

Executive Summary – Enforcement Matter – Case No. 51230
Shell Oil Company
RN100211879
Docket No. 2015-1367-AIR-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Three or more enforcement actions (NOVs, orders, etc.) over the prior five year period for the same violation(s).

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Shell Oil Deer Park, 5900 Highway 225, Deer Park, Harris County

Type of Operation:

Petroleum refining plant

Other Significant Matters:

Additional Pending Enforcement Actions: Yes, Docket No.: 2015-1215-AIR-E, 2015-1636-AIR-E, 2015-1741-AIR-E, 2015-1816-AIR-E, and 2015-1834-AIR-E

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 22, 2016

Comments Received: No

Penalty Information

Total Penalty Assessed: \$13,125

Amount Deferred for Expedited Settlement: \$0

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$6,563

Total Due to General Revenue: \$0

Payment Plan: N/A

SEP Conditional Offset: \$6,562

Name of SEP: Railroad Commission of Texas

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Executive Summary – Enforcement Matter – Case No. 51230
Shell Oil Company
RN100211879
Docket No. 2015-1367-AIR-E

Date(s) of Investigation: December 11, 2014 through July 29, 2015

Date(s) of NOE(s): August 3, 2015

Violation Information

Failed to comply with the carbon monoxide (“CO”) concentration limit of 500 parts per million by volume (“ppmv”) on a dry basis [30 TEX. ADMIN. CODE §§ 101.20(1) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), 40 CODE OF FEDERAL REGULATIONS § 60.103(a), and Federal Operating Permit No. O1669, Special Terms and Conditions No. 1A.]

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

On December 17, 2014, the Respondent obtained an Alternate Case Specific Specification for CO Emissions for Boiler H-600 in order to comply with the CO concentration limit.

Technical Requirements:

The Order will require Respondent to implement and complete a Supplemental Environmental Project (“SEP”). (See SEP Attachment A)

Litigation Information

Date Petition(s) Filed: N/A

Date Answer(s) Filed: N/A

SOAH Referral Date: N/A

Hearing Date(s): N/A

Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Rajesh Acharya, Enforcement Division, Enforcement Team 4, MC 149, (512) 239-0577; Melissa Cordell, Enforcement Division, MC 219, (512) 239-2483

TCEQ SEP Coordinator: Stuart Beckley, SEP Coordinator, Enforcement Division, MC 219, (512) 239-3565

Respondent: Barry Klein, General Manager, Shell Oil Company, P.O. Box 100, Deer Park, Texas 77536

Respondent's Attorney: N/A

Attachment A
Docket Number: 2015-1367-AIR-E
SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Shell Oil Company
Penalty Amount:	Thirteen Thousand One Hundred Twenty-Five Dollars (\$13,125)
SEP Offset Amount:	Six Thousand Five Hundred Sixty-Two Dollars (\$6,562)
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Railroad Commission of Texas
Project Name:	<i>Alternative Fuels Clean School Bus Replacement Program</i>
Location of SEP:	Statewide, Preference for 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 SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

a. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Administrator named above. The contribution will be to the **Railroad Commission of Texas** for the *Alternative Fuels Clean School Bus Replacement Program*. The contribution will be used in accordance with the SEP between the Third-Party Administrator and the TCEQ (the “Project”). Specifically, the contribution will be used to reduce nitrogen oxides, volatile organic compounds, carbon monoxide, and particulate matter emissions by replacing older diesel buses with newer buses that meet more stringent emission standards.

The Third-Party Administrator shall use the SEP Offset Amount for up to 100% of the purchase price of a propane or natural gas powered school bus that is model year 2010 or newer to public school districts and public charter schools to replace a diesel school bus that is model year 2002 or older. The SEP will be done in accordance with all federal, state, and local environmental laws and regulations.

All dollars contributed will be used for the direct cost of implementing the Project, including but not limited to supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director (“ED”), be applied to another pre-approved SEP.

The Respondent's signature affixed to this Agreed Order certifies that it has no prior commitment to make this contribution and that it is being contributed solely in an effort to settle this enforcement action. The Respondent shall not profit in any manner from this SEP.

b. Environmental Benefit

This SEP will directly benefit air quality by reducing harmful exhaust emissions which contribute to the formation of ozone and may cause or exacerbate a number of respiratory diseases, including asthma. In addition, by encouraging less school bus idling, this SEP contributes to public awareness of environmental matters.

c. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Administrator 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 Offset Amount to the Third-Party Administrator. The Respondent shall make the check payable to **Railroad Commission of Texas SEP** and shall mail the contribution with a copy of the Agreed Order to:

Alternative Energy Division
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

3. Records and Reporting

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

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

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that the Respondent failed to fully implement and complete the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP; shall make the check payable to "Texas Commission on Environmental Quality"; and shall mail it to:

Texas Commission on Environmental Quality
Litigation Division
Attention: SEP Coordinator, MC 175
P.O. Box 13087
Austin, Texas 78711-3087

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. Recognition

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 Offset Amount identified in this Agreed Order has not been, and shall not be, included as a 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 4 (April 2014)

PCW Revision March 26, 2014

TCEQ

DATES Assigned PCW Screening EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent
 Reg. Ent. Ref. No.
 Facility/Site Region Major/Minor Source

CASE INFORMATION

Enf./Case ID No. No. of Violations
 Docket No. Order Type
 Media Program(s) Government/Non-Profit
 Multi-Media Enf. Coordinator
 EC's Team

Admin. Penalty \$ Limit Minimum Maximum

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of 12/17/2014) **Subtotal 1**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History Enhancement **Subtotals 2, 3, & 7**

Notes

Culpability Enhancement **Subtotal 4**

Notes

Good Faith Effort to Comply Total Adjustments **Subtotal 5**

Economic Benefit Enhancement* **Subtotal 6**

Total EB Amounts Estimated Cost of Compliance *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7 **Final Subtotal**

OTHER FACTORS AS JUSTICE MAY REQUIRE **Adjustment**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount

STATUTORY LIMIT ADJUSTMENT **Final Assessed Penalty**

DEFERRAL Reduction **Adjustment**

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

PAYABLE PENALTY

Screening Date 3-Sep-2015

Docket No. 2015-1367-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 4 (April 2014)

Case ID No. 51230

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Rajesh Acharya

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	9	45%
	Other written NOVs	4	8%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	12	240%
	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	10	250%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	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	
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	11	-11%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	4	-8%
<i>Please Enter Yes or No</i>			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2)

>> Repeat Violator (Subtotal 3)

Adjustment Percentage (Subtotal 3)

>> Compliance History Person Classification (Subtotal 7)

Adjustment Percentage (Subtotal 7)

>> Compliance History Summary

Compliance History Notes

Enhancement for nine NOVs with same/similar violations, four NOVs with dissimilar violations, twelve orders with denial of liability, and ten orders without denial of liability. Reduction for eleven notices of intent to conduct an audit and four disclosures of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100%

Screening Date 3-Sep-2015

Docket No. 2015-1367-AIR-E

PCW

Respondent Shell Oil Company

Policy Revision 4 (April 2014)

Case ID No. 51230

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN100211879

Media [Statute] Air

Enf. Coordinator Rajesh Acharya

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(1) and 122.143(4), Tex. Health & Safety Code § 382.085(b), 40 Code of Federal Regulations § 60.103(a), and Federal Operating Permit No. O1669, Special Terms and Conditions No. 1A

Violation Description Failed comply with the carbon monoxide ("CO") concentration limit of 500 parts per million by volume ("ppmv") on a dry basis. Specifically, Boiler H-600 exceeded the CO concentration limit on February 16, 2014 for one hour by 1.95 ppmv and February 20, 2014 for two hours by an average of 126.43 ppmv and on August 17, 2014 through August 19, 2014 for six hours by an average of 219.74 ppmv.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 15.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

Violation Events

Number of Violation Events 2 Number of violation days 5

daily	
weekly	
monthly	
quarterly	X
semiannual	
annual	
single event	

mark only one with an x

Violation Base Penalty \$7,500

Two quarterly events are recommended for the instances of non-compliance that occurred from February 16, 2014 to February 20, 2014 and August 17, 2014 to August 19, 2014.

Good Faith Efforts to Comply

25.0%

Reduction \$1,875

Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer

Extraordinary	
Ordinary	X
N/A	(mark with x)

Notes The Respondent came into compliance on December 17, 2014, before the Notice of Enforcement dated August 3, 2015.

Violation Subtotal \$5,625

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$208

Violation Final Penalty Total \$13,125

This violation Final Assessed Penalty (adjusted for limits) \$13,125

Economic Benefit Worksheet

Respondent Shell Oil Company
Case ID No. 51230
Reg. Ent. Reference No. RN100211879
Media Air
Violation No. 1

Percent Interest 5.0
Years of Depreciation 15

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

Delayed Costs

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Overtime Costs	EB Amount
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$5,000	16-Feb-2014	17-Dec-2014	0.83	\$208	n/a	\$208

Notes for DELAYED costs

Estimated cost to obtain an Alternate Case Specific Specification for CO Emissions for Boiler H-600 in order to comply with the CO concentration limit. Date Required is the initial date of non-compliance. Final Date is the date of compliance.

Avoided Costs

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

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Overtime Costs	EB Amount
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$5,000

TOTAL \$208

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



TCEQ Compliance History Report

PENDING Compliance History Report for CN601542012, RN100211879, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

Customer, Respondent, or Owner/Operator: CN601542012, Shell Oil Company **Classification:** SATISFACTORY **Rating:** 11.68

Regulated Entity: RN100211879, SHELL OIL DEER PARK **Classification:** SATISFACTORY **Rating:** 15.43

Complexity Points: 92 **Repeat Violator:** NO

CH Group: 02 - Oil and Petroleum Refineries

Location: 5900 HIGHWAY 225 DEER PARK, TX 77536-2434, HARRIS COUNTY

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER HG0659W

AIR OPERATING PERMITS PERMIT 1668

AIR OPERATING PERMITS PERMIT 1945

AIR OPERATING PERMITS PERMIT 1947

POLLUTION PREVENTION PLANNING ID NUMBER P00619

WASTEWATER PERMIT WQ0000402000

WASTEWATER PERMIT WQ0000403000

AIR NEW SOURCE PERMITS PERMIT 21262

AIR NEW SOURCE PERMITS REGISTRATION 55312

AIR NEW SOURCE PERMITS REGISTRATION 55869

AIR NEW SOURCE PERMITS REGISTRATION 76315

AIR NEW SOURCE PERMITS REGISTRATION 11177

AIR NEW SOURCE PERMITS REGISTRATION 12537

AIR NEW SOURCE PERMITS REGISTRATION 13713

AIR NEW SOURCE PERMITS PERMIT 1119

AIR NEW SOURCE PERMITS PERMIT 3178

AIR NEW SOURCE PERMITS PERMIT 3216

AIR NEW SOURCE PERMITS PERMIT 6791

AIR NEW SOURCE PERMITS REGISTRATION 10888

AIR NEW SOURCE PERMITS REGISTRATION 11586

AIR NEW SOURCE PERMITS REGISTRATION 12829

AIR NEW SOURCE PERMITS REGISTRATION 15961

AIR NEW SOURCE PERMITS REGISTRATION 15262

AIR NEW SOURCE PERMITS REGISTRATION 15499

AIR NEW SOURCE PERMITS PERMIT 18576

AIR NEW SOURCE PERMITS PERMIT 22038

AIR NEW SOURCE PERMITS REGISTRATION 24096

AIR NEW SOURCE PERMITS REGISTRATION 29597

AIR NEW SOURCE PERMITS REGISTRATION 33524

AIR NEW SOURCE PERMITS REGISTRATION 34358

AIR NEW SOURCE PERMITS REGISTRATION 35608

AIR NEW SOURCE PERMITS ACCOUNT NUMBER HG0659W

AIR NEW SOURCE PERMITS PERMIT 1920

AIR NEW SOURCE PERMITS PERMIT 2597

AIR NEW SOURCE PERMITS PERMIT 3215

AIR NEW SOURCE PERMITS PERMIT 3218

AIR NEW SOURCE PERMITS PERMIT 3985A

AIR NEW SOURCE PERMITS PERMIT 4933

AIR OPERATING PERMITS PERMIT 1669

AIR OPERATING PERMITS PERMIT 1943

AIR OPERATING PERMITS PERMIT 1946

AIR OPERATING PERMITS PERMIT 1948

POLLUTION PREVENTION PLANNING ID NUMBER P07403

WASTEWATER EPA ID TX0004863

WASTEWATER EPA ID TX0004871

AIR NEW SOURCE PERMITS REGISTRATION 54895

AIR NEW SOURCE PERMITS REGISTRATION 75524

AIR NEW SOURCE PERMITS REGISTRATION 130755

AIR NEW SOURCE PERMITS PERMIT 7855

AIR NEW SOURCE PERMITS REGISTRATION 12152

AIR NEW SOURCE PERMITS REGISTRATION 13373

AIR NEW SOURCE PERMITS REGISTRATION 16429

AIR NEW SOURCE PERMITS PERMIT 1120

AIR NEW SOURCE PERMITS PERMIT 3179

AIR NEW SOURCE PERMITS PERMIT 5801

AIR NEW SOURCE PERMITS PERMIT 9334

AIR NEW SOURCE PERMITS REGISTRATION 11096

AIR NEW SOURCE PERMITS REGISTRATION 12373

AIR NEW SOURCE PERMITS REGISTRATION 13678

AIR NEW SOURCE PERMITS PERMIT 8236

AIR NEW SOURCE PERMITS REGISTRATION 15365

AIR NEW SOURCE PERMITS REGISTRATION 15940

AIR NEW SOURCE PERMITS PERMIT 19849

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX815

AIR NEW SOURCE PERMITS REGISTRATION 27598

AIR NEW SOURCE PERMITS REGISTRATION 32282

AIR NEW SOURCE PERMITS REGISTRATION 34230

AIR NEW SOURCE PERMITS REGISTRATION 35243

AIR NEW SOURCE PERMITS PERMIT 37206

AIR NEW SOURCE PERMITS AFS NUM 4820100039

AIR NEW SOURCE PERMITS PERMIT 1968

AIR NEW SOURCE PERMITS PERMIT 3214

AIR NEW SOURCE PERMITS PERMIT 3217

AIR NEW SOURCE PERMITS PERMIT 3219

AIR NEW SOURCE PERMITS PERMIT 4256

AIR NEW SOURCE PERMITS REGISTRATION 41920

AIR NEW SOURCE PERMITS REGISTRATION 41875
AIR NEW SOURCE PERMITS REGISTRATION 42573

AIR NEW SOURCE PERMITS REGISTRATION 42221
AIR NEW SOURCE PERMITS REGISTRATION 42512

AIR NEW SOURCE PERMITS REGISTRATION 43605
AIR NEW SOURCE PERMITS REGISTRATION 45654
AIR NEW SOURCE PERMITS REGISTRATION 47575
AIR NEW SOURCE PERMITS PERMIT 56476
AIR NEW SOURCE PERMITS REGISTRATION 71223
AIR NEW SOURCE PERMITS REGISTRATION 54061
AIR NEW SOURCE PERMITS REGISTRATION 52565
AIR NEW SOURCE PERMITS REGISTRATION 52088
AIR NEW SOURCE PERMITS REGISTRATION 50423
AIR NEW SOURCE PERMITS REGISTRATION 75045
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX928
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX974
AIR NEW SOURCE PERMITS REGISTRATION 76699
AIR NEW SOURCE PERMITS REGISTRATION 76265
AIR NEW SOURCE PERMITS REGISTRATION 79604
AIR NEW SOURCE PERMITS REGISTRATION 80503
AIR NEW SOURCE PERMITS REGISTRATION 84642
AIR NEW SOURCE PERMITS REGISTRATION 85596
AIR NEW SOURCE PERMITS REGISTRATION 87173
AIR NEW SOURCE PERMITS REGISTRATION 92386
AIR NEW SOURCE PERMITS REGISTRATION 93992
AIR NEW SOURCE PERMITS REGISTRATION 95595
AIR NEW SOURCE PERMITS REGISTRATION 98644
AIR NEW SOURCE PERMITS REGISTRATION 100328
AIR NEW SOURCE PERMITS REGISTRATION 100945
AIR NEW SOURCE PERMITS REGISTRATION 101891
AIR NEW SOURCE PERMITS PERMIT 120335
AIR NEW SOURCE PERMITS REGISTRATION 105051
AIR NEW SOURCE PERMITS REGISTRATION 132997
AIR NEW SOURCE PERMITS REGISTRATION 134988
AIR NEW SOURCE PERMITS REGISTRATION 112737
AIR NEW SOURCE PERMITS REGISTRATION 131062
AIR NEW SOURCE PERMITS REGISTRATION 113881
AIR NEW SOURCE PERMITS REGISTRATION 120437
AIR NEW SOURCE PERMITS REGISTRATION 105055
AIR NEW SOURCE PERMITS REGISTRATION 132281
AIR NEW SOURCE PERMITS REGISTRATION 117430
AIR NEW SOURCE PERMITS REGISTRATION 112344
AIR NEW SOURCE PERMITS REGISTRATION 122116
AIR NEW SOURCE PERMITS REGISTRATION 125842
AIR NEW SOURCE PERMITS REGISTRATION 112313
AIR NEW SOURCE PERMITS REGISTRATION 106379
AIR NEW SOURCE PERMITS REGISTRATION 115088
AIR NEW SOURCE PERMITS REGISTRATION 105058
AIR NEW SOURCE PERMITS REGISTRATION 114863
AIR NEW SOURCE PERMITS REGISTRATION 131615

INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50099

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE
REGISTRATION # (SWR) 30007
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION
6001443

IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION
(SWR) 30007

AIR EMISSIONS INVENTORY ACCOUNT NUMBER
HG0659W

AIR NEW SOURCE PERMITS REGISTRATION 42118
AIR NEW SOURCE PERMITS REGISTRATION 45944
AIR NEW SOURCE PERMITS PERMIT 48912
AIR NEW SOURCE PERMITS PERMIT 56496
AIR NEW SOURCE PERMITS REGISTRATION 71567
AIR NEW SOURCE PERMITS REGISTRATION 50548
AIR NEW SOURCE PERMITS REGISTRATION 52089
AIR NEW SOURCE PERMITS REGISTRATION 50388
AIR NEW SOURCE PERMITS REGISTRATION 74572
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX896
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX928M1
AIR NEW SOURCE PERMITS REGISTRATION 77284
AIR NEW SOURCE PERMITS REGISTRATION 77952
AIR NEW SOURCE PERMITS REGISTRATION 78624
AIR NEW SOURCE PERMITS REGISTRATION 80525
AIR NEW SOURCE PERMITS REGISTRATION 81971
AIR NEW SOURCE PERMITS REGISTRATION 87871
AIR NEW SOURCE PERMITS REGISTRATION 87183
AIR NEW SOURCE PERMITS REGISTRATION 92675
AIR NEW SOURCE PERMITS REGISTRATION 92219
AIR NEW SOURCE PERMITS REGISTRATION 94547
AIR NEW SOURCE PERMITS REGISTRATION 96066
AIR NEW SOURCE PERMITS REGISTRATION 102096
AIR NEW SOURCE PERMITS REGISTRATION 98473
AIR NEW SOURCE PERMITS REGISTRATION 96915
AIR NEW SOURCE PERMITS REGISTRATION 102948
AIR NEW SOURCE PERMITS REGISTRATION 120555
AIR NEW SOURCE PERMITS REGISTRATION 105057
AIR NEW SOURCE PERMITS REGISTRATION 133287
AIR NEW SOURCE PERMITS EPA PERMIT N208
AIR NEW SOURCE PERMITS REGISTRATION 123359
AIR NEW SOURCE PERMITS REGISTRATION 105056
AIR NEW SOURCE PERMITS REGISTRATION 105060
AIR NEW SOURCE PERMITS REGISTRATION 109247
AIR NEW SOURCE PERMITS REGISTRATION 115095
AIR NEW SOURCE PERMITS REGISTRATION 127854
AIR NEW SOURCE PERMITS REGISTRATION 135037
AIR NEW SOURCE PERMITS REGISTRATION 133665
AIR NEW SOURCE PERMITS REGISTRATION 124415
AIR NEW SOURCE PERMITS REGISTRATION 132367
AIR NEW SOURCE PERMITS REGISTRATION 130375
AIR NEW SOURCE PERMITS REGISTRATION 129997
AIR NEW SOURCE PERMITS REGISTRATION 108593
AIR NEW SOURCE PERMITS REGISTRATION 105059
AIR NEW SOURCE PERMITS REGISTRATION 105772
PETROLEUM STORAGE TANK STAGE II REGISTRATION
32780

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD067285973

INDUSTRIAL AND HAZARDOUS WASTE EPA ID
TXD000750620

PUBLIC WATER SYSTEM/SUPPLY REGISTRATION
1010320

PETROLEUM STORAGE TANK REGISTRATION
REGISTRATION 32780

STORMWATER PERMIT TXR150010946

Compliance History Period: September 01, 2010 to August 31, 2015

Rating Year: 2015

Rating Date: 09/01/2015

Date Compliance History Report Prepared: September 11, 2015

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: September 11, 2010 to September 11, 2015

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Rajesh Acharya

Phone: (512) 239-0577

Site and Owner/Operator History:

- 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/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 10/25/2010 ADMINORDER 2009-1300-AIR-E (1660 Order-Agreed Order With Denial)
 - Classification: Moderate
 - Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
 - Rqmt Prov: Special Condition No. 1 PERMIT
 - Description: Failed to prevent unauthorized emissions.
 - Classification: Moderate
 - Citation: 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)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
 - Rqmt Prov: FOP O-02108 STC 15 OP
FOP O-02108 STC 1A OP
NSR 18576 SC 4A PERMIT
NSR 1968 SC 2 PERMIT
NSR 19849 SC 2A PERMIT
NSR 3173 SC 4 PERMIT
NSR 3179 SC 14 PERMIT
 - Description: Failed to maintain minimum heating value at the HIPA and A&S Flares.
 - Classification: Moderate
 - Citation: 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)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)
5C THSC Chapter 382 382.085(b)
 - Rqmt Prov: FOP O-02108 STC 15 OP
FOP O-02108 STC 1A OP
NSR 18576 SC 4A PERMIT
NSR 19849 SC 26 PERMIT
 - Description: Failed to meet the net heating value and exit velocity at the A&S Flare.
 - Classification: Moderate
 - Citation: 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)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)
5C THSC Chapter 382 382.085(b)
 - Rqmt Prov: FOP O-02108 STC 1A OP
FOP STC O-02108 15 OP

NSR 18576 SC 4B PERMIT
NSR 1968 SC 2 PERMIT
NSR 19849 SC 2B PERMIT

Description: Failed to maintain records of the pilot monitoring data at the A&S Flare from April 21, 2008 through December 31, 2008.

- 2 Effective Date: 02/05/2011 ADMINORDER 2010-0609-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition No. 1 PERMIT
Description: Failed to prevent unauthorized emissions during Incident No. 133506. Since this emissions event could have been avoided through better maintenance practices, the demonstration criteria in 30 TEX. ADMIN. CODE § 101.222 for an affirmative defense were not met.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Description: Failed to prevent unauthorized emissions during Incident No. 134189. Since this emissions event could have been avoided through better operational practices, the demonstration criteria in 30 TEX. ADMIN. CODE § 101.222 for an affirmative defense were not met.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition No. 1 PERMIT
Description: Failed to prevent unauthorized emissions during Incident No. 134301. Since this emissions event could have been avoided through better operational practices, the demonstration criteria in 30 TEX. ADMIN. CODE § 101.222 for an affirmative defense were not met.
- 3 Effective Date: 04/18/2011 ADMINORDER 2010-1331-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Description: Failed to prevent unauthorized emissions. Since this emissions event could have been avoided by better operational practices and was reported late, the demonstrations in 30 TEX. ADMIN. CODE § 101.222 necessary to present affirmative defense were not met.
Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 101, SubChapter F 101.201(c)
5C THSC Chapter 382 382.085(b)
Description: Failed to submit the initial notification for Incident No. 136726 within 24 hours after the discovery of the event and failed to submit the final report within 14 days after the end of the event.
- 4 Effective Date: 05/08/2011 ADMINORDER 2010-1439-IHW-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 335, SubChapter F 335.173(a)(3)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT N 264.301(a)(2)
Rqmt Prov: V.G.4.g. OP
Description: Failed to ensure that the leachate depth in the leachate collection/leak detection system does not exceed 12 inches above the liner. Specifically, based on review of the Leachate Log, a TCEQ investigator noted leachate levels above the maximum permitted level of 12 inches on 14 occasions in Cell 2 of the Site 104 Landfill located at the Plant.
- 5 Effective Date: 06/20/2011 ADMINORDER 2010-1351-MLM-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E)(iii)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: PSD-TX-928 PERMIT
Description: Failing to provide first repair attempt records for three leaking pumps. Specifically, Tag Nos. 115830, 26001 and 40477 were detected to be leaking on April 11, 2007, April 10, 2007, and May 10, 2007. During an enforcement

review meeting on December 17, 2009, leaking component records were requested; however, Respondent did not provide accurate records to demonstrate compliance for these pumps until October 20, 2010.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
40 CFR Part 61, Subpart V 61.242-7(d)(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-01669, SC 1(A) OP
FOP O-01669, SC 24 OP
NSR 21262, SC 2 PERMIT
NSR 21262, SC 3(A) PERMIT
NSR 21262, SC 3(B) PERMIT
NSR 21262, SC 4(D) PERMIT
NSR 21262, SC 9(I) PERMIT
SC 2, 3(A), 3(B), 4(D), 9(I) PERMIT

Description: Failing to repair or place the valve on delay of repair by the 15th day after the detection of a leak. Specifically, Tag. No. 41855 was detected leaking on February 13, 2007, and was not repaired until March 20, 2007.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-01669, General Terms & Conditions OP

Description: Failing to report all instances of deviations. Specifically, a total of 7 deviations were missing from reports for the following time periods: November 22, 2006 through May 21, 2007, May 22, 2007 through November 21, 2007, November 22, 2007 through December 31, 2007, January 1, 2008 through June 30, 2008, and July 1, 2008 through December 31, 2008;

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter E 115.421(a)(9)(A)(ii)
5C THSC Chapter 382 382.085(b)

Description: Failing to prevent the exceedance of 3.5 pounds per gallon ("lbs/gal") volatile organic compounds (□VOC□) on a daily basis. Specifically, EPN PAINTFE exceeded this limit on 98 occasions, with amounts ranging from 3.51 lbs/gal to 6.98 lbs/gal from January 2, 2008 through July 31, 2008.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-01669, SC 1(A) OP
FOP O-01669, SC 24(A) OP
NSR 21262, SC 2 PERMIT
NSR 21262, SC 24 PERMIT
NSR 21262, SC 4 PERMIT
SC 2, 4, 24 PERMIT

Description: Failing to maintain a minimum of 300 British thermal units per standard cubic foot ("Btu/scf") for EPN COKEFLARE. Specifically, EPN COKEFLARE fell below the required heating value for a total of three hours on three separate days in January, May, and July, 2008, with heating values ranging from 238 Btu/scf to 231 Btu/scf.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-01669, SC 24(A) OP
General Condition 8 PERMIT
NSR 46535, SC 1 PERMIT

Description: Failing to maintain compliance with the MAERT for sulfur dioxide (SO_2) for the Cracked Gas Hydrotreater Furnace ("EPN H36100"). Specifically, EPN H36100 emitted 7.3067 tons in 2007, and the allowed limit is 4.48 tons per year.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.221(a)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(2)(i)(E)

Rqmt Prov: Permit Provision (PP) V.I.3.b.(1) PERMIT

Description: Failing to maintain the minimum combustion temperature at the BIF of 1800 degrees Fahrenheit. Specifically, on March 26, 2009 and May 20, 2009, a total of three excursions occurred and the temperature fell to 1744.14, 1770.38, and 1721.2 degrees Fahrenheit, respectively.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.221(a)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(7)(ii)

Rqmt Prov: PP V.I.7.d. PERMIT

Description: Failing to test or document the rationale that the BIF was being tested at least every 30 days. Specifically, more than a 30 day gap was noted from September 10, 2008 through October 14, 2008, and from December 10, 2008 until January 29, 2009

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(d)

Rqmt Prov: PP V.I.7.e. PERMIT

Description: Failing to record observations in an inspection log or summary at the BIF area. Specifically, a phenol heavy waste stream had leaked around the pump in a secondary containment, the boiler water was leaking and being collected into a fracture tank, and the operator did not make any notations about these problems on the daily BIF inspection log.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC No. 1 PERMIT

Special Condition #1 PERMIT

Description: Failing to prevent the unauthorized release of air contaminants into the atmosphere when the V-5102 Crude Column was overpressured when the wash water entered the feed crude train at the DU2. Specifically, on May 17, 2009, during this two-minute emission event (Incident No. 124343) the following emissions were released: 7.587 tons of VOCs, 4 lbs. of hydrogen sulfide (H_2S), and 32 lbs of benzene. The TCEQ determined these emissions could have been avoided by better operational practices.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.221(a)(6)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT H 266.102(e)(2)(i)(E)

Rqmt Prov: V.I.3.b.1 OP

Description: Failing to maintain the minimum combustion temperature of 1800 degrees Fahrenheit while hazardous waste is being fed to the BIF unit. Specifically, Respondent fed hazardous waste to the BIF unit below the minimum combustion temperature on June 24, 2009, August 28, 2009, September 10, 2009, and September 19, 2009.

6 Effective Date: 06/20/2011 ADMINORDER 2010-1889-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions.

7 Effective Date: 06/20/2011 ADMINORDER 2010-1538-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: Failed to prevent unauthorized emissions during an emissions event that occurred on May 7, 2010.

8 Effective Date: 07/31/2011 ADMINORDER 2010-2072-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT

Description: The Respondent is alleged to have failed to prevent unauthorized emissions from the OP2 Elevated Flare, the OP3 Elevated Flare, and the OP3 Ground Flare during Incident No. 143946.

9 Effective Date: 10/17/2011 ADMINORDER 2011-0475-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Description: Failed to prevent unauthorized emissions.

10 Effective Date: 02/18/2012 ADMINORDER 2011-0860-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
Rqmt Prov: General Terms and Conditions OP

Description: Failure to timely submit a PCC Report certifying the first semi-annual reporting period January 1, 2010 through June 30, 2010. (Category A8(c)(1)(E))

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions 01/24/2005 OP

Description: Failed to submit a PCC under Title V Permit O-01948 within the required 30-day timeframe for the certification period of January 1, 2010 through December 31, 2010

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failed to submit a PCC under Title V Permit O-01668 within the required 30-day timeframe for the certification period of January 1, 2010 through June 30, 2010

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 OP

Description: Failure to submit permit compliance certification for the period January 1, 2010 through June 30, 2010. Violation Category A8(c)(1)(E). This is a high priority violation (HPV).

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Conditions 1 OP

Description: Failed to report as deviation for not submitting a PCC for the period January 1, 2010 through June 30, 2010. Category C3 violation.

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit No. 1943 ORDER

Description: Failure to submit a timely PCC report certifying the first semi-annual reporting period January 1, 2010 through June 30, 2010 [Category A8; Attachment A c.(1)(E)]

Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms & Conditions OP

Description: Failure to submit a PCC under Title V Permit O-01669 within the required 30-day timeframe for the certification period of January 1, 2010 through December 31, 2010
Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failure to report two emissions events and four startups/shutdowns as deviations in the deviation report dated July 30, 2010

This violation discovered by the investigator during the course of this investigation

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failed to submit a PCC under Title V Permit O-01945 within the required 30-day timeframe for the certification period of January 1, 2010 through June 30, 2010

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.146(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failure to submit a permit compliance certification report. Category A8(c)(1)(E)

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Description: Failure to report as deviation for not submitting a PCC for the first semi-annual reporting period January 1, 2010 through June 30, 2010. Category C3 violation.

- 11 Effective Date: 05/25/2012 ADMINORDER 2011-1311-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: SC 1 PERMIT
ST&C 2.I PERMIT
Description: Failure to prevent unauthorized emissions. Shell failed to prevent a leak on the overhead of the DU2 Unit Crude Column V-5102.
- 12 Effective Date: 08/17/2012 ADMINORDER 2011-2121-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: FOP 01668, STC 15 OP
NSR Permit 3219, SC 1 PERMIT
Description: Failed to prevent unauthorized emissions on June 7, 2011 in Olefins Plant 3. Because the event could have been avoided by better operating practices and was not reported properly, Shell Chemical LP did not meet the criteria for claiming an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THSC Chapter 382 382.085(b)
Description: Failed to include all the total quantities of contaminants released in the final report the emissions event that occurred on June 7, 2011 in Olefins Plant 3.
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 116.715(c)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP 01669, STC 22 OP
NSR Permit 21262, SC 1 PERMIT

Description: Failed to prevent unauthorized emissions during an emissions event in the Coker Unit that began on June 12, 2011. Because the event could have been avoided by better operating practices, Shell Oil Company did not meet the

criteria for claiming an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(f)
5C THSC Chapter 382 382.085(b)

Description: Failed to provide timely submittal of additional information to the TCEQ by August 1, 2011 for the emissions event that began on June 12, 2011 in the Coker Unit.

- 13 Effective Date: 03/21/2013 ADMINORDER 2012-1385-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Description: Failed to prevent unauthorized emissions during Incident No. 165218. Specifically, 35.60 pounds ("lbs") of 1,3 butadiene, 440.56 lbs of cis-2-butene, 637.99 lbs of trans-2-butene, 511.19 lbs of n-butane, 1,392.48 lbs of butene 1_isobutene, 892.50 lbs of butanes and isobutanes, 20 lbs of propane, 339.60 lbs of other volatile organic compounds ("VOC"), and 4.90 lbs of propylene were released during an emissions event (Incident No. 165218) which began on February 22, 2012, and lasted for 24 mi
- 14 Effective Date: 05/24/2014 ADMINORDER 2013-2000-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: FOP 01946, STC No. 21 OP
Special Condition No. 1 PERMIT
Description: Failed to prevent unauthorized emissions. Since this emissions event could have been avoided by better operational practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.
- 15 Effective Date: 07/11/2014 ADMINORDER 2013-1205-AIR-E (1660 Order-Agreed Order With Denial)
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition No. 1 PERMIT
Special Terms and Conditions No. 15 OP
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition No. 1 PERMIT
Special Terms and Conditions No. 15 OP
Description: Failed to prevent unauthorized emissions.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 10 PERMIT
Special Terms and Conditions 21 OP
Description: Failed to comply with the maximum fill rate of 14,100 gallons per hour ("gal/hr") for Tank Nos. D402 and D403 and the maximum pumping rate of 126,000 gal/hr for Tank No. F354.
- 16 Effective Date: 10/27/2014 ADMINORDER 2014-0375-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 115, SubChapter H 115.722(c)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Conditions No. 1 PERMIT
Special Terms and Conditions No. 21 OP

Description: Failed to prevent unauthorized emissions and failed to limit HRVOC emissions to 1,200 lbs per one hour block period.

Classification: Major

Citation: 30 TAC Chapter 115, SubChapter H 115.722(c)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Conditions No. 1 PERMIT
Special Terms and Conditions No. 22 OP

Description: Failed to prevent unauthorized emissions and failed to limit HRVOC emissions to 1,200 lbs per one hour block period.

17 Effective Date: 12/19/2014 ADMINORDER 2014-0152-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions. Failure to prevent the overfilling of the GOHT Stripper Overhead Receiver during startup of the unit (Category A12(i)(6)).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions. Shell failed to prevent the release of unauthorized emissions associated with four holes in the floating roof of Tank G358.

18 Effective Date: 07/17/2015 ADMINORDER 2014-1110-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
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)(3)(ii)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 1945 PERMIT
3179 PERMIT

Description: Failed to maintain the minimum net heating value of 300 British thermal units per standard cubic foot ("Btu/scf") for the A & S Flare, Emission Point Number ("EPN") A1301. Specifically, the net heating value fell below 300 Btu/scf on January 25, 2013, March 5, 2013, and June 5, 2013.

Classification: Moderate

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

Rqmt Prov: 1945 PERMIT
3179 PERMIT

Description: Failed to maintain the required minimum firebox temperature of 1,500 degrees Fahrenheit ("°F") for the Regenerative Thermal Oxidizer ("RTO"), EPN H87002. Specifically, the firebox temperature fell below 1,500 °F on February 23, 2013, April 24, 2013, and April 27, 2013.

19 Effective Date: 08/10/2015 ADMINORDER 2014-1522-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Major

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 116.715(c)(7)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP No. O1669 OP

Special Condition No. 1 PERMIT

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 47,807.73 pounds ("lbs") of volatile organic compounds ("VOC"), including 1,805.52 lbs of highly reactive volatile organic compounds ("HRVOC");

28.39 lbs of hydrogen sulfide; and 0.71 lb of carbon monoxide from the Distillation Unit Column V-5102, during an emissions event (Incident No. 199252) that began on June 3, 2014 and lasted for 16 minutes. (Category A12(i)(6)).

Classification: Minor

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 116.715(c)(7)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP No. O1669 OP

Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions. Specifically, the Respondent released 6,844.43 lbs of VOC, including 640.32 lbs of HRVOC; 257.33 lbs of hydrogen sulfide; and 8.11 lbs of carbon monoxide from the Distillation Unit Column V-5102, during an emissions event (Incident No. 200476) that began on June 30, 2014 and lasted for three minutes.

20 Effective Date: 08/24/2015 ADMINORDER 2014-1245-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: ST&C 1A OP

Description: Failed to maintain the H2S concentration in the fuel gas at or below 230 mg/dscm.

Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(2)(A)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: ST&C 1A OP

Description: Failed to comply with the NH3 concentration limit of 10 ppmv at three percent oxygen for units that inject urea or NH3 into the exhaust stream for nitrogen oxides control.

Classification: Minor

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

30 TAC Chapter 122, SubChapter B 122.146(5)(C)(ii)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: GT&C OP

Description: Failed to include all applicable requirements for each deviation reported in the January 1, 2013 through June 30, 2013 deviation report dated July 30, 2013 and the July 1, 2013 through December 31, 2013 deviation report dated January 30, 2014.

21 Effective Date: 08/24/2015 ADMINORDER 2014-1728-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-1668 OP

Special Condition No. 6 PERMIT

Description: Failure to prevent unauthorized emissions. Shell Chemical LP failed to prevent a leak on the flange of the recirculation nozzle on Tank T74B (Category A12i(6)).

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	September 16, 2010	(873886)
Item 2	October 19, 2010	(881488)
Item 3	November 17, 2010	(888016)
Item 4	December 17, 2010	(896221)
Item 5	January 18, 2011	(902290)
Item 6	January 21, 2011	(878058)
Item 7	February 17, 2011	(909066)
Item 8	March 08, 2011	(900041)
Item 9	March 14, 2011	(916329)
Item 10	March 15, 2011	(859959)
Item 11	March 23, 2011	(906934)
Item 12	April 08, 2011	(906978)
Item 13	April 18, 2011	(924772)
Item 14	April 27, 2011	(901538)
Item 15	May 12, 2011	(901220)
Item 16	May 16, 2011	(901224)
Item 17	May 18, 2011	(938010)
Item 18	June 07, 2011	(912033)
Item 19	June 17, 2011	(915211)
Item 20	June 20, 2011	(945334)
Item 21	July 01, 2011	(936461)
Item 22	July 22, 2011	(937608)
Item 23	August 01, 2011	(923435)
Item 24	August 17, 2011	(948249)
Item 25	August 18, 2011	(959288)
Item 26	August 23, 2011	(937593)
Item 27	August 26, 2011	(937667)
Item 28	August 29, 2011	(937668)
Item 29	August 30, 2011	(937207)
Item 30	September 15, 2011	(965321)
Item 31	September 28, 2011	(937483)
Item 32	October 13, 2011	(971361)
Item 33	November 17, 2011	(977521)
Item 34	December 09, 2011	(965179)
Item 35	December 12, 2011	(969310)
Item 36	December 16, 2011	(970016)
Item 37	December 19, 2011	(984287)
Item 38	January 12, 2012	(990589)
Item 39	January 17, 2012	(964848)
Item 40	February 06, 2012	(976905)
Item 41	February 15, 2012	(987664)
Item 42	February 20, 2012	(997950)
Item 43	February 24, 2012	(987343)
Item 44	March 16, 2012	(994459)
Item 45	March 20, 2012	(1003474)
Item 46	March 30, 2012	(976906)
Item 47	April 10, 2012	(989049)
Item 48	April 18, 2012	(987396)
Item 49	April 19, 2012	(1010037)
Item 50	May 03, 2012	(997861)
Item 51	May 15, 2012	(1006516)
Item 52	May 18, 2012	(1016432)
Item 53	June 20, 2012	(1024153)
Item 54	June 29, 2012	(1009226)
Item 55	July 10, 2012	(1015877)
Item 56	July 20, 2012	(1031549)
Item 57	July 30, 2012	(1013049)
Item 58	August 16, 2012	(1008493)

Item 59	August 20, 2012	(1037925)
Item 60	September 05, 2012	(1013053)
Item 61	September 13, 2012	(1020375)
Item 62	September 18, 2012	(1031344)
Item 63	October 02, 2012	(1021281)
Item 64	October 18, 2012	(1060822)
Item 65	November 20, 2012	(1060823)
Item 66	December 19, 2012	(1060824)
Item 67	January 18, 2013	(1078933)
Item 68	January 25, 2013	(1046537)
Item 69	February 08, 2013	(1050758)
Item 70	February 20, 2013	(1078934)
Item 71	February 27, 2013	(1059517)
Item 72	March 20, 2013	(1089290)
Item 73	March 29, 2013	(1060207)
Item 74	April 10, 2013	(1059686)
Item 75	April 18, 2013	(1095685)
Item 76	April 29, 2013	(1073262)
Item 77	May 20, 2013	(1095684)
Item 78	June 20, 2013	(1110285)
Item 79	July 19, 2013	(1117169)
Item 80	July 31, 2013	(1098624)
Item 81	August 07, 2013	(1102332)
Item 82	August 20, 2013	(1124926)
Item 83	September 18, 2013	(1129525)
Item 84	October 17, 2013	(1135256)
Item 85	November 05, 2013	(1095043)
Item 86	November 14, 2013	(1106142)
Item 87	November 20, 2013	(1140655)
Item 88	December 18, 2013	(1147113)
Item 89	January 15, 2014	(1114349)
Item 90	January 17, 2014	(1153182)
Item 91	February 03, 2014	(1135116)
Item 92	February 18, 2014	(1139856)
Item 93	February 19, 2014	(1160517)
Item 94	March 17, 2014	(1150150)
Item 95	March 19, 2014	(1167162)
Item 96	April 04, 2014	(1152418)
Item 97	April 17, 2014	(1174295)
Item 98	May 13, 2014	(1152530)
Item 99	May 20, 2014	(1180483)
Item 100	May 28, 2014	(1163873)
Item 101	May 30, 2014	(1152587)
Item 102	June 18, 2014	(1187382)
Item 103	July 09, 2014	(1179970)
Item 104	July 17, 2014	(1198511)
Item 105	August 12, 2014	(1173221)
Item 106	August 19, 2014	(1198512)
Item 107	August 22, 2014	(1172985)
Item 108	September 15, 2014	(1086729)
Item 109	September 17, 2014	(1205786)
Item 110	October 02, 2014	(1191546)
Item 111	October 20, 2014	(1212198)
Item 112	November 19, 2014	(1218450)
Item 113	December 18, 2014	(1216102)
Item 114	January 19, 2015	(1230756)
Item 115	January 30, 2015	(1222756)
Item 116	February 04, 2015	(1223023)
Item 117	February 05, 2015	(1197220)
Item 118	February 19, 2015	(1228205)

Item 119	February 20, 2015	(1227303)
Item 120	February 23, 2015	(1209666)
Item 121	February 27, 2015	(1228929)
Item 122	March 18, 2015	(1222396)
Item 123	March 19, 2015	(1248595)
Item 124	April 20, 2015	(1255496)
Item 125	May 20, 2015	(1262206)
Item 126	June 02, 2015	(1246895)
Item 127	June 17, 2015	(1269375)
Item 128	July 16, 2015	(1228069)
Item 129	August 05, 2015	(1229874)
Item 130	August 26, 2015	(1274994)

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

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

- 1 Date: 09/26/2014 (1195897) CN601542012
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT
Description: Shell failed to ensure that the isolation valve from the HT-2 off spec header to Tank TOL909 was fully closed.
- 2 Date: 01/16/2015 (1203738) CN601542012
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT
Description: Failure to prevent unauthorized emissions. Shell failed to provide sufficient information regarding the leak on the re-run gasoline line to demonstrate they met the affirmative defense criteria (Category A12i(6)).
- 3 Date: 03/31/2015 (1255495) CN601542012
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
- 4 Date: 04/30/2015 (1262205) CN601542012
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
- 5 Date: 05/29/2015 (1229916) CN601542012
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 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
Special Conditions (SC) 23E OP
Special Terms & Conditions (ST&C) 1A OP
Special Terms & Conditions (ST&C) 21 OP
Description: Failure to prevent Open Ended Lines (OELs) in VOC service (Category C10)
- 6 Date: 05/29/2015 (1248464) CN601542012
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 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 6E PERMIT
Special Term and Condition 17 OP
Special Term and Condition 1A OP
Description: Failure to prevent open ended lines (OELs) in Volatile Organic Compounds (VOC)

service. (Category C10)

7 Date: 05/29/2015 (1229864) CN601542012
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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)

5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 22 OP
NSR Special Condition 8C PERMIT

Description: Failure to prevent visible emissions from flare [EPN: OP3FLARE]. (Category C4)

Self Report? NO Classification: Major

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 22 OP
NSR Special Condition 18A PERMIT

Description: Failure to prevent true vapor pressure (TVP) from exceeding the allowable limits for tanks [EPNs: TOL-909, TC3-3001, and K-307]. (Category B19(g)(1))

Self Report? NO Classification: Moderate

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 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 22 OP
NSR Special Condition 22E PERMIT
NSR Special Condition 2E PERMIT
NSR Special Condition 4E PERMIT
NSR Special Condition 6E PERMIT

Description: Failure to prevent open-ended lines (OELs) from Unit IDs: OP-3, OP-2, PAU2, HT-2, IRU, and CUMENE. (Category C10)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(3)(C)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to prevent any nonvapor-tight gauging and/or sampling while VOC is being transferred from Distribution EPN: SCRWRTC. (Category B1)

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 THSC Chapter 382 382.085(b)
FOP Special Term & Condition 22 OP
NSR Special Condition 7 PERMIT

Description: Failure to prevent Carbon Monoxide (CO) from exceeding 78 parts per million by volume (ppmv) limit in the combustion gas of Unit ID: PAU3 [EPN: H87920]. (Category B13)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
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)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 22 OP
NSR Special Condition 14A PERMIT

Description: Failure to maintain net heating value (NHV) above 300BTU/scf for flare [EPN: A1333]. (Category C4)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 61, Subpart V 61.242-7(c)(1)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to monitor valves for two successive months from Unit ID: HT-2.

(Category C1)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 2F OP

Description: Failure to submit an initial report in STEERS for incident No. 205862 within 24 hours. (Category C3)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(7)

30 TAC Chapter 115, SubChapter D 115.354(2)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(i)(1)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to correctly identify and monitor components for Unit IDs: ACU and BEU. (Category C1)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to attempt first repair of a component for Unit ID: OP-3. (Category C4)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to repair Unit ID: PAU3 pump within 15 days. (Category C4)

8 Date: 05/29/2015 (1229920) CN601542012
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 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 6E PERMIT
Special Term and Condition 1A OP
Special Term and Condition 21 OP

Description: Failure to prevent open ended lines (OELs) in Volatile Organic Compound (VOC) service. (Category C10)

9 Date: 05/31/2015 (1269374) CN601542012
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

10 Date: 06/30/2015 (1276920) CN601542012
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

11 Date: 07/09/2015 (1252278)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THSC Chapter 382 382.085(b)

Description: Failure to submit notification to the TCEQ of a reportable emissions event within 24 hours of discovery (Category B19g(1)).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions. Failure to prevent the shutdown of Furnace FP3-1090, which resulted in off-spec product sent to the flares (Category B19g(1)).

12 Date: 08/03/2015 (1228900) CN601542012
Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain the SO2 12-hour average 250 parts per million by volume (ppmv) for the Sulfur Recovery Unit (SRU) incinerators (EPNs: SR 3/4 and SR-7). (Category B13)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain the carbon monoxide (CO) below 400 ppmv 24 hr rolling concentration for the boilers (H-600 and H-1000). (Category B13)

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 THSC Chapter 382 382.085(b)
Special Condition 24 PERMIT
Special Terms and Condition 23 OP

Description: Failure to maintain nitrogen oxide (NOx) 3-hour (hr) rolling average concentration for boiler, H-600. (Category B13).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain ammonia (NH3) slip emissions from the boiler (EPN: H-600). (Category B13)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 49(D)(i) PERMIT
Special Terms and Condition 1A OP
Special Terms and Condition 23 OP

Description: Failure to maintain the net heating value within the permitted requirements for the flares, EPN: FLAREEP (East property flare). (Category C4)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
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 THSC Chapter 382 382.085(b)
Special Condition 9E PERMIT
Special Terms and Condition 1A OP
Special Terms and Condition 23 OP

Description: Failure to cap or seal open-ended lines (OELs). (Category C10)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(3)
30 TAC Chapter 115, SubChapter H 115.766(a)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to meet the requirements of the cooling water tower, EPN:CWT12, continuous emissions monitoring (CEMS) 95 % uptime. (Category B18).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain the furnace (EPN: H200) firing rate. (Category C4)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(a)(4)
5C THSC Chapter 382 382.085(b)
Special Condition 17D PERMIT
Special Terms and Condition 1A OP
Special Terms and Condition 23 OP

Description: Failure to submit seal gap measurements within 30 days of the inspection.

(Category C3)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(e)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 1A OP
 Description: Failure to inspect the atmospheric relief valve within 24 hrs of the actuation.
 (Category C1)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Condition 1A OP
 Description: Failure to maintain the hydrogen sulfide (H2S) required concentrations. (Category
 B13)
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 17D PERMIT
 Special Terms and Condition 23 OP
 Description: Failed to conduct seal gap measurements for tanks (EPNs: G357, G313, TA332,
 TA324 and TA309). (Category B1)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Condition 1A OP
 Description: Failed to repair a leaking valve (Unit PLAT-2) within the required timeframe.
 (Category C1)

13 Date: 09/04/2015 (1261902) CN601542012
 Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition No. 1 PERMIT
 Description: Failure to prevent unauthorized emissions. Failure to prevent a release from the
 psv on the Benzene Distillation Column (V876).

F. Environmental audits:

Notice of Intent Date: 10/20/2010 (873036)
 No DOV Associated

Notice of Intent Date: 11/18/2010 (884821)
 Disclosure Date: 07/21/2011

Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.107
 Description: Failed to report all required information or negative declaration of Subpart J Specific Reporting
 Requirements when the negative applicability statement is not marked in the cover letter of the report.

Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(c)

Description: Failed to report the magnitude of each period of excess emissions.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(e)(3)

Description: Failed to explicitly report the cause and corrective actions taken when monitoring systems were inoperable.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7

Description: Failed to submit a Fig. 1 summary report for all pollutant and diluents analyzers.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13(h)

Description: Performed incorrect application of data reduction and downtime calculations during the out of control
 periods.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(a)(12)(ii)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.107
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.107(c)

Description: Failed to include quarterly DARs in the semi-annual reports.

Notice of Intent Date: 01/26/2011 (899545)
No DOV Associated

Notice of Intent Date: 08/26/2011 (956682)
Disclosure Date: 10/27/2011

Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(b)(2)

Description: Failed to submit raw seal gap measurements from the external floating roof tanks to the agency within 60 days of taking the measurements; also the measurement data for the tanks that did not pass inspection were not submitted with the periodic compliance reports.

Viol. Classification: Minor
Citation: 30 TAC Chapter 290, SubChapter F 290.122(a)(3)(A)

Description: Failed to conduct annual backflow preventer testing, and failed to provide notification to the users of the non-community water system of the missed backflow preventer tests within 45 days of discovery of the missed testing.

Viol. Classification: Minor
Citation: 40 CFR Chapter 264, SubChapter I, PT 264, SubPT K 264.254(b)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT N 264.303(b)(3)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT N 264.310(b)

Description: Failed to include a check of the Cell 2 primary leachate systems inspections in the Site 104 inspection records; failed to include 5 weeks of 2010 inspections of the Waste Pile (8/9, 10/25, 11/1, 11/8, and 12/20) in the records; and failed to include the April 2011 record for the closed site inspection as the record was not available.

Notice of Intent Date: 09/29/2011 (976141)
No DOV Associated

Notice of Intent Date: 04/24/2012 (1014033)
No DOV Associated

Notice of Intent Date: 06/11/2012 (1014412)
Disclosure Date: 09/26/2012
Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PERMIT SC 1

Description: Failed to control emissions of benzene from the Catalytic Reformer #3 vent (V54) occurred to atmosphere in an amount greater than the MAERT limits in NSR Permit 21262 on nine separate periods since 2009. Details are listed here: 1/17/2009 1400-1659 hrs -46.6 lbs; 5/21/2009, 0600-1259 hrs --24.1 lbs; 7/3/2009 0600-1259, hrs - 129.2 lbs; 9/22/2009 1500-1659 hrs -- 17.1 lbs; 9/25/2009 0800-1159 hrs- 34.6 lbs; 7/11/2010 2000 hrs- /12/2010, 0959 hrs-140.31bs;1/9/2011 1000-1359 hrs -- 91.21bs; 11/23/2

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201

Description: Failed to submit initial notification of reportable emission events within the required time period.

Notice of Intent Date: 09/12/2012 (1043261)
No DOV Associated

Notice of Intent Date: 09/19/2012 (1035458)
Disclosure Date: 06/19/2013
Viol. Classification: Major
Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank A309.

Viol. Classification: Major
Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank G360.

Viol. Classification: Major

Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank G313.

Viol. Classification: Major

Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank A324.

Viol. Classification: Major

Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank A322.

Viol. Classification: Major

Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank G359.

Viol. Classification: Major

Citation: 30 TAC Chapter 115, SubChapter B 115.112
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(1)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(f)

Description: Failed to keep rim space vents closed when required in external floating roof tank G357 due to the malfunction of a rim vent pin.

Notice of Intent Date: 04/25/2013 (1089202)
No DOV Associated

Notice of Intent Date: 08/06/2015 (1274333)
No DOV Associated

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Description: Failure to meet the limit for one or more permit parameter
 7 Date: 06/10/2011 (899805) CN601542012
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 9 PERMIT
 ST&C 17 OP
 Description: Failure to maintain the tank fill rate below the maximum fill rate for tanks D350,
 D353, and G353. [CATEGORY B18 VIOLATION]
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)
 30 TAC Chapter 106, SubChapter K 106.262(a)(3)
 30 TAC Chapter 116, SubChapter B 116.117(b)(2)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 17 OP
 Description: Failure to submit PBR registrations (Form PI-7) within ten days after making
 parameter changes to tanks G343, G344 and J313. [Category C3 violation]
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 2.F. OP
 Description: Failure to report an emission event to STEERS within 24 hours. [Category C3
 violation]
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)
 5C THSC Chapter 382 382.085(b)
 GT&C OP
 Description: Failure to report all deviations in the corresponding semi-annual deviation report.
 [Category C3 violation]
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 30 TAC Chapter 122, SubChapter B 122.146(5)(A)
 5C THSC Chapter 382 382.085(b)
 GT&C OP
 Description: Failure to submit complete and accurate semi-annual deviation reports. (Category
 B3 violation)

8 Date: 06/30/2011 (952607) CN601542012
 Classification: Moderate
 Self Report? YES For Informational Purposes Only
 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

9 Date: 06/30/2011 (952608) CN601542012
 Classification: Moderate
 Self Report? YES For Informational Purposes Only
 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

10 Date: 08/01/2011 (899808) CN601542012
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.9(b)(2)
5C THSC Chapter 382 382.085(b)
Special Conditions 1 and 8 OP
Description: Late notification of emergency engine installation. Category B3 violation.
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.165(a)(7)
5C THSC Chapter 382 382.085(b)
Special Condition 1 OP
Description: Failure to properly document the accuracy and the completeness of a deviation report. Category C3 violation.

11 Date: 08/02/2011 (899972) CN601542012
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to limit H2S content in refinery fuel gas to 162 ppm on a 3-hour average
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to maintain the SO2 limit of 250 ppmv from the Sulfur Recovery 3/4 stack for a total of 13 hours

Classification: Minor
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(a)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to continuously monitor SO2 and particulate matter (PM) from the CCU Furnace H-600/ Wet Gas Scrubber
Classification: Minor

Self Report? NO For Informational Purposes Only
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 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
5C THSC Chapter 382 382.085(b)
SC 9E PERMIT
ST&C 1A and 22A OP
Description: Failure to seal five open-ended lines in VOC/VHAP service with a cap, blind flange, plug, or a second valve
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to maintain the fuel flow limits that were established during performance tests for the heaters
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to take HRVOC samples 9 times within 10 hours when HRVOC analyzers

for flares were down for more than 8 hours

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to maintain the minimum net heating value of 300 Btu/scf for the gas being combusted in flares

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter B 115.114(a)(1)
30 TAC Chapter 115, SubChapter B 115.114(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.640(n)(1)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to perform required visual tank inspections according to schedule

Classification: Moderate

Self Report? NO

For Informational Purposes Only

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)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.640(n)(1)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to perform required secondary seal measurements according to schedule for Tank A324

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to limit NH3 emissions to 10 ppmv from the Heater H53NN for two hours

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 117, SubChapter B 117.310(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
SC 6 PERMIT

ST&C 1A and 22A OP

Description: Failure to limit CO emissions from combustion devices

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to take VOC samples six times when VOC analyzers for cooling water towers were down for more than 24 hours

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to continuously operate monitoring systems for cooling water towers CWT16 and CWT 17

Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.165(a)(7)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Description: Failure to properly document the accuracy and completeness of a deviation report.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 4 PA
Special Terms and Conditions 21 OP
Description: Failure to limit hydrogen sulfide concentration in refinery fuel gas. Category B18 violation.

13 Date: 08/31/2011 (965322) CN601542012
Classification: Moderate

Self Report? YES For Informational Purposes Only
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

14 Date: 11/16/2011 (963333) CN601542012
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
ST&C 22 PERMIT
Description: Shell submitted compliance documentation to resolve violation tracking no. 450365.

15 Date: 01/17/2012 (963688) CN601542012
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
Description: Shell failed to prevent unauthorized emissions during Incident No. 160292.

16 Date: 02/29/2012 (1003475) CN601542012
Classification: Moderate

Self Report? YES For Informational Purposes Only
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

17 Date: 04/04/2012 (989850) CN601542012
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
Special Condition 6 PERMIT
Special Term & Condition 1A OP
Special Term & Condition 25 OP
Description: Failure to operate refinery equipment in compliance with the Carbon Monoxide (CO) limit of 500 parts per million (ppm). (Category B.19.g.1 violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 25 PERMIT
Special Term & Condition 1A OP
Special Term & Condition 25 OP
Description: Failure to limit the hydrogen sulfide content (H2S) in fuel gas streams to refinery flares. (Category B.19.g.1 violation)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(a)(3)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 25 PERMIT
Special Term & Condition 1A PERMIT
Special Term & Condition 25 OP

Description: Failure to operate two furnaces within the SO2 emissions limit of 20 ppm. (Category C4 Violation)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to operate the Sulfur Recover Unit (SRU) Incinerators (EPNs: SR3/4STACK & SR5STACK) within the 250 ppm SO2 limit. (Category B.19.g.1 Violation)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 115, SubChapter H 115.782(a)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 9H PERMIT
Special Term & Condition 1A OP
Special Term & Condition 25 OP

Description: Failure to maintain tags on leaking fugitive emissions components. (Category C4 Violation)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 49D PERMIT
Special Term & Condition 1A OP
Special Term & Condition 25 OP

Description: Failure to operate the East Property Flare (EPN: FLAREEP) with a net heating value of 300 British Thermal Units per standard cubic foot (Btu/scf). (Category C4 Violation)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP
Special Term & Condition 1K OP

Description: Failure to operate the West Property Flare analyzer with less than 5% downtime. (Category B.19.g.1 Violation)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP
Special Term & Condition 1K OP

Description: Failure to operate the Cooling Tower 16 Analyzer with less than 5% downtime. (Category B.19.g.1 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 10E PERMIT
Special Condition 9E PERMIT
Special Term & Condition 1A OP
Special Term & Condition 25 OP

Description: Failure to cap or seal one open-ended line in VOC service. (Category C4 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.354(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to Monitor a Relief Valve within 24 hours. (Category C1 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 19 PERMIT
Special Term & Condition 25 OP

Description: Failure to Maintain Coke Moisture Rate. (Category C4 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1K OP

Description: Failure to operate 11 Combustion Units in HRVOC service within the established monitoring parameter of 30 TAC 115.725. (Category B.19.g.1 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter E 115.421(a)(9)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to perform surface coating operations within the VOC limit of 3.5 lbs per gallon. (Category B.19.g.1 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 106, SubChapter K 106.262(a)(3)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 23 OP

Description: Late Registration of PBR for the CR3 Vent. (Category C3 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter B 115.114(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to conduct visual tank seal inspections in the required timeframe of 11 storage tanks. (Category C1 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter E 115.426(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP

Description: Failure to maintain records of usage for high VOC content surface coatings.

(Category C3 Violation)

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(G)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(a)
40 CFR Part 63, Subpart G 63.119(c)(2)(ix)
5C THSC Chapter 382 382.085(b)
Special Term & Conditon 1A OP

Description: Failure to operate 44 storage tanks with a sleeve on the slotted guidepoles.
(Category B.19.g.1 Violation)

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 115, SubChapter H 115.764(a)(6)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term & Condition 1A OP
Special Term & Condition 1K OP

Description: Failure to perform manual sampling to HRVOC-service equipment. (Category C1 Violation)

18

Date: 04/26/2012 (989467)

CN601542012

Classification: Minor

Self Report? NO

For Informational Purposes Only

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)
5C THSC Chapter 382 382.085(b)
Special Condition 5H PERMIT
ST&C 13 OP

Description: Failure to maintain leak tag on component.

19

Date: 05/09/2012 (989465)

CN601542012

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 18 PERMIT
ST&C 21 OP

Description: Failure to maintain minimum firebox temperature on H87002. (Category C4 Violation)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 10 PERMIT
ST&C 21 OP

Description: Failure to maintain acetone loading rate below permitted limits on F335 and F354.
(Category B19g1 Violation)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.113(a)(2)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to maintain HAP destruction efficiency on H9200. (Category C4 Violation)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

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

Special Condition 1 PERMIT
Special Condition 7 PERMIT
ST&C 21 OP

Description: Failure to maintain CO lbs/hr and ppm limits on H87920. (Category B14 Violation)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 6 PERMIT
ST&C 21 OP

Description: Failure to maintain minimum firebox temperature on H87920. (Category C4 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 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)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 14A PERMIT
ST&C 21 OP

Description: Failure to maintain required net heating value on A1333. (Category C4 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 2 PERMIT
ST&C 21 OP

Description: Failure to prevent visible emissions from H87920. (Category C4 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1H OP

Description: Failure to prevent collect grab sample within 10 hours of analyzer malfunction on A1303.
(Category B19g1 Violation)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 10 PERMIT
ST&C 21 OP

Description: Failure to maintain tank fill rates below permitted limits on D402 and D403.
(Category B19g1 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 23E PERMIT
ST&C 21 OP

Description: Failure to prevent open ended lines in VOC service. (Category C10 Violation)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 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)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)
5C THSC Chapter 382 382.085(b)
Special Condition 14B PERMIT
ST&C 21 OP

Description: Failure to maintain pilot light on A1333 and A1303. (Category C4 Violation)

- 20 Date: 05/31/2012 (1024152) CN601542012
Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 21 Date: 06/30/2012 (1031548) CN601542012
Classification: Moderate
Self Report? YES For Informational Purposes Only
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
- 22 Date: 07/10/2012 (1015667) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
TPDES Permit No. 0402000 EL&MR No. 1 PERMIT
Description: Failed to maintain compliance with the permitted effluent limits at Outfall 001. Specifically, during the record review period of May 2011 to May 2012, one violation of the permitted limit of the daily maximum for ammonia-nitrogen was noted. See the attached table. Compliance with the permitted effluent limits must be maintained.
- 23 Date: 07/18/2012 (995561) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
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)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
SC 14A PA
ST&C 1A and 13 OP
Description: Failure to maintain flare hourly net heating value at 300 Btu/SCF. Category B18 violation.
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to sample highly reactive volatile organic compound (HRVOC) on-line analyzer. Category C1 violation.
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(2)
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)(4)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(7)(ii)
5C THSC Chapter 382 382.085(b)
SC 14A PA
ST&C 1A and 13 OP
Description: Failure to maintain flare exit velocity, (EPN 1301A). category B18 violation.
- 24 Date: 07/27/2012 (1008569) CN601542012
Classification: Minor
Self Report? YES For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
Special Terms and Conditions 17 OP

Description: Failure to prevent an exceedence of the MAER for Tank X304 on October 17, 2011 (category C7)

Classification: Minor

Self Report? YES For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Conditions 1 PERMIT
Special Terms and Conditions 17 OP

Description: Failure to prevent an exceedence of the MAER for Furnace H902 on May 11, 2011. (category C7)

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Date: 07/30/2012 (989608) CN601542012

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to Furnace's carbon monoxide (CO) 24-hour rolling average to 400 ppmv. Category B13 violation.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 PA
ST&C 15 OP

Description: Failure to maintain nitrogen oxides (NOx) permitted maximum allowable emission rates hourly limit to 18.37 lb/hr for Furnaces (EPN FOL 700 and FOL 710). Category B13 violation.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 PA
ST&C 15 OP

Description: Failure to limit CO, hydrogen sulfide (H2S), sulfur dioxide (SO2), volatile organic compound (VOC), and nitrogen oxide (NOx) permitted maximum allowable emission rates (lb/hr) for Flares (EPN OP2ELFLA, OP3ELFLA and OP3GRFLA). Category B13 violation.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
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)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
SC 4 PA
ST&C 1A and 15 OP

Description: Failure to maintain flare minimum net heating value at 300 Btu/scf, (EPN OP3GRFLA). Category B18 violation.

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(2)
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)(4)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(7)(ii)
5C THSC Chapter 382 382.085(b)
SC 4 PA
ST&C 1A and 15 OP

Description: Failure to maintain flare exit velocity, (EPN OP3GRFLA). Category B18 violation.

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(A)
 5C THSC Chapter 382 382.085(b)
 ST&C 3(A)(i) OP
 Description: Failure to limit opacity from furnace stacks to 30%, (EPN FP3-110 and FP3-1120). Category B18 violation.
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 Description: Failure to sample and analyze HRVOC concentration in the flare header gas when the on-line analyzer malfunctioned, (EPN OP2ELFLA, OP3ELFLA). Category C1 violation.
 Classification: Minor
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 11D PA
 ST&C 15 OP
 Description: Equipment decontamination without proper isolation, (Unit OP2, OP3,). Category C1 violation.
 Classification: Minor
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 10 PA
 ST&C 15 OP
 Description: Failure to record results of monitoring and conduct required bump test of monitoring equipment, (Unit OP2, OP3). Category C1 violation.
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

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)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(1)
 5C THSC Chapter 382 382.085(b)
 SC 18D PA
 ST&C 1A AND 15 OP
 Description: Failure to conduct tank seal inspection within required time frame. Category B18 violation.
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.726(b)(2)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 Description: Failure to limit Furnace FP3-1130 firing rate to 287MMBTU/hr. Category B18 violation.
 Classification: Minor
 Self Report? NO For Informational Purposes Only

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)
 5C THSC Chapter 382 382.085(b)
 SC 6H PA
 ST&C 1A, and 15 OP
 Description: Missing tag on leaking valve LO-3 (Tag ID #71776). Category C7 violation.
 Classification: Moderate

Date: 07/31/2012 (1060821) CN601542012
 Classification: Moderate
 Self Report? YES For Informational Purposes Only

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

27 Date: 08/17/2012 (1020379) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
Description: Shell failed to prevent unauthorized emissions during Incident No. 169428.

28 Date: 08/21/2012 (1013047) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition 6 PERMIT
Description: Shell failed to prevent unauthorized emissions during Incident No. 168746.

29 Date: 08/22/2012 (1008119) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP
Description: Failure to limit maximum firing rate to 34 MMBtu/hr. Category B18 violation.
Classification: Minor
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085
SC 8 PA
ST&C 21 OP
Description: Failure to record results of monitoring and conduct required bump test of
monitoring equipment. Category C1 violation.
Classification: Minor
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 9D(1) PA
ST&C 21 OP
Description: Failure to isolate equipment during decontamination. Category C1 violation.

30 Date: 01/18/2013 (1043318) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
Description: Shell failed to prevent unauthorized emissions during Incident No. 174697
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter F 101.221(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
Special Condition No. 24 PERMIT
Description: Shell failed to maintain the pollution-emissions capture and abatement equipment
during Incident No. 174697.

31 Date: 01/29/2013 (1051395) CN601542012
Classification: Moderate
Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT
Description: Shell failed to prevent unauthorized emissions during Incident No. 175907.

Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THSC Chapter 382 382.085(b)
Description: Shell failed to provide the permit number governing the facilities involved in emissions event.
Incident No. 175907.

32 Date: 01/31/2013 (1078932) CN601542012
Classification: Moderate

Self Report? YES For Informational Purposes Only
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

33 Date: 03/22/2013 (1054740) CN601542012
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(1)(G)
30 TAC Chapter 101, SubChapter F 101.201(b)(1)(H)
5C THSC Chapter 382 382.085(b)
Description: Shell failed to report totally during emissions event Incident No. 177413.
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT
Description: Shell failed to prevent unauthorized emissions during Incident No. 177413.

34 Date: 05/08/2013 (1073260) CN601542012
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.782(b)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Title V O1946, ST&C 1A PERMIT
Description: Failure to repair a valve in HRVOC service within the time frame required

35 Date: 06/03/2013 (1073258) CN601542012
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)(A)
30 TAC Chapter 116, SubChapter B 116.110(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms & Conditions 17 OP
Description: Failure to notify TCEQ using form PI-7 within ten days following a change of tank service from benzene to toluene. (Category C3)
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 9 PERMIT
Special Terms & Conditions 17 OP
Description: Failure to maintain tank fill rate of D350 below permitted limits. (Category B19g1)

36 Date: 06/30/2013 (1117170) CN601542012
Classification: Moderate

Self Report? YES For Informational Purposes Only
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: 07/26/2013 (1073213)

CN601542012

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 18 PERMIT
Special Terms and Conditions 21 OP

Description: Failure to maintain minimum firebox temperature in the Regenerative Thermal Oxidizer (RTO) (EPN H87002) (Category B19g1)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.113(a)(2)
5C THSC Chapter 382 382.085(b)
Special Terms & Conditions 1A OP

Description: Failure to maintain minimum hazardous air pollutant removal / destruction efficiency of the Catalytic Incinerator (EPN H9200) (Category B19g1).

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 1 PERMIT
Special Terms & Conditions 21 OP

Description: Failure to prevent exceedance of carbon monoxide (CO) concentration and emissions rate limits from the Phenol/Acetone Plant Boiler (EPN H87920) (Category B14)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.116(d)(2)
30 TAC Chapter 122, SubChapter B 122.143(1)
General Terms & Conditions OP

Description: Failure to revise NSR Permit 3179 to incorporate operational changes documented in PBR Registration No. 87871 (Category C3).

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)
5C THSC Chapter 382 382.085(b)

Special Conditon 14A PERMIT
Special Terms & Conditions 21 OP

Description: Failure to maintain permitted flare tip velocity and net heating value on flares A-1301, A-1331 and A-1333 (Category B19g1).

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms & Conditions 1.H(i) OP

Description: Failure to collect daily grab samples within ten hours of analyzer malfunction at Flare A1301 (Category C1).

Classification: Minor

Self Report? NO For Informational Purposes Only

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)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 22.E PERMIT
Special Terms & Conditions 1A OP
Special Terms & Conditions 21 OP

Description: Failure to seal an open ended line (OEL) (Category C10).

Date: 07/31/2013 (1124925)

CN601542012

Classification: Moderate

Self Report? YES For Informational Purposes Only

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

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Date: 08/12/2013 (1073265) CN601542012

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
5C THSC Chapter 382 382.085(b)
SC 2 PERMIT
ST&C 1A and 25 PERMIT

Description: H2S exceedances in refinery fuel gas

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
SC 2 PERMIT
ST&C 1A & 25 PERMIT

Description: SO2 exceedances from the Sulfur Recovery Unit (SRU) Incinerators (EPN SR3/4 Stack & SR5 Stack)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
SC 2 PERMIT
ST & C 1A and 25 PERMIT

Description: CO exceedances from the Fluid Catalytic Cracking Unit (FCCU) Catalyst Regenerator (EPN H5500 Stack)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST & C 1A PERMIT

Description: NH3 exceedances from the Catalytic Reformer SCR (EPN H53NN) and the FCCU CO Boiler (H600)

Classification: Minor

Self Report? NO For Informational Purposes Only

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

Description: Failure to operate the Process Heater H5200 in HRVOC service within the established operating parameter limit

Classification: Minor

Self Report? NO For Informational Purposes Only

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

30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)
5C THSC Chapter 382 382.085(b)
SC 24 PERMIT
ST & C 1A and 25 PERMIT

Description: Failure to operate the North Property Flare (FLNFLARE) and the East Property Flare (EPFLARE) with the minimum net heating value of 300 Btu/scf and/or the maximum flare tip velocity

Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(5)
5C THSC Chapter 382 382.085(b)
SC 24 PERMIT
ST & C 1A and 25 PERMIT
Description: Failure to record flare's pilot flame presence for Girbitol Flare (EPN GIRBFLARE)
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 19 PERMIT
ST & C 25 PERMIT
Description: Failure to maintain the moisture content of no less than 7 percent for all coke stockpiles
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
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 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
SC 9E PERMIT
ST & C 1A and 25 PERMIT
Description: Open-ended lines
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter D 115.354(5)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1)
5C THSC Chapter 382 382.085(b)
SC 9H PERMIT
ST & C 1A and 25 PERMIT
Description: Missing fugitive emissions leak tags
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.165(b)
5C THSC Chapter 382 382.085(b)
SC 9I PERMIT
ST & C 1A and 25 PERMIT
Description: Late fugitive leak repair for the relief valve (RV36264)
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST & C 1A PERMIT
Description: Late HRVOC grab sampling for the Coker Flare (EPNFLARECOKE) and the East Property Flare (EPFLARE)
Classification: Moderate

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST & C 1A PERMIT
Description: Tank roof vents open due to tank roof landings
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 42C(ii) PERMIT

Description: ST & C 25 PERMIT
Failure to conduct daily calibrations of monitoring instruments and failure to maintain calibration records
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.340(c)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST & C 1A PERMIT

Description: Excessive downtime of NOx analyzer for the Catalytic Reformer SCR (EPN H53NN)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST & C 1A PERMIT

Description: CO exceedances from the Process Heaters (EPNs H1000, H5103, and H31003)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 3B PERMIT
ST & C 25 PERMIT

Description: CO exceedances from the Duct Burner 1 (EPN CDUCT1)

40 Date: 08/12/2013 (1073212) CN601542012
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(F)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(d)(3)(iii)
5C THSC Chapter 382 382.085(b)
Special Terms & Conditions 1.A OP

Description: Failure to prevent a secondary tank seal gap in excess of regulatory limits.
(Category B19g1)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions (ST&C) 1A OP

Description: Failure to Limit Carbon Monoxide Emissions from EPN FP3-1110 and FP3-1120 to 400 parts per million by volume (ppmv). (Category B19g1)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition (SC) 1 PERMIT
Special Terms and Conditions (ST&C) 15 OP

Description: Failure to Limit Nitrogen Oxide (NOx) Emissions from EPN FOL-700 and FOL-710 to 18.37 pounds per hour (lb/hr). (Category B19g1)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
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)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 8A PERMIT
Special Terms and Conditions (ST&C) 15 OP

Description: Special Terms and Conditions (ST&C) 1A OP
Failure to Maintain Flare Net Heating Value and Exit Velocity Within Permitted Limits. (Category B19g1)

Classification: Moderate

Self Report? NO For Informational Purposes Only

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)(1)
5C THSC Chapter 382 382.085(b)
Special Condition (SC) 6E PERMIT
Special Terms and Conditions (ST&C) 15 OP
Special Terms and Conditions (ST&C) 1A OP

Description: Failure to Seal an Open Ended Line (OEL). (Category C10)
Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)

30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Conditions (ST&C) 1A OP
Description: Failure to sample and analyze HRVOC concentration in the flare header gas when analyzer was down. (Category C1)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
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 THSC Chapter 382 382.085(b)
Special Condition (SC) 8C PERMIT
Special Terms and Conditions (ST&C) 1A OP

Description: Failure to Prevent Visible Emissions from the OP3 Ground Flare (EPN OP3GRFLA). (Category C4)

41 Date: 08/30/2013 (1073215) CN601542012

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(E)(i)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Conditions PERMIT
ST&C 13 OP

Description: Failure to maintain records sufficient to demonstrate compliance with minimum scrubber solution flow rate requirements (Category C3).

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
General Terms & Conditions OP

Description: Failure to report a deviation for failure to maintain records sufficient to demonstrate compliance with minimum scrubber solution flowrate requirements (Category C3).

42 Date: 09/30/2013 (1135255) CN601542012

Classification: Moderate

Self Report? YES For Informational Purposes Only

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

43 Date: 10/31/2013 (1140654) CN601542012

Classification: Moderate

Self Report? YES For Informational Purposes Only

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

44 Date: 12/20/2013 (1123160) CN601542012
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition No. 1 PERMIT
 Description: Failure to prevent unauthorized emissions. Shell failed to prevent a rod-out tool from becoming lodged in a bleeder valve.

45 Date: 05/01/2014 (1152660) CN601542012
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP (O-1943) , ST&C 17 OP
 NSR (9334) SC 4 PERMIT
 Description: Failure to maintain the permit firing rate for the ACU furnace, Emission Point Number (EPN: H902) on January 16, 2013. (Category C7)
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP (O-1943) ST&C 17 OP
 NSR (9334) SC 9 PERMIT
 Description: Failure to maintain the permit limit pump rate for Emission Point Number (EPNs: F-358 and D-353 on December 10, 2013 and December 11, 2013. (Category C7)
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 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)(1)
 5C THSC Chapter 382 382.085(b)
 FOP (O-1943) ST&C 17 and 1A OP
 NSR (3219) SC 13 PERMIT
 Description: Failure to seal open-ended lines on November 14, 2013 and December 5, 2013 on the IRU and the Benzene Extraction Unit (BEU). (Category C10)

46 Date: 05/08/2014 (1152559) CN601542012
 Classification: Minor

Self Report? NO For Informational Purposes Only
 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 I 61.112(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)(1)
 5C THSC Chapter 382 382.085(b)
 SC 6(E) PERMIT
 ST&C 1(A) OP
 ST&C 15 OP
 Description: Failure to seal an Open Ended Line (OEL) in VOC and HRVOC service . (Category C10)
 Classification: Moderate

Self Report? NO For Informational Purposes Only
 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 THSC Chapter 382 382.085(b)

SC 8(C) PERMIT
 ST&C 1(A) OP
 ST&C 15 ORDER
 Description: Failure to meet Flare visible emissions requirements. (Category B14)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1(A) OP
 Description: Failure to take daily grab sample. (Category B1)
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT I 61.112(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(c)(2)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 Description: Failure to monitor leaking valves. (Category B1)

47 Date: 05/31/2014 (1187381) CN601542012
 Classification: Moderate
 Self Report? YES For Informational Purposes Only
 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

48 Date: 06/30/2014 (1198513) CN601542012
 Classification: Moderate
 Self Report? YES For Informational Purposes Only
 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

49 Date: 07/17/2014 (1152563) CN601542012
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 1945 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 3179 PERMIT
 5C THSC Chapter 382 382.085(b)
 Description: Failure to maintain tank fill rates below the permitted limits on tanks D400, D402,
 and D403. (Category B19g1)

50 Date: 08/05/2014 (1173348) CN601542012
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition No. 1 PERMIT
 Description: Failure to prevent water intrusion into the Differential Pressure Controller
 Electronic Transmitter Case,

51 Date: 08/12/2014 (1152747) CN601542012
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to maintain 500 parts per million (ppm) carbon monoxide (CO) for Boiler
 (H-600). (Category B19 (g)(1))
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(i)(B)(ii)
 5C THSC Chapter 382 382.085(b)
 SC 24 PERMIT
 ST&C 1A OP
 ST&C 25 OP
 Description: Failure to maintain the Net Heating Value (NHV) Tip Velocity permitted requirements for (EPNs: FLARECOKE, FLAREEP, EPFLARE, and FLARENIP). (Category C4)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 Description: Failure to sample gas flare (FLAREEP). (Category B1)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 24 PERMIT
 ST&C 25 OP
 Description: Failure to maintain nitrogen oxide (NOx) 3-hour (hr) rolling average for Boiler (H-600). (Category C4)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.305(e)(1)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 Description: Failure to maintain carbon monoxide (CO) 400 ppm for Boiler (H-5500). (Category B1)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 ST&C 1A OP
 Description: Failure to test Highly Reactive Volatile Organic Compound (HRVOC) fuel flow for heaters (H-31003, H-31001/H-31002, H-5100, H-5102, H53NN, and H1011). Category B1
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 44 PERMIT
 ST&C 1A OP
 ST&C 25 OP
 Description: Failure to ensure tanks were properly maintained. (Category B1)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 SC 11A PERMIT
 ST&C 25 OP
 Description: Failure to record visual, audible and/or olfactory checks for H2S. (Category B3)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 106, SubChapter U 106.478(7)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to submit a PI-7 for new construction. (Category B4)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.783(5)
30 TAC Chapter 116, SubChapter G 116.715(a)
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 THSC Chapter 382 382.085(b)
SC 9(E) PERMIT
ST&C 1A OP
ST&C 25 OP

Description: Failure to cap or seal open-ended lines. (Category C10)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter E 115.421(a)(9)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to control high VOC paint emisisions. (Category B14)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
ST&C 1A OP

Description: Failure to sample HRVOC at cooling water tower (CWT-9). (Category B1)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.354(9)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(2)
5C THSC Chapter 382 382.085(b)
SC 9(F) & (G) PERMIT
ST&C 1A OP
ST&C 25 OP

Description: Failure to conduct Leak Detection and Repair (LDAR) Monitoring on 199 fugitive components. (Category B1)
Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 42(C)(ii) PERMIT
ST&C 25 OP

Description: Failure to record test for lower limit (LEL). (Category B1)

52* Date: 09/26/2014 (1195897)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT

Description: Shell failed to ensure that the isolation valve from the HT-2 off spec header to Tank TOL909 was fully closed.

53* Date: 01/16/2015 (1203738)

CN601542012

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions. Shell failed to provide sufficient information regarding the leak on the re-run gasoline line to demonstrate they met the affirmative defense criteria (Category A12i(6)).

54* Date: 03/31/2015 (1255495)

CN601542012

Classification: Moderate

Self Report? YES For Informational Purposes Only
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

55* Date: 04/30/2015 (1262205) CN601542012
Classification: Moderate

Self Report? YES For Informational Purposes Only
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

56* Date: 05/29/2015 (1229916) CN601542012
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 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 THSC Chapter 382 382.085(b)
Special Conditions (SC) 23E OP
Special Terms & Conditions (ST&C) 1A OP
Special Terms & Conditions (ST&C) 21 OP
Description: Failure to prevent Open Ended Lines (OELs) in VOC service (Category C10)

57* Date: 05/29/2015 (1248464) CN601542012
Classification: Minor

Self Report? NO For Informational Purposes Only
Citation: 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 THSC Chapter 382 382.085(b)
Special Condition 6E PERMIT
Special Term and Condition 17 OP
Special Term and Condition 1A OP
Description: Failure to prevent open ended lines (OELs) in Volatile Organic Compounds (VOC) service. (Category C10)

58* Date: 05/29/2015 (1229864) CN601542012
Classification: Moderate

Self Report? NO For Informational Purposes Only
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)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 22 OP
NSR Special Condition 8C PERMIT
Description: Failure to prevent visible emissions from flare [EPN: OP3FLARE]. (Category C4)
Classification: Major

Self Report? NO For Informational Purposes Only
Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP
FOP Special Term & Condition 22 OP
NSR Special Condition 18A PERMIT
Description: Failure to prevent true vapor pressure (TVP) from exceeding the allowable limits for tanks [EPNs: TOL-909, TC3-3001, and K-307]. (Category B19(g)(1))
Classification: Moderate

Self Report? NO For Informational Purposes Only
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 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 1A OP
 FOP Special Term & Condition 22 OP
 NSR Special Condition 22E PERMIT
 NSR Special Condition 2E PERMIT
 NSR Special Condition 4E PERMIT
 NSR Special Condition 6E PERMIT

Description: Failure to prevent open-ended lines (OELs) from Unit IDs: OP-3, OP-2, PAU2, HT-2, IRU, and CUMENE. (Category C10)
 Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter C 115.212(a)(3)(C)(ii)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 1A OP

Description: Failure to prevent any nonvapor-tight gauging and/or sampling while VOC is being transferred from Distribution EPN: SCRWRTC. (Category B1)
 Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 22 OP
 NSR Special Condition 7 PERMIT

Description: Failure to prevent Carbon Monoxide (CO) from exceeding 78 parts per million by volume (ppmv) limit in the combustion gas of Unit ID: PAU3 [EPN: H87920]. (Category B13)
 Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.722(d)(1)
 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)(3)(ii)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 1A OP
 FOP Special Term & Condition 22 OP
 NSR Special Condition 14A PERMIT

Description: Failure to maintain net heating value (NHV) above 300BTU/scf for flare [EPN: A1333]. (Category C4)
 Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Part 61, Subpart V 61.242-7(c)(1)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 1A OP

Description: Failure to monitor valves for two successive months from Unit ID: HT-2. (Category C1)
 Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 2F OP

Description: Failure to submit an initial report in STEERS for incident No. 205862 within 24 hours. (Category C3)
 Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.352(7)
 30 TAC Chapter 115, SubChapter D 115.354(2)(C)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(i)(1)
 5C THSC Chapter 382 382.085(b)
 FOP Special Term & Condition 1A OP

Description: Failure to correctly identify and monitor components for Unit IDs: ACU and BEU. (Category C1)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to attempt first repair of a component for Unit ID: OP-3. (Category C4)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
FOP Special Term & Condition 1A OP

Description: Failure to repair Unit ID: PAU3 pump within 15 days. (Category C4)

59* Date: 05/29/2015 (1229920)

CN601542012

Classification: Minor

Self Report? NO

For Informational Purposes Only

Citation: 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 THSC Chapter 382 382.085(b)
Special Condition 6E PERMIT
Special Term and Condition 1A OP
Special Term and Condition 21 OP

Description: Failure to prevent open ended lines (OELs) in Volatile Organic Compound (VOC) service. (Category C10)

60* Date: 05/31/2015 (1269374)

CN601542012

Classification: Moderate

Self Report? YES

For Informational Purposes Only

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

61* Date: 06/30/2015 (1276920)

CN601542012

Classification: Moderate

Self Report? YES

For Informational Purposes Only

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

62* Date: 07/09/2015 (1252278)

Classification: Moderate

Self Report? NO

For Informational Purposes Only

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

Description: Failure to submit notification to the TCEQ of a reportable emissions event within 24 hours of discovery (Category B19g(1)).

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THSC Chapter 382 382.085(b)
Special Condition No. 1 PERMIT

Description: Failure to prevent unauthorized emissions. Failure to prevent the shutdown of Furnace FP3-1090, which resulted in off-spec product sent to the flares (Category B19g(1)).

63* Date: 08/03/2015 (1228900)

CN601542012

Classification: Moderate

Self Report? NO

For Informational Purposes Only

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain the SO₂ 12-hour average 250 parts per million by volume (ppmv) for the Sulfur Recovery Unit (SRU) incinerators (EPNs: SR 3/4 and SR-7). (Category B13)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(1)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain the carbon monoxide (CO) below 400 ppmv 24 hr rolling concentration for the boilers (H-600 and H-1000). (Category B13)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 24 PERMIT
Special Terms and Condition 23 OP

Description: Failure to maintain nitrogen oxide (NO_x) 3-hour (hr) rolling average concentration for boiler, H-600. (Category B13).

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 117, SubChapter B 117.310(c)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to maintain ammonia (NH₃) slip emissions from the boiler (EPN: H-600). (Category B13)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
5C THSC Chapter 382 382.085(b)
Special Condition 49(D)(i) PERMIT
Special Terms and Condition 1A OP
Special Terms and Condition 23 OP

Description: Failure to maintain the net heating value within the permitted requirements for the flares, EPN: FLAREEP (East property flare). (Category C4)

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
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 THSC Chapter 382 382.085(b)
Special Condition 9E PERMIT
Special Terms and Condition 1A OP
Special Terms and Condition 23 OP

Description: Failure to cap or seal open-ended lines (OELs). (Category C10)

Classification: Moderate

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.764(a)(3)
30 TAC Chapter 115, SubChapter H 115.766(a)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Terms and Condition 1A OP

Description: Failure to meet the requirements of the cooling water tower, EPN:CWT12, continuous emissions monitoring (CEMS) 95 % uptime. (Category B18).

Classification: Minor

Self Report? NO For Informational Purposes Only

Citation: 30 TAC Chapter 115, SubChapter H 115.725(a)(1)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
 Special Terms and Condition 1A OP
 Description: Failure to maintain the furnace (EPN: H200) firing rate. (Category C4)
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(a)(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 17D PERMIT
 Special Terms and Condition 1A OP
 Special Terms and Condition 23 OP
 Description: Failure to submit seal gap measurements within 30 days of the inspection.
 (Category C3)
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 115, SubChapter H 115.781(e)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 1A OP
 Description: Failure to inspect the atmospheric relief valve within 24 hrs of the actuation.
 (Category C1)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Condition 1A OP
 Description: Failure to maintain the hydrogen sulfide (H2S) required concentrations. (Category
 B13)
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Condition 17D PERMIT
 Special Terms and Condition 23 OP
 Description: Failed to conduct seal gap measurements for tanks (EPNs: G357, G313, TA332,
 TA324 and TA309). (Category B1)
 Classification: Minor
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 115, SubChapter D 115.352(2)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1)
 5C THSC Chapter 382 382.085(b)
 Special Terms and Condition 1A OP
 Description: Failed to repair a leaking valve (Unit PLAT-2) within the required timeframe.
 (Category C1)

64 Date: 09/04/2015 (1261902) CN601542012
 Classification: Moderate
 Self Report? NO For Informational Purposes Only
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 5C THSC Chapter 382 382.085(b)
 Special Condition No. 1 PERMIT
 Description: Failure to prevent unauthorized emissions. Failure to prevent a release from the
 psv on the Benzene Distillation Column (V876).

* NOVs applicable for the Compliance History rating period 9/1/2010 to 8/31/2015

Appendix B

All Investigations Conducted During Component Period September 11, 2010 and September 11, 2015

(873886)
 Item 1* September 16, 2010** For Informational Purposes Only
 (827506)

Item 2 September 29, 2010** For Informational Purposes Only
(881487)

Item 3 October 19, 2010** For Informational Purposes Only
(871868)

Item 4 November 13, 2010** For Informational Purposes Only
(888016)

Item 5* November 17, 2010** For Informational Purposes Only
(863684)

Item 6 December 16, 2010** For Informational Purposes Only
(896221)

Item 7* December 17, 2010** For Informational Purposes Only
(878837)

Item 8 January 05, 2011** For Informational Purposes Only
(902290)

Item 9* January 18, 2011** For Informational Purposes Only
(878058)

Item 10* January 21, 2011** For Informational Purposes Only
(893323)

Item 11 January 27, 2011** For Informational Purposes Only
(885367)

Item 12 February 16, 2011** For Informational Purposes Only
(909066)

Item 13* February 17, 2011** For Informational Purposes Only
(900341)

Item 14 February 28, 2011** For Informational Purposes Only
(900041)

Item 15* March 08, 2011** For Informational Purposes Only
(916329)

Item 16* March 14, 2011** For Informational Purposes Only
(859959)

Item 17* March 15, 2011** For Informational Purposes Only
(906934)

Item 18* March 23, 2011** For Informational Purposes Only
(906978)

Item 19* April 08, 2011** For Informational Purposes Only
(924772)

Item 20* April 18, 2011** For Informational Purposes Only
(901124)

Item 21 April 26, 2011** For Informational Purposes Only
(901538)

Item 22* April 27, 2011** For Informational Purposes Only
(901121)

Item 23 April 28, 2011** For Informational Purposes Only

		(901220)
Item 24*	May 12, 2011**	For Informational Purposes Only
		(901224)
Item 25*	May 16, 2011**	For Informational Purposes Only
		(899809)
Item 26	May 18, 2011**	For Informational Purposes Only
		(921593)
Item 27	May 20, 2011**	For Informational Purposes Only
		(899804)
Item 28	May 27, 2011**	For Informational Purposes Only
		(899988)
Item 29	June 01, 2011**	For Informational Purposes Only
		(912033)
Item 30*	June 07, 2011**	For Informational Purposes Only
		(899805)
Item 31	June 10, 2011**	For Informational Purposes Only
		(915211)
Item 32*	June 17, 2011**	For Informational Purposes Only
		(945333)
Item 33	June 20, 2011**	For Informational Purposes Only
		(935712)
Item 34	June 28, 2011**	For Informational Purposes Only
		(936461)
Item 35*	July 01, 2011**	For Informational Purposes Only
		(915097)
Item 36	July 15, 2011**	For Informational Purposes Only
		(952607)
Item 37	July 19, 2011**	For Informational Purposes Only
		(937608)
Item 38*	July 22, 2011**	For Informational Purposes Only
		(899808)
Item 39	August 01, 2011**	For Informational Purposes Only
		(899972)
Item 40	August 02, 2011**	For Informational Purposes Only
		(948249)
Item 41*	August 17, 2011**	For Informational Purposes Only
		(899806)
Item 42	August 18, 2011**	For Informational Purposes Only
		(937593)
Item 43*	August 23, 2011**	For Informational Purposes Only
		(899807)
Item 44	August 25, 2011**	For Informational Purposes Only

(937667)
Item 45* August 26, 2011** For Informational Purposes Only

(937668)
Item 46* August 29, 2011** For Informational Purposes Only

(937207)
Item 47* August 30, 2011** For Informational Purposes Only

(952258)
Item 48 September 07, 2011** For Informational Purposes Only

(952283)
Item 49 September 15, 2011** For Informational Purposes Only

(944375)
Item 50 September 23, 2011** For Informational Purposes Only

(937483)
Item 51* September 28, 2011** For Informational Purposes Only

(941190)
Item 52 October 07, 2011** For Informational Purposes Only

(971361)
Item 53* October 13, 2011** For Informational Purposes Only

(941179)
Item 54 October 21, 2011** For Informational Purposes Only

(963333)
Item 55 November 16, 2011** For Informational Purposes Only

(977521)
Item 56* November 17, 2011** For Informational Purposes Only

(965179)
Item 57* December 09, 2011** For Informational Purposes Only

(969310)
Item 58* December 12, 2011** For Informational Purposes Only

(970016)
Item 59* December 16, 2011** For Informational Purposes Only

(984287)
Item 60* December 19, 2011** For Informational Purposes Only

(990589)
Item 61* January 12, 2012** For Informational Purposes Only

(963688)
Item 62 January 17, 2012** For Informational Purposes Only

(977254)
Item 63 January 20, 2012** For Informational Purposes Only

(976905)
Item 64* February 06, 2012** For Informational Purposes Only

(987664)
Item 65* February 15, 2012** For Informational Purposes Only

(997950)

Item 66*	February 20, 2012**	For Informational Purposes Only (987343)
Item 67*	February 24, 2012**	For Informational Purposes Only (994459)
Item 68*	March 16, 2012**	For Informational Purposes Only (1003474)
Item 69*	March 20, 2012**	For Informational Purposes Only (976906)
Item 70*	March 30, 2012**	For Informational Purposes Only (989850)
Item 71	April 04, 2012**	For Informational Purposes Only (989049)
Item 72*	April 10, 2012**	For Informational Purposes Only (996820)
Item 73	April 12, 2012**	For Informational Purposes Only (987396)
Item 74*	April 18, 2012**	For Informational Purposes Only (1010037)
Item 75*	April 19, 2012**	For Informational Purposes Only (990391)
Item 76	April 24, 2012**	For Informational Purposes Only (989467)
Item 77	April 26, 2012**	For Informational Purposes Only (997861)
Item 78*	May 03, 2012**	For Informational Purposes Only (989465)
Item 79	May 09, 2012**	For Informational Purposes Only (1006516)
Item 80*	May 15, 2012**	For Informational Purposes Only (1016432)
Item 81*	May 18, 2012**	For Informational Purposes Only (1006482)
Item 82	May 22, 2012**	For Informational Purposes Only (1024153)
Item 83*	June 20, 2012**	For Informational Purposes Only (1014058)
Item 84	June 27, 2012**	For Informational Purposes Only (1009226)
Item 85*	June 29, 2012**	For Informational Purposes Only (995571)
Item 86	July 06, 2012**	For Informational Purposes Only (1015667)

Item 87	July 10, 2012**	For Informational Purposes Only (995561)
Item 88	July 18, 2012**	For Informational Purposes Only (1024152)
Item 89	July 20, 2012**	For Informational Purposes Only (1008569)
Item 90	July 27, 2012**	For Informational Purposes Only (1013049)
Item 91*	July 30, 2012**	For Informational Purposes Only (1023236)
Item 92	August 13, 2012**	For Informational Purposes Only (1020379)
Item 93	August 14, 2012**	For Informational Purposes Only (1008493)
Item 94*	August 16, 2012**	For Informational Purposes Only (1037925)
Item 95*	August 20, 2012**	For Informational Purposes Only (1013047)
Item 96	August 21, 2012**	For Informational Purposes Only (1008119)
Item 97	August 22, 2012**	For Informational Purposes Only (1028983)
Item 98	August 29, 2012**	For Informational Purposes Only (1013053)
Item 99*	September 05, 2012**	For Informational Purposes Only (1020375)
Item 100*	September 13, 2012**	For Informational Purposes Only (1031344)
Item 101*	September 18, 2012**	For Informational Purposes Only (1021281)
Item 102*	October 02, 2012**	For Informational Purposes Only (1060822)
Item 103*	October 18, 2012**	For Informational Purposes Only (1060823)
Item 104*	November 20, 2012**	For Informational Purposes Only (1046438)
Item 105	December 06, 2012**	For Informational Purposes Only (1044385)
Item 106	December 07, 2012**	For Informational Purposes Only (1060824)
Item 107*	December 19, 2012**	For Informational Purposes Only (1043318)
Item 108	January 17, 2013**	For Informational Purposes Only

		(1078933)
Item 109*	January 18, 2013**	For Informational Purposes Only
		(1046537)
Item 110*	January 25, 2013**	For Informational Purposes Only
		(1051395)
Item 111	January 29, 2013**	For Informational Purposes Only
		(1050758)
Item 112*	February 08, 2013**	For Informational Purposes Only
		(1055337)
Item 113	February 14, 2013**	For Informational Purposes Only
		(1078932)
Item 114	February 20, 2013**	For Informational Purposes Only
		(1059517)
Item 115*	February 27, 2013**	For Informational Purposes Only
		(1089290)
Item 116*	March 20, 2013**	For Informational Purposes Only
		(1054740)
Item 117	March 22, 2013**	For Informational Purposes Only
		(1060207)
Item 118*	March 29, 2013**	For Informational Purposes Only
		(1059686)
Item 119*	April 10, 2013**	For Informational Purposes Only
		(1043351)
Item 120	April 18, 2013**	For Informational Purposes Only
		(1077973)
Item 121	April 26, 2013**	For Informational Purposes Only
		(1073262)
Item 122*	April 29, 2013**	For Informational Purposes Only
		(1041345)
Item 123	May 08, 2013**	For Informational Purposes Only
		(1095684)
Item 124*	May 20, 2013**	For Informational Purposes Only
		(1073260)
Item 125	May 24, 2013**	For Informational Purposes Only
		(1073258)
Item 126	May 30, 2013**	For Informational Purposes Only
		(1075951)
Item 127	June 07, 2013**	For Informational Purposes Only
		(1098625)
Item 128	June 19, 2013**	For Informational Purposes Only
		(1098627)
Item 129	June 20, 2013**	For Informational Purposes Only

		(1117169)
Item 130*	July 19, 2013**	For Informational Purposes Only
		(1073212)
Item 131	July 26, 2013**	For Informational Purposes Only
		(1094084)
Item 132	July 30, 2013**	For Informational Purposes Only
		(1098624)
Item 133*	July 31, 2013**	For Informational Purposes Only
		(1102332)
Item 134*	August 07, 2013**	For Informational Purposes Only
		(1073265)
Item 135	August 19, 2013**	For Informational Purposes Only
		(1124925)
Item 136	August 20, 2013**	For Informational Purposes Only
		(1073215)
Item 137	August 29, 2013**	For Informational Purposes Only
		(1129525)
Item 138*	September 18, 2013**	For Informational Purposes Only
		(1121947)
Item 139	September 30, 2013**	For Informational Purposes Only
		(1122669)
Item 140	October 11, 2013**	For Informational Purposes Only
		(1135255)
Item 141	October 17, 2013**	For Informational Purposes Only
		(1103791)
Item 142	October 18, 2013**	For Informational Purposes Only
		(877155)
Item 143	October 22, 2013**	For Informational Purposes Only
		(877137)
Item 144	October 24, 2013**	For Informational Purposes Only
		(1095043)
Item 145*	November 05, 2013**	For Informational Purposes Only
		(1106142)
Item 146*	November 14, 2013**	For Informational Purposes Only
		(1140654)
Item 147	November 20, 2013**	For Informational Purposes Only
		(1147113)
Item 148*	December 18, 2013**	For Informational Purposes Only
		(1120624)
Item 149	December 20, 2013**	For Informational Purposes Only
		(1114349)
Item 150*	January 15, 2014**	For Informational Purposes Only
		(1153182)

Item 151*	January 17, 2014**	For Informational Purposes Only (1138362)
Item 152	January 29, 2014**	For Informational Purposes Only (1135116)
Item 153*	February 03, 2014**	For Informational Purposes Only (1120606)
Item 154	February 07, 2014**	For Informational Purposes Only (1055871)
Item 155	February 11, 2014**	For Informational Purposes Only (1139856)
Item 156*	February 18, 2014**	For Informational Purposes Only (1160517)
Item 157*	February 19, 2014**	For Informational Purposes Only (1150150)
Item 158*	March 17, 2014**	For Informational Purposes Only (1167162)
Item 159*	March 19, 2014**	For Informational Purposes Only (1156960)
Item 160	March 31, 2014**	For Informational Purposes Only (1152418)
Item 161*	April 04, 2014**	For Informational Purposes Only (1152600)
Item 162	April 09, 2014**	For Informational Purposes Only (1174295)
Item 163*	April 17, 2014**	For Informational Purposes Only (1152660)
Item 164	May 01, 2014**	For Informational Purposes Only (1152559)
Item 165	May 08, 2014**	For Informational Purposes Only (1152530)
Item 166*	May 13, 2014**	For Informational Purposes Only (1180483)
Item 167*	May 20, 2014**	For Informational Purposes Only (1163873)
Item 168*	May 28, 2014**	For Informational Purposes Only (1152587)
Item 169*	May 30, 2014**	For Informational Purposes Only (1187381)
Item 170	June 18, 2014**	For Informational Purposes Only (1179970)
Item 171*	July 09, 2014**	For Informational Purposes Only (1152563)

Item 172	July 17, 2014**	For Informational Purposes Only (1173348)
Item 173	August 05, 2014**	For Informational Purposes Only (1152747)
Item 174	August 12, 2014**	For Informational Purposes Only (1198512)
Item 175*	August 19, 2014**	For Informational Purposes Only (1172985)
Item 176*	August 22, 2014**	For Informational Purposes Only (1170848)
Item 177	August 25, 2014**	For Informational Purposes Only (1086729)
Item 178*	September 15, 2014**	For Informational Purposes Only (1205786)
Item 179*	September 17, 2014**	For Informational Purposes Only (1185545)
Item 180	September 19, 2014**	For Informational Purposes Only (1195897)
Item 181	September 26, 2014**	For Informational Purposes Only (1191546)
Item 182*	October 02, 2014**	For Informational Purposes Only (1191434)
Item 183	October 03, 2014**	For Informational Purposes Only (1212198)
Item 184*	October 20, 2014**	For Informational Purposes Only (1198250)
Item 185	October 28, 2014**	For Informational Purposes Only (1218450)
Item 186*	November 19, 2014**	For Informational Purposes Only (1216102)
Item 187*	December 18, 2014**	For Informational Purposes Only (1211048)
Item 188	December 19, 2014**	For Informational Purposes Only (1230756)
Item 189*	January 19, 2015**	For Informational Purposes Only (1203738)
Item 190	January 20, 2015**	For Informational Purposes Only (1222756)
Item 191*	January 30, 2015**	For Informational Purposes Only (1223023)
Item 192*	February 04, 2015**	For Informational Purposes Only (1197220)
Item 193*	February 05, 2015**	For Informational Purposes Only

Item 194	February 06, 2015**	(1198253) For Informational Purposes Only
Item 195*	February 19, 2015**	(1228205) For Informational Purposes Only
Item 196*	February 20, 2015**	(1227303) For Informational Purposes Only
Item 197*	February 23, 2015**	(1209666) For Informational Purposes Only
Item 198	February 26, 2015**	(1209667) For Informational Purposes Only
Item 199*	February 27, 2015**	(1228929) For Informational Purposes Only
Item 200	March 02, 2015**	(1222339) For Informational Purposes Only
Item 201*	March 18, 2015**	(1222396) For Informational Purposes Only
Item 202*	March 19, 2015**	(1248595) For Informational Purposes Only
Item 203	April 20, 2015**	(1255495) For Informational Purposes Only
Item 204	April 28, 2015**	(1239133) For Informational Purposes Only
Item 205	May 04, 2015**	(1241983) For Informational Purposes Only
Item 206	May 12, 2015**	(1247067) For Informational Purposes Only
Item 207	May 20, 2015**	(1262205) For Informational Purposes Only
Item 208	May 29, 2015**	(1229864) For Informational Purposes Only
Item 209*	June 02, 2015**	(1246895) For Informational Purposes Only
Item 210	June 17, 2015**	(1269374) For Informational Purposes Only
Item 211	July 09, 2015**	(1252278) For Informational Purposes Only
Item 212*	July 16, 2015**	(1228069) For Informational Purposes Only
Item 213	July 28, 2015**	(1252281) For Informational Purposes Only
Item 214	August 03, 2015**	(1228900) For Informational Purposes Only

Item 215*	August 05, 2015**	(1229874) For Informational Purposes Only
Item 216*	August 26, 2015**	(1274994) For Informational Purposes Only
Item 217	September 03, 2015	(1261902) For Informational Purposes Only

* No violations documented during this investigation

**Investigation applicable for the Compliance History Rating period between 09/01/2010 and 08/31/2015.

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: SHELL OIL DEER PARK

Reg Entity Add: 5900 HIGHWAY 225

Reg Entity City: DEER PARK

Reg Entity No: RN100211879

EPA Case No: 06-2009-3404

Order Issue Date (yyyymmdd): 20140606

Case Result: Final Order with Penalty

Statute: CAA

Sect of Statute: 173

Classification: Moderate

Program: Permit Requirements

Citation:

Violation Type: Benzene Waste

Cite Sect:

Cite Part:

Enforcement Action: Consent Decree or Court Order Resolving a Civil

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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

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§

**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

**AGREED ORDER
DOCKET NO. 2015-1367-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 ("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 refining plant located 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 conducted from December 11, 2014 through July 29, 2015, TCEQ staff documented that the Respondent failed to comply with the carbon monoxide ("CO") concentration limit of 500 parts per million by volume ("ppmv") on a dry basis. Specifically, Boiler H-600 exceeded the CO concentration limit on February 16, 2014 for one hour by 1.95 ppmv and February 20, 2014 for two hours by an average of 126.43 ppmv and on August 17, 2014 through August 19, 2014 for six hours by an average of 219.74 ppmv.
4. The Respondent received notice of the violations on August 5, 2015.
5. The Executive Director recognizes that on December 17, 2014, the Respondent obtained an Alternate Case Specific Specification for CO Emissions for Boiler H-600 in order to comply with the CO concentration limit.

II. CONCLUSIONS OF LAW

1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382, TEX. WATER CODE ch. 7, and the rules of the Commission.
2. As evidenced by Findings of Fact No. 3, the Respondent failed to comply with the CO concentration limit of 500 ppmv on a dry basis, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), 40 CODE OF FEDERAL REGULATIONS § 60.103(a), and Federal Operating Permit No. O1669, Special Terms and Conditions No. 1A.
3. 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.
4. An administrative penalty in the amount of Thirteen Thousand One Hundred Twenty-Five Dollars (\$13,125) 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 Six Thousand Five Hundred Sixty-Three Dollars (\$6,563) of the administrative penalty. Six Thousand Five Hundred Sixty-Two Dollars (\$6,562) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project ("SEP").

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 Thirteen Thousand One Hundred Twenty-Five Dollars (\$13,125) as set forth in Section II, Paragraph 4 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. 2015-1367-AIR-E" to:

Financial Administration Division, Revenue Operations 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 the SEP in accordance with TEX. WATER CODE § 7.067. As set forth in Section II, Paragraph 4 above, Six Thousand Five Hundred Sixty-Two Dollars (\$6,562) of the assessed administrative penalty shall be offset with the condition that the SEP defined in Attachment A, incorporated herein by reference, is implemented by the Respondent. 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 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.
4. 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.
5. 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.

6. 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.
7. 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.
8. 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.
9. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

3/25/14

Date

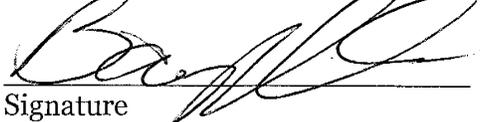
I, the undersigned, have read and understand the attached Agreed Order in the matter of Shell Oil Company. I am authorized to agree to the attached Agreed Order on behalf Shell Oil Company, and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for 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

DEC 7, 2015

Date

BARRY KLEIN

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

GM- DEER PARK SITE

Title

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

Attachment A
Docket Number: 2015-1367-AIR-E
SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Shell Oil Company
Penalty Amount:	Thirteen Thousand One Hundred Twenty-Five Dollars (\$13,125)
SEP Offset Amount:	Six Thousand Five Hundred Sixty-Two Dollars (\$6,562)
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Railroad Commission of Texas
Project Name:	<i>Alternative Fuels Clean School Bus Replacement Program</i>
Location of SEP:	Statewide, Preference for 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 SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

a. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Administrator named above. The contribution will be to the **Railroad Commission of Texas** for the *Alternative Fuels Clean School Bus Replacement Program*. The contribution will be used in accordance with the SEP between the Third-Party Administrator and the TCEQ (the “Project”). Specifically, the contribution will be used to reduce nitrogen oxides, volatile organic compounds, carbon monoxide, and particulate matter emissions by replacing older diesel buses with newer buses that meet more stringent emission standards.

The Third-Party Administrator shall use the SEP Offset Amount for up to 100% of the purchase price of a propane or natural gas powered school bus that is model year 2010 or newer to public school districts and public charter schools to replace a diesel school bus that is model year 2002 or older. The SEP will be done in accordance with all federal, state, and local environmental laws and regulations.

All dollars contributed will be used for the direct cost of implementing the Project, including but not limited to supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director (“ED”), be applied to another pre-approved SEP.

The Respondent's signature affixed to this Agreed Order certifies that it has no prior commitment to make this contribution and that it is being contributed solely in an effort to settle this enforcement action. The Respondent shall not profit in any manner from this SEP.

b. Environmental Benefit

This SEP will directly benefit air quality by reducing harmful exhaust emissions which contribute to the formation of ozone and may cause or exacerbate a number of respiratory diseases, including asthma. In addition, by encouraging less school bus idling, this SEP contributes to public awareness of environmental matters.

c. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Administrator 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 Offset Amount to the Third-Party Administrator. The Respondent shall make the check payable to **Railroad Commission of Texas SEP** and shall mail the contribution with a copy of the Agreed Order to:

Alternative Energy Division
Railroad Commission of Texas
P.O. Box 12967
Austin, Texas 78711-2967

3. Records and Reporting

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

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

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that the Respondent failed to fully implement and complete the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP; shall make the check payable to "Texas Commission on Environmental Quality"; and shall mail it to:

Texas Commission on Environmental Quality
Litigation Division
Attention: SEP Coordinator, MC 175
P.O. Box 13087
Austin, Texas 78711-3087

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. Recognition

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