s)?		en e	
5. When did the change(s) in ownership occur?		Constant of Margin Park Constant − − − − − − − − − − − − − − − − − − −	
Components (Multimedia) for the Site :	· · · · ·		

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

ADMINORDER 2004-1532-AIR-E

Classification: Moderate

Effective Date: 07/15/2005

A

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: Special Condition No. 2 PERMIT

Description: Failed to prevent the unauthorized emission of volatile organic compounds (VOCs) exceeding the maximum allowable emission rate from the Ultraformer No. 4 Unit during a period of 2 hours and 55 minutes on March 30, 2004.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit an administratively complete final emissions event report with the preconstruction authorization number and the authorized emission limits.

ADMINORDER 2001-0329-AIR-E

Classification: Moderate

Citation:

Effective Date: 03/20/2003

30 TAC Chapter 101, SubChapter A 101.4

30 TAC Chapter 112, SubChapter B 112.31

30 TAC Chapter 112, SubChapter B 112.32

5C THC Chapter 382, SubChapter A 382.085(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Discharging one or more air contaminants in such a concentration and of such duration as are or may tend to be injurious to human health or welfare, as documented during TCEQ mobile monitoring conducted from 1995-2001.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 40 CFR Part 60, Subpart J 60.105(a)(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to continuously monitor the fuel gas in Distillate Desulfurization Unit (DDU) No. 300 during Third and Fourth Quarters of 2000.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to include cylinder gases certified values in the CEMS reports for FCCU Nos. 1, 2, 3, DDU. Nos. 200 & 300, Hydrogen Recovery Unit, Sulfur Recovery Unit, and Power Stations Nos. 3 and 4 for First Quarter 1997 thru Fourth Quarter 2000.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to close the sampling hatch on Tank No. 91.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.131(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to control emissions from the Pipestill 3A water separator during a maintenance activity during the week of February 19, 2001.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(2)(F)

30 TAC Chapter 101, SubChapter A 101.6(b)(5)

30 TAC Chapter 101, SubChapter A 101.6(b)(6)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to include all the required information in the initial notification and final report for the week of March 8, 2001 upset at FCCU No. 3.

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(a)

Description: Failed to prevent the unauthorized emissions resulting from a corroded pipeline rupture in FCCU No. 3 on March 8, 2001.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)[G]

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report a reportable upset that occurred on March 27-29, 2001 at FCCU No. 3 within 24 hours of discovery.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 4 PERMIT

Description: Exceeded the allowable hourly er	mission rate for SO2 at FCCU No. 3 on March 27-29, 2001. Contract of the same second to
Classification: Moderate	 A second s
Citation: 30 TAC Chapter 101, SubChapt	
. 30 TAC Chapter 101, SubChapt	ter A 101.6(b)(6)
5C THC Chapter 382, SubChap	oter A 382.085(b)
•	the catalyst emission in the initial and final reports for the
November 21, 2000 upset.	en en en en angeler en
Classification: Moderate	
Citation: 30 TAC Chapter 101, SubChapt	
30 TAC Chapter 101, SubChapt	
	ter A 111.111(a)(1)(B) (as to be see the descence of the strength of the second s
	ter B 116,115(c)
	pter A-882,085(a) al la casa a ser el se la construcción de la casa de la casa de la casa de la casa de la cas pter A-882,085(b) entre el casa de la casa de
Rqmt Prov: SC 1 PERMIT	
	and catalyst emissions from an upset at FCCU No. 1 on
11/21/00 resulting in nuisance conditions.	
Effective Date: 02/02/2003	ADMINORDER 2002-0524-IWD-E
Classification: Moderate	and the standard stan
Citation: 30 TAC Chapter 305, SubChapt	
Challon.	
	$a(0, \gamma_{2}, \gamma_{2}) = a(\gamma_{1}, \gamma_{2}) + \sum_{i=1}^{n} \sum_{j=1}^{n} a(\gamma_{1}, \gamma_{2}) + \sum_{i=1}^{n} a(\gamma_{1}, \gamma_{2}) + \sum_{i=1}$
	its for Oll and Grease and Total Organic Carbon.
Effective Date: 03/09/2002	ADMINORDER 1999-1278-AIR-E
Classification: Moderate	(1,2,2) is the equation of $(1,2,2)$ is the equation of $(2,2,2)$ is th
Citation: 30 TAC Chapter 112, SubChapt	iter B 112.32
5C THC Chapter 382, SubChap	ション・ション 人名 かんし かいしん かいしょう 白柳 生成した たいせい
5C THC Chapter 382, SubChap	医子宫后静脉 医马克氏 医小脑 法定当时 人名法国斯特 自己的 人名法格尔 化乙烯酸 化乙烯酸 化乙烯酸
Description: Exceed the 30-minute hydrogen	sulfide net ground level concentration standard of 0.12 parts
per million on September 29, 1998 from 12:55	
Classification: Moderate	a series and a series of the series of th The series of the series of t
Citation: 30 TAC Chapter 112, SubChapt	iter A 112.3(b)
5C THC Chapter 382, SubChap	
5C THC Chapter 382, SubChap	
	minute net ground level concentration of 0,28 parts per million
by volume on September 29, 1998 from 3:25 a	
Effective Date: 08/29/2005	ADMINORDER 2005-0284-AIR-E
Classification: Moderate	ston & 444 444(o)(4)(P)
Citation: 30 TAC Chapter 111, SubChapt	
30 TAC Chapter 116, SubChapt 30 TAC Chapter 116, SubChapt	stor P 116 115(b)(2)/E)
50 THC Chapter 382, SubChap	
No. 0047 October 10 Constitution 44	
Rqmt Prov: No. 2315 Special Condition #1, Special Condition 7 PERMIT	en en entre anten en entre en la construction de la construction de la construction de la construction de la c
•	emissions limits and allowed unauthorized emissions.
See addendum for information regarding federal actions.	
Any criminal convictions of the state of Texas and the federa	al government.
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The approval dates of investigations. (CCEDS Inv. Track. No	o.)
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2 12/30/2002 (156257)	an Anna an Ann Anna an Anna an
3 12/27/2001 (156256)	$\sum_{i=1}^{n-1} \frac{\partial f_{i}}{\partial t} = \frac{\partial f_{i}}{\partial t} \sum_{i=1}^{n-1} $
4 08/09/2002 (4413)	 Antiput de la strategieux participation de la sector de sector de la sector de la s
5 06/26/2002 (1427)	 The set Weinger of the set of t
6 12/20/2000 (156255)	
7 05/07/2003 (28250)	and the second data second and the second second second
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12	11/25/2002	(156253)
12	01/10/2005	(339436)
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16	10/21/2003	(294635)
17	12/27/2004	(234833)
18	12/16/2004	(339023)
19	12/14/2004	(340622)
20	11/24/2003	(294636)
20	11/26/2001	(156252)
21	04/28/2005	(378515)
22	12/14/2004	(339099)
24	09/23/2005	(432666)
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25 26	12/19/2003	(156251)
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29 30	10/19/2004	(290690)
30 31	08/30/2005	(405036)
32	08/31/2005	(406160)
33	04/24/2004	(254305)
34	08/16/2004	(234333)
35	02/23/2005	(350617)
36	04/25/2005	(377475)
37	05/16/2003	(38169)
38	11/19/2004	(339371)
39	01/07/2005	(291517)
40	09/26/2002	(12389)
41	05/26/2005	(282424)
42	08/24/2004	(351823)
43	12/27/2004	(283778)
44	04/26/2004	(251990)
45	10/21/2002	(156249)
46	04/22/2005	(377248)
47	08/31/2002	(7829)
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49	12/13/2004	(282146)
50	02/15/2001	(246482)
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52	09/01/2004	(291363)
53	12/22/2004	(344971)
54	02/14/2005	(341146)
55	01/04/2005	(289427)
56	11/05/2004	(339795)
57	08/23/2005	(400386)
58	06/29/2005	(348404)
59	12/31/2004	(344475)
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	61	09/23/2004	(351824)
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	66	12/27/2004	(283882)
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	68	05/16/2003	(38170)
	69	02/10/2005	(282617)
	70	09/23/2002	(156246)
	71	10/25/2004	(351825)
	72	12/28/2004	(281660)
	73	12/28/2004	(339638)
	74	08/31/2002	(4786)
	75	10/12/2005	(252191)
	76	04/13/2003	(31558)
	77	11/04/2003	(248163)
	78	08/30/2005	(418478)
	79	01/03/2005	(284492)
	80	09/24/2001	(156245)
· ·	81	10/19/2004	(291164)
	82	03/18/2003	(20996)
	83	04/24/2004	(254307)
	84	01/19/2005	(337943)
	85	11/16/2004	(351826)
	86	03/22/2005	(373360)
	87	05/11/2003	(28139)
	88	04/09/2004	(268950)
	89	09/14/2005	(406870)
	90	09/15/2005	(377149)
	91	06/03/2004	(268798)
	92	11/21/2000	(156243)
	93	02/22/2005	(381703)
	94	09/11/2003	(247716)
	95	09/05/2002	(9375)
	96	09/25/2002	(7870)
	97	03/21/2005	(381704)
	98.	05/27/2004	(272970)
	99	08/12/2003	(149114)
1	00	08/23/2002	(156242)
1	01	08/31/2002	(7795)
1	02	12/13/2004	(339102)
1	03	12/27/2004	(381705)
1	04	10/25/2004	(351827)
	05	08/29/2001	(156241)
	06	06/28/2005	(392489)
1	07	11/05/2004	(339757)
	08	08/14/2002	(3273)
	09	10/01/2004	(293097)
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113	01/03/2005	(284816)
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120	12/14/2004	(338125)
121	09/30/2004	(286082)
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123	11/19/2004	(339082)
124	12/18/2002	(13671)
125	07/24/2001	(156237)
126	09/05/2002	(9373)
127	12/08/2003	(255385)
128	05/26/2004	(268395)
129	08/12/2005	(401566)
130	01/28/2004	(257477)
131	03/04/2004	(263718)
132	04/20/2005	(373601)
133	08/24/2005	(404566)
134	08/31/2004	(268075)
135	05/19/2004	(271625)
136	11/18/2004	(341140)
137	03/10/2004	(263897)
138	03/18/2004	(253458)
139	12/20/2004	(344346)
140	06/02/2004	(268755)
141	06/18/2003	(156235)
142	12/13/2004	(340541)
143	08/08/2005	(400685)
144	03/28/2003	(28949)
145	09/01/2004	(286037)
146	03/28/2003	(28942)
147	06/24/2002	(156234)
148	01/07/2004	(259035)
149	12/20/2004	(339027)
150	08/19/2005	(394676)
151	09/30/2004	(286092)
152	05/02/2003	(280657)
152	06/28/2001	(156233)
154	09/30/2004	(286067)
155	10/07/2005	(393826)
155	12/13/2004	(336747)
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165	01/06/2005	(288366)
166	09/11/2003	(247715)
167	09/14/2005	(403367)
168	12/29/2004	(344652)
169	12/10/2004	(338900)
170	01/07/2005	(341103)
171	05/23/2002	(156230)
172	04/25/2005	(377472)
173	02/23/2005	(350616)
174	12/14/2001	(IE0017395001001)
175	08/31/2004	(280950)
176	12/09/2004	(340663)
177	02/18/2005	(343652)
178	05/18/2001	(156229)
179	08/19/2005	(402460)
180	07/12/2002	(1488)
181	09/01/2004	(286055)
182	02/24/2004	(261244)
183	04/21/2003	(156227)
184	05/29/2003	(34942)
185	04/22/2002	(156226)
186	06/23/2005	(350406)
187	04/18/2005	(419497)
188	12/20/2004	(338583)
189	12/31/2004	(345043)
190	01/19/2005	(337942)
1 91	05/27/2004	(273737)
192	12/16/2004	(338890)
193	04/23/2001	(156225)
194	05/20/2005	(419498)
195	11/29/2004	(340639)
196	08/08/2005	(274224)
197	12/17/2004	(340853)
198	09/01/2004	(288979)
199	03/10/2005	(371700)
200	06/17/2005	(419499)
201	08/28/2002	(9794)
202	09/16/2005	(285680)
203	08/28/2002	(9781)
204	04/25/2005	(419500)
205	09/15/2003	(248772)
206	11/19/2004	(340338)
207	11/21/2002	(11937)
208	11/29/2004	(340062)
209	09/19/2005	(404902)
210	03/03/2005	(373069)
211	05/27/2004	(273749)
212	03/28/2003	(28893)
213	08/29/2005	(400410)
214	11/05/2004	(339803)
215	08/16/2005	(403465)
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217	08/31/2002	(7886)
218	03/24/2003	(156222)
219	09/15/2005	(260589)
220	08/31/2002	(4776)
221	09/01/2004	(291083)
222	08/24/2005	(404569)
223	12/29/2004	(338297)
224	03/03/2005	(372375)
225	01/06/2005	(288634)
226	03/21/2002	(156221)
227	08/31/2004	(283764)
228	08/08/2005	(398880)
229	01/06/2005	(292125)
230	05/19/2004	(271629)
231	12/20/2004	(339872)
232	03/19/2001	(156220)
233	05/16/2003	(29638)
234	09/26/2002	(12031)
235	12/09/2004	(340574)
236	11/23/2004	(333630)
237	12/14/2004	(338108)
238	08/13/2004	(274408)
239	07/22/2005	(345720)
240	08/02/2005	(397176)
241	04/06/2004	(252241)
242	02/24/2003	(156219)
243	05/26/2005	(341932)
244	12/27/2004	(344688)
245	08/31/2004	(287046)
246	06/18/2004	(266747)
247	07/26/2005	(397181)
248	11/19/2004	(341137)
249	01/18/2005	(268595)
250	02/21/2003	(281259)
251	02/25/2002	(156218)
252	09/01/2005	(400327)
253	09/30/2004	(280208)
254	02/23/2001	(156217)
255	11/29/2004	(340125)
256	04/07/2005	(344347)
257	08/13/2004	(274792)
258	12/16/2004	(338891)
259	08/24/2005	(404560)
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261	11/04/2004	(339482)
262	08/30/2005	(403600)
263	11/29/2004	(339078)
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269	12/13/2004	(339031)
270	09/06/2005	(399764)
271	05/25/2005	(379936)
272	12/14/2004	(339128)
273	12/28/2004	(291446)
274	12/09/2004	(338894)
275	03/28/2003	(28927)
276	08/31/2004	(283681)
277	05/13/2003	(33667)
278	08/31/2004	(285140)
279	08/19/2005	(402082)
280	10/12/2005	(433061)
281	01/06/2005	(284616)
282	09/01/2004	(291452)
283	01/06/2005	(341553)
284	12/31/2004	(289229)
285	09/27/2005	(394338)
286	02/23/2004	(294620)
287	05/27/2004	(273717)
288	12/13/2004	(339270)
289	09/11/2003	(247707)
290	12/29/2004	(339794)
291	11/10/2003	(254108)
292	08/28/2002	(9817)
293	08/13/2004	(274627)
294	01/03/2005	(338765)
295	05/20/2005	(377045)
296	10/11/2005	(432303)
297	03/16/2004	(294622)
298	12/28/2004	(340682)
299	05/19/2004	(271621)
300	04/13/2004	(294623)
301	11/19/2004	(339079)
302	02/26/2003	(14741)
303	05/09/2005	(379955)
303	08/19/2003	(37 33553)
304	10/12/2004	(433072)
305	12/14/2003	(338239)
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307	08/31/2004	(272768)
308	05/17/2004	(294625)
309	07/19/2004	(281796)
310	09/16/2005	(380788)
311	06/21/2004	(294627)
312	08/13/2004	(274430)
313	01/10/2005	(340723)
314	09/15/2005	(418585)
315	12/08/2004	(335444)
316	07/12/2004	(294629)
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318	12/31/2003	(250496)
319	11/26/2004	(267345)
320	12/08/2003	(255379)

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321	01/22/2003	(156261)
322	08/08/2005	(336477)
323	05/20/2005	(379096)
324	12/14/2004	(339131)
325	05/11/2005	(373962)
326	01/02/2004	(250803)
327	12/14/2004	(340656)
328	12/20/2004	(339263)
329	08/31/2004	(283738)
330	12/29/2004	(288544)
331	12/28/2004	(344613)
332	08/25/2003	(294631)
333	01/23/2002	(156260)
334	05/27/2004	(272823)
335	12/30/2004	(284317)
336	11/11/2004	(282297)
337	03/28/2003	(28954)
338	04/13/2003	(31549)
339	12/31/2004	(284156)
340	08/31/2004	(278218)
341	01/16/2001	(156259)
342	11/22/2004	(282861)
343	12/16/2004	(340555)

Written notices of violations (NOV). (CCEDS Inv. Track. No.)

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N/A Date: 11/30/2000	(156255)	
Self Report? YES		Classification: Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)	
	TWC Chapter 26 26.121(a)[G]	
	Description: Failure to meet the limit for one or more pe	ermit parameter
Date: 10/31/2002	(156253)	
Self Report? YES	3	Classification: Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]	
	Description: Failure to meet the limit for one or more pe	ermit parameter
Date: 05/26/2005	(345468)	
Self Report? NO		Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.110(a)[G]	
	5C THC Chapter 382, SubChapter A 382.085(b)	
	Description: Failure to prevent an avoidable emissions	event.
	Failure to avoid leak in the system.	
Date: 05/23/2005	Failure to avoid leak in the system. (377045)	
	(377045)	Classification: Minor
Self Report? NO	(377045)	Classification: Minor
	(377045) 30 TAC Chapter 116, SubChapter B 116.115(c)	Classification: Minor
Self Report? NO	(377045)	Classification: Minor
Self Report? NO Citation:	(377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2)	
Self Report? NO Citation:	(377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emissio	
Self Report? NO Citation: Rqmt Prov:	(377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emissio Facility exceeded NH3 slip (406870)	
Self Report? NO Citation: Rqmt Prov: Date: 09/14/2005	(377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emissio Facility exceeded NH3 slip (406870)	ons below permitted level. Classification: Moderate
Self Report? NO Citation: Rqmt Prov: Date: 09/14/2005 Self Report? NO	(377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emissio Facility exceeded NH3 slip (406870)	ons below permitted level. Classification: Moderate
Self Report? NO Citation: Rqmt Prov: Date: 09/14/2005 Self Report? NO	 (377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emission Facility exceeded NH3 slip (406870) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(/) 	ons below permitted level. Classification: Moderate
Self Report? NO Citation: Rqmt Prov: Date: 09/14/2005 Self Report? NO	 (377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emission Facility exceeded NH3 slip (406870) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(7) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA 	ons below permitted level. Classification: Moderate A)
Self Report? NO Citation: Rqmt Prov: Date: 09/14/2005 Self Report? NO Citation:	 (377045) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 117, SubChapter B 117.206(e)(2) PERMIT IA Description: Facility did not maintain ammonia emissic Facility exceeded NH3 slip (406870) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(/ 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) 	ons below permitted level. Classification: Moderate A)

Date: 08/30/2004	(268075)		
Self Report? N))	Classification: Moderate	
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)		
David Drov #	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA	•	
Rqmt Prov:	Description: Exceeded VOC permit limit.		
		Classification: Moderate	
Self Report? No Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)		$\{f_{ij},\ldots,f_{ij}\}_{i=1}^{N} \in \{f_{ij}^{N}\} \cap \{f_{$
	5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT IA		$P(\sigma) = \frac{1}{2} \left(\frac{1}{2} \left(\frac{1}{2} \right)^2 \right)^{-1} \left(\frac{1}{2} \left(\frac{1}{2} \left(\frac{1}{2} \right)^2 \right)^{-1} \left(\frac{1}{2} \left(\frac{1}{2} \left$
	Description: Exceeded VOC limits.		
Date: 02/15/2001	(246482)	Classification: Moderate	3 (1997) (1997) (1997) (1997) 1997 - Maria Mari
Self Report? No) 30 TAC Chapter 305, SubChapter F 305.125(1)	Classification. Moderate	$\int d^{2} dx = \int dx = \int$
Citation:	Description: NON-RPT VIOS FOR MONIT PER OR	PIPE	$\mathcal{T}(\mathcal{B}_{n,n}^{(1)}) = -\mathcal{T}(\mathcal{T}_{n,n}^{(1)}) = \mathcal{T}(\mathcal{T}_{n,n}^{(1)})$
		Classification: Moderate	
Self Report? No Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		$C_{n,n} \to D^{n,n}$.
	Description: NON-RPT VIOS FOR MONIT PER OR	PIPE	
Self Report? N)	Classification: Moderate	$(A_{ij})_{ij} = 0$
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: NON-RPT VIOS FOR MONIT PER OR	PIPE	
Self Report? No)	Classification: Moderate	
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: NON-RPT VIOS FOR MONIT PER OR	PIPE	\mathbf{f}_{i} , \mathbf{f}_{i}
Date: 02/18/2005	(343652)	Classification: Moderate	$[1, \dots, 1] \in \{1, \dots, n\}$
Self Report? No Citation:) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	an en san Verana an San an an an an
Gitation.	5C THC Chapter 382, SubChapter A 382,085(b)	(¹)	•
	Description: BP failed to properly control the air flow	in the ESP Stack resulting in	an opacity of 57%,
	averaged over a six-minute period, for 30 minutes.		
Data: 01/02/2004			$\sim 10^{-11}$ GeV G_{\odot}
Date: 01/02/2004	(250803)	Classification: Moderate	e in the die Nation Manage Nation Manage
Date: 01/02/2004 Self Report? No Citation:	(250803)	Classification: Moderate	e stanting state notioner multiple (state) 1.1. state state 1.1. state state state
Self Report? No	(250803) D		and the second secon Second second second Second second second Second second second Second second second Second second
Self Report? No	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA	ganto de carectores. Antes de carectores de la composición d	 A De La Contra da La Contra d Contra da La Contra da La
Self Report? No Citation:	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S,	ganto de carectores. Antes de carectores de la composición d	en de tradicio de la companya de la comp
Self Report? No Citation:	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305)	ganto de carectores. Antes de carectores de la composición d	
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305)	ganto de carectores. Antes de carectores de la composición d	na konstruktionen er en
Self Report? No Citation: Rqmt Prov:	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101,201(a)(2)	and CO emissions during a C Classification: Moderate	ante en esta en esta en en esta en entre en el esta entre en el est en el esta esta esta entre en el esta entre en entre atribuier entre
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a)	and CO emissions during a C Classification: Moderate (D)	na konstruktionen er en
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation:	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e	and CO emissions during a C Classification: Moderate (D)	na konstruktionen er en
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882)	and CO emissions during a C Classification: Moderate (D) vent.	ante en estas en estas en entre en entre entre Entre entre entre Entre entre
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation:	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882)	and CO emissions during a C Classification: Moderate (D) /ent. Classification: Moderate	ante en estas en estas en entre en entre entre Entre entre entre Entre entre
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882)	and CO emissions during a C Classification: Moderate (D) /ent. Classification: Moderate	
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No	(250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate	
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov:	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions et (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida 	and CO emissions during a C Classification: Moderate (D) Vent. Classification: Moderate ble emissions event.	
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions et (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoidat (156246) 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event.	 A second secon
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate	
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions et (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoidat (156246) 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate	
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions et (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] Description: Failure to meet the limit for one or more 	and CO emissions during a C Classification: Moderate (D) /ent. Classification: Moderate ble emissions event. Classification: Moderate	 A second secon
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate permit parameter	 a. A second se
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE Citation: Date: 08/31/2001 Self Report? YE	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions et (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] Description: Failure to meet the limit for one or more (156245) 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate permit parameter Classification: Moderate	 a. A second se
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE Citation:	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(1) 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate permit parameter	 An and a second secon
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE Citation: Date: 08/31/2001 Self Report? YE	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] Description: Failure to meet the limit for one or more (156245) 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate permit parameter Classification: Moderate	 An and a second secon
Self Report? No Citation: Rqmt Prov: Date: 04/24/2004 Self Report? No Citation: Date: 12/27/2004 Self Report? No Citation: Rqmt Prov: Date: 08/31/2002 Self Report? YE Citation: Date: 08/31/2001 Self Report? YE	 (250803) 30 TAC Chapter 116, SubChapter B 116,115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to properly control VOC, H2S, cycle. (254305) 30 TAC Chapter 101, SubChapter F 101.201(a)(2) 5C THC Chapter 382, SubChapter A 382.085(a) Description: Failed to properly report an emissions e (283882) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limits during an avoida (156246) 30 TAC Chapter 305, SubChapter F 305.125(1) 30 TAC Chapter 305, SubChapter F 305.125(1) 	and CO emissions during a C Classification: Moderate (D) vent. Classification: Moderate ble emissions event. Classification: Moderate permit parameter	 An and a second secon

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		Classification:	Madarata
Self Report? NO Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)	Classification.	Moderate
Citation.	5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT IA		
	Description: BP failed to prevent a leak from the short le	oop in the regen	eration system.
Date: 07/15/2004	(261949)		
Self Report? NO		Classification:	Moderate
Citation:	30 TAC Chapter 115, SubChapter C 115.212(a)(3)(B	;)	
	5C THC Chapter 382, SubChapter A 382.085(b) Description: Failure to prevent VOC leaks during a tran	sfer operation	
Date: 09/14/2005	(403367)	ofer operation.	
	(10001)	Classification:	Moderate
Self Report? NO Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)		
	5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT IA		
	Description; Failure to prevent an avoidable emissions	event.	
Date: 08/23/2005	(402317)	o	
Self Report? NO		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)		ť
Rgmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA		
Kquit Ploy.	Description: Failure to prevent an avoidable emissions	event.	
Date: 12/31/2003	(250496)		
Self Report? NO		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)		-
	5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT IA	•	
	Description: BP failed to properly control VOC and H2S	S emissions duri	ng a shutdown operation.
Date: 11/30/2004	(381705)	Classification:	Mederate
Self Report? YE		Classification.	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]		
	Description: Failure to meet the limit for one or more p	ermit parameter	
Date: 04/24/2004	(254307)		
Self Report? NO		Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b)(9)		
	5C THC Chapter 382, SubChapter A 382.085(b)		
	Description: Failed to properly report an emissions even	ent.	
Date: 06/30/2001	(156237)	Classification:	Moderate
Self Report? YE Citation:	S 30 TAC Chapter 305, SubChapter F 305.125(1)	olabomoatori.	
Citation.	TWC Chapter 26 26.121(a)[G]		
	Description: Failure to meet the limit for one or more p	ermit parameter	
Date: 01/03/2005	(284492)		
Self Report? NC		Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)		
	5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT IA Description: Exceeded permit limit during an avoidable	a amissions aver	at
Date: 11/22/2004	(282861)		
		Classification:	Moderate
Self Report? NC Citation:) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(/	A)	
	5C THC Chapter 382, SubChapter A 382.085(b)		
	Description: Avoidable upset which caused visible em	issions with opa	city over 30% for more than six minutes.
Date: 02/28/2003	(156222)		
Self Report? YE		Classification	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
	TWC Chapter 26 26.121(a)[G] Description: Failure to meet the limit for one or more p	permit parameter	

	Date: 01/06/2005	(288366)				
	Self Report? NO		Classification:	Moderate	<i>1</i> .1	
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)	ay We			
	Rqmt Prov:		i daga sa sanadar			
		Description: BP Products North America, Texas City, fa gas compressor. BP failed to repair the power piston to extended periods of time, which in-turn caused the turk	o prevent stickir		•	en ander Reisenaar op
	Date: 01/31/2003	(156219)	the state of the s	1.1		
	Self Report? YES	S	Classification:			
	Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]	а а _{ла} й _с тур		an an an an Array an Array an Array an Arr	•
		Description: Failure to meet the limit for one or more pe	ermit parameter		etter de la service de la s	an an se
	Date: 04/06/2004	(252241)	Classification:			2 ⁴
	Self Report? NO Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)	Oldssmodilon,	Moderate	n i statistika Maria Maria Maria	
	Rqmt Prov:	PERMITIA				e de la companya de l
		Description: Exceeded a permit limit during an emission	ns event.			And Markey Markey
·	Date: 12/29/2004	(288544)	· :	1		
	Self Report? NO		Classification:	Moderate		
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)				
	Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b)				
	Nyint Prov.	Description: BP representatives failed to properly main F-301B coke drum. BP failed to repair the 10 ft. K-ray	•		-	ded
	Date: 01/06/2005	period of time, which in-turn caused the turbine to trip. (284616)	•	$< \alpha_{1,1}$	na sa karana na sa k	-
	Self Report? NO	e de la companya de l	Classification:	Minor	a transmission data	
	Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B	•)			and the
		30 TAC Chapter 101, SubChapter F 101.201(c) Description: BP failed to submit initial and final notificat	tions in a fimely	manner		
			Classification:	1.		the trainer
	Self Report? NO Citation:	30 TAC Chapter 116, SubChapter B 116,115(c)		modorato	5. A.	
	Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA	in a de la com			ar 11
		Description: Failure to prevent the overpressure of the	401E overhead	tower		• • • • • • • •
	Date: 12/15/2004	(282146)				
	Self Report? NO Citation:	30 TAC Chapter 116, SubChapter B 116.115(c)	Classification:	Moderate	e di	
	Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA	#== 0001-		1t	. Y + [C1] .
	Date: 06/09/2004	Description: Failure to prevent the premature failure of (269846)	-	te da esta	a tha a fair a star dhuir an a	
			Classification:		and the state of a second second	
	Self Report? NO Citation:	30 TAC Chapter 101, SubChapter A 101.4 Description: Facility failed to prevent a nuisance violati			Sec. Const.	na ann ann an 1969. Ann an 1969 an 1970
	Date: 01/06/2005	(292125)		intel de la composición Composición	era este diviser din . Se se	1 .
	Self Report? NO		Classification:	Moderate	1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)		$1 \leq y ^{-1}$	n an	
	Rqmt Prov:	PERMIT IA Description: Failure to prevent the H3566 relief valve fr	om leaking to th	ne CRPII Flar	e (501).	and they are given by
	Date: 09/05/2003	(148573)		andar da internetiente da serie da serie En la serie da serie d		1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -
	Self Report? NO	30 TAC Chapter 116, SubChapter B 116.115(c)			an a	Mariaka shekara
		Description: BP failed to control emissions during a cau	ustic dumping of	peration.		
	Date: 09/16/2005	(406970)	ista de la	et précision	and the state of the second	n de la companya de l Nome de la companya de
	Self Report? NO Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A	Classification:	Moderate		

	5C THC Chapter 382, SubChapter A 382.085(b) Description: Failure to maintain proper catalyst aeration	n and catalyst ci	rcculation.	
		Classification:	Minor	
Self Report? NO				
Citation:	30 TAC Chapter 101, SubChapter F 101.201(g) Description: BP failed to submit a written Initial Notifica of discovery of the incident.	tion for Incident	# 55146 to the TCEQ within 24 hou	rs
Date: 05/26/2005	(341932)			
Self Report? NO		Classification:	Moderate	
Citation:	30 TAC Chapter 116, SubChapter B 116.110(a)[G] 5C THC Chapter 382, SubChapter A 382.085(b)			
	Description: Failure to prevent the release of Freon err	issions to the at	tmosphere.	
Self Report? NO		Classification:	Minor	
Citation	30 TAC Chapter 101, SubChapter F 101.201(a)(1)(E	3)		
	Description: Failure to report in a timely manner.			
Date: 01/03/2005	(284816)			
		Classification:	Moderate	
Self Report? NC		0		
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(/ 5C THC Chapter 382, SubChapter A 382.085(b)	v)		
	Description: Exceeded opacity limits during an avoidab		vent	
	,			
Date: 12/31/2002	(156261)			
Self Report? YE	S	Classification:	Moderate	
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)			
	TWC Chapter 26 26.121(a)[G]			
	Description: Failure to meet the limit for one or more p	ermit parameter		
Date: 12/21/2004	(344971)			
Self Report? NC		Classification:	Moderate	
Citation:	, 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(/	A)		
Ondidon.	5C THC Chapter 382, SubChapter A 382.085(b)	,		
	Description: BP maintenance personnel failed to locko	out the switch to	the UPS output static switch and the	эу
	failed to prevent a precipitator trip that resulted in an o			
	periods).			
Date: 12/28/2004	(291446)			
Self Report? NO)	Classification:	: Moderate	
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(1)(I	- 1		
		в)		
	30 TAC Chapter 116, SubChapter B 116.115(c)	в)		
	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)	в)		
Rqmt Prov:	-	в)		
Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b)			
Rqmt Prov:	5C THC Chapter 382, SubChapter A 382,085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge			
Date: 08/19/2005	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676)		: Moderate	
Date: 08/19/2005 Self Report? NO	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676)		: Moderate	
Date: 08/19/2005	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c)		: Moderate	
Date: 08/19/2005 Self Report? NC Citation:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)		: Moderate	
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Date: 08/19/2005 Self Report? NC Citation: Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission	Classification	: Moderate	
Date: 08/19/2005 Self Report? NC Citation:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA	Classification ons event.		
Date: 08/19/2005 Self Report? NC Citation: Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission (259089)	Classification		
Date: 08/19/2005 Self Report? NO Citation: Rqmt Prov: Date: 07/27/2004	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission (259089) 30 TAC Chapter 116, SubChapter B 116.115(c)	Classification ons event.		
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Date: 08/19/2005 Self Report? NC Citation: Rqmt Prov: Date: 07/27/2004 Self Report? NC Citation:	 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission (259089) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limit during an avoidable 	Classification ons event. Classification e emissions eve	: Moderate ant.	
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Date: 08/19/2005 Self Report? NC Citation: Rqmt Prov: Date: 07/27/2004 Self Report? NC Citation: Rqmt Prov: Self Report? NC Citation: Date: 01/07/2005	 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission (259089) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limit during an avoidable 30 TAC Chapter 101, SubChapter F 101.201(g) Description: Failure to submit final report via STEERS (341103) 	Classification ons event. Classification e emissions eve Classification	i: Moderate ent. h: Minor	
Date: 08/19/2005 Self Report? NC Citation: Rqmt Prov: Date: 07/27/2004 Self Report? NC Citation: Rqmt Prov: Self Report? NC Citation: Date: 01/07/2005 Self Report? NC	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surge (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission (259089) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limit during an avoidable 30 TAC Chapter 101, SubChapter F 101.201(g) Description: Failure to submit final report via STEERS (341103)	Classification ons event. Classification e emissions eve Classification	i: Moderate ent. h: Minor	
Date: 08/19/2005 Self Report? NC Citation: Rqmt Prov: Date: 07/27/2004 Self Report? NC Citation: Rqmt Prov: Self Report? NC Citation: Date: 01/07/2005	5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Failure to prevent the J4 air blower surger (394676) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: BP failed to prevent an avoidable emission (259089) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT IA Description: Exceeded permit limit during an avoidable 30 TAC Chapter 101, SubChapter F 101.201(g) Description: Failure to submit final report via STEERS (341103) 30 TAC Chapter 111, SubChapter A 111.111(a)(1)	Classification ons event. Classification e emissions eve Classification	i: Moderate ent. h: Minor	
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Environmental audits.

F.

Notice of intent	it Date:	06/17/2003	(251315)		a tha an					
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Ci	itation:		Moderate Moderate		Req Prpv;	PERMIT2610	YES	1	$\mathcal{A} \to \mathcal{A} \to \mathcal{A}$	21.0
, OI			er 116, SubChapter l e to comply with per				a state	o vente Ni	- e 1	lan sin
		•	tmosphere instead o	•			YES	n san se	2 3. 1	ana a
Ci	itation:	30 TAC Chapte (2)[G]	er 115, SubChapter I	B 115.127(a)	and and the	- Land - States		. (14 - 14 - 3) 1	
Notice of Inten	t Date:	07/15/2002	sions from the short (32987)	11111				hittent bas	sis.	
Disclosu		01/23/2003 Viol, Classification:		e gydd 1 E	1 *		VES			1.1
Ci	itation:		er 331, SubChapter					iste di		i.
Notice of Inten		Description: Failure	e to submit an inver (35078)				- X	•	an dh' dhe a	
		12/20/2002	. ,	[e4]	egnus antis sur a ev Autoritat autoritat					a.
		Viol. Classification:	Moderate	ana ang karang si	$\begin{cases} \alpha & \beta & \beta & \beta & \beta \\ \beta & \beta & \beta & \beta & \beta \\ \beta & \beta &$					
Ci	itation:	40 CFR Chapte SubPT A 61.01	er 61, SubChapter C					lan an a	jan Se	
		Description: Fallure	e to identify liquid h ene (TAB) report	drocarbons cont	aining benzene th	at were routed	to blowdov	vn stacks	in the set of	ig ^a nika Nitera
		Viol. Classification;					YES			
Ci	itation:	40 CFR Chapte SubPT A 61.01	ər 61, SubChapter C (a)	, PT 61,			1997) 1997 1997		an en t	i a ci
		Description: Failure benzene in controlle Viol. Classification:	e to manage waste led waste managem Moderate	streams containir ent units	ng greater than 2 N	9 11 L.A		s, the		an an ta
Ci		30 TAC Chapte	er 115, SubChapter		de la se	an is	ata State	or 38 71		
			e to include emissio volatile organic com Moderate						80, 98M	
Ci	itation:		er 63, SubChapter C	, PT 63,			1400.30		an i sequ t	
		SubPT A 63.1(a	B)			aat in tat	1997 - A	,		
		SubPT A 63.1(a Description: Failure stack, which render	e to control a gaseo rs the blowdown sta	ck a Group 1 Mis	g from valve PV-34 cellaneous Proces	107 at the Ultr is Vent ("MPV	aformer No /")	. 3 blowdd		$\mathbb{T}(Y_{i})$
Ci		SubPT A 63.1(a Description: Failure stack, which render Viol. Classification:	e to control a gaseo rs the blowdown sta	ck a Group 1 Mis	g from valve PV-34	107 at the Ultr is Vent ("MPV	aformer No /") YES	. 3 blowdd		
Ci		SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G]	e to control a gaseo rs the blowdown sta Moderate	ck a Group 1 Mis B 115.127(a)	g from valve PV-34 cellaneous Proces	107 at the Ultr s Vent ("MP∨	aformer No /") YES	. 3 blowdc	ar Grante La succ	i se se
Ci	itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter l	ck a Group 1 Mis B 115.127(a) B 115.142[G]	g from valve PV-34 cellaneous Proces	107 at the Ultr is Vent ("MP∨	aformer No /*') YES on criteria f	3 blowdo	ar GRESS Marcass	i se se
CI	itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter l er 115, SubChapter l s in the gaseous stre	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in	g from valve PV-34 cellaneous Proces	107 at the Ultr is Vent ("MP∨	aformer No /") YES on criteria fo	. 3 blowdc	ar GRESS Marcass	i San se Si si
	itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification:	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter l er 115, SubChapter l s in the gaseous stre	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in	g from valve PV-34 cellaneous Proces	107 at the Ultr is Vent ("MP∨	aformer No /") YES on crițeria fr YES	A Blowdc	ar GRESS Marcass	i par pa et i di para Di parati
	itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification: 30 TAC Chapte	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter I er 115, SubChapter I s in the gaseous stre Moderate	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in B 112.31	g from valve PV-34 cellaneous Proces	107 at the Ultr is Vent ("MP∨	aformer No /") YES on criteria fo	3 Blowdc	uni Linette Linette Linette Linette Linette	a see an ear a se sea se se sea se se sea se s
	itation: itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification: 30 TAC Chapte 30 TAC Chapte Description: Failure	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter I er 115, SubChapter I s in the gaseous stre Moderate er 112, SubChapter I	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in B 112.31 B 112.33[G] drogen sulfide err	g from valve PV-34 cellaneous Proces Violation No. 4 ex	107 at the Ultr is Vent ("MPV ceed exempti	aformer No ") YES on criteria fo YES {cracker an	3 blowdc	אנג 2000 - 20 יייי יייי יייי יייי	an a
	itation: itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification: 30 TAC Chapter 30 TAC Chapter	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter l ar 115, SubChapter l s in the gaseous stre Moderate er 112, SubChapter l er 112, SubChapter l re to comply with hyd	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in B 112.31 B 112.33[G] drogen sulfide err	g from valve PV-34 cellaneous Proces Violation No. 4 ex	107 at the Ultr is Vent ("MPV ceed exempti	aformer No //') YES on criţeria fr YES (caracker an	3 blowdc	אנג 2000 - 20 יייי יייי יייי יייי	Carrier Garage Garage Garage Garage Garage
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CI	itation: itatioh: itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification: 30 TAC Chapte 30 TAC Chapte 30 TAC Chapte No. 3 Units Viol. Classification: 30 TAC Chapte [G] Description: Failure	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter I ar 115, SubChapter I ar 115, SubChapter I a in the gaseous stree Moderate er 112, SubChapter I re to comply with hyd Major er 116, SubChapter I re to obtain authorize ted as emission poin	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in B 112.31 B 112.33[G] drogen sulfide err B 116.110(a) attion for routine e nt number ("EPN"	g from valve PV-34 cellaneous Proces Violation No. 4 ex lission requiremen	107 at the Ultr s Vent ("MPV ceed exempti ts for the Ultra tewater strea No, 2315	aformer No ") YES on criteria fo YES acracker an YES	3 blowdc	یں 1930ء کی ا 1930ء کی ا 1930 کی ا 1930 کی ا 1930 کی ا 1930 کی ا 1930 کی ا 1930 کی ا 19	
Ci	itation: itatioh: itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification: 30 TAC Chapter 30 TAC Chapter No. 3 Units Viol. Classification: 30 TAC Chapter [G] Description: Failure blowdown stack list Viol. Classification:	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter I ar 115, SubChapter I ar 115, SubChapter I a in the gaseous stree Moderate er 112, SubChapter I re to comply with hyd Major er 116, SubChapter I re to obtain authorize ted as emission poin	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in B 112.31 B 112.33[G] drogen sulfide err B 116.110(a) attion for routine e tt number ("EPN" B 116.110(a)	g from valve PV-34 cellaneous Proces Violation No. 4 ex tission requiremen missions from was) 73 in Air Permit I	107 at the Ultr s Vent ("MPV ceed exempti ts for the Ultra tewater strea No, 2315	aformer No ") YES on criteria fo YES acracker an YES	3 blowdc	یں 1930ء کی ا 1930ء کی ا 1930 کی ا 1930 کی ا 1930 کی ا 1930 کی ا 1930 کی ا 1930 کی ا 19	
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CI CI CI	itation: itation: itation:	SubPT A 63.1(¢ Description: Failure stack, which render Viol. Classification: 30 TAC Chapte [G] 30 TAC Chapte Description: VOCs requirements Viol. Classification: 30 TAC Chapte 30 TAC Chapte Description: Failure No. 3 Units Viol. Classification: 30 TAC Chapte [G] Description: Failure blowdown stack list Viol. Classification: 30 TAC Chapter [G] Description: Failure new source review Viol. Classification:	e to control a gaseo rs the blowdown sta Moderate er 115, SubChapter I ar 115, SubChapter I ar 115, SubChapter I ar 115, SubChapter I er 112, SubChapter I er 112, SubChapter I er 116, SubChapter I e to obtain authorize ted as emission poir Major er 116, SubChapter I e to authorize blowc ("NSR") regulations	ck a Group 1 Mis B 115.127(a) B 115.142[G] eam referred to in B 112.31 B 112.33[G] drogen sulfide em B 116.110(a) ation for routine e nt number ("EPN" B 116.110(a) down stack routing	g from valve PV-34 cellaneous Process Violation No. 4 ex hission requiremen according from wate) 73 in Alr Permit I	407 at the Ultr is Vent ("MPV ceed exempti ts for the Ultra stewater strea No. 2315	aformer No ") YES on criteria fo YES ((***********************************	3 blowdc	2008 2010 2010 2010 2010 2010 2010 2010	

Description: Failure to maintain records of maintenance emissions from blowdown stacks Viol. Classification: Minor YES Citation: 30 TAC Chapter 101, SubChapter F 101.211[G] Description: Failure to report emissions from blowdown stacks which exceeded reportable quantities for hydrogen sulfide and benzene Viol. Classification: Minor YES Citation: 30 TAC Chapter 101, SubChapter A 101.10(a) [G] Description: Failure to report emissions from the blowdown stacks in the annual emission inventory report Type of environmental management systems (EMSs). N/A Voluntary on-site compliance assessment dates. N/A Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

G.

Н.

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING BP PRODUCTS NORTH AMERICA INC. RN102535077 **BEFORE THE**

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2005-1839-AIR-E

At its _______ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding BP Products North America Inc. ("BP Products") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and BP Products North America Inc., presented this agreement to the Commission.

BP Products understands that they have certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, BP Products agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions will be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon BP Products.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

- 1. BP Products owns and operates a refinery located at 2401 5th Avenue South, Texas City, Galveston County, Texas (the "Plant").
- 2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
- 3. During inspections conducted on August 4, 2004, April 5, and June 1, 2005, and record reviews conducted on July 12, 2004, August 4, and 11, 2005, it was documented that BP Products failed to prevent the unauthorized release of air contaminants into the atmosphere, and failed to maintain opacity at 30% averaged during a six-minute period. The events did not meet the demonstration criteria necessary to present an affirmative defense for the unauthorized emissions. (See table below)

BP Products North America Inc. Docket No. 2005-1839-AIR-E Page 2

Incident No.	Date/ Permit No./ Cause	Unauthorized Emissions	Incident No.	Date/Permit No./Cause	Unauthorized Emissions
17651	3/18 - 3/19/03 - New Source Review ("NSR") Permit No. 18707: BP failed to prevent the over pressure of Tank Nos. 159 and 161 at the fluid catalytic cracking unit 3 ("FCCU3"), and it began venting to the atmosphere. (19 hrs.)	3,989 lbs. of Volatile Organic Compounds ("VOCs")	55147	2/25/05 - NSR Permit No. 19599 and PSD-TX- 023: The light feed to the Pipestill 3A unit resulted in a pressure surge which caused a release from relief valve no. 189 to the atmosphere. (22 min.)	45 lbs. of butane, 2,512 lbs. of hexane, 9 lbs. of isobutane, 1,710 lbs. of isopentane, 1,238 lbs. of pentane, 81 lbs. of benzene, and 20 lbs. of H_2S
25606	8/8 - 8/18/03 - NSR Permit C-18706: BP failed to prevent a heat exchanger leak which occurred at the fluid catalytic cracking unit 2 ("FCCU2") cooling tower. (247 hrs.)	14,260 lbs. of VOCs	54786	3/3/05 - NSR Permit No. 8810 and PSD-TX- 402M2: BP failed to prevent an increase in system pressure at the RHU, which caused a pressure controller to relieve to the CRPII Flare (EPN No. 501). (5 hrs., 50 min.)	2,368 lbs. of SO_2 , and 215 lbs. of CO
49566	11/17/04 - NSR Permit No. 8810 and PSD-TX- 402M2: The electrical relay failed on the switchgear cubicle to the 557J light hydrocarbon compressor, causing the 557J compressor to trip and flare at the CRPII Flare [Emission Point No. ("EPN") No. 501] at the Resid Hydrotreating Unit ("RHU"). (40 min.)	1,765 lbs. of sulfur dioxide ("SO ₂ "), 0.39 lbs. of nitrogen dioxide ("NO ₂ "), 3 lbs. of nitrogen oxide ("NOx"), and 37 lbs. of carbon monoxide ("CO")	55442 & 55443	3/17/05 - NSR Permit No. 18707 - BP failed to prevent a malfunction of a north upper slide valve which caused high differential pressure between a regenerator and a reactor at the FCCU3, and also caused an unplanned shutdown of the electrostatic precipitator ("ESP"). This resulted in an 87% opacity for 6 min.	18 lbs. of alumina silica catalyst fines, and a 87% opacity for 6 minutes
49944	11/24/04 - NSR Permit No. 8810 and PSD-TX- 402M2: The L2467 A & B level transmitters at the RHU failed and caused the 201-E High Pressure Amine Absorber oil side to become full of liquid. This caused increased pressure to the system, and the 207-F flash drum pressure controller opened to the CP II flare (EPN No. 501). (9 hrs., 24 min.)	7,696 lbs. of SO_2 , 59 lbs. of NOx, 7 lbs. of NO ₂ and 711 lbs. of CO	55487 & 56049	3/18/05 - NSR Permit No. 18707: BP failed to prevent a slide valve failure at the FCCU3 which caused a decrease in reactor pressure and inlet temperature. The decrease in pressure and temperature caused a low plug valve malfunction which shutdown the unit and resulted in emissions from Flare No. 5 to the atmosphere. (2 hrs., 55 min.)	2,211 lbs. Of VOCs
51878 & 51879	1/4/05 - NSR Permit No. 18707: BP failed to prevent the malfunction of a liquid level controller (L4834) on the 506-E depropanizer tower, which resulted in emissions from Flares No. 3 and 5 to the atmosphere. (13 hrs. 36 min.)	2100 lbs. of VOCs, and 27 lbs. hydrogen sulfide ("H ₂ S")	58226, 58227, & 58231	5/12/05 - NSR Permit No. 18707: BP failed to properly direct the flow of Light Cat Cycle Oil ("LCCO") from a loading dock during an oil movements line-up procedure. The LCCO was inadvertently routed to FCCU3, which resulted in an increase in reactor pressure and the shutdown of the unit. The shutdown of the unit resulted in the release of unauthorized emissions from the ESP stack to the atmosphere. This also resulted in an 89% opacity for 6 minutes. (14 hrs., 16 min.)	4,028 lbs. of VOCs, 13.44 lbs. of H_2S , 15.42 lbs. of alumina silica catalyst fines, and an 89% opacity for 6 minutes.
54083 & 54088	2/16/05 - NSR Permit No. 18707 - BP failed to prevent excessive water from collecting in an instrument air header which caused an increase in reactor pressure that resulted in venting to Flare No. 3 at the FCCU3, and also caused an unplanned shutdown of the ESP. This resulted in a 59% opacity for 6 minutes. (6 min.)	62 lbs. of alumina silica catalyst fines, and a 59% opacity for 6 minutes			

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- 4. During an investigation conducted on June 1, 2005, it was documented that BP Products failed to equip an open-ended line (tag no. 16333) in the fluid catalytic cracking unit 3 ("FCCU3") with a cap, blind flange, plug, or a second valve. The estimated amount of fugitive volatile organic compound emissions ("VOCs") from this open ended line is 0.12 lbs.
- 5. During a record review conducted on August 4, 2005, it was documented that BP Products failed to prevent the unauthorized release of air contaminants into the atmosphere from the UU3. Specifically, an operator failed to close a valve to the blowdown system in the UU3 (Incident No. 49293). The drum was full, and as a result, it overflowed to the blowdown stack which then released liquid. The spilled liquid vaporized, and released seven pounds of benzene, 28 lbs. of toluene, and 904 lbs. of unauthorized VOCs to the atmosphere.

6. BP Products received notices of the violations on September 4, 6, 20, and 21, 2005.

- 7. The Executive Director recognizes that BP Products has implemented the following corrective measures at the Plant:
 - a. On August 18, 2003, concerning Incident No. 25606 which occurred on August 8, 2003, BP Products installed new heat exchanger bundles in the fluid catalytic cracking unit 2 ("FCCU2"), and unit technicians replaced faulty wiring on November 30, 2004;
 - b. On November 30, 2003, concerning Incident No. 17651 which occurred on March 18, 2003, BP Products re-routed the sour water tank vent at the FCCU3 to the low-pressure refinery fuel gas system. The gas is now recovered, scrubbed to remove hydrogen sulfide, and used in various combustion sources at the refinery;
 - c. On November 11, 2004, concerning Incident No. 49293 which occurred on November 10, 2004, BP Products repaired the faulty level alarm on the vessel that overflowed on the UU3;
 - d. On November 30, 2004, concerning Incident No. 49566 which occurred on November 17, 2004, BP Products replaced the faulty wiring in the Resid Hydrotreater Unit ("RHU");
 - e. On January 4, 2005, concerning Incident Nos. 51878 and 51879 which occurred on January 4, 2005, BP Products replaced the float in the liquid level controller on the 506-E depropanizer tower;
 - f. On March 31, 2005, concerning Incident No. 49944 which occurred on November 24, 2004, BP Products replaced the level transmitter in the RHU during unit turnaround;
 - g. On May 4, 2005, concerning Incident Nos. 54083 and 54088 which occurred on February 16, 2005, plant shift personnel responsible for proper functioning of plant equipment were instructed to check every shift for water in the instrument header at the FCCU3;

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- h. On June 1, 2005, BP Products placed a plug on the open-ended line (tag no. 16333) at the FCCU3;
- i. On June 22, 2005, concerning Incident No. 55147 which occurred on February 25, 2005, BP re-trained all plant shift personnel responsible for proper functioning of the levels of the Pipestill 3A;
- j. On August 12, 2005, concerning Incident Nos. 58226, 58227 and 58231 which occurred on May 12, 2005, shift personnel responsible for proper flow and functioning of the light cat cycle oil ("LCCO") were re-trained, and the valve on the FCCU3 was closed and locked;
- k. On September 15, 2005, concerning Incident No. 54786 which occurred on March 3, 2005, BP Products implemented computer controller changes, and changes to startup procedures at the RHU;
- 1. On September 28, 2005, concerning Incident Nos. 55442 and 55443 which occurred on March 17, 2005, the valve was repaired at the electrostatic precipitator;
- m. On September 28, 2005, concerning Incident Nos. 55487 and 56049 which occurred on March 18, 2005, the valve was repaired at the FCCU3; and
- n. On November 18, 2005, BP Product's notarized certification of compliance was received at the TCEQ.

II. CONCLUSIONS OF LAW

- 1. BP Products is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE § 7.002, TEX. HEALTH & SAFETY CODE ch. 382, and the rules of the Commission.
- 2. As evidenced by Finding of Fact No. 3, BP Products failed to prevent the unauthorized release of air contaminants into the atmosphere, and failed to maintain opacity at 30% averaged over a six-minute period, in violation of 30 TEX. ADMIN. CODE §§ 111.111(a)(1)(A), 116.115(c), Air Permit Nos. 8810 and PSD-TX-402M2, C-18706, 18707, 19599 and PSD-TX-023, Special Condition No.1, and TEX. HEALTH & SAFETY CODE § 382.085(b).
- 3. As evidenced by Finding of Fact No. 4, BP Products failed to equip an open-ended line with a cap, blind flange, plug, or a second valve, in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 115.352(4), and 40 CODE OF FEDERAL REGULATIONS § 63.167(a)(1), and TEX. HEALTH & SAFETY CODE § 382.085(b).
- 4. As evidenced by Finding of Fact No. 5, BP Products failed to prevent the unauthorized release of air contaminants into the atmosphere, in violation of 30 TEX. ADMIN. CODE § 116.116(a), and TEX. HEALTH AND SAFETY CODE § 382.085(b).

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- 5. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against BP Products for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.
- 6. An administrative penalty in the amount of One Hundred Thirty Thousand Six Hundred Twenty-Five Dollars (\$130,625) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. BP Products has paid the One Hundred Thirty Thousand Six Hundred Twenty-Five Dollar (\$130,625) administrative penalty.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. BP Products is assessed an administrative penalty in the amount of One Hundred Thirty Thousand Six Hundred Twenty-Five Dollars (\$130,625), as set forth in Section II, Paragraph 6 above, for violations of TCEQ rules and state statutes. The imposition of this administrative penalty and BP Products's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: BP Products North America Inc., Docket No. 2005-1839-AIR-E" to:

> Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The provisions of this Agreed Order shall apply to and be binding upon BP Products. BP Products is ordered to give notice of this Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
- 3. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to BP Products if the Executive Director determines that BP Products has not complied with one or more of the terms or conditions in this Agreed Order.
- 4. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.

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- 5. This Agreed Order, issued by the Commission, shall not be admissible against BP Products in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 6. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
- 7. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. By law, the effective date of this Agreed Order is the third day after the mailing date, as provided by 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142.

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SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

6/5/D6 Date

For the Executive Director

I, the undersigned, have read and understand the attached Agreed Order in the matter of BP Products North America Inc. I am authorized to agree to the attached Agreed Order on behalf of BP Products North America Inc., and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, BP Products North America Inc. waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that my failure to comply with the Ordering Provisions, 1 any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact or my compliance history;
- Greater scrutiny of any permit applications submitted by the;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against me;
- Automatic referral to the Attorney General's Office of any future enforcement actions against me; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

COUN H. T. MACLERN

Name (printed or typed) Authorized Representative BP Products North America Inc

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Ordering Provision 1 of this Agreed Order.

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