

EXECUTIVE SUMMARY - ENFORCEMENT MATTER

**DOCKET NO.: 2006-1067-AIR-E TCEQ ID: RN100238385 CASE NOS.: 30300 AND 32216
RESPONDENT NAME: VALERO REFINING-TEXAS, L.P.**

ORDER TYPE:		
<input type="checkbox"/> 1660 AGREED ORDER	<input checked="" type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input checked="" type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION

SITE WHERE VIOLATION(S) OCCURRED: 1301 Loop 197 South, Texas City, Galveston County

TYPE OF OPERATION: Petroleum refinery

SMALL BUSINESS: Yes No

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

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 23, 2007. No comments were received.

CONTACTS AND MAILING LIST:

- TCEQ Attorney:** Mr. Robert R. Mosley, Litigation Division, MC 175, (512) 239-0627;
Ms. Jennifer Cook, Litigation Division, MC 175, (512) 239-1873
- TCEQ SEP Coordinator:** Ms. Sharon Blue, Litigation Division, MC 175, (512) 239-2223
- TCEQ Enforcement Coordinators:** Mr. Bryan Elliott, Enforcement Division, Section III, MC 149, (512) 239-6162;
Ms. Rebecca Johnson, Enforcement Division, Section III, MC R-12, (713) 422-8931;
Ms. Jessica Rhodes, Enforcement Division, Section III, MC 149, (512) 239-2879
- TCEQ Regional Contact:** Ms. Linda Vasse, Houston Regional Office, MC R-12, (713) 767-3637
- Respondent:** Mr. Patrick Passantino, Environmental Manager, Valero Energy Corporation, 1301 Loop 197 South, Texas City, Texas 77590
- Respondent's Attorney:** Mr. Parker Wilson, Valero Energy Corporation, P.O. Box 696000, San Antonio, Texas 78269

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation:</p> <p><input type="checkbox"/> Complaint <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Investigation Relating to this Case: April 18, 2006, June 14, 2006, July 5, 2006, September 14, 2006, October 18, 2006 and December 18, 2006</p> <p>Date of NOV/NOE Relating to this Case: June 30, 2006, July 6, 2006, July 19, 2006, October 23, 2006 and November 7, 2006 (NOEs)</p> <p>Background Facts: A signed Agreed Order was received on February 20, 2007.</p> <p>AIR:</p> <p>1. Failed to comply with permitted emissions limits during an emissions event which occurred on February 15, 2006. Since the emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3) and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>2. Failed to comply with permitted emissions limits during an emissions event which occurred on March 11, 2006. Since this emissions event could have been avoided by good operating practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3) and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>3. Failed to comply with permitted emissions limits during an emissions event which occurred on March 22, 2006. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3) and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>4. Failed to comply with permitted emissions limits during an emissions event which occurred on February 12, 2006. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3) and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>5. Failed to comply with permitted emissions limits during an emissions event which occurred on March 30, 2006. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3) and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>	<p>Total Assessed: \$119,149</p> <p>Total Deferred: \$0</p> <p><input type="checkbox"/> Expedited Settlement</p> <p><input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$59,574</p> <p>Total Paid to General Revenue: \$59,575</p> <p>The Respondent has paid \$59,575 of the administrative penalty. The remaining amount of \$59,574 of the administrative penalty shall be conditionally offset by the completion of a Supplemental Environmental Project (SEP).</p> <p>Site Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification: <input type="checkbox"/> High <input checked="" type="checkbox"/> Avg. <input type="checkbox"/> Poor</p> <p>Major Source: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p> <p>Findings Order Justification: Absence of management practices designed to ensure compliance.</p>	<p>Ordering Provisions</p> <p>The Respondent shall implement and complete a Supplemental Environmental Project (SEP) (See SEP Attachment A).</p> <p>The Respondent shall undertake the following technical requirements:</p> <p>1. Within 30 days:</p> <p>a. Implement improvements to design, operation, or procedures at the Plant, in order to address the emissions events that occurred on February 12, 2006, February 15, 2006, March 11, 2006, March 22, 2006, March 30, 2006, May 19, 2006, July 9, 2006 and July 18, 2006, and to prevent the reoccurrence of same or similar incidents; and</p> <p>b. Provide additional personnel training and implement improvements to emissions event reporting procedures in order to timely submit complete and accurate report.</p> <p>2. Within 45 days, submit written certification demonstrating compliance with Ordering Provision No. 1.</p> <p>3. Within 60 days, comply with the TCEQ request dated December 18, 2006 for the submittal of a corrective action plan ("CAP") to address the excessive emissions event that occurred October 4, 2004.</p> <p>4. Within 15 days of written requests for information concerning the submitted CAP or by other deadline specified in writing, respond completely and adequately.</p> <p>5. Upon Commission approval, implement the CAP in accordance with the approved schedule.</p> <p>6. Upon completion of the CAP implementation, submit written certification demonstrating compliance with Ordering Provision Nos. 3, 4 and 5.</p>

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>6. Failed to comply with permitted emissions limits during an emissions event which occurred on May 19, 2006. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3) and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>7. Failed to submit a copy of the final record for a reportable emissions event which occurred on March 11, 2006 no later than two weeks after the end of the emissions event [30 TEX. ADMIN. CODE § 101.201(c) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>8. Failed to submit a copy of the final record for a reportable emissions event which occurred on February 12, 2006 no later than two weeks after the end of the emissions event [30 TEX. ADMIN. CODE § 101.201(c) AND TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>9. Failed to provide the preconstruction authorization number on the final report for a reportable emissions event (Incident No. 76064) which occurred on May 19, 2006 [30 TEX. ADMIN. CODE § 101.201(b)(1)(H) and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>10. Failed to prevent unauthorized emissions that exceeded the fence line H2S concentration limit during an emissions event that started on October 4, 2004 [30 TEX. ADMIN. CODE §§ 112.31 and 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>11. Failed to comply with permitted emissions limits during an emissions event which occurred on July 9, 2006. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE § 116.715(a), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>12. Failed to comply with permitted emissions limits during an emissions event which occurred on July 18, 2006. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE § 116.715(c), Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1 and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p>		



Policy Revision 2 (September 2002)

Penalty Calculation Worksheet (PCW)

PCW Revision April 25, 2006

DATES	Assigned	05-Jul-2006	Screening	18-Jul-2006	EPA Due	27-Mar-2007
	PCW	18-Jul-2006				

RESPONDENT/FACILITY INFORMATION	
Respondent	Valero Refining-Texas, L.P.
Reg. Ent. Ref. No.	RN100238385
Facility/Site Region	12-Houston
Major/Minor Source	Major Source

CASE INFORMATION			
Enf./Case ID No.	30300	No. of Violations	9
Docket No.	2006-1067-AIR-E	Order Type	Findings
Media Program(s)	Air Quality	Enf. Coordinator	Bryan Elliott
Multi-Media		EC's Team	Enforcement Team 5
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$25,300
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	183% Enhancement	Subtotals 2, 3, & 7	\$46,299
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Notes The penalty was enhanced due to eighteen NOV's for same or similar violations, nineteen NOV's for dissimilar violations, one 1660 style order, and one court order containing a denial of liability.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes The Respondent does not meet culpability criteria.

Good Faith Effort to Comply	0% Reduction	Subtotal 5	\$0
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	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	(mark with a small x)

Notes The Respondent does not meet good faith criteria.

Economic Benefit	0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$562	*Capped at the Total EB \$ Amount
Approx. Cost of Compliance	\$12,600	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$71,599
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OTHER FACTORS AS JUSTICE MAY REQUIRE		Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes

Final Penalty Amount	\$71,599
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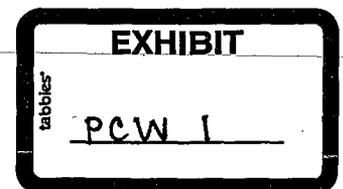
STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$59,149
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DEFERRAL	0% Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes No deferral offered for Findings Order.

PAYABLE PENALTY	\$59,149
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Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	30300			<i>PCW Revision April 25, 2006</i>
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	18	90%
	Other written NOVs	19	38%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	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 commission	1	25%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgements or consent decrees meeting criteria</i>)	1	30%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were</i>	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 183%

>> Repeat Violator (Subtotal 3)

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes The penalty was enhanced due to eighteen NOVs for same or similar violations, nineteen NOVs for dissimilar violations, one 1660 style order, and one court order containing a denial of liability.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 183%

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PGW
Respondent	Valero Refining-Texas, L.P.			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	30300			<i>PCW Revision April 25, 2006</i>
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	1			
Primary Rule Cite(s)	30 Tex. Admin. Code §§ 116.715(a) and 101.20(3) and Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1			
Secondary Rule Cite(s)	Tex. Health and Safety Code § 382.085(b)			
Violation Description	<p>The Respondent failed to comply with permitted emissions limits. Specifically, the authorized emissions limit for emissions events under a flexible permit is zero pounds per hour ("lbs/hr"). As documented during an investigation conducted on April 18, 2006, an emissions event occurred on February 15, 2006 at the No. 5 Flare Stack (Emission Point No. EFL-05) that lasted 28 minutes, resulting in the release of 6,823.30 lbs of sulfur dioxide. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.</p>			
		Base Penalty	\$10,000	

>> Environmental, Property and Human Health Matrix						
		Harm				
	Release	Major	Moderate	Minor		
OR	Actual		X		Percent 50%	
	Potential					
>> Programmatic Matrix						
		Falsification	Major	Moderate	Minor	Percent
Matrix Notes	Human health or the environment was exposed to significant amounts of pollutants which did not exceed levels protective of human health or environmental receptors as a result of the violation.					
		Adjustment	-\$5,000			

Base Penalty Subtotal \$5,000

>> Violation Events					
	Number of Violation Events	1	Number of violation days	1	
					Violation Base Penalty \$5,000
	<i>mark only one use a small x</i>	daily			
		monthly			
		quarterly			
		semiannual			
		annual			
		single event	X		
	One single event is recommended.				

Economic Benefit (EB) for this violation		Statutory Limit Test	
Estimated EB Amount	\$101	Violation Final Penalty Total	\$14,150
This violation Final Assessed Penalty (adjusted for limits)		\$10,000	

Economic Benefit Worksheet

Respondent Valero Refining-Texas, L.P.
Case ID No. 30300
Reg. Ent. Reference No. RN100238385
Media [Statute] Air Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$2,000	15-Feb-2006	20-Feb-2007	1.0	\$101	n/a	\$101

Notes for DELAYED costs Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is based on the date of the emissions event and Final Date is the prospective date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$2,000

TOTAL \$101

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.	<i>Policy Revision 2 (September 2002)</i>		
Case ID No.	30300	<i>PCW Revision April 25, 2006</i>		
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	<input type="text" value="2"/>			
Primary Rule Cite(s)	30 Tex. Admin. Code §§ 116.715(a) and 101.20(3) and Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1			
Secondary Rule Cite(s)	Tex. Health and Safety Code § 382.085(b)			
Violation Description	The Respondent failed to comply with permitted emissions limits. Specifically, the authorized emissions limit for emissions events under a flexible permit is zero lbs/hr. As documented during an investigation conducted on April 18, 2006, an emissions event occurred on March 11, 2006 at the No. 5 Flare Stack (Emission Point No. EFL-05) that lasted for 44 minutes, resulting in the release of 5,265.10 lbs of sulfur dioxide. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.			
			Base Penalty	<input type="text" value="\$10,000"/>

>> Environmental, Property and Human Health Matrix				
OR	Harm			
		Major	Moderate	Minor
	Actual	<input type="text"/>	<input checked="" type="checkbox"/>	<input type="text"/>
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>
				Percent <input type="text" value="50%"/>
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
				Percent <input type="text"/>
Matrix Notes	Human health or the environment was exposed to significant amounts of pollutants which did not exceed levels protective of human health or environmental receptors as a result of the violation.			
			Adjustment	<input type="text" value="-\$5,000"/>

	Base Penalty Subtotal	<input type="text" value="\$5,000"/>
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Violation Events				
	Number of Violation Events	<input type="text" value="1"/>	Number of violation days	<input type="text" value="1"/>
<i>mark only one use a small x</i>		daily <input type="text"/> monthly <input type="text"/> quarterly <input type="text"/> semiannual <input type="text"/> annual <input type="text"/> single event <input checked="" type="checkbox"/>		Violation Base Penalty
				<input type="text" value="\$5,000"/>
One single event is recommended.				

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	<input type="text" value="\$95"/>
	Violation Final Penalty Total
	<input type="text" value="\$14,150"/>
This violation Final Assessed Penalty (adjusted for limits)	
<input type="text" value="\$10,000"/>	

Economic Benefit Worksheet

Respondent: Valero Refining-Texas, L.P.
 Case ID No. 30300
 Reg. Ent. Reference No. RN100238385
 Media [Statute] Air Quality
 Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$2,000	11-Mar-2006	20-Feb-2007	0.9	\$95	n/a	\$95

Notes for DELAYED costs: Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is based on the date of the emissions event and Final Date is the prospective date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance \$2,000 TOTAL \$95

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.	<i>Policy Revision 2 (September 2002)</i>		
Case ID No.	30300	<i>PCW Revision April 25, 2006</i>		
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	3			
Primary Rule Cite(s)	30 Tex. Admin. Code §§ 116.715(a) and 101.20(3) and Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1			
Secondary Rule Cite(s)	Tex. Health and Safety Code § 382.085(b)			
Violation Description	<p>The Respondent failed to comply with permitted emissions limits. Specifically, the authorized emissions limit for emissions events under a flexible permit is zero lbs/hr. As documented during an investigation conducted on April 18, 2006, an emissions event occurred on March 22, 2006 at the No. 5 Flare Stack (Emission Point No. EFL-05) that lasted for 1 hour and 45 minutes, resulting in the release of 8,390.80 lbs of sulfur dioxide. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.</p>			
Base Penalty			\$10,000	

>> **Environmental, Property and Human Health Matrix**

OR	Harm				Percent <input type="text" value="50%"/>
	Release	Major	Moderate	Minor	
	Actual	<input type="text"/>	X	<input type="text"/>	
	Potential	<input type="text"/>	<input type="text"/>	<input type="text"/>	

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	Percent <input type="text"/>
	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	

Matrix Notes
 Human health or the environment was exposed to significant amounts of pollutants which did not exceed levels protective of human health or environmental receptors as a result of the violation.

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events Number of violation days

mark only one use a small x	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	X

Violation Base Penalty

One single event is recommended.

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent: Valero Refining-Texas, L.P.
Case ID No.: 30300
Reg. Ent. Reference No.: RN100238385
Media [Statute]: Air Quality
Violation No.: 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$2,000	22-Mar-2006	20-Feb-2007	0.9	\$92	n/a	\$92

Notes for DELAYED costs: Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is based on the date of the emissions event and Final Date is the prospective date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$2,000
TOTAL \$92

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.		Policy Revision 2 (September 2002)	
Case ID No.	30300	PCW Revision April 25, 2006		
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	4			
Primary Rule Cite(s)	30 Tex. Admin. Code §§ 116.715(a) and 101.20(3) and Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1			
Secondary Rule Cite(s)	Tex. Health and Safety Code § 382.085(b)			
Violation Description	<p>The Respondent failed to comply with permitted emissions limits. Specifically, the authorized emissions limit for emissions events under a flexible permit is zero lbs/hr. As documented during an investigation conducted on April 18, 2006, an emissions event occurred on February 12, 2006 at the No. 2 and No. 3 Flare Stacks (Emission Point Nos. EFL-02 and EFL-03) that lasted for 1 hour and 19 minutes, resulting in the release of 2,012.60 lbs of sulfur dioxide. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.</p>			
Base Penalty			\$10,000	

>> **Environmental, Property and Human Health Matrix**

OR	Harm				Percent
	Release	Major	Moderate	Minor	
	Actual			X	
	Potential				25%

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	Percent

Matrix Notes: Human health or the environment was exposed to insignificant amounts of pollutants which did not exceed levels protective of human health or environmental receptors as a result of the violation.

Adjustment -\$7,500

Base Penalty Subtotal \$2,500

Violation Events

Number of Violation Events: 1 1 Number of violation days

mark only one use a small x	daily	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	X

Violation Base Penalty \$2,500

One single event is recommended.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount: \$102	Violation Final Penalty Total: \$7,075
This violation Final Assessed Penalty (adjusted for limits) \$7,075	

Economic Benefit Worksheet

Respondent Valero Refining-Texas, L.P.
Case ID No. 30300
Reg. Ent. Reference No. RN100238385
Media [Statute] Air Quality
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime	EB
						Costs	Amount

Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$2,000	30-Mar-2006	20-Feb-2007	0.9	\$90	n/a	\$90

Notes for DELAYED costs Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is based on the date of the emissions event and Final Date is the prospective date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$2,000

TOTAL \$90

Screening Date 18-Jul-2006 **Docket No.** 2006-1067-AIR-E **PGW**
Respondent Valero Refining-Texas, L.P. *Policy Revision 2 (September 2002)*
Case ID No. 30300 *PCW Revision April 25, 2006*
Reg. Ent. Reference No. RN100238385
Media [Statute] Air Quality
Enf. Coordinator Bryan Elliott

Violation Number 6
Primary Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3) and Flexible Permit No. 39142/PSD-TX-822M2, Special Condition No. 1
Secondary Rule Cite(s) Tex. Health and Safety Code § 382.085(b)
Violation Description
 The Respondent failed to comply with permitted emissions limits. Specifically, the authorized emissions limit for emissions events under a flexible permit is zero lbs/hr. As documented during an investigation conducted on July 5, 2006, an emissions event occurred on May 19, 2006 at Tank 452 (Emission Point No. F-33) that lasted for 24 hours, resulting in the release of 1,326.40 lbs of volatile organic compounds. Since this emissions event could have been avoided by good operation practices, it failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.

Base Penalty \$10,000

>> **Environmental, Property and Human Health Matrix**

		Harm			
Release		Major	Moderate	Minor	
OR	Actual			X	Percent 25%
	Potential				

>> **Programmatic Matrix**

		Major	Moderate	Minor	
	Falsification				Percent

Matrix Notes
 Human health or the environment was exposed to insignificant amounts of pollutants which did not exceed levels protective of human health or environmental receptors as a result of the violation.

Adjustment -\$7,500

Base Penalty Subtotal \$2,500

Violation Events

Number of Violation Events Number of violation days
 mark only one use a small x

daily	
monthly	
quarterly	
semiannual	
annual	
single event	X

Violation Base Penalty \$2,500

One single event is recommended.

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$79 **Violation Final Penalty Total** \$7,075
This violation Final Assessed Penalty (adjusted for limits) \$7,075

Economic Benefit Worksheet

Respondent: Valero Refining-Texas, L.P.
 Case ID No: 30300
 Reg. Ent. Reference No: RN100238385
 Media [Statute]: Air Quality
 Violation No: 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$2,000	19-May-2006	02-Mar-2007	0.8	\$79	n/a	\$79

Notes for DELAYED costs: Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is based on the date of the emissions event and Final Date is the prospective date of compliance.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance \$2,000

TOTAL \$79

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	30300			<i>PCW Revision April 25, 2006</i>
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	7			
Primary Rule Cite(s)	30 Tex. Admin. Code § 101.201(c)			
Secondary Rule Cite(s)	Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failure to submit a copy of the final record for a reportable emissions event which occurred on March 11, 2006 no later than two weeks after the end of the emissions event. Specifically, during the April 18, 2006 investigation, it was documented that the respondent submitted the final report for Incident No. 72816 on March 27, 2006, two days after the March 25, 2006 due date.			
		Base Penalty	\$10,000	

>> **Environmental, Property and Human Health Matrix**

OR	Harm				
	Release	Major	Moderate	Minor	
	Actual	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Percent <input type="text"/>
	Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Percent <input type="text" value="1%"/>

Matrix Notes

Adjustment

Base Penalty Subtotal

Violation Events

Number of Violation Events Number of violation days

<i>mark only one use a small x</i>	<i>daily</i>	<input type="checkbox"/>
	<i>monthly</i>	<input type="checkbox"/>
	<i>quarterly</i>	<input type="checkbox"/>
	<i>semiannual</i>	<input type="checkbox"/>
	<i>annual</i>	<input type="checkbox"/>
	<i>single event</i>	<input checked="" type="checkbox"/>

Violation Base Penalty

Economic Benefit (EB) for this violation Statutory Limit Test

Estimated EB Amount	<input type="text" value="\$0"/>	Violation Final Penalty Total	<input type="text" value="\$283"/>
This violation Final Assessed Penalty (adjusted for limits)		<input type="text" value="\$283"/>	

Economic Benefit Worksheet

Respondent: Valero Refining-Texas, L.P.
 Case ID No. 30300
 Reg. Ent. Reference No. RN100238385
 Media [Statute] Air Quality
 Violation No. 7

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	\$250	25-Mar-2006	27-Mar-2006	0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to procure proper record keeping procedures designed to submit final reports on time. Date Required is based on the due date for the report. Final Date is the date report was submitted.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item. (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$250

TOTAL \$0

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	30300			<i>PCW Revision April 25, 2006</i>
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	8			
Primary Rule Cite(s)	30 Tex. Admin. Code § 101.201(c)			
Secondary Rule Cite(s)	Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failure to submit a copy of the final record for a reportable emissions event which occurred on February 12, 2006 no later than two weeks after the end of the emissions event. Specifically, during the April 18, 2006 investigation, it was documented that the respondent submitted the final report for Incident No. 71648 on February 28, 2006, one day after the February 27, 2006 due date.			
	Base Penalty	\$10,000		

>> **Environmental, Property and Human Health Matrix**

Release	Harm			Percent
	Major	Moderate	Minor	
Actual				
Potential				

OR

>> **Programmatic Matrix**

Falsification	Major	Moderate	Minor	Percent
			X	1%

Matrix Notes: Less than 30% of the rule requirement was not met.

Adjustment - \$9,900

Base Penalty Subtotal \$100

Violation Events

Number of Violation Events Number of violation days

daily	
monthly	
quarterly	
semiannual	
annual	
single event	X

mark only one use a small x

Violation Base Penalty \$100

One single event is recommended.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount \$0	Violation Final Penalty Total \$283
This violation Final Assessed Penalty (adjusted for limits) \$283	

Economic Benefit Worksheet

Respondent: Valero Refining-Texas, L.P.
 Case ID No: 30300
 Reg. Ent. Reference No: RN100238385
 Media [Statute]: Air Quality
 Violation No: 8

Percent Interest	Years of Depreciation
5.0	15

Item	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	\$250	27-Feb-2006	28-Feb-2006	0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs: Estimated cost to procure proper record keeping procedures designed to submit final reports on time. Date Required is based on the due date for the report. Final Date is the date report was submitted.

Avoided Costs							
ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)							
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs:

Approx. Cost of Compliance \$250 TOTAL \$0

Screening Date	18-Jul-2006	Docket No.	2006-1067-AIR-E	PCW
Respondent	Valero Refining-Texas, L.P.			<i>Policy Revision 2 (September 2002)</i>
Case ID No.	30300			<i>PCW Revision April 25, 2006</i>
Reg. Ent. Reference No.	RN100238385			
Media [Statute]	Air Quality			
Enf. Coordinator	Bryan Elliott			
Violation Number	9			
Primary Rule Cite(s)	30 Tex. Admin. Code § 101.201(b)(1)(H)			
Secondary Rule Cite(s)	Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failure to provide the preconstruction authorization number on the final report for a reportable emissions event (Incident No. 76064) which occurred on May 19, 2006, as documented during the July 5, 2006 investigation.			
		Base Penalty	\$10,000	

>> **Environmental, Property and Human Health Matrix**

OR	Harm				Percent
	Release	Major	Moderate	Minor	
	Actual	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

>> **Programmatic Matrix**

	Falsification	Major	Moderate	Minor	Percent
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
					1%

Matrix Notes: Less than 30% of the rule requirement was not met.

Adjustment - \$9,900

Base Penalty Subtotal \$100

Violation Events

Number of Violation Events Number of violation days

mark only one use a small x	daily	<input type="checkbox"/>
	monthly	<input type="checkbox"/>
	quarterly	<input type="checkbox"/>
	semiannual	<input type="checkbox"/>
	annual	<input type="checkbox"/>
	single event	<input checked="" type="checkbox"/>

Violation Base Penalty \$100

One single event is recommended.

Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount \$4	Violation Final Penalty Total \$283
This violation Final Assessed Penalty (adjusted for limits) \$283	

Economic Benefit Worksheet

Respondent Valero Refining-Texas, L.P.
Case ID No. 30300
Reg. Ent. Reference No. RN100238385
Media [Statute] Air Quality
Violation No. 9

Percent Interest	Years of Depreciation
5.0	15

Item	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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Description No commas or \$

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System	\$100	02-Jun-2006	02-Mar-2007	0.7	\$4	n/a	\$4
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0

Notes for DELAYED costs Estimated cost to procure proper record keeping procedures designed to submit reports containing all required information. Date Required is based on the due date for the report. Final Date is the date of prospective compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$100

TOTAL \$4

