

EXECUTIVE SUMMARY - ENFORCEMENT MATTER

DOCKET NO.: 2007-1789-AIR-E **TCEQ ID:** RN100211879 **CASE NO.:** 34902

RESPONDENT NAME: Shell Oil Company

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
<p>SITE WHERE VIOLATION(S) OCCURRED: Shell Oil Deer Park, 5900 Highway 225, Deer Park, Harris County</p> <p>TYPE OF OPERATION: Petroleum refinery</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There are eight additional pending enforcement actions regarding this facility location, Docket Nos. 2008-0283-AIR-E, 2008-0635-AIR-E, 2006-0328-MLM-E, 2007-0837-AIR-E, 2007-1218-AIR-E, 2007-1472-AIR-E, 2007-2001-AIR-E, and 2008-0079-AIR-E.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on August 4, 2008. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: Ms. Melissa Keller, SEP Coordinator, Enforcement Division, MC 219, (512) 239-1768 TCEQ Enforcement Coordinator: Mr. Bryan Elliott, Enforcement Division, Enforcement Team 4, MC 149, (512) 239-6162; Mr. Bryan Sinclair, Enforcement Division, MC 219, (512) 239-2171 Respondent: Ms. Joyce Williams, Air Compliance Specialist, Shell Oil Company, 5900 Highway 225, Deer Park, Texas 77536 Mr. Aamir Farid, General Manager, Shell Oil Company, 5900 Highway 225, Deer Park, Texas 77536 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <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: July 11, September 4, and May 10, 2007</p> <p>Date of NOV/NOE Relating to this Case: September 14, November 2, and November 3, 2007 (NOE)</p> <p>Background Facts: These were routine investigations.</p> <p>AIR</p> <p>1) Failure to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 116.715(a) and 101.20(3), TEX. HEALTH & SAFETY CODE § 382.085(b), and New Source Review ("NSR") Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1].</p> <p>2) Failure to keep a flame present at a flare at all times [30 TEX. ADMIN. CODE §§ 101.20(3) and 101.221(a), 40 CODE OF FEDERAL REGULATIONS § 60.18(c)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].</p> <p>3) Failure to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 116.715(a) and 101.20(3), TEX. HEALTH & SAFETY CODE § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1].</p> <p>4) Failure to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 116.715(a) and 101.20(3), TEX. HEALTH & SAFETY CODE § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1].</p>	<p>Total Assessed: \$80,000</p> <p>Total Deferred: \$0 <input type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$40,000</p> <p>Total Paid to General Revenue: \$40,000</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <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 Orders Justification: Unauthorized emissions which are excessive emissions events.</p> <p>Excessive Emissions Event Determination Factors:</p> <p>1) 30 TEX. ADMIN. CODE § 101.222(a)(2) The cause of the emissions event was poor operation practices. The pressure transmitter alarm was deactivated for troubleshooting but was not re-activated when troubleshooting was completed. As a result, personnel were not alerted to the failure of the transmitter until after the unit began to recycle which led to the compressor trip and prolonged flaring.</p> <p>2) 30 TEX. ADMIN. CODE § 101.222(a)(4) The duration of the emissions event was extended because of poor operation practices.</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:</p> <p>a. On August 22, 2007, to address the emissions event that occurred on July 19, 2007:</p> <p>i. Installed a new 3000 Volt-Amps ("VA") Constant Voltage Transformer ("CVT") on the Alternating Current ("AC") input to C-3150s exciter circuit;</p> <p>ii. Replaced the existing 2000 VA CVT on the AC input to C-70001s exciter circuit with a 3000 VA CVT;</p> <p>b. By December 28, 2007, to address the emissions event that occurred from May 28 to 29, 2007:</p> <p>i. Provided refresher training for all East Tank Farm operators on a revised pilot lighting procedure; and</p> <p>ii. Installed two supplementary flare pilots on the East Property Flare.</p> <p>Ordering Provisions:</p> <p>1) The Order will require the Respondent to implement and complete a Supplemental Environmental Project (SEP). (See SEP Attachment A)</p> <p>2) The Order will also require the Respondent to:</p> <p>a. Respond completely and adequately, as determined by the Executive Director, to all written requests for information concerning the submitted Corrective Action Plan ("CAP"), in conjunction with the April 24, 2007 excessive emissions event, within 15 days after the date of such requests, or by any other deadline specified in writing;</p> <p>b. Upon Commission approval, implement the CAP, in accordance with the approved schedule; and</p>

		c. Upon completion of CAP implementation, submit written certification to demonstrate compliance with Ordering Provisions Nos. 2.a. and 2.b.
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Additional ID No(s):: HG0659W

Attachment A
Docket Number: 2007-1789-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Shell Oil Company
Payable Penalty Amount:	Eighty Thousand Dollars (\$80,000)
SEP Amount:	Forty Thousand Dollars (\$40,000)
Type of SEP:	Pre-approved
Third-Party Recipient:	Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program
Location of SEP:	Harris County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent will contribute to Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program in Harris County. The contribution will be used in accordance with the *Supplemental Environmental Project Agreement between the Houston-Galveston AERCO and the Texas Commission on Environmental Quality*.

SEP monies will be used to aid local school districts and area transit agencies in reaching local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP monies will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. Those SEP monies will be used exclusively by the school districts and transit agencies as supplements to meet the local match requirements of the EPA. SEP monies will be used to pay for the cost of replacing older diesel buses with alternative fueled or clean diesel buses. The old buses will be permanently retired and only sold for scrap. The schools and transit agencies will also use the SEP monies to retrofit more buses to reduce emissions. Houston-Galveston AERCO will send the TCEQ verification in the form of paid invoices and other documentation to show that the retrofits were completed. Retrofit technologies include particulate matter traps, diesel particulate matter filters, NOx reduction catalyst technology in combination with diesel particulate filters, and other emission control technologies that are developed and approved by EPA or the California Air Resources Board.

The Respondent certifies that there is no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Houston-Galveston Area Council
Houston-Galveston AERCO
P.O. Box 22777
Houston, Texas 77227-2777

3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to "Texas Commission on Environmental Quality" and mailed to:

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

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.



Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002)

PCW Revision June 26, 2007

TCEQ

DATES	Assigned	20-Aug-2007	Screening	7-Sep-2007	EPA Due	10-May-2008
	PCW	7-Sep-2007				

RESPONDENT/FACILITY INFORMATION	
Respondent	Shell Oil Company
Reg. Ent. Ref. No.	RN100211879
Facility/Site Region	12-Houston
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	34902	No. of Violations	8
Docket No.	2007-1789-AIR-E	Order Type	Findings
Media Program(s)	Air	Enf. Coordinator	Bryan Elliott
Multi-Media		EC's Team	EnforcementTeam 4
Admin. Penalty \$	Limit Minimum \$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$50,000
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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	343% Enhancement	Subtotals 2, 3, & 7	\$171,500
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Notes: Penalty enhancement due to 32 NOVs for same or similar violations, 42 NOVs for unrelated violations, five 1660 style orders, two findings orders, and one court order with a denial of liability. Penalty reduction due to 48 NOAs, nine DOVs, one EMS, and the participation in a voluntary pollution reduction program.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the 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 x)

Notes: The Respondent does not meet the good faith criteria.

Total EB Amounts	\$362	0% Enhancement*	Subtotal 6	\$0
Approx. Cost of Compliance	\$10,000	*Capped at the Total EB \$ Amount		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$221,500
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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	\$221,500
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$80,000
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DEFERRAL	0% Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes: No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$80,000
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Screening Date 7-Sep-2007

Docket No. 2007-1789-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 2 (September 2002)

Case ID No. 34902

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

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 (number of NOVs meeting criteria)	32	160%
	Other written NOVs	42	84%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	5	100%
	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	2	50%
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 (number of judgements or consent decrees meeting criteria)	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 (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	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 (number of audits for which notices were submitted)	48	-48%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	9	-18%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	Yes	-10%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	Yes	-5%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 343%

>> **Repeat Violator (Subtotal 3)**

No

Adjustment Percentage (Subtotal 3) 0%

>> **Compliance History Person Classification (Subtotal 7)**

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> **Compliance History Summary**

Compliance History Notes

Penalty enhancement due to 32 NOVs for same or similar violations, 42 NOVs for unrelated violations, five 1660 style orders, two findings orders, and one court order with a denial of liability. Penalty reduction due to 48 NOAs, nine DOVs, one EMS, and the participation in a voluntary pollution reduction program.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 343%

Screening Date 7-Sep-2007
 Respondent Shell Oil Company
 Case ID No. 34902

Docket No. 2007-1789-AIR-E

PCW

Policy Revision 2 (September 2002)

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a), 101.20(3), and 101.221(a), 40 Code of Federal Regulations § 60.18(c)(2), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1

Violation Description Failed to keep a flame present at a flare at all times and failed to comply with permitted emissions limits, as documented during an investigation on July 11, 2007. Specifically, an emissions event occurred from May 28 to 29, 2007 at the East Property Flare (Emission Point No. FLAREEP) due to an outage of the flare's pilot flame, which lasted for nine hours and five minutes, resulting in the release of 4,653.60 pounds ("lbs") of hydrocarbons, including 3099.50 lbs of volatile organic compounds ("VOCs"), 0.30 lbs of carbon monoxide ("CO"), 408 lbs of hydrogen, and 429.50 lbs of hydrogen sulfide ("H2S"). This emissions event failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.

Base Penalty

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text" value="50%"/>
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" value="0%"/>

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

Violation Events

Number of Violation Events Number of violation days

mark only one with an x	daily	<input type="text"/>
	monthly	<input checked="" type="text" value="x"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input type="text"/>

Violation Base Penalty

One monthly 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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
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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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				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)	\$2,500	28-May-2007	28-Dec-2007	0.6	\$73	n/a	\$73

Notes for DELAYED costs

Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is the date of the emissions event and Final Date is the 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

\$2,500

TOTAL

\$73

Screening Date 7-Sep-2007

Docket No. 2007-1789-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 2 (September 2002)

Case ID No. 34902

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1

Violation Description

Failed to comply with permitted emissions limits, as documented during an investigation on September 4, 2007. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 40,859 lbs of sulfur dioxide ("SO2"). 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

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Percent

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Percent

Matrix Notes

Human health or the environment was exposed to significant amounts of pollutants which did exceed levels protective of human health or environmental receptors as a result of the violation.

Adjustment

Violation Events

Number of Violation Events

Number of violation days

mark only one with an x

daily	<input checked="" type="checkbox"/>
monthly	<input type="checkbox"/>
quarterly	<input type="checkbox"/>
semiannual	<input type="checkbox"/>
annual	<input type="checkbox"/>
single event	<input type="checkbox"/>

Violation Base Penalty

One daily 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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
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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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				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)	\$2,500	19-Jul-2007	22-Aug-2007	0.1	\$12	n/a	\$12

Notes for DELAYED costs

Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is the date of the emissions event and Final Date is the 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

\$2,500

TOTAL

\$12

Screening Date 7-Sep-2007

Docket No. 2007-1789-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 2 (September 2002)

Case ID No. 34902

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1

Violation Description

Failed to comply with permitted emissions limits, as documented during an investigation on September 4, 2007. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 62,989 lbs of CO. 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

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Percent

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Percent

Matrix Notes

Human health or the environment was exposed to significant amounts of pollutants which did exceed levels protective of human health or environmental receptors as a result of the violation.

Adjustment

Violation Events

Number of Violation Events

Number of violation days

mark only one with an x

daily	<input checked="" type="checkbox"/>
monthly	<input type="checkbox"/>
quarterly	<input type="checkbox"/>
semiannual	<input type="checkbox"/>
annual	<input type="checkbox"/>
single event	<input type="checkbox"/>

Violation Base Penalty

One daily 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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
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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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				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

Economic Benefit is included in Violation No. 2.

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

\$0

TOTAL

\$0

Screening Date 7-Sep-2007

Docket No. 2007-1789-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 2 (September 2002)

Case ID No. 34902

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1

Violation Description

Failed to prevent unauthorized emissions, as documented during an investigation on September 4, 2007. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 8,721 lbs of nitrogen oxides ("NOx"). This emissions event failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.

Base Penalty

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input checked="" type="text" value="x"/>	<input type="text"/>	<input type="text" value="50%"/>
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" value="0%"/>

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

Violation Events

Number of Violation Events Number of violation days

mark only one with an x	daily	<input type="text"/>
	monthly	<input checked="" type="text" value="x"/>
	quarterly	<input type="text"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input type="text"/>

Violation Base Penalty

One monthly 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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

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

Economic Benefit is included in Violation No. 2.

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

\$0

TOTAL

\$0

Screening Date 7-Sep-2007
Respondent Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media [Statute] Air
Enf. Coordinator Bryan Elliott

Docket No. 2007-1789-AIR-E

PCW

Policy Revision 2 (September 2002)

PCW Revision June 26, 2007

Violation Number
Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1
Violation Description Failed to prevent unauthorized emissions, as documented during an investigation on September 4, 2007. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 1,620 lbs of VOCs, 18 lbs of particulate matter ("PM"), and 435 lbs of H2S. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
Actual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="x"/>	<input type="text" value="25%"/>
Potential	<input type="text"/>	<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" value="0%"/>

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

Violation Events

Number of Violation Events Number of violation days

<i>mark only one with an x</i>	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input type="text" value="x"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input type="text"/>

Violation Base Penalty

One quarterly 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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
Violation No. 5

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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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				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

Economic Benefit is included in Violation No. 2.

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

\$0

TOTAL

\$0

Screening Date 7-Sep-2007

Docket No. 2007-1789-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 2 (September 2002)

Case ID No. 34902

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1

Violation Description

Failed to prevent unauthorized emissions, as documented during an investigation on May 10, 2007. Specifically, an excessive emissions event began on April 24, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for four hours and 51 minutes, resulting in the release of 132,220 lbs of SO₂. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.

Base Penalty

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text" value="100%"/>
	Potential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text" value="0%"/>

Matrix Notes

Human health or the environment was exposed to significant amounts of pollutants which did exceed levels protective of human health or environmental receptors as a result of the violation.

Adjustment

Violation Events

Number of Violation Events Number of violation days

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

Violation Base Penalty

One daily 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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
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
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)	\$5,000	24-Apr-2007	1-Jun-2008	1.1	\$277	n/a	\$277

Notes for DELAYED costs
 Estimated cost for additional oversight and management practices designed to ensure proper maintenance practices are followed. Date Required is the date of the emissions event and 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 TOTAL
\$5,000 \$277

Screening Date 7-Sep-2007

Docket No. 2007-1789-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 2 (September 2002)

Case ID No. 34902

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Bryan Elliott

Violation Number

Rule Cite(s) 30 Tex. Admin. Code §§ 116.715(a) and 101.20(3), Tex. Health & Safety Code § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1

Violation Description

Failed to prevent unauthorized emissions, as documented during an investigation on May 10, 2007. Specifically, an excessive emissions event began on April 24, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for four hours and 51 minutes, resulting in the release of 5,861.20 lbs of VOCs. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 Tex. Admin. Code § 101.222.

Base Penalty

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input checked="" type="checkbox"/>	<input type="text"/>	<input type="text" value="50%"/>
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" value="0%"/>

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

Violation Events

	<input type="text" value="1"/>	<input type="text" value="1"/>	Number of violation days
mark only one with an x	daily	<input type="text"/>	Violation Base Penalty <input type="text" value="\$5,000"/>
	monthly	<input checked="" type="checkbox"/>	
	quarterly	<input type="text"/>	
	semiannual	<input type="text"/>	
	annual	<input type="text"/>	
	single event	<input type="text"/>	

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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
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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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				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

Economic Benefit is included in Violation No. 6.

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

\$0

TOTAL

\$0

Screening Date 7-Sep-2007
Respondent Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media [Statute] Air
Enf. Coordinator Bryan Elliott

Docket No. 2007-1789-AIR-E

PCW

Policy Revision 2 (September 2002)
PCW Revision June 26, 2007

Violation Number

Rule Cite(s)

Violation Description

Base Penalty

>> Environmental, Property and Human Health Matrix

Release	Harm			Percent
	Major	Moderate	Minor	
Actual	<input type="text"/>	<input type="text"/>	<input checked="" type="checkbox"/>	<input type="text" value="25%"/>
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" value="0%"/>

Matrix Notes

Adjustment

Violation Events

Number of violation days

<i>mark only one with an x</i>	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	<input checked="" type="checkbox"/>
	semiannual	<input type="text"/>
	annual	<input type="text"/>

Violation Base Penalty

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 Shell Oil Company
Case ID No. 34902
Reg. Ent. Reference No. RN100211879
Media Air
Violation No. 8

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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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				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

Economic Benefit is included in Violation No. 6.

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

\$0

TOTAL

\$0

Compliance History

Customer/Respondent/Owner-Operator:	CN601542012	Shell Oil Company	Classification: AVERAGE	Rating: 4.49
Regulated Entity:	RN100211879	SHELL OIL DEER PARK	Classification: AVERAGE	Site Rating: 4.03
ID Number(s):	AIR OPERATING PERMITS	ACCOUNT NUMBER	HG0659W	
	AIR OPERATING PERMITS	PERMIT	1669	
	AIR OPERATING PERMITS	PERMIT	1668	
	AIR OPERATING PERMITS	PERMIT	1940	
	AIR OPERATING PERMITS	PERMIT	1941	
	AIR OPERATING PERMITS	PERMIT	1942	
	AIR OPERATING PERMITS	PERMIT	1943	
	AIR OPERATING PERMITS	PERMIT	1945	
	AIR OPERATING PERMITS	PERMIT	1946	
	AIR OPERATING PERMITS	PERMIT	1947	
	AIR OPERATING PERMITS	PERMIT	1948	
	AIR OPERATING PERMITS	PERMIT	2108	
	AIR OPERATING PERMITS	PERMIT	3179	
	WASTEWATER	PERMIT	WQ0000402000	
	WASTEWATER	PERMIT	TPDES0004863	
	WASTEWATER	PERMIT	TX0004863	
	WASTEWATER	PERMIT	WQ0000403000	
	WASTEWATER	PERMIT	TPDES0004871	
	AIR NEW SOURCE PERMITS	PERMIT	3180	
	AIR NEW SOURCE PERMITS	PERMIT	21262	
	AIR NEW SOURCE PERMITS	REGISTRATION	54895	
	AIR NEW SOURCE PERMITS	REGISTRATION	55312	
	AIR NEW SOURCE PERMITS	REGISTRATION	76382	
	AIR NEW SOURCE PERMITS	REGISTRATION	75524	
	AIR NEW SOURCE PERMITS	REGISTRATION	55730	
	AIR NEW SOURCE PERMITS	REGISTRATION	55869	
	AIR NEW SOURCE PERMITS	REGISTRATION	55717	
	AIR NEW SOURCE PERMITS	REGISTRATION	76315	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX815	
	AIR NEW SOURCE PERMITS	PERMIT	70613	
	AIR NEW SOURCE PERMITS	PERMIT	48912	
	AIR NEW SOURCE PERMITS	PERMIT	70389	
	AIR NEW SOURCE PERMITS	PERMIT	56476	
	AIR NEW SOURCE PERMITS	PERMIT	56496	
	AIR NEW SOURCE PERMITS	PERMIT	70903	
	AIR NEW SOURCE PERMITS	PERMIT	71223	
	AIR NEW SOURCE PERMITS	REGISTRATION	71567	
	AIR NEW SOURCE PERMITS	PERMIT	50815	
	AIR NEW SOURCE PERMITS	PERMIT	54061	
	AIR NEW SOURCE PERMITS	PERMIT	52476	
	AIR NEW SOURCE PERMITS	PERMIT	52477	
	AIR NEW SOURCE PERMITS	PERMIT	50548	
	AIR NEW SOURCE PERMITS	PERMIT	52565	
	AIR NEW SOURCE PERMITS	PERMIT	52089	
	AIR NEW SOURCE PERMITS	PERMIT	52088	
	AIR NEW SOURCE PERMITS	PERMIT	50388	
	AIR NEW SOURCE PERMITS	PERMIT	50423	
	AIR NEW SOURCE PERMITS	PERMIT	70612	
	AIR NEW SOURCE PERMITS	REGISTRATION	74572	
	AIR NEW SOURCE PERMITS	REGISTRATION	75045	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX896	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX928	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX928M1	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX961	
	AIR NEW SOURCE PERMITS	EPA ID	PSDTX974	
	AIR NEW SOURCE PERMITS	REGISTRATION	77284	
	AIR NEW SOURCE PERMITS	REGISTRATION	76699	
	AIR NEW SOURCE PERMITS	REGISTRATION	77952	
	AIR NEW SOURCE PERMITS	REGISTRATION	76265	
	AIR NEW SOURCE PERMITS	REGISTRATION	78839	
	AIR NEW SOURCE PERMITS	REGISTRATION	78864	
	AIR NEW SOURCE PERMITS	REGISTRATION	78624	
	AIR NEW SOURCE PERMITS	REGISTRATION	78816	
	AIR NEW SOURCE PERMITS	PERMIT	6949	
	AIR NEW SOURCE PERMITS	PERMIT	7855	
	AIR NEW SOURCE PERMITS	PERMIT	9856	
	AIR NEW SOURCE PERMITS	PERMIT	11177	
	AIR NEW SOURCE PERMITS	PERMIT	12152	
	AIR NEW SOURCE PERMITS	PERMIT	12537	
	AIR NEW SOURCE PERMITS	PERMIT	13373	
	AIR NEW SOURCE PERMITS	PERMIT	13713	
	AIR NEW SOURCE PERMITS	PERMIT	16429	
	AIR NEW SOURCE PERMITS	PERMIT	1119	
	AIR NEW SOURCE PERMITS	PERMIT	1120	
	AIR NEW SOURCE PERMITS	PERMIT	3178	
	AIR NEW SOURCE PERMITS	PERMIT	3179	
	AIR NEW SOURCE PERMITS	PERMIT	3216	
	AIR NEW SOURCE PERMITS	PERMIT	5801	
	AIR NEW SOURCE PERMITS	PERMIT	6791	

AIR NEW SOURCE PERMITS	PERMIT	7621
AIR NEW SOURCE PERMITS	PERMIT	9334
AIR NEW SOURCE PERMITS	PERMIT	10888
AIR NEW SOURCE PERMITS	PERMIT	11096
AIR NEW SOURCE PERMITS	PERMIT	11586
AIR NEW SOURCE PERMITS	PERMIT	12373
AIR NEW SOURCE PERMITS	PERMIT	12829
AIR NEW SOURCE PERMITS	PERMIT	13678
AIR NEW SOURCE PERMITS	PERMIT	15961
AIR NEW SOURCE PERMITS	PERMIT	8236
AIR NEW SOURCE PERMITS	PERMIT	9505
AIR NEW SOURCE PERMITS	PERMIT	15262
AIR NEW SOURCE PERMITS	PERMIT	15365
AIR NEW SOURCE PERMITS	PERMIT	15499
AIR NEW SOURCE PERMITS	PERMIT	15940
AIR NEW SOURCE PERMITS	PERMIT	18209
AIR NEW SOURCE PERMITS	PERMIT	18576
AIR NEW SOURCE PERMITS	PERMIT	18738
AIR NEW SOURCE PERMITS	PERMIT	18768
AIR NEW SOURCE PERMITS	PERMIT	19849
AIR NEW SOURCE PERMITS	PERMIT	22038
AIR NEW SOURCE PERMITS	PERMIT	23273
AIR NEW SOURCE PERMITS	PERMIT	24096
AIR NEW SOURCE PERMITS	PERMIT	24874
AIR NEW SOURCE PERMITS	PERMIT	26368
AIR NEW SOURCE PERMITS	PERMIT	27598
AIR NEW SOURCE PERMITS	PERMIT	29597
AIR NEW SOURCE PERMITS	PERMIT	32282
AIR NEW SOURCE PERMITS	PERMIT	33524
AIR NEW SOURCE PERMITS	PERMIT	34230
AIR NEW SOURCE PERMITS	PERMIT	34358
AIR NEW SOURCE PERMITS	PERMIT	35243
AIR NEW SOURCE PERMITS	PERMIT	35608
AIR NEW SOURCE PERMITS	PERMIT	37206
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HG0659W
AIR NEW SOURCE PERMITS	AFS NUM	4820100039
AIR NEW SOURCE PERMITS	PERMIT	96
AIR NEW SOURCE PERMITS	PERMIT	97
AIR NEW SOURCE PERMITS	PERMIT	266
AIR NEW SOURCE PERMITS	PERMIT	747
AIR NEW SOURCE PERMITS	PERMIT	748
AIR NEW SOURCE PERMITS	PERMIT	920
AIR NEW SOURCE PERMITS	PERMIT	1920
AIR NEW SOURCE PERMITS	PERMIT	1968
AIR NEW SOURCE PERMITS	PERMIT	2597
AIR NEW SOURCE PERMITS	PERMIT	3173
AIR NEW SOURCE PERMITS	PERMIT	3177
AIR NEW SOURCE PERMITS	PERMIT	3214
AIR NEW SOURCE PERMITS	PERMIT	3215
AIR NEW SOURCE PERMITS	PERMIT	3217
AIR NEW SOURCE PERMITS	PERMIT	3218
AIR NEW SOURCE PERMITS	PERMIT	3219
AIR NEW SOURCE PERMITS	PERMIT	3985A
AIR NEW SOURCE PERMITS	PERMIT	4256
AIR NEW SOURCE PERMITS	PERMIT	4406
AIR NEW SOURCE PERMITS	PERMIT	4596
AIR NEW SOURCE PERMITS	PERMIT	4933
AIR NEW SOURCE PERMITS	PERMIT	41920
AIR NEW SOURCE PERMITS	PERMIT	41875
AIR NEW SOURCE PERMITS	PERMIT	42221
AIR NEW SOURCE PERMITS	PERMIT	42573
AIR NEW SOURCE PERMITS	PERMIT	42512
AIR NEW SOURCE PERMITS	PERMIT	43605
AIR NEW SOURCE PERMITS	PERMIT	42118
AIR NEW SOURCE PERMITS	PERMIT	45654
AIR NEW SOURCE PERMITS	PERMIT	45653
AIR NEW SOURCE PERMITS	PERMIT	45652
AIR NEW SOURCE PERMITS	PERMIT	45944
AIR NEW SOURCE PERMITS	PERMIT	46535
AIR NEW SOURCE PERMITS	PERMIT	47575
AIR NEW SOURCE PERMITS	REGISTRATION	79604
AIR NEW SOURCE PERMITS	REGISTRATION	80525
AIR NEW SOURCE PERMITS	REGISTRATION	80503
AIR NEW SOURCE PERMITS	REGISTRATION	81503
AIR NEW SOURCE PERMITS	REGISTRATION	81971
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD067285973
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30007
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50099
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50099
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50099
UNDERGROUND INJECTION CONTROL	PERMIT	WDW172

UNDERGROUND INJECTION CONTROL	PERMIT	WDW173
PETROLEUM STORAGE TANK STAGE II	REGISTRATION	32780
WASTEWATER LICENSING	LICENSE	WQ0000402000
WATER LICENSING	LICENSE	1010320
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	6001443
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1010320
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30007
INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50099
COMPLIANCE PLANS		
PETROLEUM STORAGE TANK	REGISTRATION	32780
REGISTRATION		

Location: 5900 HIGHWAY 225, DEER PARK, TX, 77536 Rating Date: September 01 07 Repeat Violator: NO

TCEQ Region: REGION 12 - HOUSTON
Date Compliance History Prepared: December 05, 2007
Agency Decision Requiring Compliance History: Enforcement
Compliance Period: December 05, 2002 to December 05, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Bryan Elliott Phone: 239-6162

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?
 - Shell Deer Park Refining Company
 - Shell Chemical LP
 - Shell Oil Company
 - Deer Park Refining Limited Partnership
4. If Yes, who was/were the prior owner(s)?
 - Equilon Enterprises LLC
5. When did the change(s) in ownership occur?
 - 06/10/2004

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
- | | | |
|--------------------------|---|----------------------------|
| Classification: Moderate | Effective Date: 06/12/2003 | ADMINORDER 2002-0478-AIR-E |
| Citation: | 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
40 CFR Part 61, Subpart V 61.242-6(a)(1)
5C THC Chapter 382, SubChapter A 382.085(b) | |
| Rqmt Prov: | SC 4 PERMIT | |
| Description: | Failure to install redundant valves or end caps on open ended lines. | |
| Classification: Moderate | | |
| Citation: | 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(1)(i)

5C THC Chapter 382, SubChapter A 382.085(b) | |
| Description: | Failure to adjust monitoring schedule to monthly from quarterly when leak rate exceeds 2%. | |
| Classification: Moderate | | |
| Citation: | 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.120

40 CFR Part 63, Subpart G 63.114(a)(1)(ii)
5C THC Chapter 382, SubChapter A 382.085(b) | |
| Rqmt Prov: | SC 2 PERMIT | |
| Description: | Failure to install a temperature monitoring device in the gas stream immediately before and after the catalyst bed. | |
| Classification: Moderate | | |
| Citation: | 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b) | |
| Rqmt Prov: | SC 8(A) PERMIT | |
| Description: | Failure to operate incinerator H9200 at a VOC outlet concentration of less than 20 ppmv. | |

Effective Date: 08/30/2004

ADMINORDER 2003-1321-AIR-E

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: MAERT PERMIT

Description: Failed to comply with the permitted limit established in the MAERT of Air Permit No. 9334 for benzene. Specifically, Shell failed to prevent the unauthorized emission of benzene at the ACU Tank Farm, Tank D-371, for a period of 58 minutes on April 28, 2003. The permitted benzene limit for Tank D-371 is 0.45 lbs/hour.

Effective Date: 09/26/2004

ADMINORDER 2004-0101-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 113, SubChapter C 113.120

40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.7(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.116(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to conduct flare performance testing in accordance with 40 CFR 63.11 within 180 days of startup or rule applicability.

Effective Date: 08/20/2005

ADMINORDER 2004-0867-IHW-E

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.224(11)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.103(c)

Description: Failure to conduct compliance testing for the PHenol-3 BIF and submit recertification of compliance within three years of the previous certification.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.224(14)

Description: Failure to cease the burning of waste in the Phenol-3 BIF on October 12, 2003.

Effective Date: 02/20/2006

ADMINORDER 2005-0765-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)

30 TAC Chapter 116, SubChapter G 116.721(a)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: Failed to obtain control emissions from an emissions event that occurred on December 21, 2000 at the Coker Unit.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(7)
30 TAC Chapter 101, SubChapter F 101.201(b)(8)

30 TAC Chapter 101, SubChapter F 101.201(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete final report for a reportable emissions event which occurred at the Coker Unit on December 21, 2000.

Effective Date: 02/20/2006

ADMINORDER 2005-0734-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter B 116.116(b)(1)

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

Rqmt Prov: Special Condition 1 PERMIT

Description: Failed to prevent a power outage at Switchback 6B13 which resulted in unauthorized emissions from the HIPA Flare, HIPA Vent, Benji Vent (PC5500A), and Relief Valves RV0624, RV3033B, and RV0298 on May 9, 2004. Category A.11.i(6).

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Also No. 3219, GC #8 PERMIT

Description: Failed to maintain the ratio of hydrogen to acetylene in the converter resulting in the flaring of off-specification product resulting in excess emissions from the OP2 Elevated Flare, OP3 Elevated Flare, and OP3 Ground Flare on June 17, 2004.

Classification: Major

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

Rqmt Prov: SC #1 PERMIT

Description: Failed to prevent the lifting of Relief Valve RV3033B on the fat acid storage tank (T-75B) on June 27, 2004 which resulted in unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.116(b)(1)

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

Rqmt Prov: Also No. 3219, GC #8 PERMIT

Description: Failed to maintain steam pressure on the Olefins 2 Unit and operated the Propylene Refrigerator Compressor with a faulty suction/pressure indicating controller resulting in the flaring of off-specification products at the OP2 Elevated Flare, OP3 Elevated Flare, and OP3 Ground Flare on September 13, 2004.

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter B 116.116(b)(1)

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

Rqmt Prov: NSR Permit #3173, Special Condition #1 PA

Description: Failed to comply with the maximum allowable emission rates for carbon monoxide, volatile organic compounds ("VOC"), and nitrogen oxides and varied from permit representations for VOC emissions from the IPA Purge Line on September 6, 2004

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Also Permit No. 3219, Gen. Condition 8 PERMIT

Description: Failed to control the ammonia concentration in the sour hydrogen feed resulting in excess emissions from the OP2 Elevated Flare, OP3 Elevated Flare, and OP3 Ground Flare on May 22, 2004. Category A.11.i(6).

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit initial notification of a reportable emissions event at the Isopropyl Alcohol (IPA) Unit which occurred on September 6, 2004 within 24 hours of discovery.

Effective Date: 05/12/2006

ADMINORDER 2005-1614-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to report the December 25, 2004 emissions event within 24 hours of discovery.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No 3214, Gen Cond. No. 8 OP

Description: Failed to prevent unauthorized emissions of 241 lbs of 1, 3-Butadiene, 322 lbs of Butene, 1,299 lbs of Pentane, 2,182 lbs of Ethylene, 68 lbs of Benzene and 1,018 lbs of Propylene during a 10 hour and 30 minute emissions event that occurred on December 25, 2004 in the OP3 Unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: General Condition #8 PERMIT

Description: Failed to prevent unauthorized emissions of 686 lbs of 1, 3-Butadiene, 949 lbs of Butene, 1,299 lbs of Pentane, 4,059 lbs of Ethylene and 2,044 lbs of Propylene during a 23 minute emissions event that occurred on February 17, 2005 in the Olefins No. 3 Unit ("OP3").

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No. 3219, Max. Allow. Em. Rate Ta PERMIT

Description: Failed to prevent unauthorized emissions of 1847.7 lbs of Ethylene, 680.70 lbs of Carbon Monoxide, and 87.3 lbs of Nitrogen Monoxide during a 3-hour emissions event that occurred on February 24, 2005 at the Acetylene Converters in the Olefins #2 Unit.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Permit No. 3219, Gen. Cond. No. 8 OP
 Description: Failed to prevent unauthorized emissions of 404 lbs of volatile organic compounds ("VOC") in one hour on January 13, 2005 in the OP2 Unit Elevated Flare. Specifically, 868 lbs of VOCs were released and the VOC maximum allowable emission rate for the flare is 464 lbs per hour.

Effective Date: 08/29/2006

COURTORDER

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.4
 30 TAC Chapter 101, SubChapter A 101.5

30 TAC Chapter 111, SubChapter B 111.201

Description: Shell caused, suffered, allowed the outdoor burning of low sulfur diesel fuel and heavy crude oil sludge in such concentration and of such duration to interfere with the normal use and enjoyment of property and caused a freeway closure.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.4
 30 TAC Chapter 101, SubChapter A 101.5

30 TAC Chapter 111, SubChapter B 111.201

Description: Shell caused, suffered, allowed the outdoor burning of natural gas in such concentration and of such duration to interfere with the normal use and enjoyment of property and caused a freeway closure.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 116, SubChapter G 116.715(c)(7)

Rqmt Prov: mact rates PERMIT
 Description: Exceeded maximum allowable emission rates for hydrogen sulfide.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.4
 Description: Discharged approximately 327 pounds of unspiciated VOC resulting in air contaminants in such concentration and duration so as to interfere with the normal use and enjoyment of property in teh area.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1	12/06/2002	(13895)
2	12/09/2002	(14114)
3	12/17/2002	(16626)
4	12/19/2002	(13703)
5	12/23/2002	(157770)
6	12/23/2002	(15106)
7	12/30/2002	(157725)
8	12/31/2002	(13462)
9	01/09/2003	(19750)
10	01/10/2003	(20830)
11	01/13/2003	(246531)
12	01/24/2003	(17948)
13	01/27/2003	(157729)
14	01/28/2003	(157774)
15	02/05/2003	(23703)
16	02/10/2003	(157684)
17	02/12/2003	(24287)
18	02/13/2003	(22044)
19	02/20/2003	(10139)
20	02/24/2003	(157683)
21	02/24/2003	(22731)
22	02/28/2003	(157734)
23	03/25/2003	(157687)
24	03/31/2003	(10812)
25	03/31/2003	(157737)
26	04/03/2003	(19124)
27	04/23/2003	(157693)
28	04/29/2003	(157742)
29	05/09/2003	(26339)
30	05/10/2003	(450832)
31	05/11/2003	(26340)
32	05/22/2003	(157697)
33	05/27/2003	(157746)
34	05/30/2003	(36614)
35	06/05/2003	(29924)
36	06/16/2003	(114383)
37	06/24/2003	(157701)
38	06/25/2003	(157750)
39	06/26/2003	(60695)

40	06/28/2003	(33595)
41	07/23/2003	(284079)
42	07/23/2003	(295231)
43	07/25/2003	(157705)
44	07/25/2003	(157709)
45	08/06/2003	(114294)
46	08/12/2003	(148558)
47	08/23/2003	(36650)
48	08/26/2003	(295233)
49	08/29/2003	(149848)
50	09/22/2003	(295235)
51	09/25/2003	(295217)
52	10/22/2003	(249626)
53	10/23/2003	(295219)
54	10/27/2003	(295237)
55	10/28/2003	(252341)
56	11/21/2003	(295220)
57	11/26/2003	(295238)
58	11/30/2003	(248256)
59	12/17/2003	(295221)
60	12/23/2003	(295239)
61	01/02/2004	(257380)
62	01/02/2004	(252698)
63	01/04/2004	(251319)
64	01/14/2004	(254260)
65	01/21/2004	(252556)
66	01/22/2004	(295240)
67	01/26/2004	(295222)
68	01/28/2004	(261052)
69	02/23/2004	(248995)
70	02/23/2004	(432673)
71	02/27/2004	(295223)
72	03/16/2004	(295208)
73	03/24/2004	(295225)
74	03/31/2004	(260311)
75	04/16/2004	(256199)
76	04/21/2004	(295209)
77	04/23/2004	(295226)
78	05/19/2004	(256196)
79	05/19/2004	(295206)
80	05/19/2004	(295211)
81	05/25/2004	(268601)
82	05/25/2004	(295228)
83	05/25/2004	(266874)
84	05/26/2004	(273578)
85	06/03/2004	(270210)
86	06/09/2004	(272409)
87	06/18/2004	(271341)
88	06/18/2004	(270854)
89	06/21/2004	(295213)
90	06/23/2004	(352010)
91	07/14/2004	(260134)
92	07/22/2004	(352011)
93	07/26/2004	(352004)
94	08/11/2004	(288458)
95	08/11/2004	(288745)
96	08/11/2004	(287418)
97	08/11/2004	(287399)
98	08/16/2004	(279252)
99	08/16/2004	(279239)
100	08/23/2004	(352012)
101	08/24/2004	(352003)
102	08/24/2004	(352005)
103	08/31/2004	(272715)
104	08/31/2004	(267451)
105	08/31/2004	(268068)
106	08/31/2004	(292677)
107	09/07/2004	(292099)
108	09/22/2004	(352013)
109	09/30/2004	(287575)
110	10/04/2004	(352006)
111	10/18/2004	(335028)
112	10/20/2004	(352007)
113	10/20/2004	(352014)
114	11/11/2004	(289756)
115	11/12/2004	(290146)
116	11/12/2004	(288819)
117	11/22/2004	(285617)
118	11/22/2004	(352015)
119	11/23/2004	(352008)

120	11/29/2004	(339553)
121	12/05/2004	(268602)
122	12/10/2004	(338725)
123	12/11/2004	(341292)
124	12/11/2004	(342406)
125	12/11/2004	(342558)
126	12/14/2004	(341177)
127	12/14/2004	(342547)
128	12/15/2004	(340217)
129	12/17/2004	(339115)
130	12/20/2004	(352016)
131	12/21/2004	(342546)
132	12/27/2004	(352009)
133	12/28/2004	(290091)
134	12/28/2004	(338893)
135	12/29/2004	(342425)
136	12/30/2004	(342431)
137	12/30/2004	(344374)
138	12/30/2004	(344491)
139	01/04/2005	(288475)
140	01/04/2005	(285114)
141	01/04/2005	(288902)
142	01/04/2005	(342600)
143	01/04/2005	(293105)
144	01/05/2005	(289527)
145	01/05/2005	(288541)
146	01/06/2005	(344370)
147	01/06/2005	(344373)
148	01/06/2005	(289146)
149	01/07/2005	(288436)
150	01/09/2005	(289381)
151	01/10/2005	(286434)
152	01/10/2005	(287676)
153	01/10/2005	(279219)
154	01/20/2005	(381814)
155	01/24/2005	(381811)
156	01/26/2005	(342583)
157	01/31/2005	(342585)
158	02/01/2005	(342419)
159	02/22/2005	(350798)
160	02/22/2005	(381812)
161	02/23/2005	(371820)
162	03/22/2005	(381813)
163	03/23/2005	(381809)
164	03/28/2005	(381810)
165	04/01/2005	(346780)
166	04/22/2005	(419640)
167	04/22/2005	(419642)
168	04/22/2005	(575179)
169	04/29/2005	(344372)
170	05/03/2005	(373899)
171	05/09/2005	(378729)
172	05/18/2005	(575182)
173	05/25/2005	(380203)
174	06/17/2005	(392662)
175	06/20/2005	(575185)
176	06/21/2005	(419641)
177	06/21/2005	(419643)
178	06/28/2005	(394944)
179	07/06/2005	(398907)
180	07/13/2005	(374690)
181	07/18/2005	(575188)
182	07/18/2005	(379933)
183	07/18/2005	(379934)
184	07/20/2005	(400891)
185	07/21/2005	(400399)
186	07/28/2005	(379300)
187	08/02/2005	(400361)
188	08/03/2005	(399624)
189	08/05/2005	(341201)
190	08/05/2005	(341194)
191	08/05/2005	(341195)
192	08/05/2005	(341198)
193	08/05/2005	(341200)
194	08/10/2005	(403710)
195	08/15/2005	(453221)
196	08/16/2005	(404329)
197	08/16/2005	(404327)
198	08/18/2005	(404406)
199	08/22/2005	(400922)

200	08/22/2005	(575191)
201	08/23/2005	(401945)
202	08/23/2005	(404915)
203	08/25/2005	(405926)
204	08/30/2005	(401403)
205	09/23/2005	(440775)
206	09/23/2005	(440776)
207	09/27/2005	(575193)
208	09/28/2005	(431096)
209	10/04/2005	(405964)
210	10/05/2005	(407310)
211	10/05/2005	(406803)
212	10/05/2005	(431097)
213	10/05/2005	(431095)
214	10/10/2005	(406428)
215	10/24/2005	(468331)
216	10/24/2005	(575195)
217	10/26/2005	(433389)
218	10/28/2005	(405406)
219	11/03/2005	(431819)
220	11/04/2005	(431796)
221	11/04/2005	(431865)
222	11/14/2005	(371956)
223	11/23/2005	(433921)
224	11/23/2005	(575197)
225	11/28/2005	(437043)
226	11/28/2005	(468332)
227	11/30/2005	(437117)
228	12/08/2005	(418800)
229	12/16/2005	(451110)
230	12/21/2005	(575199)
231	12/22/2005	(575200)
232	12/27/2005	(468333)
233	01/24/2006	(451885)
234	01/24/2006	(468334)
235	01/24/2006	(575201)
236	02/16/2006	(454090)
237	02/21/2006	(455170)
238	02/21/2006	(575174)
239	02/21/2006	(454835)
240	02/23/2006	(455872)
241	02/23/2006	(455897)
242	02/23/2006	(439108)
243	02/24/2006	(438342)
244	02/24/2006	(468329)
245	02/25/2006	(456944)
246	02/25/2006	(457085)
247	02/27/2006	(457162)
248	02/27/2006	(456661)
249	02/28/2006	(457143)
250	02/28/2006	(457152)
251	03/03/2006	(455540)
252	03/09/2006	(457675)
253	03/15/2006	(458469)
254	03/17/2006	(451544)
255	03/20/2006	(431859)
256	03/20/2006	(571632)
257	03/21/2006	(575176)
258	03/23/2006	(290016)
259	03/23/2006	(468330)
260	03/28/2006	(405965)
261	04/03/2006	(455004)
262	04/21/2006	(575180)
263	04/24/2006	(449499)
264	04/24/2006	(498125)
265	04/25/2006	(449838)
266	04/26/2006	(455005)
267	04/27/2006	(440023)
268	04/28/2006	(462216)
269	05/10/2006	(266908)
270	05/10/2006	(268067)
271	05/12/2006	(461088)
272	05/17/2006	(461235)
273	05/17/2006	(466235)
274	05/22/2006	(498126)
275	05/22/2006	(575183)
276	05/26/2006	(460174)
277	05/26/2006	(460095)
278	05/26/2006	(460156)
279	05/26/2006	(460637)

280	05/30/2006	(459416)
281	05/30/2006	(460198)
282	05/31/2006	(480622)
283	05/31/2006	(455293)
284	06/12/2006	(455296)
285	06/13/2006	(457735)
286	06/14/2006	(480612)
287	06/15/2006	(449850)
288	06/16/2006	(575186)
289	06/20/2006	(498127)
290	06/21/2006	(467546)
291	06/23/2006	(467537)
292	06/23/2006	(467329)
293	06/28/2006	(467525)
294	06/30/2006	(463111)
295	06/30/2006	(466561)
296	07/10/2006	(482757)
297	07/11/2006	(482755)
298	07/11/2006	(482760)
299	07/11/2006	(482407)
300	07/14/2006	(467608)
301	07/24/2006	(520133)
302	07/24/2006	(575189)
303	07/26/2006	(487301)
304	07/27/2006	(486448)
305	07/31/2006	(482753)
306	08/08/2006	(482747)
307	08/14/2006	(480383)
308	08/16/2006	(392732)
309	08/18/2006	(457259)
310	08/18/2006	(457480)
311	08/22/2006	(575192)
312	08/23/2006	(457432)
313	08/25/2006	(510170)
314	08/28/2006	(479997)
315	08/29/2006	(509957)
316	08/29/2006	(479999)
317	08/30/2006	(509636)
318	08/31/2006	(457283)
319	09/07/2006	(510326)
320	09/22/2006	(575194)
321	09/25/2006	(520134)
322	09/29/2006	(487313)
323	10/04/2006	(510017)
324	10/04/2006	(512388)
325	10/05/2006	(510021)
326	10/05/2006	(512393)
327	10/05/2006	(512392)
328	10/13/2006	(510023)
329	10/23/2006	(575196)
330	10/24/2006	(544406)
331	10/26/2006	(512394)
332	10/27/2006	(515112)
333	10/31/2006	(513138)
334	10/31/2006	(509694)
335	10/31/2006	(343595)
336	11/03/2006	(513228)
337	11/03/2006	(513328)
338	11/06/2006	(515706)
339	11/16/2006	(512687)
340	11/16/2006	(514711)
341	11/21/2006	(517284)
342	11/22/2006	(575198)
343	11/27/2006	(544407)
344	11/30/2006	(379581)
345	12/07/2006	(488023)
346	12/07/2006	(488025)
347	12/07/2006	(487985)
348	12/07/2006	(488004)
349	12/15/2006	(508968)
350	12/21/2006	(534053)
351	12/27/2006	(544408)
352	12/27/2006	(544409)
353	12/29/2006	(343599)
354	01/19/2007	(531892)
355	01/22/2007	(575202)
356	01/31/2007	(537439)
357	01/31/2007	(538238)
358	01/31/2007	(538659)
359	02/17/2007	(532455)

360	02/20/2007	(457345)
361	02/22/2007	(575167)
362	02/22/2007	(575175)
363	02/23/2007	(532463)
364	02/23/2007	(532452)
365	02/27/2007	(532471)
366	03/01/2007	(509707)
367	03/05/2007	(406521)
368	03/21/2007	(575177)
369	03/23/2007	(575168)
370	04/12/2007	(554202)
371	04/19/2007	(575169)
372	04/23/2007	(575181)
373	04/25/2007	(542681)
374	04/25/2007	(532459)
375	04/26/2007	(541475)
376	04/30/2007	(542592)
377	04/30/2007	(542683)
378	05/07/2007	(537121)
379	05/08/2007	(542690)
380	05/09/2007	(467500)
381	05/14/2007	(542697)
382	05/16/2007	(575170)
383	05/18/2007	(542652)
384	05/22/2007	(575184)
385	05/29/2007	(559183)
386	05/30/2007	(560809)
387	06/20/2007	(575171)
388	06/22/2007	(575187)
389	06/25/2007	(563779)
390	06/25/2007	(564308)
391	06/27/2007	(564822)
392	06/27/2007	(564828)
393	07/06/2007	(565610)
394	07/10/2007	(565422)
395	07/20/2007	(575172)
396	07/20/2007	(575173)
397	07/23/2007	(575178)
398	07/23/2007	(575190)
399	08/01/2007	(567841)
400	08/03/2007	(568522)
401	08/13/2007	(571026)
402	08/14/2007	(567884)
403	08/15/2007	(571883)
404	08/17/2007	(571025)
405	08/22/2007	(607528)
406	09/18/2007	(571877)
407	09/19/2007	(572770)
408	09/20/2007	(601572)
409	09/24/2007	(607529)
410	10/12/2007	(580777)
411	10/16/2007	(593594)
412	10/18/2007	(601573)
413	10/25/2007	(596852)
414	11/06/2007	(593367)
415	11/06/2007	(565492)
416	11/15/2007	(597968)
417	11/15/2007	(597891)
418	11/19/2007	(572257)
419	11/19/2007	(599691)
420	11/27/2007	(597446)
421	11/30/2007	(608138)
422	11/30/2007	(601276)
423	12/04/2007	(600886)

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

Date	12/16/2002	(16626)		
Self Report?		NO	Classification:	Minor
Citation:	30 TAC Chapter 290, SubChapter D 290.43(c)(1)			
Description:	Failure to protect the vent opening on the ground storage tank with a 16-mesh or finer corrosion resistant screen.			
Self Report?		NO	Classification:	Moderate
Citation:	30 TAC Chapter 290, SubChapter D 290.42(e)(3)(D)			
Description:	Failure to provide scales for determining the amount of disinfectant used daily.			
Self Report?		NO	Classification:	Moderate
Citation:	30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)			
Description:	Failure to seal the wellhead with the use of gaskets or a pliable crack-resistant caulking compound.			
Self Report?		NO	Classification:	Moderate
Citation:	30 TAC Chapter 290, SubChapter D 290.41(c)(3)(K)			
Description:	Failure to seal the wellhead with the use of gaskets or a pliable crack-resistant caulking			

Date	12/30/2002	compound. (13462)		
Self Report?		NO	Classification:	Minor
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:		Failure to comply with permitted effluent limits for pH, Oil and Grease, TOC, and BOD.		
Date	12/31/2002	(157729)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	01/24/2003	(17948)		
Self Report?		NO	Classification:	Moderate
Citation:		30 TAC Chapter 101, SubChapter F 101.201(b)(10) 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)		
Description:		Failure to identify cause of the event and failure to comply with TCEQ Air Permit 3219 which resulted in unauthorized emissions.		
Date	01/31/2003	(157683)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	06/28/2003	(33595)		
Self Report?		NO	Classification:	Moderate
Citation:		5C THC Chapter 382, SubChapter A 382.085(a)		
Description:		Failed to prevent an emissions release by good design, operation, and maintenance practices.		
Date	07/31/2003	(157709)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	09/30/2003	(295219)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	11/30/2003	(295239)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	01/04/2004	(251319)		
Self Report?		NO	Classification:	Moderate
Citation:		30 TAC Chapter 116, SubChapter B 116.115(c)		
Rqmt Prov:		PERMIT TCEQ AIR PERMIT #19849, SC #1		
Description:		Shell allowed 237 lbs of unauthorized emissions of mesityl oxide (a highly irritating ketone, which overflowed Tank T-40-16 due to an inaccurate level indicator and failure to respond to a high level alarm from the back up high level alarm system.		
Date	01/14/2004	(254260)		
Self Report?		NO	Classification:	Moderate
Citation:		30 TAC Chapter 116, SubChapter B 116.115(c)		
Rqmt Prov:		PERMIT TCEQ AIR PERMIT #3219, SC #4		
Description:		Main induced-draft fan on Boiler H-8610 shut down when governor seized due to dirty oil (inadequate attention to the status of the oil). The (large) boiler tripped on loss of the fan. Two olefin plants were shut down due to insufficient steam supply to the steam turbines driving the large critical compressors which resulted in unauthorized emissions.		
Date	01/21/2004	(252556)		
Self Report?		NO	Classification:	Moderate
Citation:		30 TAC Chapter 116, SubChapter G 116.715(a)		
Rqmt Prov:		PERMIT TCEQ AIR PERMIT #21262, SC #1		
Description:		Shell damaged the lube oil pump for the Recycle Gas Compr. Either possible root cause (failure to prime the pump or improperly installing the new motive screws) avoidably damaged those screws. Shell failed to control SO2 emissions during a startup activity.		
Date	04/30/2004	(295228)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	06/30/2004	(352011)		
Self Report?		YES	Classification:	Moderate
Citation:		30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:		Failure to meet the limit for one or more permit parameter		
Date	07/13/2004	(260134)		
Self Report?		NO	Classification:	Minor
Citation:		30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B) 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:		PERMIT TCEQ AIR PERMIT #920, SC #1		

Description:	Failure to report an emissions event in a timely manner and failed to prevent unauthorized emissions.		
Date	08/31/2004	(272715)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 3219 and PSD-TX-974, GC #8		
Description:	Failure to operate within the permit limits.		
Date	08/31/2004	(267451)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 21262 and PSD-TX-928		
Description:	Failure to prevent unauthorized emissions.		
Date	09/22/2004	(335028)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 290, SubChapter D 290.46(m)		
Description:	Failure to maintain all pressure maintenance facilities and related appurtenances in a watertight condition.		
Date	09/30/2004	(352007)	
Self Report?	YES		Classification: Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	11/22/2004	(285617)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 3219 and PSD-TX-974, GC #8		
Description:	Failure to operate within the permit limits.		
Self Report?	NO		Classification: Minor
Citation:	30 TAC Chapter 101, SubChapter F 101.201(b)(7)		
Description:	Failure to indicate the air contaminants from the flare completely in the final report.		
Date	11/30/2004	(352009)	
Self Report?	YES		Classification: Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	12/14/2004	(340217)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(4) 30 TAC Chapter 305, SubChapter F 305.125(5) TWC Chapter 26 26.121(a)(1)		
Description:	Failure to prevent the unauthorized discharge of untreated or partially treated process, sanitary, balast, and utility wastewaters through outfall 008. The permittee is authorized to discharge storm water and fire water only to outfall 008. See attached Table 1.		
Date	12/28/2004	(290091)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(b)(2) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 3219 and PSD-TX-974, GC #8		
Description:	Failure to avoid loss of cooling in the PRC surface condensate system which resulted in unauthorized emissions.		
Date	12/30/2004	(344491)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PA Permit #21262/PSD-TX-928, SC#1		
Description:	Failure to control emissions.		
Date	12/30/2004	(344374)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PA Permit #s:21262,PSD-TX-928, SC #1		
Description:	Failure to Control Emissions		
Date	01/04/2005	(342600)	
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 3219 and PSD-TX-974, GC # 8		
Description:	Failure to control hydrate formation in the demethanizer column which resulted in unauthorized emissions.		
Self Report?	NO		Classification: Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)		
Description:	Failure to report emissions event in a timely manner.		
Date	01/07/2005	(288436)	
Self Report?	NO		Classification: Moderate

Citation:	30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 21262 and PSD-TX-928		
Description:	Exceeded permit limits during an avoidable emissions event.		
Date	01/09/2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT TCEQ Air Permit #3219 and PSD-TX-974		
Description:	Exceeded permit limits during an avoidable emissions event.		
Date	03/31/2005		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	04/29/2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.110(a) 5C THC Chapter 382, SubChapter A 382.085(b)		
Description:	Failure to control emissions.		
Date	05/31/2005		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	06/20/2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No. 9334, Gen. Condition #8		
Description:	Failure to prevent spill during tank heel transfer. which resulted in unauthorized emissions		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A) 30 TAC Chapter 101, SubChapter F 101.201(b)(8)		
Description:	Failure to submit an emissions event in a timely manner.		
Date	07/31/2005		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	07/31/2005		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	08/17/2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 117, SubChapter B 117.206(e)(2)		
Description:	Failure to maintain ammonia emissions below 10ppm on furnace 110.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 117, SubChapter B 117.206(e)(2)		
Description:	Failure to maintain ammonia emissions below 10ppm on furnace 150.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 117, SubChapter B 117.206(e)(2)		
Description:	Failure to maintain ammonia emissions below 10ppm on furnace 180.		
Date	09/30/2005		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	10/10/2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Description:	Failure to control emissions.		
Date	11/30/2005		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	12/08/2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
Description:	Failure to maintain compliance with the effluent permit limits. Effluent violations were reported for ammonia-nitrogen at outfall 104 in 07/05 and for calcium, nickel and fecal coliform at outfall 001 in 03/05.		
Date	02/23/2006		
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:	PA 3219 AND PSD-TX-974		

Description: Exceeded permit limits during an avoidable emissions event.
 Date 02/27/2006 (438342)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Description: Failed to control unauthorized emissions.
 Date 04/04/2006 (455004)
 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: PA NSR Permit #3173, Special Condition #1
 Description: Failure to control unauthorized emissions for Incident #64365.
 Date 05/17/2006 (461235)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.665(f)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(j)(7)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.118(a)(1)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP 1946, Special Condition 15H
 OP 1946, Special Condition 1A
 Description: Failure to record whether the pilot flame was continuously present during each hour for
 Flares OP2ELFLA and OP3ELFLA

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP 1668, Special Condition 1A
 Description: Failure to record daily flare observations for Flares OP2ELFLA, OP3ELFLA and
 OP3GRFLA.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP 1668, Special Condition 1A
 PERMIT 3219, Special Conditions 5 and 6
 Description: Operation of Flares OP2ELFLA, OP3ELFLA and OP3GRFLA with visible emissions .

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(2)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP 1946, Special Condition 1A
 OP 1946, Special Condition 21
 PERMIT 3216, Special Condition 6E
 PERMIT 3218, Special Condition 8E
 Description: Nine OELs in HT2; 2 OELs in CIPX

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: PERMIT 18576, Special Condition 7E
 OP 1946, Special Condition 1A
 OP 1946, Special Condition 21
 Description: Failure to seal 18 OELs in IRU.

Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)
 Rqmt Prov: OP 1946, Special Condition 1A
 OP 1946, Special Condition 21
 PERMIT 3217, Special Condition 3E
 Description: Failure to seal OELs in BD3.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)
 Rqmt Prov: OP 1946, Special Condition 21
 PERMIT 3216, Special Condition 1
 PERMIT 3216, Special Condition 5
 Description: Furnaces FOL-601 and FOL-602 exceeded the permitted maximum hourly firing rates.

Self Report? NO Classification: Moderate

Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1946, Special Condition 21 PERMIT 3216, Special Conditions 1 and 4		
Description:	The fuel gas used by Furnaces FOL601, FOL602, FOL603 and FOL604 exceeded the permitted maximum H2S concentration.		
Date	05/31/2006 (455293)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter D 382.085(b)		
Rqmt Prov:	PERMIT No. 3219 and PSD-TX-974 MAERT		
Description:	Failure to prevent an operator error resulting in unauthorized emissions.		
Date	06/15/2006 (457735)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter D 382.085(b)		
Rqmt Prov:	PERMIT 9334 MAERT		
Description:	Failure to prevent a leak from a line that was bent beyond its minimum flex radius creating a weak point that resulted in unauthorized emissions.		
Date	06/16/2006 (510170)		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1)		
Rqmt Prov:	PERMIT Self-reporting Requirements		
Description:	Using unapproved self-generated Discharge Monitoring Report (DMR) forms to report monitoring results.		
Date	06/28/2006 (467525)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter G 116.715(a) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT #21262, Special Condition #1		
Description:	Failure to prevent overpressure of Secondary Debutanizer Column, V-613 which resulted in unauthorized emissions.		
Date	06/30/2006 (520133)		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	07/14/2006 (467608)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT No 3219 MAERT		
Description:	Failure to prevent unauthorized emissions during decoking of furnace FOL170.		
Date	07/31/2006 (440775)		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	07/31/2006 (575192)		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	08/18/2006 (457259)		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 266, SC 7E PERMIT 3985A, SC 7E OP O-01947, Special Condition 13 OP O-01947, Special Condition 1A		
Description:	3 OELs in SITEFE and 1 OEL in WRACKFE		
Date	08/23/2006 (457432)		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(c) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 1A		
Description:	Components associated with Tank F-347 and Tank F-349 were not identified as being subject to 40 CFR 63, Subpart H.		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)		

Rqmt Prov:	5C THC Chapter 382, SubChapter A 382.085(b) OP 1948, Special Condition 13 OP 1948, Special Condition 1A PERMIT 19849, Special Condition 11E		
Description:	10 OELs in MPLANTFE		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 13 OP 1948, Special Condition 1A PERMIT 1968, Special Condition 3E PERMIT 19849, Special Condition 11E PERMIT 3173, Special Condition 6E		
Description:	5 OELs in LPGFE; 15 OELs in IPAFINFE; 8 OELs in IPACRUFEE; 1 OEL in HPLANTFE		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.354(2)(C) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 13 OP 1948, Special Condition 1A PERMIT 3173, Special Condition 6F		
Description:	Failure to monitor Valve Tag No. 301622 in IPAFINFE during the first quarter of 2005		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 13 PERMIT 19849, Special Condition 7D		
Description:	Failure to inspect Tank T667B by the due date of March 2005		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 106, SubChapter K 106.261(a)(2) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 13 PERMIT 3173, Special Condition 1		
Description:	VOC emissions from V118 exceeded the combined hourly emissions limit of 6.49 lb/hr-0.52 lb/hr permitted in Permit 3173 and 5.97 lb/hr represented in PBR Registration No. 74572.		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 115, SubChapter H 115.782(b)(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 1H(iv)		
Description:	Failure to repair Component No. 200706 in IPACRUFEE within seven days		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.354(4) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP 1948, Special Condition 1A		
Description:	Failure to monitor a relief valve in Unit LPGFE within 24 hours after the valve released emissions to the atmosphere (479997)		
Date 08/28/2006			
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 115, SubChapter H 115.782(b)(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 3219, Special Condition 2I OP O-1668, Special Condition 15		
Description:	OP O-1668, Special Condition 1H(v) Failure to repair Component No. 64110.P in OP2FUG within 15 days		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 3219, Special Condition 2E OP O-1668, Special Condition 15 OP O-1668, Special Condition 1A		
Description:	Forty-nine incidences of open-ended lines in OP2FUG		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(2) 5C THC Chapter 382, SubChapter A 382.085(b)		

Rqmt Prov:	PERMIT 3214, Special Condition 5E OP O-1668, Special Condition 15 OP O-1668, Special Condition 1A		
Description: Self Report?	26 OELs in OL3FUG and 4 OELs in PYR3FUG	NO	Classification: Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 3214, Special Condition 5E PERMIT 3219, Special Condition 2E OP O-1668, Special Condition 15 OP O-1668, Special Condition 1A		
Description: Self Report?	28 OELs in OL3FUG, 4 OELs in OP2FUG, and 25 OELs in PYR3FUG	NO	Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 3219, Maximum Allowable Emission Rates OP O-1668, Special Condition 15		
Description: Date 08/29/2006	Exceedance of VOC MAER in tpy for the Olefins Flare System (479999)		
Self Report?		NO	Classification: Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 9334, Special Condition 15E OP O-1943, Special Condition 17 OP O-1943, Special Condition 1A		
Description: Self Report?	One OEL in ACUFUG and one OEL in FUGOXU	NO	Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 9334, Special Condition 7 OP O-1943, Special Condition 17		
Description: Self Report?	Incomplete records of furnace firing rates for the ACU furnace, EPN H902	NO	Classification: Minor
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(a)(3)(iii) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP O-1943, Special Condition 1A		
Description: Self Report?	Failure to conduct internal inspection of Tank F-361 by the due date of May 2005	NO	Classification: Minor
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 9334, Special Condition 8 OP O-1943, Special Condition 17		
Description: Self Report?	Operation of the East Property Flare with visible emissions	NO	Classification: Minor
Citation:	30 TAC Chapter 115, SubChapter B 115.114(a)(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Description: Self Report?	Failure to visually inspect Tank G-359 by the due date of August 16, 2005	NO	Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 9334, Special Condition 10D OP O-1943, Special Condition 17		
Description: Self Report?	Failure to provide notification to the TCEQ 30 days in advance of taking gap measurements in Tank G-359	NO	Classification: Minor
Citation:	30 TAC Chapter 115, SubChapter B 115.114(a)(2) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 9334, Special Condition 10D OP O-1943, Special Condition 17 OP O-1943, Special Condition 1A		
Description: Date 08/31/2006	Failure to perform the annual seal gap inspection for Tank G-343 by the due date of September 1, 2005. (457283)		
Self Report?		NO	Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	PERMIT 48912, Special Condition 5 OP O-2108, Special Condition 15		
Description:	Failure to analyze wastewater for isobutyraldehyde		

Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 115, SubChapter B 115.132(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP O-2108, Special Condition 1A		
Description:	Failure to meet the control requirements for VOC water separators NAPI and SAPI		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.116b(f)(2) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP O-2108, Special Condition 1A		
Description:	Failure to obtain vapor pressure sample from T-1318		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(f)(2) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP O-2108, Special Condition 1A		
Description:	Failure to monitor the presence of the pilot flame on the A&S Flare, EPN A1301		
Date	11/03/2006		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 101, SubChapter F 101.223(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b)		
Description:	Shell failed to submit a CAP in a timely manner.		
Date	11/14/2006		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP FOP #O-01669, Special Condition #1A		
Description:	Failure to record the daily visual observations of flare per 30 TAC111.111(a)(4)(A)(ii).		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 113, SubChapter C 113.100(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP FOP #O-01669, Special Condition #1A OP FOP #O-01669, Special Condition #1D		
Description:	Failure to prevent visible emissions in the operation of flares on six different occasions during the compliance certification period as required by 40 CFR 63.11(b)(4) and 40 CFR 60.18(c)(1).		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THC Chapter 382, SubChapter A 382.085(b)		
Description:	Failure to include all deviations in the deviation and annual compliance certification reports in accordance with 30 TAC 122.145(2)(A).		
Date	11/30/2006		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	12/31/2006		
Self Report?	YES	Classification:	Moderate
Citation:	30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)		
Description:	Failure to meet the limit for one or more permit parameter		
Date	02/23/2007		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 115, SubChapter H 115.782(a) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.246(b)(1) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(f)(1) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP FOP O-01946, Special Condition 1A OP FOP O-01946, Special Condition 1M(iv) OP FOP O-01946, Special Condition 21 PA NSR #18576, Special Condition 7H PA NSR #3216, Special Condition 6H PA NSR #3217, Special Condition 3H		
Description:	Failure to maintain leaking component tags on 15 leaking LDAR components per 30 TAC 115.354(5).		
Self Report?	NO	Classification:	Minor
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-1(d) 5C THC Chapter 382, SubChapter A 382.085(b)		
Rqmt Prov:	OP FOP # O-01946, Special Condition 1A OP FOP #O-01946, Special Condition 21 PA NSR 3216, Special Condition 2		

Description: PA NSR 3218, Special Condition 2
 Failure to maintain 94 LDAR components with identification tags as required by 40 CFR 61.242-1(d) as well NSR Permits #3216 and #3218.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
 30 TAC Chapter 115, SubChapter H 115.783(5)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 1A
 OP FOP O-01946, Special Condition 1M(iv)
 OP FOP O-01946, Special Condition 21
 PA NSR Permit 3215, Special Condition 2E
 PA NSR Permit 3216, Special Condition 2
 PA NSR Permit 3216, Special Condition 6E
 PA NSR Permit 3217, Special Condition 3E
 PA NSR Permit 3218, Special Condition 2
 PA NSR Permit 3218, Special Condition 8E

Description: Failure to cap 57 open-ended valves/lines per 30 TAC115.352(4). Some of these open-ends are violations of HON, NSPS, NESHAPs, and several NSR permits.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 21
 PA NSR Permit 3216, Special Condition 5

Description: Failure to monitor the firing rate of the FOL-601 furnace for 213 hours as required

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 1A
 OP FOP O-01946, Special Condition 21
 PA NSR Permit 3219, Special Condition 4

Description: Failure to continuously monitor for the presence of a flare pilot light on the OP3ELFLA unit, on two separate occasions for a total of 156 hours, as required by 40 CFR 60.18(f)(2), 40 CFR 63.11(b)(5), and NSR #3219, SC#4.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 21
 PA NSR Permit 3216, Special Condition 1

Description: Failure to comply with NSR Permit #3216 MAERT limits for EPN FOL604, by emitting to atmosphere 93.7 lbs. of VOC during a four hour period on January 23, 2006.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(B)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 1M(ii)

Description: Failure to capture required fuel gas monitoring and recordkeeping data, for approximately eight hours on February 17, 2006, relating to uncontrolled HRVOC-service vents, as required by 30 TAC 115.725(a)(1)(B).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 1M(ii)

Description: Failure to limit the fuel gas flow for Flare FOL-604 to 19,100scf/hr. for approximately 180 hours between February 1 through February 16, 2006. Exceeding this limit is a violation of 30 TAC 115.725(a)(1)(C).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter B 115.114(a)(2)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(1)
 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP O-01946, Special Condition 1A

Description: Failure to perform seal gap inspections for Tank 354 as required by 30 TAC 115.114(a)(2) and 40 CFR 60.113b(b)(1).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 68, SubChapter C, PT 68, SubPT D 68.73(c)
5C THC Chapter 382, SubChapter A 382.085(b)
Rqmt Prov: OP FOP O-01946, Special Condition 28
Description: Failure to provide chemical process training to refinery personnel per by 40 CFR 68.73(c).

Date 02/27/2007 (532471)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.146(2)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP #O-01947, General Terms & Conditions
Description: Failure to submit PCC within 30 days as required.
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(C)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: OP FOP #O-01947, General Terms & Conditions
Description: Failure to submit a Deviation report within 30 days as required.
Date 02/28/2007 (575168)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 02/28/2007 (575177)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 03/31/2007 (575169)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 04/30/2007 (575170)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 05/14/2007 (542697)
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.211(a)
Description: Failure to submit the initial notification ten days prior or as soon as practicable for a major turnaround.
Date 05/31/2007 (575171)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 05/31/2007 (575187)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 06/30/2007 (575172)
Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TWC Chapter 26 26.121(a)
Description: Failure to meet the limit for one or more permit parameter
Date 07/31/2007 (575173)
Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter
Date 08/29/2007 (543555)
Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(C)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov: OP Title V O-01669, General Terms/Condition
Description: failed to submit a permit compliance certification and a deviation report in a timely manner.

Date 08/31/2007 (601572)
Self Report? YES Classification: Moderate
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter
Date 09/30/2007 (601573)
Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

F Environmental audits.

Notice of Intent Date: 12/20/2002 (265131)
 Disclosure Date: 06/24/2003
 Viol. Classification: Major
 Citation: 30 TAC Chapter 116, SubChapter B
 Description: Failed to authorize emissions from rail car cleaning.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A
 Description: Failed to report emissions from EPN Carclean in emissions inventory.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter F
 Description: Failed to justify control efficiency of railcar cleaning CAS.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter F
 Description: Failed to keep records of CAS breakthrough monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B
 Description: failed to submit compliance plan with application

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter F
 Description: failed to process tank cars with partial vapor pressure of >= 0.5 psia through properly operating control system

Notice of Intent Date: 01/12/2003 (32908)
 No DOV Associated

Notice of Intent Date: 02/26/2003 (263866)
 No DOV Associated

Notice of Intent Date: 02/26/2003 (29900)
 No DOV Associated

Notice of Intent Date: 04/28/2003 (263686)
 No DOV Associated

Notice of Intent Date: 05/27/2003 (112481)
 No DOV Associated

Notice of Intent Date: 06/13/2003 (251436)
 No DOV Associated

Notice of Intent Date: 06/12/2003 (251440)
 Disclosure Date: 09/04/2003
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter B
 Description: Failure to maintain and compile inspection reports that document all of the elements required by the applicable regulations.

Notice of Intent Date: 06/19/2003 (397860)
 No DOV Associated

Notice of Intent Date: 08/12/2003 (251504)
 No DOV Associated

Notice of Intent Date: 09/05/2003 (251740)
 No DOV Associated

Notice of Intent Date: 09/05/2003 (251760)
 No DOV Associated

Notice of Intent Date: 10/20/2003 (263020)
 No DOV Associated

Notice of Intent Date: 10/20/2003 (263024)
 No DOV Associated

Notice of Intent Date: 10/20/2003 (263025)
 No DOV Associated

Notice of Intent Date: 10/20/2003 (263029)
 No DOV Associated

Notice of Intent Date: 10/20/2003 (263033)
 Disclosure Date: 12/07/2004
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter B
 Description: records not available for daily sampling/analysis results for vapor pressure of the wastewater streams processed by the unit's API separator

Notice of Intent Date: 11/20/2003 (449697)
 No DOV Associated

Notice of Intent Date: 02/20/2004 (265126)
 No DOV Associated

Notice of Intent Date: 08/06/2004 (334038)
 Disclosure Date: 10/12/2004
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter F
 Rqmt PERMIT Compliance b. Operational Requirements 1
 PERMIT General b.
 Description: noncompliance with requirement to maintain all facilities and systems of treatment and control (and related appurtenances)

Notice of Intent Date: 08/06/2004 (334047)
 Disclosure Date: 08/26/2004
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter A
 40 CFR Chapter 261, SubChapter I, PT 261, SubPT A
 Description: Failure to characterize a process water stream from a leaking economizer, which contained K022 waste.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C

30 TAC Chapter 335, SubChapter R
 40 CFR Chapter 262, SubChapter I, PT 262, SubPT A
 Description: Failure to characterize wastewater treatment plant residues carrying the K022 waste code.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter A
 Description: Improper disposal of K022 WWTP residual solids at a Class 1 non-hazardous waste landfill.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 305, SubChapter D
 Description: Failure to amend RCRA permit to reflect management of K022 waste.
 Viol. Classification: Moderate
 Rqmt: PERMIT 1. General b.
 Description: discharge of process water to storm water impoundment basins
 Notice of Intent Date: 08/27/2004 (334576)
 No DOV Associated

Notice of Intent Date: 10/12/2004 (349555)
 No DOV Associated

Notice of Intent Date: 10/28/2004 (263123)
 No DOV Associated

Notice of Intent Date: 11/11/2004 (349565)
 No DOV Associated

Notice of Intent Date: 01/04/2005 (349867)
 Disclosure Date: 06/17/2005

Viol. Classification: Minor
 Citation: 30 TAC Chapter 113, SubChapter C
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA
 Description: documentation was not readily available to fully demonstrate that a formal refinery maximum achievable control technology applicability determination (ie >5% HAPS) had been made for equipment in light crude service
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A
 Description: one New Source Performance Standard (NSPS) notification for Start of Construction and Start of Operation for the CGHT unit could not be located
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG
 Description: documentation was not readily available to fully demonstrate that the process to determine if a project triggered NSPS "Modification" was being completed for NSPS Subpart GGG compliance
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A
 40 CFR Chapter 372, SubChapter J, PT 372, SubPT B
 Description: emissions from fueling of vehicles in the Deer Park Refinery were not included in emissions inventories as required
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 113, SubChapter C
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A
 Description: documentation was not readily available to demonstrate the development of a formal startup, shutdown, and malfunction plan (SSMP), and to document that when appropriate, a semi-annual report was submitted
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 113, SubChapter C
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA
 Description: documentation was not readily available to fully demonstrate the group 1 or group 2 applicability determination for miscellaneous process vents
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F
 Description: although monthly monitoring of cooling water return to the HON SWT was conducted and no leaks were detected, it is unclear whether there was complete compliance with HON requirements
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF
 Description: annual LDAR instrument monitoring of CPI and IGF benzene wastewater equipment had not been performed as required by benzene waste NESHAP regulations
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF
 Description: periodic visual inspection of the CPI and IGF benzene wastewater equipment to ensure access hatches and other openings are properly closed and gasketed had not been performed as required by the benzene waste NESHAP regulations

Notice of Intent Date: 01/06/2005 (349868)
 No DOV Associated

Notice of Intent Date: 01/05/2005 (371573)
 No DOV Associated

Notice of Intent Date: 01/27/2005 (350720)
 No DOV Associated

Notice of Intent Date: 01/27/2005 (350721)
 Disclosure Date: 03/23/2005

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT F
 Description: failed to meet requirements for maintenance/start-up/shutdown related activities
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C
 Description: incorporation by reference of 40 CFR 63 Subpart F (SOCMI MACT standard)
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C
 Description: incorporation by reference of 40 CFR 63 Subpart G (SOCMI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater MACT standard)

Notice of Intent Date: 01/27/2005 (350723)

Disclosure Date: 07/06/2005
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 335, SubChapter C
 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C
 Description: Equipment associated with a decommissioned cumene unit in the Phenol Acetone Production Areas was not properly decontaminated when shut down in 2001. Process vessels, pumps, exchangers, and piping contain material that meets the definition of a characteristically hazardous waste (D002, D018).
 Notice of Intent Date: 03/02/2005 (375030)
 No DOV Associated

Notice of Intent Date: 03/02/2005 (375031)
 Disclosure Date: 07/14/2005
 Viol. Classification: Minor
 Rqmt PERMIT Air New Source Permit No. 9334 SC 10.D
 Description: no notification 30 days in advance of 11/04 seal gap measurement for Aromatics EFR tank G-359
 Viol. Classification: Minor
 Rqmt PERMIT Air New Source Permits
 Description: no notification 30 days in advance of refilling of Solvents IFR tank T140B, Phenol Acetone IFR tank D391, Solvents IFR tank F337
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 113, SubChapter C
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G
 Rqmt PERMIT Permit 9334 Special Condition 10D
 Description: no 10 yr internal seal inspection of Aromatics IFR tank F-361
 Notice of Intent Date: 04/15/2005 (380864)
 No DOV Associated

Notice of Intent Date: 05/18/2005 (396476)
 No DOV Associated

Notice of Intent Date: 08/22/2005 (434090)
 No DOV Associated

Notice of Intent Date: 08/22/2005 (434095)
 No DOV Associated

Notice of Intent Date: 11/04/2005 (438422)
 No DOV Associated

Notice of Intent Date: 12/02/2005 (451075)
 No DOV Associated

Notice of Intent Date: 01/05/2006 (452942)
 No DOV Associated

Notice of Intent Date: 01/05/2006 (452952)
 No DOV Associated

Notice of Intent Date: 05/22/2006 (454159)
 No DOV Associated

Notice of Intent Date: 04/18/2007 (562595)
 No DOV Associated

Notice of Intent Date: 08/03/2007 (593493)
 No DOV Associated

Notice of Intent Date: 08/24/2007 (594238)
 No DOV Associated

Notice of Intent Date: 09/24/2007 (596731)
 No DOV Associated

Notice of Intent Date: 10/16/2007 (599701)
 No DOV Associated

Notice of Intent Date: 10/15/2007 (599713)
 No DOV Associated

G. Type of environmental management systems (EMSs).

Non 30 TAC CH 90 Certified, ISO
 14001:2004, installed 1/12/2005,
 certified 1/19/2006

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

Type	Tier	Certification Date
CLEAN TEXAS PROGRAM		12/20/2004

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
SHELL OIL COMPANY
RN100211879**

§
§
§
§
§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2007-1789-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 Shell Oil Company (“the Respondent”) 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 the Respondent presented this agreement to the Commission.

The Respondent understands that it has 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, the Respondent 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 shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

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

I. FINDINGS OF FACT

1. The Respondent operates a petroleum refinery at 5900 Highway 225 in Deer Park, Harris 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 an investigation on July 11, 2007, TCEQ staff documented that the Respondent failed to comply with permitted emissions limits. Specifically, an emissions event occurred from May 28 to 29, 2007 at the East Property Flare (Emission Point No. FLAREEP) which lasted for nine hours and five minutes, resulting in the release of 4,653.60 pounds ("lbs") of hydrocarbons, including 3099.50 lbs of volatile organic compounds ("VOCs"), 0.30 lbs of carbon monoxide ("CO"), 408 lbs of hydrogen, and 429.50 lbs of hydrogen sulfide ("H₂S"). This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
4. During an investigation on July 11, 2007, TCEQ staff documented that the Respondent failed to keep a flame present at a flare at all times. Specifically, the East Property Flare was operated during the emissions event that occurred from May 28 to 29, 2007 without a flame present at all times due to an outage of the flare's pilot flame.
5. During an investigation on September 4, 2007, TCEQ staff documented that:
 - a. The Respondent failed to comply with permitted emissions limits. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 40,859 lbs of sulfur dioxide ("SO₂"). This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
 - b. The Respondent failed to comply with permitted emissions limits. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 62,989 lbs of CO. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
 - c. The Respondent failed to comply with permitted emissions limits. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 8,721 lbs of nitrogen oxides ("NO_x"). This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
 - d. The Respondent failed to comply with permitted emissions limits. Specifically, an emissions event occurred on July 19, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for two hours and one minute, resulting in the release of 1,620 lbs of VOCs, 18 lbs of particulate matter ("PM"), and 435 lbs of H₂S. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
6. During an investigation on May 10, 2007, TCEQ staff documented that:

- a. The Respondent failed to comply with permitted emissions limits. Specifically, an excessive emissions event began on April 24, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for four hours and 51 minutes, resulting in the release of 132,220 lbs of SO₂. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
 - b. The Respondent failed to comply with permitted emissions limits. Specifically, an excessive emissions event began on April 24, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for four hours and 51 minutes, resulting in the release of 5,861.20 lbs of VOCs. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
 - c. The Respondent failed to comply with permitted emissions limits. Specifically, an excessive emissions event began on April 24, 2007 at the Coker Flare (Emission Point No. FLARECOKE), which lasted for four hours and 51 minutes, resulting in the release of 1,408 lbs of H₂S, 3,124 lbs of CO, 433 lbs of NO_x, and 51.40 lbs of PM. This emissions event failed to meet the demonstrations for affirmative defense as found in 30 TEX. ADMIN. CODE § 101.222.
7. The Respondent received notices of the violations on September 19, November 7 and 8, 2007.
 8. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:
 - a. On August 22, 2007, to address the emissions event that occurred on July 19, 2007:
 - i. Installed a new 3000 Volt-Amps (“VA”) Constant Voltage Transformer (“CVT”) on the Alternating Current (“AC”) input to C-3150s exciter circuit;
 - ii. Replaced the existing 2000 VA CVT on the AC input to C-70001s exciter circuit with a 3000 VA CVT;
 - b. By December 28, 2007, to address the emissions event that occurred from May 28 to 29, 2007:
 - i. Provided refresher training for all East Tank Farm operators on a revised pilot lighting procedure; and
 - ii. Installed two supplementary flare pilots on the East Property Flare.

II. CONCLUSIONS OF LAW

1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7 and the rules of the Commission.

2. As evidenced by Findings of Fact No. 3, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.715(a) and 101.20(3), TEX. HEALTH & SAFETY CODE § 382.085(b), and New Source Review ("NSR") Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1.
3. As evidenced by Findings of Fact No. 4, the Respondent failed to keep a flame present at a flare at all times, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3) and 101.221(a), 40 CODE OF FEDERAL REGULATIONS § 60.18(c)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b).
4. As evidenced by Findings of Fact No. 5, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.715(a) and 101.20(3), TEX. HEALTH & SAFETY CODE § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1.
5. As evidenced by Findings of Fact No. 6, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.715(a) and 101.20(3), TEX. HEALTH & SAFETY CODE § 382.085(b), and NSR Flexible Permit No. 21262/PSD-TX-928, Special Condition No. 1.
6. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against the Respondent 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.
7. An administrative penalty in the amount of Eighty Thousand Dollars (\$80,000) 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. The Respondent has paid the Forty Thousand Dollar (\$40,000) administrative penalty. Forty Thousand Dollars (\$40,000) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed an administrative penalty in the amount of Eighty Thousand Dollars (\$80,000) as set forth in Section II, Paragraph 7 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent'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: Shell Oil Company, Docket No. 2007-1789-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 Respondent shall implement and complete a Supplemental Environmental Project ("SEP") in accordance with TEX. WATER CODE § 7.067. As set forth in Section II, Paragraph 7 above, Forty Thousand Dollars (\$40,000) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
3. The Respondent shall undertake the following technical requirements:
 - a. Respond completely and adequately, as determined by the Executive Director, to all written requests for information concerning the submitted Corrective Action Plan ("CAP"), in conjunction with the April 24, 2007 excessive emissions event, within 15 days after the date of such requests, or by any other deadline specified in writing;
 - b. Upon Commission approval, implement the CAP, in accordance with the approved schedule;
 - c. Upon completion of CAP implementation, submit written certification to demonstrate compliance with Ordering Provisions Nos. 3.a. and 3.b. as described below; and

The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

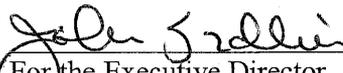
Air Section, Manager
Houston Regional Office
Texas Commission on Environmental Quality
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

4. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
5. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
6. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
7. 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 the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
8. 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.
9. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent 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.
10. 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.
11. 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.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission



For the Executive Director

3/21/2008
Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of Shell Oil Company. I am authorized to agree to the attached Agreed Order on behalf of Shell Oil Company, 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, Shell Oil Company 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 failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- 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;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

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



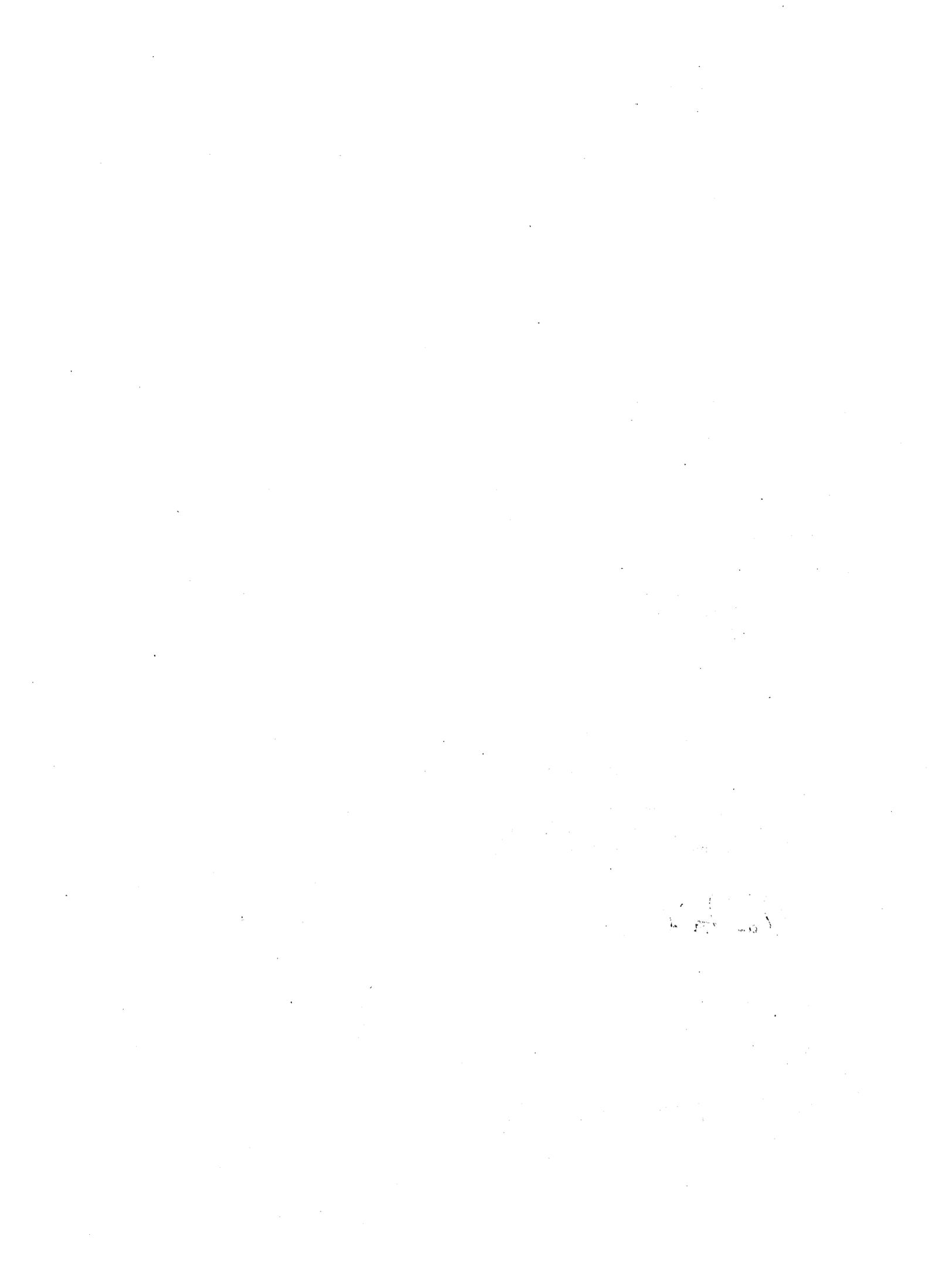
Signature

3/31/2008
Date

Amir Farid
Name (Printed or typed)
Authorized Representative of
Shell Oil Company

General Manager
Title

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



Attachment A
Docket Number: 2007-1789-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Shell Oil Company
Payable Penalty Amount:	Eighty Thousand Dollars (\$80,000)
SEP Amount:	Forty Thousand Dollars (\$40,000)
Type of SEP:	Pre-approved
Third-Party Recipient:	Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program
Location of SEP:	Harris County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent will contribute to Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program in Harris County. The contribution will be used in accordance with the *Supplemental Environmental Project Agreement between the Houston-Galveston AERCO and the Texas Commission on Environmental Quality*.

SEP monies will be used to aid local school districts and area transit agencies in reaching local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP monies will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. Those SEP monies will be used exclusively by the school districts and transit agencies as supplements to meet the local match requirements of the EPA. SEP monies will be used to pay for the cost of replacing older diesel buses with alternative fueled or clean diesel buses. The old buses will be permanently retired and only sold for scrap. The schools and transit agencies will also use the SEP monies to retrofit more buses to reduce emissions. Houston-Galveston AERCO will send the TCEQ verification in the form of paid invoices and other documentation to show that the retrofits were completed. Retrofit technologies include particulate matter traps, diesel particulate matter filters, NOx reduction catalyst technology in combination with diesel particulate filters, and other emission control technologies that are developed and approved by EPA or the California Air Resources Board.

The Respondent certifies that there is no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Houston-Galveston Area Council
Houston-Galveston AERCO
P.O. Box 22777
Houston, Texas 77227-2777

3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to "Texas Commission on Environmental Quality" and mailed to:

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

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

