

TCEQ INTERAGENCY TRANSMITTAL MEMO

DATE: December 19, 2008

To: LaDonna Castanuela  
Chief Clerk  
Building F, MC-105

From: Dede Sigman *DJS*  
Environmental Law Division  
Building A, MC-173

Attached: Agenda Backup Documents

Agenda Date: January 14, 2009  
Applicant: CITGO Refining and Chemical Company, L.P.  
Proposed Permit No: 46637  
Program: Air *g*  
TCEQ Docket No.: 2009-0779-AIR

Documents with this transmittal memo are indicated below:

- Attachment A: Final Draft Permit, including any special provisions or conditions
- Attachment B: Maximum Allowable Emission Rate Table (MAERT)
- Attachment C: The summary of the technical review of the permit application
- Attachment D: Modeling Audit Report
- Attachment E: Toxicology Report
- Attachment F: The compliance histories of the applicant and facility

TEXAS  
COMMISSION  
ON ENVIRONMENTAL  
QUALITY  
2008 DEC 19 PM 12:12  
CHIEF CLERKS OFFICE

**Attachment A:**  
**Final Draft Permit, including any special  
provisions or conditions**

SPECIAL CONDITIONS  
Permit Number 46637

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the special conditions. (4/08)
2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions. (4/08)

OPERATIONAL REQUIREMENTS

3. The holder of this permit shall within one year from the date of approval of the permit amendment application dated January 31, 2007, install a secondary rim seals on Tank Number 5 and install an internal floating roof in Tank 64-TK13. (4/08)
4. Tank 47-T103 shall be limited to a maximum fill rate of 25 gallons per minute. (4/08)

FEDERAL REQUIREMENTS

5. These facilities shall comply with all applicable requirements of EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories promulgated for General Provisions and National Emission Standard for Hazardous Air Pollutants from Petroleum Refineries in Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), Subparts A and CC. (4/08)

MARINE LOADING

6. All loading shall be submerged and limited to the loading of gasoline, alkylate, C5/PLAT, reformate and petroleum products having an initial boiling point of 300 degrees Fahrenheit or greater. (4/08)
7. The permit holder shall maintain and update monthly an emissions record which includes calculated emissions of VOC from all loading operations over the previous rolling 12 month period. The record shall include the loading spot, control method used, quantity loaded in

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gallons, name of the liquid loaded, vapor molecular weight, liquid temperature in degrees Fahrenheit, liquid vapor pressure at the liquid temperature in psia, liquid throughput for the previous month and rolling 12 months to date. Records of VOC temperature are not required to be kept for liquids loaded from unheated tanks which receive liquids that are at or below ambient temperatures. Emissions shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations." (4/08)

8. Before loading a marine vessel with a VOC which has a vapor pressure equal to or greater than 0.5 pounds per square inch absolute under actual storage conditions, the owner or operator of the marine terminal shall verify that the marine vessel has passed an annual vapor tightness test as specified in 40 CFR §63.565(c) (September 19, 1995) or 40 CFR §61.304(f) (October 17, 2000). (4/08)
9. Dock 7 loading emissions from loading of gasoline, aklylate, C5/PLAT, and reformat shall be vented to the MEC vapor combustor (FIN 57-VC2D7). A permissive interlock system must be operational prior to loading that prevents loading to begin until the MEC vapor combustor reaches the operating temperature required by Special Condition 10. If the operating temperature drops below that required, loading shall immediately shut down. (4/08)

### VAPOR COMBUSTOR

10. The MEC vapor combustor (FIN 57-VC2D7) shall achieve a 98 percent control of the waste loading emissions from the loading of gasoline, aklylate, C5/PLAT, and reformat and shall be operated with no visible emissions. This shall be ensured by maintaining the temperature in, or immediately downstream of, the combustion chamber above 1500 °F, when waste gases are being sent to the vapor combustor, prior to the initial stack test performed in accordance with Special Condition 14. Following the completion of that stack test, the six-minute average temperature shall be maintained above the minimum one hour average temperature maintained during the last satisfactory stack test

The temperature measurement device shall reduce the temperature readings to an averaging period of 6 minutes or less and record it at that frequency. The temperature monitor shall be installed, calibrated at least annually, and maintained according to the manufacturer's specifications. The device shall have an accuracy of the greater of ±2 percent of the temperature being measured expressed in degrees Celsius or ±2.5°C.

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Quality assured (or valid) data must be generated when the VCU is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the VCU operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded. (4/08)

11. Pilot and assist gas combusted at this facility shall be pipeline quality natural gas containing no more than 5 grains of total sulfur per 100 dry standard cubic feet. (4/08)

FUGITIVE EMISSIONS - Piping, Valves, Connectors, Pumps, Agitators, and Compressors - 28VHP

12. Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment:

- A. These conditions shall not apply (1) where the Volatile Organic Compound (VOC) has an aggregate partial pressure or vapor pressure of less than 0.044 pounds per square inch, absolute (psia) at 68°F or (2) operating pressure is at least 5 kilopascals (0.725 psi) below ambient pressure. Equipment excluded from this condition shall be identified in a list or by one of the methods described below to be made readily available upon request.

The exempted components may be identified by one or more of the following methods:

- (1) piping and instrumentation diagram (PID); or
  - (2) a written or electronic database.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.
  - C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.

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- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in subparagraph A above. If an unsafe-to-monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe-to-monitor times. A difficult-to-monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.
- Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve to seal the line so that no leakage occurs. Except during sampling, both valves shall be closed. If the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 24 hours. If the repair or replacement is not completed within 24 hours, the line or valve must have a cap, blind flange, plug, or second valve installed.
- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

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A check of the reading of the pressure-sensing device to verify disc integrity shall be performed weekly and recorded in the unit log.

The gas analyzer shall conform to requirements listed in Method 21 of 40 CFR Part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs are being monitored, the response factor shall be calculated for the average composition of the process fluid. If a response factor less than 10 cannot be achieved using methane, then the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.

Replacements for leaking components shall be re-monitored within 15 days of being placed back into VOC service.

- G. Except as may be provided for in the special conditions of this permit, all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days. Records of the first attempt to repair shall be maintained.
- I. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair

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would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC 115.782 (c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shutdown as calculated in accordance with 30 TAC § 115.782 (c)(1)(B)(i)(I), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. Records of physical inspections shall be noted in the operator's log or equivalent.
- K. Alternative monitoring frequency schedules of 30 TAC §§ 115.352 - 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations. (4/08)

### COMPLIANCE ASSURANCE MONITORING (CAM)

13. The following requirements apply to capture systems for the MEC vapor combustor (FIN 57-VC2D7):

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- A. Once a year, verify the capture system is leak-free by inspecting in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppmv above background.
- B. The control device shall not have a bypass.
- C. If any of the above inspections is not satisfactory, a deviation shall be reported if the monitoring or inspections indicate bypass of the control device and the permit holder shall promptly take necessary corrective action. **(4/08)**

COMPLIANCE TESTING

14. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the MEC vapor combustor (FIN 57-VC2D7) to demonstrate compliance with the MAERT and destruction efficiency of 98%. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60) testing which must have EPA approval shall be submitted to the TCEQ OCE, Compliance Support Division.

- A. The appropriate TCEQ Regional Office shall be notified not less than 45 days prior to sampling. The notice shall include:
  - (1) Proposed date for pretest meeting.
  - (2) Date sampling will occur.
  - (3) Name of firm conducting sampling.
  - (4) Type of sampling equipment to be used.
  - (5) Method or procedure to be used in sampling.
  - (6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.

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- (7) Procedure/parameters to be used to determine worst case emissions during the sampling period. Include testing from gasoline loading at maximum rates, destruction efficiency and firebox (exhaust) temperature measured every 6 minutes and averaged hourly.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. The TCEQ Regional Director or the TCEQ Office of Compliance and Enforcement (OCE), Compliance Support Division must approve any deviation from specified sampling procedures.

- B. Air contaminants emitted from the loading of gasoline at Dock 7 to be tested for include total VOC and benzene.
- C. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities and at such other times as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.
- D. The facility being sampled shall operate at the scenario producing maximum emissions from the Dock 7 MEC, EPN MEC7, during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

During subsequent operations, if the emission rates from loading is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.

- E. Copies of the final sampling report shall be forwarded to the offices below within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions entitled "Chapter 14, Contents of Sampling Reports" of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

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One copy to the appropriate TCEQ Regional Office.

One copy to each local air pollution control program.

One copy to the TCEQ OCE, Compliance Support Division, Austin. **(4/08)**

15. Sampling ports and platform(s) shall be incorporated into the design of MEC vapor combustor (FIN 57-VC2D7) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Manager or the TCEQ Office of Compliance and Enforcement, Compliance Support Division. **(4/08)**

Dated

**Attachment B:**  
**Maximum Allowable Emission Rate Table**  
**(MAERT)**

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 46637

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

### AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
F1002	Dock 7 Piping Fugitives (4)	VOC	0.37	1.61
MEC7	Dock 7 MEC	VOC (5)	55.18	10.64
		Benzene	0.33	0.04
		NO <sub>x</sub>	15.69	22.52
		CO	11.77	16.89
		SO <sub>2</sub>	0.01	0.06
591	Dock 7 Loading Fugitives	VOC (5)	159.78	29.28
		Benzene	0.87	0.11

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1  
 NO<sub>x</sub> - nitrogen oxides  
 CO - carbon monoxide  
 SO<sub>2</sub> - sulphur dioxide
- (4) Emission rate is an estimate and compliance is demonstrated by meeting the requirements of the applicable special conditions and permit application representations.
- (5) VOC emission rates are total VOC emission rates and include the Benzene emission rates.

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

\_\_\_ Hrs/day \_\_\_ Days/week \_\_\_ Weeks/year or 8,760 Hrs/year

\*\* Compliance with annual emission limits is based on a rolling 12-month period.

Dated \_\_\_\_\_

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**

**Attachment C:**  
**Tech Review**

## Construction Permit Amendment Review Analysis & Technical Review

Company:	Citgo Refining And Chemicals Company Lp	Permit No.:	46637
City:	Corpus Christi	Record No.:	127227
County:	Nueces	Account No.:	NE-0027-V
Project Type:	CAMD	Regulated Entity No.:	RN102555166
Project Reviewer:	Mr. Troy Dalton	Customer Reference No.:	CN600127922
Facility Name:	Citgo Corpus Christi Refinery East Plant		

### Authorization Checklist

Will a new policy/precedent be established? (ED signature required if yes) .....	No
Is a state or local official opposed to the permit?(ED signature required if yes) .....	No
Is waste or tire derived fuel involved? (ED signature required if yes) .....	No
Are waste management facilities involved?(ED signature required if yes) .....	No
Will action on this application be posted on the Executive Director's agenda? .....	Yes
Have any changes to the application or subsequent proposals been required to increase protection of public health and the environment during the review? .....	Yes

### Project Overview

The amendment is to allow Citgo to load gasoline and gasoline blend products at Dock 7. The permit covers an area in the benzene watch area. Citgo needed to have benzene reductions, they agreed to put secondary seals on Tank 5 within the first year of this permit (SC 3). In order to meet impact they agreed to install a floating roof in Tank 64-TK13 (SC 3) and reduce pumping rates on Tank 47T-103 (SC 4). Tanks 64-TK13 and 47T-103 are authorized by PBR and an application is currently under review to incorporate them into Permit 80693.

### Compliance History

In compliance with 30 TAC Chapter 60, a compliance history report was reviewed on: .....	8/31/07
Was the application received after September 1, 2002? .....	Yes
If yes, what was the site rating? 5.68/AVG	Company rating? 2.94/AVG

### Public Notice Information

§39.403	Public notification required? .....		Yes
§39.418	C.	Date 1st Public Notice /Admin Complete/Legislators letters mailed: .....	3/15/07
§39.603	D.	Pollutants: VOC, NOx, CO, SO2	
	E.	Date Published: 4/11/07 in Corpus Christi Caller Times Date Affidavits/Copies received: Yes	
	F.	Bilingual notice required? .....	Yes
		Language: Spanish Date Published: No Spanish publications, certification rec'd	
§39.604	G.	Certification of Sign Posting / Application availability .....	Yes
	H.	Public Comments Received? Yes Meeting requested? No Hearing requested? Yes                      Hearing held? Was/were the request(s) withdrawn?                      Date: Replies to Comments sent to OCC: .....	
		Consideration of Comments:	
§39.419		2nd Public Notification required? .....	Yes
§39.603	C.	Pollutants: VOC, NOx, CO, SO2	
	D.	Date Published: 11/21/07                      in Corpus Christi Caller Times Date Affidavits/Copies received: 12/13/07	
	E.	Bilingual notice required? .....	Yes
		Language: Spanish Date Published: Affidavits received no paper available Date Affidavits/Copies received: 1/14/08	
	F.	Public Comments Received? No Meeting requested? No .....	Meeting held?

Review Analysis & Technical Review

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Regulated Entity No. RN102555166

Hearing requested? Hearing held?
Was/were the request(s) withdrawn? Date:

§39.420 G. Consideration of Comments:
RTC, Technical Review & Draft Permit Conditions sent to OCC:
Request for Reconsideration Received?
H. Final action: Letters enclosed?

Emission Controls

§116.111(a)(2)(G) Is the facility expected to perform as represented in the application? Yes
§116.140 Permit Fee: \$ 30,000.00 Fee certification provided? Yes

Sampling and Testing

§116.111(a)(2)(A)(i) Are the emissions expected to comply with all TCEQ air quality rules and regulations, and the intent of the Texas Clean Air Act? Yes
§116.111(a)(2)(B) Will emissions be measured? Yes
Method: Calculation and stack sampling

Federal Program Applicability

§116.111(a)(2)(D) Compliance with applicable NSPS expected? n/a
§116.111(a)(2)(E) Compliance with applicable NESHAP expected? n/a
§116.111(a)(2)(F) Compliance with applicable MACT expected? Yes
Subparts A and CC

§116.111(a)(2)(H) Is nonattainment review required? No
A. Is the site located in a nonattainment area? No
If no, skip to 116.111(2)(I). If yes, continue.

116.111(a)(2)(I) Is PSD applicable? Yes
A. Is the site a federal major source (100/250 tons/yr)? Yes
B. Is the project a federal major source by itself? No
C. Is the project a federal major modification? No
1. Did project emission increases, without decreases, for pollutant of concern, minus the two-year average actual emissions trigger netting? No
2. Was contemporaneous increase significant? No

Mass Cap and Trade Applicability

§116.111(a)(2)(L) Is Mass Cap and Trade applicable? No

Request for Comments

Region: 14 Reviewed by: none received
TARA: Reviewed by: Manny Reyna
Legal: Reviewed by: Dede Sigman

Process Description

Dock 7 loading is to barges. Loading currently is permitted to load heavy oils.

Sources, Controls, Source Reduction and BACT [§116.111(a)(2)(C)]

Barge loading will meet BACT and emissions will be routed to a vapor combustor authorized by Special Permit 80564. The vapor combustor, with a 98% DRE, has a permissive lockout system to insure proper combustion temperature for loading, failure to achieve destruction temp. will prevent loading. Fugitive emissions are subject to 28 VHP.

Impacts Evaluation

1. Was modeling done? Yes Type? Sitewide
2. Will GLC of any air contaminant cause violation of NAAQS? No
3. Is this a sensitive location with respect to nuisance? No

Review Analysis & Technical Review

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- 4. Is the site within 3000 feet of any school? ..... No
- 5. Toxics Evaluation: *See Toxicology Memo and MSEA*

Miscellaneous

- 1. Is applicant in agreement with special conditions? ..... Yes  
Company representative? ..... ED Biligo
- 2. Emission reductions from source reduction or pollution prevention ..... Yes
- 3. Emissions reductions resulting from the application of BACT required by state rules, avoidance of potential impacts problems, and voluntary reductions ..... Yes
- 4. Other permit(s) affected by this action? ..... None

*2/22/08*

Project Reviewer

Date

*Jeffrey P. Geif 2/28/08*

Team Leader/Section Manager/Backup

Date

**Attachment D:  
Modeling Audit Report**

# Texas Commission On Environmental Quality

## INTEROFFICE MEMORANDUM

To: Troy Dalton, P.E. Date: September 6, 2007  
 Chemical Section

Thru: *ms* Robert Opiela, Team Leader *9-11-07*  
 Air Dispersion Modeling Team (ADMT)

From: Dan Schultz *Das*  
 ADMT

Subject: Modeling Audit – Citgo Refining and Chemicals Company LP (RN102555166)

- 1.0 Project Identification Information.  
 Permit Application Number: 46637  
 NSR Project Number: 127227  
 ADMT Project Number: 2595  
 NSRP Document Number: 346534  
 County: Nueces

Modeling Report: Submitted by JD Consulting, L.P., June 2007, on behalf of Citgo Refining and Chemicals Company LP.

- 2.0 Report Summary. The modeling analysis is acceptable for all review types and pollutants. The results are summarized below.

The GLCmax are located along the north property line. The 1-hr GLCni, according to the applicant, is located approximately 460 meters east of the site for gasoline and approximately 335 meters southwest of the site for benzene. This site is included on the Air Pollution Watch List for benzene.

Table 1: Project-Related Modeling Results for State Property Line			
Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
SO <sub>2</sub>	1-hr	< 1	20

Table 2: Site-wide Modeling Results for Health Effects				
Pollutant & CAS#	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	GLCni ( $\mu\text{g}/\text{m}^3$ )	ESL ( $\mu\text{g}/\text{m}^3$ )
Benzene 71-43-2	1-hr	1174	160	75
	Annual	6.1	< 1	3
Gasoline 8006-61-9	1-hr	50684	7040	3500
	Annual	263	12	350

The GLCmax for gasoline and 1-hr benzene occur over water. The GLCmax for annual benzene occurs over land.

Pollutant	Averaging Time	1 X ESL GLCmax	10 X ESL GLCmax	20 X ESL GLCmax
Benzene	1-hr	3	20	0
Gasoline	1-hr	3	18	0

Pollutant	Averaging Time	GLCmax ( $\mu\text{g}/\text{m}^3$ )	De Minimis ( $\mu\text{g}/\text{m}^3$ )
SO <sub>2</sub>	3-hr	< 1	25
	24-hr	< 1	5
	Annual	< 1	1
NO <sub>2</sub>	Annual	0.2	1
CO	1-hr	7	2000
	8-hr	5	500

3.0 Land Use. Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the topographic map, and aerial photography. The selection of medium roughness appears to be reasonable.

4.0 Modeling Emissions Inventory. The modeled emission point and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

Annualized emission rates were used for the annual averaging times for sources VC447, VC448, VC449, MEC7, and FL\_446.

5.0 Building Wake Effects (Downwash). Input data to Building Profile Input Program Prime (Version 04274) are consistent with the aerial photography, plot plan, and modeling report.

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Modeling Audit – Citgo Refining and Chemicals Company LP

- 6.0 Meteorological Data.
  - Surface Station and ID: Corpus Christi, TX (Station #: 12924)
  - Upper Air Station and ID: Brownsville, TX (Station #: 12919)
  - Meteorological Dataset: 1988
  - Profile Base: 17.07 meters
  
- 7.0 Receptor Grid. The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations and exceedances.
  
- 8.0 Model Used and Modeling Techniques. AERMOD (Version 07026) was used in the refined screening mode.

**Attachment E:  
Toxicology Report**

# Texas Commission on Environmental Quality

## INTEROFFICE MEMORANDUM

**To:** Troy Dalton  
Air Permits Division  
Office of Permitting, Remediation & Registration

**Date:** September 5, 2007

**From:** Manuel Reyna *MSR*  
Toxicology Section  
Chief Engineer's Office

**Subject:** Health effects review of benzene and gasoline emissions in air from CITGO Refining and Chemicals Co., Corpus Christi, Nueces County, TX (Permit No. 46637 and TOX Control No. 6438)

As requested, we conducted a health effects review of benzene and gasoline emissions in air from CITGO Refining and Chemicals' Corpus Christi - East Plant. The site is located within TCEQ's Air Pollution Watch List (APWL) area of concern regarding benzene emissions. This permit amendment authorizes the addition of gasoline and gasoline components (i.e., benzene) at the barge loading dock. However, you indicated that benzene emission increases will be offset by the addition of secondary storage tank seals. The tank seals are scheduled to be installed up to 12 months after this permit amendment is authorized, and barge loading has begun. Furthermore, you indicated that as a result of this permit action, benzene emissions are expected to be reduced by 1.7 tons per year (TPY), for an overall 4.2% reduction in benzene emissions from the site. Refined modeling includes site wide emission sources. The maximum off-property ground level chemical concentrations ( $GLC_{s_{max}}$ ) are predicted to occur over industrial land and water. Predicted ground level chemical concentrations at the maximally impacted non-industrial receptor ( $GLC_{s_{ni}}$ ) occur at a residence. Modeling results were compared to their respective short and long-term Effects Screening Levels (ESLs).

Modeling predicts a short-term  $GLC_{max}$  of  $1,174 \mu g/m^3$  for benzene that occurs over industrial water, and exceeds its ESL of  $75 \mu g/m^3$  by 15.6 times. The corresponding frequency of exceeding 10 times the ESL is 20 hours per year (hr/yr). Benzene's predicted maximum short-term impact over industrial land exceeds its ESL by 8.3 times, with a corresponding frequency of exceeding 2 and 4 times its ESL of 14 and 4 hr/yr, respectively. Benzene's short-term ESL is exceeded by 2.1 times at the residence, with a corresponding frequency of ESL exceedance of only 3 hr/yr. Although benzene's long-term ESL is exceeded by 2 times at the  $GLC_{max}$  (over industrial land), its long-term ESL is not exceeded at the residence. Considering the magnitude and frequency of the short-term ESL exceedances, that the maximum short-term ESL exceedances occur over industrial land and water, the magnitude and small frequency of the short-term ESL exceedance at the residence, that the long-term ESL is not exceeded at the residence, that overall annual benzene emission reductions are expected, and since benzene exposure is more of a long-term health concern, the predicted benzene concentrations are allowable.

Troy Dalton  
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Over industrial water, gasoline's short-term  $GLC_{max}$  of  $50,684 \mu\text{g}/\text{m}^3$  exceeds its ESL of  $3,500 \mu\text{g}/\text{m}^3$  by 14.4 times. Its corresponding frequency of exceeding 10 times the ESL is 18 hr/yr. Gasoline's predicted maximum short-term impact over industrial land of  $24,603 \mu\text{g}/\text{m}^3$  exceeds its ESL by 7 times. Its corresponding frequency of exceeding 2 and 4 times the ESL is 6 and 4 hr/yr, respectively. Gasoline's short-term ESL is exceeded by 2 times at the residence, with a corresponding frequency of ESL exceedance of only 3 hr/yr. However, gasoline's long-term ESL is not exceeded. Considering the magnitude and frequency of the short-term ESL exceedances, that the maximum short-term ESL exceedances occur over industrial land and water, the magnitude and small frequency of the short-term ESL exceedance at the residence, and that the long-term ESL is not exceeded, the predicted gasoline concentrations are allowable.

In conclusion, we do not expect adverse health effects to occur among the general public from exposure to the described benzene and gasoline emissions from this facility. If you have any questions, please call me at 239-1816.

**Attachment F:  
Compliance Histories**

# Compliance History

Customer/Respondent/Owner-Operator:	CN600127922	Citgo Refining and Chemicals Company, L.P.	Classification: AVERAGE	Rating: 2.92
Regulated Entity:	RN102555166	CITGO CORPUS CHRISTI REFINERY EAST PLANT	Classification: AVERAGE	Site Rating: 5.68
ID Number(s):	AIR NEW SOURCE PERMITS	REGISTRATION		83882
	AIR NEW SOURCE PERMITS	REGISTRATION		83913
	AIR NEW SOURCE PERMITS	PERMIT		17670
	AIR NEW SOURCE PERMITS	PERMIT		2494A
	AIR NEW SOURCE PERMITS	PERMIT		2695A
	AIR NEW SOURCE PERMITS	PERMIT		2696A
	AIR NEW SOURCE PERMITS	PERMIT		2697A
	AIR NEW SOURCE PERMITS	PERMIT		2699A
	AIR NEW SOURCE PERMITS	PERMIT		2700A
	AIR NEW SOURCE PERMITS	PERMIT		2703A
	AIR NEW SOURCE PERMITS	PERMIT		2704A
	AIR NEW SOURCE PERMITS	PERMIT		2705A
	AIR NEW SOURCE PERMITS	PERMIT		2706A
	AIR NEW SOURCE PERMITS	PERMIT		2708A
	AIR NEW SOURCE PERMITS	PERMIT		3119A
	AIR NEW SOURCE PERMITS	PERMIT		3123A
	AIR NEW SOURCE PERMITS	PERMIT		3390A
	AIR NEW SOURCE PERMITS	PERMIT		3857A
	AIR NEW SOURCE PERMITS	PERMIT		4728A
	AIR NEW SOURCE PERMITS	PERMIT		5418A
	AIR NEW SOURCE PERMITS	PERMIT		5946A
	AIR NEW SOURCE PERMITS	PERMIT		6722A
	AIR NEW SOURCE PERMITS	PERMIT		8653A
	AIR NEW SOURCE PERMITS	PERMIT		9604A
	AIR NEW SOURCE PERMITS	PERMIT		17670A
	AIR NEW SOURCE PERMITS	PERMIT		10733A
	AIR NEW SOURCE PERMITS	PERMIT		12005A
	AIR NEW SOURCE PERMITS	PERMIT		2709A
	AIR NEW SOURCE PERMITS	PERMIT		4979A
	AIR NEW SOURCE PERMITS	PERMIT		19044
	AIR NEW SOURCE PERMITS	PERMIT		19623
	AIR NEW SOURCE PERMITS	PERMIT		20156
	AIR NEW SOURCE PERMITS	PERMIT		21303
	AIR NEW SOURCE PERMITS	PERMIT		21358
	AIR NEW SOURCE PERMITS	PERMIT		21706
	AIR NEW SOURCE PERMITS	PERMIT		22312
	AIR NEW SOURCE PERMITS	PERMIT		22418
	AIR NEW SOURCE PERMITS	PERMIT		23834
	AIR NEW SOURCE PERMITS	PERMIT		28092
	AIR NEW SOURCE PERMITS	PERMIT		30099
	AIR NEW SOURCE PERMITS	PERMIT		42533
	AIR NEW SOURCE PERMITS	PERMIT		46637
	AIR NEW SOURCE PERMITS	PERMIT		46641
	AIR NEW SOURCE PERMITS	PERMIT		46640
	AIR NEW SOURCE PERMITS	PERMIT		46642
	AIR NEW SOURCE PERMITS	PERMIT		47656
	AIR NEW SOURCE PERMITS	PERMIT		49265
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER		NE0027V
	AIR NEW SOURCE PERMITS	PERMIT		5418
	AIR NEW SOURCE PERMITS	PERMIT		6748
	AIR NEW SOURCE PERMITS	PERMIT		10309
	AIR NEW SOURCE PERMITS	REGISTRATION		56720
	AIR NEW SOURCE PERMITS	AFS NUM		4835500003
	AIR NEW SOURCE PERMITS	REGISTRATION		71021
	AIR NEW SOURCE PERMITS	PERMIT		53921
	AIR NEW SOURCE PERMITS	PERMIT		54775
	AIR NEW SOURCE PERMITS	EPA ID		PSDTX653M1
	AIR NEW SOURCE PERMITS	PERMIT		72654
	AIR NEW SOURCE PERMITS	PERMIT		74515
	AIR NEW SOURCE PERMITS	REGISTRATION		74376
	AIR NEW SOURCE PERMITS	REGISTRATION		75017
	AIR NEW SOURCE PERMITS	REGISTRATION		75340

AIR NEW SOURCE PERMITS	EPA ID	PSDTX831
AIR NEW SOURCE PERMITS	REGISTRATION	76930
AIR NEW SOURCE PERMITS	REGISTRATION	76737
AIR NEW SOURCE PERMITS	REGISTRATION	76742
AIR NEW SOURCE PERMITS	REGISTRATION	76880
AIR NEW SOURCE PERMITS	REGISTRATION	76883
AIR NEW SOURCE PERMITS	REGISTRATION	77066
AIR NEW SOURCE PERMITS	REGISTRATION	77680
AIR NEW SOURCE PERMITS	REGISTRATION	77094
AIR NEW SOURCE PERMITS	REGISTRATION	77050
AIR NEW SOURCE PERMITS	REGISTRATION	78081
AIR NEW SOURCE PERMITS	REGISTRATION	78541
AIR NEW SOURCE PERMITS	REGISTRATION	78522
AIR NEW SOURCE PERMITS	REGISTRATION	78851
AIR NEW SOURCE PERMITS	REGISTRATION	78850
AIR NEW SOURCE PERMITS	REGISTRATION	78195
AIR NEW SOURCE PERMITS	REGISTRATION	79234
AIR NEW SOURCE PERMITS	REGISTRATION	79760
AIR NEW SOURCE PERMITS	PERMIT	80407
AIR NEW SOURCE PERMITS	EPA ID	PSDTX1086
AIR NEW SOURCE PERMITS	PERMIT	80693
AIR NEW SOURCE PERMITS	REGISTRATION	80521
AIR NEW SOURCE PERMITS	REGISTRATION	80564
AIR NEW SOURCE PERMITS	PERMIT	80801
AIR NEW SOURCE PERMITS	REGISTRATION	83336
AIR NEW SOURCE PERMITS	REGISTRATION	83016
AIR OPERATING PERMITS	ACCOUNT NUMBER	NE0027V
AIR OPERATING PERMITS	PERMIT	1423
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD051161990
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30532
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50160
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50160
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50160
WASTEWATER	PERMIT	WQ0000467000
WASTEWATER	PERMIT	TPDES0006211
WASTEWATER	PERMIT	TX0006211
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30532
INDUSTRIAL AND HAZARDOUS WASTE POST CLOSURE	PERMIT	50160

Location: 1801 NUECES BAY BLVD, CORPUS CHRISTI, TX, 78407 Rating Date: 9/1/2007 Repeat Violator: YES

TCEQ Region: REGION 14 - CORPUS CHRISTI

Date Compliance History Prepared: January 25, 2008

Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

Compliance Period: February 02, 2002 to February 02, 2007

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

Name: Phone:

### Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
  2. Has there been a (known) change in ownership of the site during the compliance period? Yes
  3. If Yes, who is the current owner? Citgo Refining and Chemicals Company, L.P.
  4. If Yes, who was/were the prior owner(s)? Citgo Refining and Chemicals Company, L.P.
- When did the change(s) in ownership occur? 09/25/2002

### Components (Multimedia) for the Site :

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

Classification: Minor

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

Rqmt Prov: Special condition 5 PERMIT

Description: Failed to maintain results of outer floating roof seal inspections on Tank Nos. 5005, 5006, and 5007

Classification: Moderate

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

Rqmt Prov: SC 3 and 6 PERMIT

Description: Failed to maintain records of monthly and year-to-date throughput for Tank Nos. 5001 through 5008

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 2494A PERMIT

Description: Failed to operate storage tank Nos. 5006 and 5008 within the temperature limits represented in permit application for Permit No. 2494A

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
4C CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(3)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(4)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(5)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(a)(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(a)(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(a)(3)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.115b(a)(4)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.116b(a)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.116b(b)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.116b(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.116b(d)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to provide notification of Tank No. 1016 startup date, maintain records of internal floating roof tank inspections, and failed to submit a report describing control equipment and certifying control equipment meets specifications.

Classification: Moderate

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

Rqmt Prov: GP 5 PERMIT  
SP 3 PERMIT

Description: Failed to maintain records and provide, as requested, the annual throughput of each diesel storage tank in Area 91, ie., Tanks Nos.4001, 4002, and 4003

Classification: Moderate

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

Rqmt Prov: SC 16D PERMIT

Description: Failed to provide seal inspection records to verify seal integrity on Storage Tank No. 1027 and failed to provide notification of tank seal inspections for Tank No. 1027.

Classification: Minor

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

Rqmt Prov: 16G PERMIT

Description: Failed to maintain records which include the monthly and year-to-date VOC throughput for Tank #s 13,14,20,40,41,42,50,929 and 930 and failed to maintain accurate calculated emissions for these tanks and Tank Nos 4, 1023, and 1027.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(1)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: GP 6D PERMIT

Description: Failed to maintain records of the annual floating roof seal inspections on Tank Nos. 57, 82, 83, 201, 202, 211, 212, 222, 223, 301, 402, 403, 1011, 1014, 1029, 1030, & 1031.

Classification: Moderate

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

Rqmt Prov: 9604A, SP 1 PERMIT

Description: Failed to comply with the emissions limitations set forth in the MAER table in Permit No. 9604A for Storage Tank No. 202.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 113, SubChapter C 113.130  
30 TAC Chapter 115, SubChapter D 115.324(1)(C)  
30 TAC Chapter 115, SubChapter D 115.325(1)  
30 TAC Chapter 115, SubChapter D 115.326(2)  
30 TAC Chapter 116, SubChapter B 116.115(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(d)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(b)(1)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.180(b)(1)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.180(b)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Unknown PERMIT

Description: Failed to properly conduct fugitive monitoring in accordance with 40 CFR Part 60, Appendix A, Method 21 and by failing to monitor on an annual basis, with a hydrocarbon gas analyzer, the emissions from all process drains.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(h)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to comply with the 3 % limitation of total number of valves designated as difficult-to-monitor or hard-to-monitor (HTM) in the SOCOMI and Petroleum Refinery Units.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.322(5)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to mark pipeline and pressure relief valves in gaseous VOC service in a manner readily obvious to monitoring personnel.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(4)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to provide notification of actual date of initial startup of Boiler B, failed to notify the TNRCC in the change in the type of fuel used in Boiler B within 60 days prior to making the change, and failed to notify the TNRCC of the date of construction.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.42  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.43  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.44  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to conduct a performance test on Boiler B as required by 40 CFR 60 Subpart D

Classification: Moderate

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

Rqmt Prov: SC 1 PERMIT

Description: Failed to comply with the maximum hourly NOx emission rate listed in the MAER Table for the CO Boiler Stack on October 21, 1997 for at least five hours.

Classification: Moderate

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

Rqmt Prov: SC 6 PERMIT

Description: Failed to install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of NOx from the CO Boiler Stack within 12 months of the permit renewal date.

Classification: Moderate

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

Rqmt Prov: 5946A, SC 8 PERMIT

Description: Failed to comply with the combined total fuel consumed limit of 438 MMBtu/hr for Boilers 60-B-1C, 61-B-1B on March 31, 1997

Classification: Moderate

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

Rqmt Prov: 1 and 3 PERMIT

Description: Failed to comply with the 25.60 PPH emission limit for NOx as stated in the MAER table of Permit 22312 for Boiler E.

Classification: Moderate

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

Rqmt Prov: SC 10D PERMIT

Description: Failed to report, within 24 hours of detection, all equipment malfunctions for Boiler E for the second quarter of 1997 through the second quarter of 1998.

Classification: Minor

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

Rqmt Prov: SC 12 PERMIT

Description: Failed to submit a complete report, on a qrtly basis, regarding Boiler E for the first quarter of 1996, the third and fourth quarters of 1997, and the 1st quarter of 1998.

Classification: Moderate

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

Rqmt Prov: 9604A, GP 6G PERMIT

Description: Failed to maintain monthly VOC emission records for its loading operations at the tanker truck loading station, also known as the truck rack (EPN 521) from 1/1/97 thru 5/98.

Classification: Moderate

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

Rqmt Prov: SC 2 PERMIT

Description: Failed to comply with the maximum firing rate of 34.3 MMBtu/hr for the ADP Heater (17-H-1) by operating at a rate of 40.8 on 6/30/97

Classification: Moderate

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

Rqmt Prov: 6722A, SC 12&13 PERMIT

Description: Failed to maintain, from January 1, 1997 thru May 12, 1998, cumene production records, denoted as cumulative BPY as required by Special condition 12 to ensure continuous compliance with the annual limit of 4,467,965 barrels.

Classification: Moderate

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

Rqmt Prov: SC 16 PERMIT

Description: Failed to maintain, from 1/1/97 thru 5/12/98, cyclohexane production records denoted as cumulative BPY, to ensure continuous compliance with the emission limits of TNRCC Permit No. 20156.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 101, SubChapter A 101.20(3)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 4 PERMIT

Description: Failed to control the H2S concentration in the refinery fuel gas to a concentration below 230 milligrams per day dry standard cubic meters (0.10 grains per dry standard cubic foot).

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(c)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to maintain a daily record of the average coke burn-off rate, in thousands of kilograms per hour, and the hours of operation for the FCCU catalyst regenerator at FCCU #2 from 1/1/97 thru 5/12/98.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(1)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: GP 7 PERMIT

Description: Failed to vent all carbon compound waste gases, including those from the relief valves other than those for "fire only" emergency purposes, to a flare.

Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to obtain permit authorization from May 12, 1998 through the present to operate the Cumene Flare as a process flare.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to maintain a flare operation log since January 1, 1997 for both the Cumene Flare and the Corrugated Plate Interceptor Flare.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 101, SubChapter A 101.20(2)  
30 TAC Chapter 113, SubChapter C 113.130  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(d)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-10(d)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(3)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(4)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(5)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(6)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.485(g)(7)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT A 61.13(a)(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(2)(iii)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(d)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-11(d)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172(d)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to conduct performance tests or request waivers from testing on the Cumene Flare, the Fluor Flare, and the CPI Flare.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT A 61.10(b)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT A 61.10(c)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to install controls on the desalter before the termination of the waiver period, i.e. Jan 7, 1995, and failed to provide change of information, as related to the desalter and CPI separator, to the Administrator within 30 days after the change.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit complete Total Annual Benzene (TAB) reports containing the information listed in 40 CFR 61.357(a)(1) thru 61.347(a)(6) as required by 40 CFR 61.357(d)(2) and quarterly certifications as required from 1st qtr 95 thru 1st qtr 98.

Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.110  
30 TAC Chapter 113, SubChapter C 113.120  
30 TAC Chapter 113, SubChapter C 113.130  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(c)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(c)(4)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit on schedule a Notification of Compliance Status report as required by Subparts G and H of 40 CFR ch 63 for the new MTBE Unit and failed to submit on schedule an NCS report as required by Subpart H of 40 CFR ch 63 for Aromatic Units.

Classification: Moderate

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

Rqmt Prov: SC 3 PERMIT

Description: Exceeded the crude oil throughput limit for Storage Tank No. 5008.

Classification: Moderate

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

Rqmt Prov: SC 8D and 10D PERMIT

1D PERMIT

5D and 7D PERMIT

6722A, SC 9D PERMIT

GP 7D PERMIT

SC 11D, 12D, 13D PERMIT

SC 1D and 2D PERMIT

SC 1D PERMIT

SC 2D PERMIT

SC 4D PERMIT

SC 5D and 7D PERMIT

SC 6D PERMIT

SC 7D PERMIT

SC 8D PERMIT

Description: Failed to maintain a list of non-accessible valves for each permit as stated in the fugitive monitoring special conditions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.7

30 TAC Chapter 116, SubChapter B 116.115(c)

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

Rqmt Prov: SC 5 PERMIT

Description: Failed to notify TNRCC of needed maintenance on visible openings on Tank Nos. 5001, 5002, and 5008 in the seal or seal fabric or record the corrective action taken.

Classification: Moderate

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

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

Rqmt Prov: SC 2 PERMIT

Description: Exceeded the Crude Heater (11-H-1) fired duty maximum rate of 440 MMBtu/hour on three days, June 30, 1998(441 MMBtu/hr) 9/30/98 (444 MMBtu/hr) and 7/29/99 (447 MMBtu/hr).

Classification: Minor

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

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

Rqmt Prov: SC 3 PERMIT

Description: Exceeded the Vacuum Heater (11-H-2) fired duty maximum rate of 132 MMBtu/hour on 7/29/99.

Classification: Moderate

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

30 TAC Chapter 116, SubChapter B 116.115(c)

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

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

Rqmt Prov: 5946A, SC 6 PERMIT

6722A, SC 7 PERMIT

9604A, SP 2 PERMIT

SC 1 PERMIT

SC 2 and 4 PERMIT

SC 3 and 4 PERMIT

SC 4 and 7 PERMIT

SC 4 PERMIT

SC 5 PERMIT

SC 7 PERMIT

SP 4 PERMIT

Description: Exceeded, from 3/13/99 thru 3/23/99 the hydrogen sulfide concentration limit of 230 mg/dscm (0.10 grain per dry standard cubic foot) in refinery fuel gas which serves combustion devices in the East Plant.

Classification: Moderate

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

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

Rqmt Prov: SC 9 PERMIT

Description: Failed to implement fugitive monitoring in the preheat train and pump suction areas within 180 days after the issuance of the permit amendments.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 101, SubChapter A 101.20(2)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(d)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245(b)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 11F PERMIT  
5946A - SC 6, 6722A - SC 7 PERMIT  
8653A - SC5F PERMIT  
GP 7F PERMIT  
SC 10F and 10G PERMIT  
SC 1F PERMIT  
SC 2F PERMIT  
SC 4F PERMIT  
SC 6F PERMIT  
SC 7F PERMIT  
SC 8F PERMIT

Description: Failed to properly conduct fugitive monitoring in accordance with 40 CFR Part 60, Appendix A, Method 21. Gas analyzer Bacharach TLV KK0530 was placed in service on April 22, 1998 without conducting the required precision test.

Classification: Moderate

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

Rqmt Prov: GC 8, SC 11 PERMIT

Description: Exceeded the short term VOC emission rate for the Crude and Vacuum Heaters, 11-H-1 and 11-H-2 and failed to conduct stack sampling within 90 days from completion of construction. Stack testing was required on or before February 22, 1998.

Classification: Moderate

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

Rqmt Prov: 2A PERMIT  
6722A -SC 9A PERMIT  
SC 12A and 13A PERMIT  
SC 1A PERMIT  
SC 2A PERMIT  
SC 5A and 7A PERMIT  
SC 6A PERMIT  
SC 8A and 10A PERMIT  
SC 8A PERMIT

Description: Failed to maintain a list of equipment from the fugitive monitoring program due to vapor pressure or size limitations.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: SC 1 PERMIT

Description: Exceeded the 250 ppm in-stack dioxide (SO<sub>2</sub>) concentration limit for the Shell Claus Off-gas Treating unit tail gas incinerator.

Classification: Moderate

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

Rqmt Prov: SC 5 PERMIT

Description: Exceeded the gasoline loading throughput limit of 720,000 barrels of gasoline per year at the No. 2 barge dock.

Classification: Moderate

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

Rqmt Prov: SC 2 PERMIT

Description: Exceeded the ADP Heater (17-H-1) maximum fired duty rate of 34.3 MMBtu/hour on 12/31/98.

Classification: Minor

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

Rqmt Prov: 9604A - GP 6D PERMIT

Description: Failed to maintain complete annual floating seal inspection records on Tanks Nos. 57, 82, 83, 201, 202, 211, 212, 221-223, 301, 402,403,1011, 1014,1029 and 1031 for 1998.

Classification: Moderate

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

Rqmt Prov: SC 11E and 12E PERMIT

Description: Failed to submit, on a quarterly basis, a certification statement signed by the permit holder that the records of fuel supplier certification submitted represent all of the fuel supplied or combusted during the quarter.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.6(a)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit timely and/or complete reportable upset notifications.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.6(b)  
30 TAC Chapter 101, SubChapter A 101.7(c)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to create complete records of reportable and non-reportable by-pass upsets, maintenance, start-ups, and shutdowns with unauthorized emissions as soon as practicable, but no later than two weeks after upsets occurred.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10(b)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to include excess emissions occurring during maintenance, startups, shutdowns, upsets, and downtime in the Annual Emissions Inventory Update submitted on March 15, 1999.

Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.327(4)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to notify the executive director of the shutdown, as it occurred, of the Aromatics Disproportionation Unit when it was brought off-line in June 98 and the old Methyl T-Butyl Ether (MTBE) Unit which was brought off-line around August 1994.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(i)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to comply with the three percent limitation of total number of valves designated as difficult-to-monitor/hard-to-monitor in the SOxMI Units and Petroleum Refinery Units.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 101, SubChapter A 101.20(2)  
30 TAC Chapter 113, SubChapter C 113.130  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(f)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.246(f)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(b)(7)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to maintain an up-to-date, complete, and readily accessible log for the fugitive monitoring program.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(e)(2)(i)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Exceeded the 6.0 Megagrams (Mg) of benzene yearly limit for facility waste, for the years 1998 thru 2000.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(5)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a complete Total Annual Benzene report for 1998.

Classification: Moderate

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

Rqmt Prov: 3119A, GC8 PERMIT

Description: Exceeded the SO<sub>2</sub> hourly maximum allowable emission rate of 26.44 pounds per hour.

Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(b)  
Description: Emitted unauthorized VOC and benzene emissions and had excessive opacity  
Classification: Moderate

Citation: 5C THC Chapter 382, SubChapter A 382.085(b)  
Description: Emitted unauthorized VOC and benzene emissions from the BTX wastewater stripper on March 8 through March 19, 1999 for a total of 262 hours and from the CPI flare pilot light outages on 8/9 thru 8/15/98.  
Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121  
Rqmt Prov: - PERMIT  
Description: Failed to comply with the maximum daily average limit of 10 milligrams per liter for total Fluoride for Nov 98, Jan 99, and Feb 99.

Effective Date: 03/05/2004 ADMINORDER 2001-1469-AIR-E  
Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
Rqmt Prov: 20156 PERMIT  
Description: Failed to limit emissions released from the Hydrar Unit to the levels allowed.  
Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)  
30 TAC Chapter 101, SubChapter A 101.27(a)  
30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)  
30 TAC Chapter 116, SubChapter B 116.110(a)  
30 TAC Chapter 116, SubChapter B 116.116(a)  
40 CFR Chapter 52, SubChapter C, PT 52, SubPT A 52.21  
Description: Failed to obtain appropriate regulatory authority for sour water and acid gas flares as installed and operated at the East and West Plants and to pay emissions fees or maintain flare logs for these flares.  
Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
Rqmt Prov: 3390A PERMIT  
Description: Failed to limit emissions released from the Unibon Unit to the levels allowed.  
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201  
30 TAC Chapter 101, SubChapter F 101.211  
5C THC Chapter 382, SubChapter A 382.085(b)  
Description: Failed to submit notifications of upset emissions in a timely manner; to provide proper notification for maintenance events; and to maintain complete records regarding emission events.  
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)  
5C THC Chapter 382, SubChapter A 382.085(b)  
Rqmt Prov: 3119A PERMIT  
Description: Failed to comply with emissions limits applicable to the East and West Plant sulfur recovery units.  
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 111, SubChapter A 111.111(a)(2)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.102(a)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)  
Rqmt Prov: 9604A PERMIT  
GP PERMIT  
Description: Failed to comply with limits on emissions from Fluid Catalytic Cracking units.  
Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)  
5C THC Chapter 382, SubChapter A 382.085(b)  
Description: Failed to prevent fuel gas burned in combustion devices from containing excess hydrogen sulfide.  
Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

30 TAC Chapter 335, SubChapter C 335.69(a)(3)  
30 TAC Chapter 335, SubChapter C 335.69(d)(1)  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)

Rqmt Prov: II.B.9 PERMIT  
IV.B.1 PERMIT

Description: Failed to submit notification of hazardous waste (HW) management areas, to comply with the accumulation time requirements, to properly label drums of HW, maintain a container of HW closed, mark containers with an accumulation start date, timely submit certification of waste minimization and limit HW to permitted wastes

Classification: Moderate

Citation: 30 TAC Chapter 327 327.5(a)  
30 TAC Chapter 335, SubChapter A 335.4  
TWC Chapter 26 26.121

Description: Failure to prevent the unauthorized discharge of industrial or other waste and to initiate response actions.

Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121  
30 TAC Chapter 319, SubChapter A 319.11  
30 TAC Chapter 319, SubChapter A 319.7

Rqmt Prov: Effluent limitations PERMIT

Description: Failure to comply with TPDES permits, including failure to properly operate process wastewater and stormwater collection systems, limit effluent characteristics, use proper sample collection & storage procedures, to record all required information for storm water collection, to record QA/QC data for pH & Cl.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-5  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.698(b)  
40 CFR Part 60, Subpart QQQ 60.692-3(a)

Description: Failed to meet the requirements of 40 CFR, Part 60, Subpart QQQ, including failure to prevent oil carryover from oil-water (o/w) separators, to equip o/w storage vessels with fixed roofs & o/w tank with closed vent system and control devices, to submit reports or conduct inspection; operated the CPI sep without flare.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(e)(2)(ii)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(c)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(2)

Description: Failed to meet NESHAP req. for benzene wastes, including failure to conduct inspections of drain systems, equip tanks, submit complete total annual benzene report & determine quantity from each waste stream, determine the flow-weighted annual avg appropriately, limit the benzene quantity of uncontrolled waste streams.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120  
40 CFR Part 63, Subpart G 63.120(b)(3)  
40 CFR Part 63, Subpart G 63.120(b)(4)  
40 CFR Part 63, Subpart G 63.122(a)

Description: Failed to comply with the requirements for external floating roof tank seal gap repair and reporting.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 60, Subpart A 60.18

Rqmt Prov: Not specified PERMIT

Description: Failure to comply with the flare pilot operation requirements applicable to the Fluor flare or to obtain regulatory authority for uncombusted emissions from that flare.

Classification: Moderate

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

Rqmt Prov: Not specified PERMIT

Description: Failure to comply with emission limits during vessel loading operations.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

Rqmt Prov: 46642 PERMIT

Description: Failure to demonstrate initial compliance with emission tests of Compressor Nos. 1A, 1B, and 1C (EPNs 062, 063, and 064).

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

N/A

C. Chronic excessive emissions events.

N/A

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

1	03/04/2002	(158875)
2	03/07/2002	(142326)
3	03/27/2002	(158878)
4	04/22/2002	(158883)
5	05/20/2002	(158887)
6	05/23/2002	(142327)
7	05/23/2002	(142328)
8	06/10/2002	(142329)
9	06/10/2002	(142330)
10	06/12/2002	(142331)
11	06/12/2002	(142332)
12	06/21/2002	(142333)
13	07/02/2002	(158891)
14	08/02/2002	(158895)
15	08/26/2002	(158899)
16	09/23/2002	(284321)
17	09/26/2002	(158902)
18	09/30/2002	(12547)
19	10/30/2002	(158905)
20	10/30/2002	(15118)
21	12/09/2002	(158909)
22	01/06/2003	(158913)
23	01/28/2003	(158917)
24	01/30/2003	(22329)
25	03/03/2003	(158876)
26	03/31/2003	(158879)
27	04/04/2003	(246547)
28	04/28/2003	(158884)
29	05/22/2003	(158888)
30	06/13/2003	(33932)
31	06/13/2003	(28894)
32	06/13/2003	(28895)
33	06/13/2003	(62480)
34	06/24/2003	(158892)
35	07/22/2003	(158896)
36	08/11/2003	(149101)
37	08/11/2003	(149496)
38	08/15/2003	(147279)
39	08/19/2003	(295716)
40	09/19/2003	(295718)
41	10/30/2003	(252796)
42	10/30/2003	(249984)
43	10/30/2003	(252955)
44	10/30/2003	(295720)
45	10/30/2003	(250829)
46	11/21/2003	(295722)
47	12/29/2003	(295723)
48	01/27/2004	(295725)
49	01/29/2004	(258191)
50	02/02/2004	(261589)
51	02/09/2004	(256114)
52	02/09/2004	(256568)
53	02/09/2004	(256569)
54	02/23/2004	(295705)
55	03/01/2004	(264188)

56	03/01/2004	(264223)
57	03/25/2004	(295709)
58	03/27/2004	(283414)
59	04/15/2004	(266190)
60	04/28/2004	(295710)
61	05/10/2004	(270683)
62	05/24/2004	(272559)
63	05/25/2004	(295712)
64	05/28/2004	(272866)
65	06/23/2004	(276515)
66	06/24/2004	(269190)
67	06/30/2004	(352239)
68	07/01/2004	(278271)
69	07/01/2004	(278139)
70	07/19/2004	(268646)
71	07/22/2004	(352240)
72	08/30/2004	(352241)
73	08/31/2004	(291703)
74	09/15/2004	(298570)
75	09/16/2004	(334411)
76	09/28/2004	(283343)
77	10/12/2004	(335820)
78	10/29/2004	(352243)
79	11/19/2004	(339890)
80	11/19/2004	(336845)
81	11/19/2004	(341541)
82	11/19/2004	(336653)
83	11/19/2004	(339919)
84	11/22/2004	(341305)
85	11/23/2004	(352244)
86	11/30/2004	(341912)
87	12/20/2004	(352242)
88	12/20/2004	(381902)
89	12/30/2004	(342227)
90	01/21/2005	(345684)
91	01/24/2005	(381903)
92	02/03/2005	(348348)
93	02/23/2005	(381900)
94	03/08/2005	(453246)
95	03/11/2005	(372798)
96	03/24/2005	(373888)
97	03/24/2005	(374168)
98	03/28/2005	(374190)
99	03/28/2005	(381901)
100	04/26/2005	(419743)
101	05/06/2005	(378559)
102	05/23/2005	(419744)
103	06/03/2005	(393464)
104	06/03/2005	(392988)
105	06/16/2005	(395438)
106	06/23/2005	(419745)
107	07/07/2005	(395347)
108	07/18/2005	(393465)
109	07/22/2005	(440879)
110	08/18/2005	(405799)
111	08/22/2005	(402137)
112	08/26/2005	(440880)
113	09/20/2005	(440881)
114	10/11/2005	(434051)
115	10/25/2005	(468522)
116	11/16/2005	(405717)
117	11/17/2005	(436667)
118	11/28/2005	(468523)
119	12/01/2005	(435829)
120	12/22/2005	(468524)
121	01/02/2006	(450793)
122	01/02/2006	(450794)
123	01/24/2006	(468525)

124 02/09/2006 (453193)  
 125 02/21/2006 (451197)  
 126 02/24/2006 (468521)  
 127 03/07/2006 (454499)  
 128 03/08/2006 (458417)  
 129 03/20/2006 (498260)  
 130 03/27/2006 (459448)  
 131 04/06/2006 (459050)  
 132 04/13/2006 (459661)  
 133 04/13/2006 (459665)  
 134 04/18/2006 (455371)  
 135 04/24/2006 (498261)  
 136 05/23/2006 (498262)  
 137 05/24/2006 (467417)  
 138 06/05/2006 (466364)  
 139 06/06/2006 (467393)  
 140 06/23/2006 (498263)  
 141 07/19/2006 (482242)  
 142 07/21/2006 (484425)  
 143 07/24/2006 (520275)  
 144 08/09/2006 (572255)  
 145 08/17/2006 (520276)  
 146 08/21/2006 (489885)  
 147 08/21/2006 (520277)  
 148 08/22/2006 (487181)  
 149 08/24/2006 (482569)  
 150 08/31/2006 (483126)  
 151 09/13/2006 (510995)  
 152 09/25/2006 (520278)  
 153 10/12/2006 (514095)  
 154 10/12/2006 (514897)  
 155 10/12/2006 (514878)  
 156 10/16/2006 (515256)  
 157 10/18/2006 (515782)  
 158 10/18/2006 (510953)  
 159 10/24/2006 (544597)  
 160 11/15/2006 (516860)  
 161 11/15/2006 (518976)  
 162 11/27/2006 (544598)  
 163 11/29/2006 (512162)  
 164 12/19/2006 (544599)  
 165 12/21/2006 (534104)  
 166 12/29/2006 (534672)  
 167 01/04/2007 (516900)  
 168 01/08/2007 (512157)  
 169 01/22/2007 (544600)

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

Date: 06/30/2002 (158895)  
 Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 08/31/2002 (158902)  
 Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 09/30/2002 (158905)  
 Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 11/30/2002 (158913)  
 Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter

Date: 04/04/2003 (246547)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: NON-RPT VIOS FOR MONIT PER OR PIPE

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: NON-RPT VIOS FOR MONIT PER OR PIPE  
Date: 04/30/2003 (158888)

Self Report? YES Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
TWC Chapter 26 26.121(a)  
Description: Failure to meet the limit for one or more permit parameter  
Date: 08/18/2003 (147279)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to limit the effluent characteristics to those specified in the permit.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 319, SubChapter A 319.7(a)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to maintain required records for each measurement or sample collected and analyzed at the facility.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 319, SubChapter A 319.7(a)  
30 TAC Chapter 319, SubChapter A 319.7(c)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to maintain a record of quality assurance/quality control (QA/QC) data for the analysis of total residual chlorine.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 319, SubChapter A 319.7(a)  
30 TAC Chapter 319, SubChapter A 319.7(c)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to monitor and record temperatures inside ovens used in the analysis of Total Suspended Solids (TSS).

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 319, SubChapter A 319.11(b)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to use the appropriate reagent for the analysis of total residual chlorine.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to properly operate and maintain the storm water collection system.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(5)  
Rqmt Prov: PERMIT WQ0000467-000  
Description: Failure to properly operate and maintain the clarifier at the East Plant.  
Date: 10/31/2003 (249984)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)  
Description: Failure to provide initial notification of an emissions event within 24 hours of discovery.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)  
30 TAC Chapter 116, SubChapter B 116.115(c)(1)  
Rqmt Prov: PERMIT Air Permit No. 3390A  
PERMIT VERP No. 46641  
Description: Failure to obtain regulatory authority for, or satisfy all criteria of 30 Texas Admin. Code §101.222 to exempt from compliance limitations, the emissions released during an emissions event.

Date: 02/03/2004 (258191)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)  
Description: Failure to provide required information in the notification of a reportable emissions, released as a result of emissions events at the Vacuum Unit on November 18, 2003, to the commission's regional office within 24 hours of discovery.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)  
Description: Failure to provide required information in the final record of a reportable emissions, released as a result of emissions events at the Vacuum Unit on

November 18, 2003, to the commission's regional office no later than two weeks after the end of the emission event.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)  
Rqmt Prov: PA Permit 2695A - General Conditions  
Description: Failure to obtain regulatory authority for the emissions released from the 11-H2 Vacuum Heater facility during an emissions event on November 18, 2003. Specifically, all criteria identified in §101.222(b) were not satisfied as required.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)  
Description: Failure to obtain regulatory authority for the opacity based emissions released from the 11-H2 Vacuum Heater facility during an emissions event on November 18, 2003. Specifically, all criteria identified in §101.222(b) were not satisfied as required.

Date: 02/06/2004 (256569)

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)  
Rqmt Prov: PERMIT 9604A  
Description: Failure to operate the Cumene Flare with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)  
Rqmt Prov: PERMIT 9604A  
Description: Failure to maintain the Cumene Flare in good working order.

Date: 02/06/2004 (256114)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)  
Rqmt Prov: PERMIT 3123A  
Description: Failure to obtain regulatory authority or meet the demonstration requirements of 30 TAC 101.222(b)(2), (b)(3), (b)(6), and (b)(9), for reportable emissions resulting from an emissions event.

Date: 02/06/2004 (256568)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)  
Description: Failure to obtain regulatory authority for, or satisfy all criteria of 30 Texas Admin. Code §101.222(b), to exempt from compliance limitations, the emissions released during an emissions event.

Date: 04/15/2004 (266190)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)  
Description: Failure to meet the demonstration criteria of 30 TAC 101.222.

Date: 04/30/2004 (295712)

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

Date: 05/21/2004 (272559)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)  
Rqmt Prov: PA 3119A  
Description: Failure to obtain regulatory authority or meet the demonstration requirements of 30 TAC 101.222 for emissions involving the SRU during an emissions event which began on January 5, 2004.

Date: 06/23/2004 (276515)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
Rqmt Prov: PA 9604A  
Description: Failure to obtain regulatory authority or meet the demonstration requirements of 30 TAC 101.222 for emissions involving the Fluor Flare during an emissions event which began on March 3, 2004.

Date: 08/31/2004 (291703)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 113, SubChapter C 113.130  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 63, Subpart H 63.162(a)  
Rqmt Prov: PA 5418A & 20156  
Description: Failure to demonstrate compliance with the fugitive emission standards for all components in HON service at the BTX and Hydrar Units as directed by § 63.162(a) and (f).

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 113, SubChapter C 113.130  
 40 CFR Part 63, Subpart H 63.166  
 Description: Failure to equip process sampling stations with a closed-purge, closed-loop, or closed-vent system

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 113, SubChapter C 113.130  
 30 TAC Chapter 115, SubChapter D 115.322(4)  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 40 CFR Part 63, Subpart H 63.167  
 Rqmt Prov: PA 5418A & 20156  
 Description: Failure to equip applicable each open-ended valve or line with a cap, blind flange, plug, or a second valve.

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 113, SubChapter C 113.130  
 30 TAC Chapter 115, SubChapter D 115.325(1)  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 40 CFR Part 63, Subpart H 63.180(b)  
 Rqmt Prov: PA 5418A & 20156  
 Description: Failure to demonstrate that fugitive monitoring was being performed in accordance with Method 21 of 40 CFR part 60, appendix A.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 113, SubChapter C 113.130  
 40 CFR Part 63, Subpart H 63.182(d)  
 Description: Failure to submit an accurate and complete HON semiannual report due on or about July 2003 for the reporting period of January through June 2003.

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 113, SubChapter C 113.130  
 40 CFR Part 63, Subpart H 63.182(d)  
 Description: Failure to include in the BTX and Hydrar Unit HON semiannual reports the number and percent of connectors leaking, and the total number of connectors monitored. Additionally, the number and percent of valves leaking and the total number of valves monitored are incorrect.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
 Rqmt Prov: PA 5418A & 20156  
 Description: Failure to maintain and provide, upon request, lists of equipment excluded from fugitive emission monitoring requirements due to vapor pressure, operating pressure and/or size. Additionally, the operator failed to demonstrate that the weekly AVO inspections of connectors and/or flanges are being conducted.

Date: 11/19/2004 (341305)

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 Rqmt Prov: PERMIT Special Condition No. 3  
 Description: Failure to satisfy all demonstrations criteria as listed under 30 Tex. Admin. Code § 101.222 and gain authority for emissions released from an event that occurred on April 14, 2004, TCEQ incident No. 37963.

Date: 11/29/2004 (341912)

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 327 327.3(b)  
 Description: The regulated entity failed to notify the TCEQ of a reportable incident as soon as possible, but no later than 24 hours. The CASA Line Filter at CITGO East in Corpus Christi, Texas released approx. 10 barrels of 2-Oil to the ground on 09/18/04, however, CITGO personnel did not notify the TCEQ until 09/28/04.

Date: 12/29/2004 (342227)

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(4)  
 Description: Failure to submit all additional or more detailed information requested for TCEQ STEERS No. 39028 within the time frame established in the request. Information requested to be submitted by September 22, 2004 was received on November 24, 2004.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(12)  
 Description: All additional information necessary to evaluate the emissions event (TCEQ STEERS No. 39028) which occurred on or about May 4, 2004 was not provided in the final record.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(f)  
 Description: Failure to submit in writing an analysis of the probable cause of an emissions event (TCEQ STEERS No. 39028) within 60 days from the date of the request.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)  
Description: Failure to prevent the occurrence of visible emissions with an opacity of greater than 20% averaged over a six- minute period for emissions released from the No. 2 FCCU during an emissions event (TCEQ STEERS No. 39028) that occurred on or about May 4, 2004.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.102(a)(2)  
Description: Failure to maintain compliance with applicable requirements specified in New Source Performance Standards (NSPS) for Petroleum Refineries 40 Code of Federal Regulations (CFR) Part 60 Subpart J.  
Date: 03/31/2005 (419743)

Self Report? YES Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
TWC Chapter 26 26.121(a)  
Description: Failure to meet the limit for one or more permit parameter  
Date: 07/18/2005 (393465)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Rqmt Prov: PERMIT TPDES Permit No. 00467-003  
Description: Failure to comply with the 0.5 mg/l daily maximum permit limit for BTEX.  
Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 319, SubChapter A 319.4  
Rqmt Prov: PERMIT TPDES Permit No. 00467-003  
Description: Failure to meet minimum self-monitoring requirements for sample collection and laboratory analysis.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Rqmt Prov: PERMIT TPDES Permit No. 00467-001  
Description: Failure to comply with the maximum pH permit limit of 9.0 su (standard units).  
Date: 12/31/2005 (468525)

Self Report? YES Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
TWC Chapter 26 26.121(a)  
Description: Failure to meet the limit for one or more permit parameter  
Date: 08/24/2006 (482569)

Self Report? NO Classification: Moderate  
Citation: TWC Chapter 26 26.121(a)(1)  
Rqmt Prov: PERMIT TPDES Permit No. WQ0000467-001  
Description: Failure to prevent an unauthorized discharge of approximately 6 barrels of slop oil into the Corpus Christi Inner Harbor.  
Date: 08/31/2006 (483126)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)  
Description: Failure to meet accumulation time limits as required for storage of hazardous-waste without a permit.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)  
30 TAC Chapter 335, SubChapter E 335.112(a)(8)  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(i)  
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174  
Description: Failure to inspect all container storage areas as required.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
Rqmt Prov: OP PP III.D.  
Description: Failure to inspect Permitted Units as per permit requirements.  
Date: 11/28/2006 (512162)

Self Report? NO Classification: Moderate  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)  
30 TAC Chapter 335, SubChapter A 335.4  
Description: Failure to prevent discharge of industrial or other waste into or adjacent to any water in the state.

Environmental audits.

Notice of Intent Date: 06/24/2004 (334400)  
Disclosure Date: 12/21/2004  
Viol. Classification: Major

Citation: 30 TAC Chapter 101, SubChapter F  
Description: Failure to report emission events.  
Notice of Intent Date: 07/07/2004 (334350)  
No DOV Associated

Notice of Intent Date: 07/27/2004 (509717)  
No DOV Associated

Notice of Intent Date: 06/02/2005 (403329)  
Disclosure Date: 12/01/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: Failed to control 63 open-ended lines by cap, plug, blind, or double block valves.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: Failure to maintain records of weekly visual inspections documenting inspection of non-leaking pumps.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT R  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV

Description: Failure to properly complete DOR forms.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: Failure to submit monitoring reports on time and Reports did not contain all information required by the regulations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: Failure to tag components in the ADP and BTX units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: The 5 to 15 day report submitted in July 2005 generated by the fugitive software had inaccurate or not probable dates that reported excessive deviations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: Failure to identify compressor leaks in semi-annual report for 2004 MACT or HON units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV

Description: Failure to include complete downtime information in several MACT reports for the East Plant.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H

Description: Failure to include reason for delay of repair on the 2004 HON and MACT semiannual reports.

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

# Compliance History

Customer/Respondent/Owner-Operator:	CN600127922	Citgo Refining and Chemicals Company L.P.	Classification: AVERAGE	Rating: 3.80
Regulated Entity:	RN102555166	CITGO CORPUS CHRISTI REFINERY EAST PLANT	Classification: AVERAGE	Site Rating: 11.79
ID Number(s):	AIR NEW SOURCE PERMITS	PERMIT		17670
	AIR NEW SOURCE PERMITS	PERMIT		2494A
	AIR NEW SOURCE PERMITS	PERMIT		2695A
	AIR NEW SOURCE PERMITS	PERMIT		2696A
	AIR NEW SOURCE PERMITS	PERMIT		2697A
	AIR NEW SOURCE PERMITS	PERMIT		2699A
	AIR NEW SOURCE PERMITS	PERMIT		2700A
	AIR NEW SOURCE PERMITS	PERMIT		2703A
	AIR NEW SOURCE PERMITS	PERMIT		2704A
	AIR NEW SOURCE PERMITS	PERMIT		2705A
	AIR NEW SOURCE PERMITS	PERMIT		2706A
	AIR NEW SOURCE PERMITS	PERMIT		2708A
	AIR NEW SOURCE PERMITS	PERMIT		3119A
	AIR NEW SOURCE PERMITS	PERMIT		3123A
	AIR NEW SOURCE PERMITS	PERMIT		3390A
	AIR NEW SOURCE PERMITS	PERMIT		3857A
	AIR NEW SOURCE PERMITS	PERMIT		4728A
	AIR NEW SOURCE PERMITS	PERMIT		5418A
	AIR NEW SOURCE PERMITS	PERMIT		5946A
	AIR NEW SOURCE PERMITS	PERMIT		6722A
	AIR NEW SOURCE PERMITS	PERMIT		8653A
	AIR NEW SOURCE PERMITS	PERMIT		9604A
	AIR NEW SOURCE PERMITS	PERMIT		17670A
	AIR NEW SOURCE PERMITS	PERMIT		10733A
	AIR NEW SOURCE PERMITS	PERMIT		12005A
	AIR NEW SOURCE PERMITS	PERMIT		2709A
	AIR NEW SOURCE PERMITS	PERMIT		4979A
	AIR NEW SOURCE PERMITS	PERMIT		19044
	AIR NEW SOURCE PERMITS	PERMIT		20156
	AIR NEW SOURCE PERMITS	PERMIT		21303
	AIR NEW SOURCE PERMITS	PERMIT		21358
	AIR NEW SOURCE PERMITS	PERMIT		21706
	AIR NEW SOURCE PERMITS	PERMIT		22312
	AIR NEW SOURCE PERMITS	PERMIT		22418
	AIR NEW SOURCE PERMITS	PERMIT		23834
	AIR NEW SOURCE PERMITS	PERMIT		28092
	AIR NEW SOURCE PERMITS	PERMIT		30099
	AIR NEW SOURCE PERMITS	PERMIT		42533
	AIR NEW SOURCE PERMITS	PERMIT		46637
	AIR NEW SOURCE PERMITS	PERMIT		46641
	AIR NEW SOURCE PERMITS	PERMIT		46640
	AIR NEW SOURCE PERMITS	PERMIT		46642
	AIR NEW SOURCE PERMITS	PERMIT		47656
	AIR NEW SOURCE PERMITS	PERMIT		49265
	AIR NEW SOURCE PERMITS	ACCOUNT NUMBER		NE0027V
	AIR NEW SOURCE PERMITS	PERMIT		5418
	AIR NEW SOURCE PERMITS	PERMIT		6748
	AIR NEW SOURCE PERMITS	PERMIT		10309
	AIR NEW SOURCE PERMITS	REGISTRATION		56720
	AIR NEW SOURCE PERMITS	AFS NUM		4835500003
	AIR NEW SOURCE PERMITS	REGISTRATION		71021
	AIR NEW SOURCE PERMITS	PERMIT		53921
	AIR NEW SOURCE PERMITS	PERMIT		54775
	AIR NEW SOURCE PERMITS	EPA ID		PSDTX653M1
	AIR NEW SOURCE PERMITS	PERMIT		72654
	AIR NEW SOURCE PERMITS	PERMIT		74515
	AIR NEW SOURCE PERMITS	REGISTRATION		74376
	AIR NEW SOURCE PERMITS	REGISTRATION		75017
	AIR NEW SOURCE PERMITS	REGISTRATION		75340
	AIR NEW SOURCE PERMITS	EPA ID		PSDTX831

AIR NEW SOURCE PERMITS	REGISTRATION	76930
AIR NEW SOURCE PERMITS	REGISTRATION	76737
AIR NEW SOURCE PERMITS	REGISTRATION	76742
AIR NEW SOURCE PERMITS	REGISTRATION	76880
AIR NEW SOURCE PERMITS	REGISTRATION	76883
AIR NEW SOURCE PERMITS	REGISTRATION	77066
AIR NEW SOURCE PERMITS	REGISTRATION	77680
AIR NEW SOURCE PERMITS	REGISTRATION	77094
AIR NEW SOURCE PERMITS	REGISTRATION	77050
AIR NEW SOURCE PERMITS	REGISTRATION	78081
AIR NEW SOURCE PERMITS	REGISTRATION	78541
AIR NEW SOURCE PERMITS	REGISTRATION	78522
AIR NEW SOURCE PERMITS	REGISTRATION	78851
AIR NEW SOURCE PERMITS	REGISTRATION	78850
AIR NEW SOURCE PERMITS	REGISTRATION	78195
AIR NEW SOURCE PERMITS	REGISTRATION	79234
AIR NEW SOURCE PERMITS	REGISTRATION	79760
AIR NEW SOURCE PERMITS	PERMIT	80407
AIR NEW SOURCE PERMITS	EPA ID	PSDTX1086
AIR NEW SOURCE PERMITS	PERMIT	80693
AIR NEW SOURCE PERMITS	REGISTRATION	80521
AIR NEW SOURCE PERMITS	REGISTRATION	80564
AIR NEW SOURCE PERMITS	PERMIT	80801
AIR NEW SOURCE PERMITS	REGISTRATION	83336
AIR NEW SOURCE PERMITS	REGISTRATION	83016
AIR NEW SOURCE PERMITS	REGISTRATION	86253
AIR NEW SOURCE PERMITS	REGISTRATION	83882
AIR NEW SOURCE PERMITS	REGISTRATION	83913
AIR OPERATING PERMITS	ACCOUNT NUMBER	NE0027V
AIR OPERATING PERMITS	PERMIT	1423
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD051161990
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30532
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50160
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50160
INDUSTRIAL AND HAZARDOUS WASTE STORAGE	PERMIT	50160
WASTEWATER	PERMIT	WQ0000467000
WASTEWATER	PERMIT	TPDES0006211
WASTEWATER	PERMIT	TX0006211
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30532
INDUSTRIAL AND HAZARDOUS WASTE POST CLOSURE	PERMIT	50160

Location: 1802 NUECES BAY BLVD, CORPUS CHRISTI, TX, 78407 Rating Date: 9/1/2007 Repeat Violator: YES

TCEQ Region: REGION 14 - CORPUS CHRISTI

Date Compliance History Prepared: December 02, 2008

Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

Compliance Period: December 02, 2003 to December 02, 2008

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

Name: Phone:

### Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes
2. Has there been a (known) change in ownership of the site during the compliance period? Yes
3. If Yes, who is the current owner?

Citgo Refining and Chemicals  
Company L.P.

Champlin Refining Company

4. If Yes, who was/were the prior owner(s)?

Citgo Petroleum Corporation

5. When did the change(s) in ownership occur?

10/01/2007

**Components (Multimedia) for the Site :**

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

Effective Date: 03/05/2004

ADMINORDER 2001-1469-AIR-E

Classification: Moderate

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

Rqmt Prov: 20156 PERMIT

Description: Failed to limit emissions released from the Hydrar Unit to the levels allowed.

Classification: Major

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)  
30 TAC Chapter 101, SubChapter A 101.27(a)  
30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)

30 TAC Chapter 116, SubChapter B 116.110(a)

30 TAC Chapter 116, SubChapter B 116.116(a)

40 CFR Chapter 52, SubChapter C, PT 52, SubPT A 52.21

Description: Failed to obtain appropriate regulatory authority for sour water and acid gas flares as installed and operated at the East and West Plants and to pay emissions fees or maintain flare logs for these flares.

Classification: Moderate

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

Rqmt Prov: 3390A PERMIT

Description: Failed to limit emissions released from the Unibon Unit to the levels allowed.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201  
30 TAC Chapter 101, SubChapter F 101.211  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notifications of upset emissions in a timely manner; to provide proper notification for maintenance events; and to maintain complete records regarding emission events.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 3119A PERMIT

Description: Failed to comply with emissions limits applicable to the East and West Plant sulfur recovery units.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 111, SubChapter A 111.111(a)(2)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.102(a)(2)  
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: 9604A PERMIT

GP PERMIT

Description: Failed to comply with limits on emissions from Fluid Catalytic Cracking units.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)  
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to prevent fuel gas burned in combustion devices from containing excess hydrogen sulfide.

Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)  
30 TAC Chapter 335, SubChapter C 335.69(a)(3)  
30 TAC Chapter 335, SubChapter C 335.69(d)(1)  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)  
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)

Rqmt Prov: II.B.9 PERMIT  
IV.B.1 PERMIT

Description: Failed to submit notification of hazardous waste (HW) management areas, to comply with the accumulation time requirements, to properly label drums of HW, maintain a container of HW closed, mark containers with an accumulation start date, timely submit certification of waste minimization and limit HW to permitted wastes

Classification: Moderate

Citation: 30 TAC Chapter 327 327.5(a)  
30 TAC Chapter 335, SubChapter A 335.4  
TWC Chapter 26 26.121

Description: Failure to prevent the unauthorized discharge of industrial or other waste and to initiate response actions.

Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121  
30 TAC Chapter 319, SubChapter A 319.11  
30 TAC Chapter 319, SubChapter A 319.7

Rqmt Prov: Effluent limitations PERMIT

Description: Failure to comply with TPDES permits, including failure to properly operate process wastewater and stormwater collection systems, limit effluent characteristics, use proper sample collection & storage procedures, to record all required information for storm water collection, to record QA/QC data for pH & Cl.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-5  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.698(b)  
40 CFR Part 60, Subpart QQQ 60.692-3(a)

Description: Failed to meet the requirements of 40 CFR, Part 60, Subpart QQQ, including failure to prevent oil carryover from oil-water (o/w) separators, to equip o/w storage vessels with fixed roofs & o/w tank with closed vent system and control devices, to submit reports or conduct inspection; operated the CPI sep without flare.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(e)(2)(ii)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.351  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(a)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(c)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(2)

Description: Failed to meet NESHAP req. for benzene wastes, including failure to conduct inspections of drain systems, equip tanks, submit complete total annual benzene report & determine quantity from each waste stream, determine the flow-weighted annual avg appropriately, limit the benzene quantity of uncontrolled waste streams.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120  
40 CFR Part 63, Subpart G 63.120(b)(3)  
40 CFR Part 63, Subpart G 63.120(b)(4)  
40 CFR Part 63, Subpart G 63.122(a)

Description: Failed to comply with the requirements for external floating roof tank seal gap repair and reporting.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 60, Subpart A 60.18

Rqmt Prov: Not specified PERMIT

Description: Failure to comply with the flare pilot operation requirements applicable to the Fluor flare or to obtain regulatory authority for uncombusted emissions from that flare.

Classification: Moderate

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

Rqmt Prov: Not specified PERMIT

Description: Failure to comply with emission limits during vessel loading operations.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)  
 Rqmt Prov: 46642 PERMIT  
 Description: Failure to demonstrate initial compliance with emission tests of Compressor Nos. 1A, 1B, and 1C (EPNs 062, 063, and 064).  
 Effective Date: 08/31/2007 ADMINORDER 2007-0170-AIR-E  
 Classification: Moderate  
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)  
 5C THC Chapter 382, SubChapter D 382.085(b)  
 Rqmt Prov: TCEQ Air Permit 5418A General Conditions PERMIT  
 Description: Failed to prevent unauthorized emissions. Specifically, 20 pounds of the Hazardous Air Pollutant benzene was released from the UDEX Unit Fugitives during an emissions event that began June 21, 2006 and lasted five minutes.  
 Effective Date: 12/20/2007 ADMINORDER 2007-0594-AIR-E  
 Classification: Moderate  
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 5C THC Chapter 382, SubChapter D 382.085(b)  
 Rqmt Prov: 3123A, SC 1 PERMIT  
 Permit No. 3123A, Special Condition 3 PERMIT  
 Description: Failed to prevent an unauthorized emissions event that occurred on November 15, 2006.

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

Conviction Date: 6/27/2007 12:00:00AM Type of Action: COURTDORDER  
 Classification: Major  
 Rqmt Prov:  
 Citation: 42 USC Chapter 85 Subchapter I 85.7413(c)(1)  
 Description: On June 27, 2007 a federal jury in Corpus Christi, Texas, found CITGO Petroleum Corp., and its subsidiary, CITGO Refining and Chemicals Co. (collectively CITGO) guilty of two felony criminal violations of the Clean Air Act by operating two huge open top tanks as oil / water separators, without installing the proper emission controls required by state and federal laws.  
 Classification: Major  
 Rqmt Prov:  
 Citation: 42 USC Chapter 85 Subchapter I 85.7413(c)(1)  
 Description: On June 27, 2007 a federal jury in Corpus Christi, Texas, found CITGO Petroleum Corp., and its subsidiary, CITGO Refining and Chemicals Co. (collectively CITGO) guilty of two felony criminal violations of the Clean Air Act by operating two huge open top tanks as oil / water separators, without installing the proper emission controls required by state and federal laws

C. Chronic excessive emissions events.

N/A

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

1	12/29/2003	(295723)
2	01/27/2004	(295725)
3	01/29/2004	(258191)
4	02/02/2004	(261589)
5	02/09/2004	(256114)
6	02/09/2004	(256568)
7	02/09/2004	(256569)
8	02/23/2004	(295705)
9	03/01/2004	(264188)
10	03/01/2004	(264223)
11	03/25/2004	(295709)
12	03/27/2004	(283414)
13	04/15/2004	(266190)
14	04/28/2004	(295710)
15	05/10/2004	(270683)
16	05/24/2004	(272559)
17	05/25/2004	(295712)
18	05/28/2004	(272866)
19	06/23/2004	(276515)
20	06/24/2004	(269190)
21	06/30/2004	(352239)
22	07/01/2004	(278271)
23	07/01/2004	(278139)
24	07/19/2004	(268646)

25	07/22/2004	(352240)
26	08/30/2004	(352241)
27	08/31/2004	(291703)
28	09/15/2004	(298570)
29	09/16/2004	(334411)
30	09/28/2004	(283343)
31	10/12/2004	(335820)
32	10/29/2004	(352243)
33	11/19/2004	(339890)
34	11/19/2004	(336845)
35	11/19/2004	(341541)
36	11/19/2004	(336653)
37	11/19/2004	(339919)
38	11/22/2004	(341305)
39	11/23/2004	(352244)
40	11/30/2004	(341912)
41	12/20/2004	(352242)
42	12/20/2004	(381902)
43	12/30/2004	(342227)
44	01/21/2005	(345684)
45	01/24/2005	(381903)
46	02/03/2005	(348348)
47	02/23/2005	(381900)
48	03/08/2005	(453246)
49	03/11/2005	(372798)
50	03/24/2005	(373888)
51	03/24/2005	(374168)
52	03/28/2005	(374190)
53	03/28/2005	(381901)
54	04/26/2005	(419743)
55	05/06/2005	(378559)
56	05/23/2005	(419744)
57	06/03/2005	(393464)
58	06/03/2005	(392988)
59	06/16/2005	(395438)
60	06/23/2005	(419745)
61	07/07/2005	(395347)
62	07/18/2005	(393465)
63	07/22/2005	(440879)
64	08/18/2005	(405799)
65	08/22/2005	(402137)
66	08/26/2005	(440880)
67	09/20/2005	(440881)
68	10/11/2005	(434051)
69	10/25/2005	(468522)
70	11/16/2005	(405717)
71	11/17/2005	(436667)
72	11/28/2005	(468523)
73	12/01/2005	(435829)
74	12/22/2005	(468524)
75	01/02/2006	(450793)
76	01/02/2006	(450794)
77	01/24/2006	(468525)
78	02/09/2006	(453193)
79	02/21/2006	(451197)
80	02/24/2006	(468521)
81	03/07/2006	(454499)
82	03/08/2006	(458417)
83	03/20/2006	(498260)
84	03/27/2006	(459448)
85	04/06/2006	(459050)
86	04/13/2006	(459661)
87	04/13/2006	(459665)
88	04/18/2006	(455371)
89	04/24/2006	(498261)
90	05/23/2006	(498262)
91	05/24/2006	(467417)
92	06/05/2006	(466364)

93	06/06/2006	(467393)
94	06/23/2006	(498263)
95	07/19/2006	(482242)
96	07/21/2006	(484425)
97	07/24/2006	(520275)
98	08/09/2006	(572255)
99	08/17/2006	(520276)
100	08/21/2006	(489885)
101	08/21/2006	(520277)
102	08/22/2006	(487181)
103	08/24/2006	(482569)
104	08/31/2006	(483126)
105	09/13/2006	(510995)
106	09/25/2006	(520278)
107	10/12/2006	(514095)
108	10/12/2006	(514897)
109	10/12/2006	(514878)
110	10/16/2006	(515256)
111	10/18/2006	(515782)
112	10/18/2006	(510953)
113	10/24/2006	(544597)
114	11/15/2006	(516860)
115	11/15/2006	(518976)
116	11/27/2006	(544598)
117	11/29/2006	(512162)
118	12/19/2006	(544599)
119	12/21/2006	(534104)
120	12/29/2006	(534672)
121	01/04/2007	(516900)
122	01/08/2007	(512157)
123	01/22/2007	(544600)
124	02/12/2007	(539381)
125	02/16/2007	(540236)
126	02/18/2007	(540855)
127	02/22/2007	(575434)
128	02/26/2007	(538209)
129	03/20/2007	(538211)
130	03/26/2007	(575435)
131	04/04/2007	(554293)
132	04/23/2007	(575436)
133	04/23/2007	(575440)
134	04/25/2007	(540902)
135	05/04/2007	(558318)
136	05/08/2007	(558508)
137	05/16/2007	(575437)
138	05/25/2007	(561868)
139	06/01/2007	(559013)
140	06/21/2007	(563744)
141	06/22/2007	(575438)
142	07/13/2007	(562870)
143	07/13/2007	(564523)
144	07/13/2007	(567064)
145	07/23/2007	(575439)
146	08/17/2007	(565565)
147	08/20/2007	(607562)
148	08/27/2007	(573505)
149	08/31/2007	(572127)
150	09/14/2007	(570950)
151	09/24/2007	(607563)
152	10/02/2007	(594482)
153	10/03/2007	(608617)
154	10/17/2007	(596344)
155	10/22/2007	(481761)
156	10/22/2007	(619546)
157	11/26/2007	(619547)
158	11/28/2007	(598481)
159	12/27/2007	(619548)
160	01/18/2008	(598045)

161 02/02/2008 (594422)  
 162 02/11/2008 (617736)  
 163 02/11/2008 (617821)  
 164 02/25/2008 (672070)  
 165 03/25/2008 (672071)  
 166 04/01/2008 (639935)  
 167 04/17/2008 (689998)  
 168 04/28/2008 (653240)  
 169 05/19/2008 (689999)  
 170 05/20/2008 (670835)  
 171 05/27/2008 (657010)  
 172 05/29/2008 (657015)  
 173 06/04/2008 (642002)  
 174 06/17/2008 (636408)  
 175 06/20/2008 (690000)  
 176 06/20/2008 (690001)  
 177 07/02/2008 (671093)  
 178 08/29/2008 (683983)  
 179 10/16/2008 (705092)  
 180 10/21/2008 (704422)  
 181 10/21/2008 (702325)  
 182 11/06/2008 (701557)  
 183 11/18/2008 (704866)

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

Date: 02/03/2004 (258191)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)

Description: Failure to provide required information in the notification of a reportable emissions, released as a result of emissions events at the Vacuum Unit on November 18, 2003, to the commission's regional office within 24 hours of discovery.

Self Report? NO Classification: Moderate

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

Description: Failure to provide required information in the final record of a reportable emissions, released as a result of emissions events at the Vacuum Unit on November 18, 2003, to the commission's regional office no later than two weeks after the end of the emission event.

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA Permit 2695A - General Conditions

Description: Failure to obtain regulatory authority for the emissions released from the 11-H2 Vacuum Heater facility during an emissions event on November 18, 2003. Specifically, all criteria identified in §101.222(b) were not satisfied as required.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

Description: Failure to obtain regulatory authority for the opacity based emissions released from the 11-H2 Vacuum Heater facility during an emissions event on November 18, 2003. Specifically, all criteria identified in §101.222(b) were not satisfied as required.

Date: 02/06/2004 (256569)

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)

Rqmt Prov: PERMIT 9604A

Description: Failure to operate the Cumene Flare with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

Rqmt Prov: PERMIT 9604A

Description: Failure to maintain the Cumene Flare in good working order.

Date: 02/06/2004 (256114)

Self Report? NO Classification: Moderate

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

Rqmt Prov: PERMIT 3123A

Description: Failure to obtain regulatory authority or meet the demonstration requirements of

30 TAC 101.222(b)(2), (b)(3), (b)(6), and (b)(9), for reportable emissions resulting from an emissions event.

Date: 02/06/2004 (256568)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)  
Description: Failure to obtain regulatory authority for, or satisfy all criteria of 30 Texas Admin. Code §101.222(b), to exempt from compliance limitations, the emissions released during an emissions event.

Date: 04/15/2004 (266190)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)  
Description: Failure to meet the demonstration criteria of 30 TAC 101.222.

Date: 04/30/2004 (295712)

Self Report? YES Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
TWC Chapter 26 26.121(a)

Description: Failure to meet the limit for one or more permit parameter

Date: 05/21/2004 (272559)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)

Rqmt Prov: PA 3119A

Description: Failure to obtain regulatory authority or meet the demonstration requirements of 30 TAC 101.222 for emissions involving the SRU during an emissions event which began on January 5, 2004.

Date: 06/23/2004 (276515)

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA 9604A

Description: Failure to obtain regulatory authority or meet the demonstration requirements of 30 TAC 101.222 for emissions involving the Fluor Flare during an emissions event which began on March 3, 2004.

Date: 08/31/2004 (291703)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 63, Subpart H 63.162(a)

Rqmt Prov: PA 5418A & 20156

Description: Failure to demonstrate compliance with the fugitive emission standards for all components in HON service at the BTX and Hydrar Units as directed by § 63.162(a) and (f).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130

40 CFR Part 63, Subpart H 63.166

Description: Failure to equip process sampling stations with a closed-purge, closed-loop, or closed-vent system

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130  
30 TAC Chapter 115, SubChapter D 115.322(4)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 63, Subpart H 63.167

Rqmt Prov: PA 5418A & 20156

Description: Failure to equip applicable each open-ended valve or line with a cap, blind flange, plug, or a second valve.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130  
30 TAC Chapter 115, SubChapter D 115.325(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 63, Subpart H 63.180(b)

Rqmt Prov: PA 5418A & 20156

Description: Failure to demonstrate that fugitive monitoring was being performed in accordance with Method 21 of 40 CFR part 60, appendix A.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130  
40 CFR Part 63, Subpart H 63.182(d)

Description: Failure to submit an accurate and complete HON semiannual report due on or

about July 2003 for the reporting period of January through June 2003.

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 113, SubChapter C 113.130  
40 CFR Part 63, Subpart H 63.182(d)  
Description: Failure to include in the BTX and Hydrar Unit HON semiannual reports the number and percent of connectors leaking, and the total number of connectors monitored. Additionally, the number and percent of valves leaking and the total number of valves monitored are incorrect.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
Rqmt Prov: PA 5418A & 20156  
Description: Failure to maintain and provide, upon request, lists of equipment excluded from fugitive emission monitoring requirements due to vapor pressure, operating pressure and/or size. Additionally, the operator failed to demonstrate that the weekly AVO inspections of connectors and/or flanges are being conducted.  
Date: 11/19/2004 (341305)

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
Rqmt Prov: PERMIT Special Condition No. 3  
Description: Failure to satisfy all demonstrations criteria as listed under 30 Tex. Admin. Code § 101.222 and gain authority for emissions released from an event that occurred on April 14, 2004, TCEQ incident No. 37963.  
Date: 11/29/2004 (341912)

Self Report? NO Classification: Minor  
Citation: 30 TAC Chapter 327 327.3(b)  
Description: The regulated entity failed to notify the TCEQ of a reportable incident as soon as possible, but no later than 24 hours. The CASA Line Filter at CITGO East in Corpus Christi, Texas released approx. 10 barrels of 2-Oil to the ground on 09/18/04, however, CITGO personnel did not notify the TCEQ until 09/28/04.  
Date: 12/29/2004 (342227)

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(4)  
Description: Failure to submit all additional or more detailed information requested for TCEQ STEERS No. 39028 within the time frame established in the request. Information requested to be submitted by September 22, 2004 was received on November 24, 2004.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(12)  
Description: All additional information necessary to evaluate the emissions event (TCEQ STEERS No. 39028) which occurred on or about May 4, 2004 was not provided in the final record.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter F 101.201(f)  
Description: Failure to submit in writing an analysis of the probable cause of an emissions event (TCEQ STEERS No. 39028) within 60 days from the date of the request.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(C)  
Description: Failure to prevent the occurrence of visible emissions with an opacity of greater than 20% averaged over a six- minute period for emissions released from the No. 2 FCCU during an emissions event (TCEQ STEERS No. 39028) that occurred on or about May 4, 2004.

Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.102(a)(2)  
Description: Failure to maintain compliance with applicable requirements specified in New Source Performance Standards (NSPS) for Petroleum Refineries 40 Code of Federal Regulations (CFR) Part 60 Subpart J.  
Date: 03/31/2005 (419743)

Self Report? YES Classification: Moderate  
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
TWC Chapter 26 26.121(a)  
Description: Failure to meet the limit for one or more permit parameter  
Date: 07/18/2005 (393465)

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Rqmt Prov: PERMIT TPDES Permit No. 00467-003  
 Description: Failure to comply with the 0.5 mg/l daily maximum permit limit for BTEX.

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 319, SubChapter A 319.4  
 Rqmt Prov: PERMIT TPDES Permit No. 00467-003  
 Description: Failure to meet minimum self-monitoring requirements for sample collection and laboratory analysis.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Rqmt Prov: PERMIT TPDES Permit No. 00467-001  
 Description: Failure to comply with the maximum pH permit limit of 9.0 su (standard units).  
 Date: 12/31/2005 (468525)

Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 08/24/2006 (482569)

Self Report? NO Classification: Moderate  
 Citation: TWC Chapter 26 26.121(a)(1)  
 Rqmt Prov: PERMIT TPDES Permit No. WQ0000467-001  
 Description: Failure to prevent an unauthorized discharge of approximately 6 barrels of slop oil into the Corpus Christi Inner Harbor.  
 Date: 08/31/2006 (483126)

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)  
 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)  
 Description: Failure to meet accumulation time limits as required for storage of hazardous waste without a permit.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)  
 30 TAC Chapter 335, SubChapter E 335.112(a)(8)  
 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(i)  
 40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.174  
 Description: Failure to inspect all container storage areas as required.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Rqmt Prov: OP PP III.D.  
 Description: Failure to inspect Permitted Units as per permit requirements.  
 Date: 11/28/2006 (512162)

Self Report? NO Classification: Moderate  
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)  
 30 TAC Chapter 335, SubChapter A 335.4  
 Description: Failure to prevent discharge of industrial or other waste into or adjacent to any water in the state.  
 Date: 03/31/2007 (575436)

Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 05/31/2007 (575438)

Self Report? YES Classification: Moderate  
 Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 TWC Chapter 26 26.121(a)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 07/31/2007 (607562)

Self Report? YES Classification: Moderate  
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Description: Failure to meet the limit for one or more permit parameter  
 Date: 08/17/2007 (565565)

Self Report? NO Classification: Moderate  
 Citation: TWC Chapter 26 26.121(a)(1)

Description: Failure to prevent an un-permitted discharge of commingled process wastewater, storm water, cooling tower blow-down, and fire water via outfall 003

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PERMIT TPDES Permit No. 00467-001

Description: Failure to comply with the daily maximum effluent permit limit for biochemical oxygen demand (BOD) and chemical oxygen demand (COD) for 12/2005 at outfall 001.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 319, SubChapter A 319.4

Rqmt Prov: PERMIT TPDES Permit No. 00467-003

Description: Failure to analyze total chrome at storm water outfall 003 for the month of November 2005. On 11/26/2005, a discharge occurred at outfall 003 with a corresponding rain event. A sample was collected during the discharge for laboratory analyses of the required permit parameters. The in-house laboratory did not perform the total chromium analysis due to a laboratory error.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

Rqmt Prov: PERMIT TPDES Permit No. 00467-003

Description: Failure to comply with the daily maximum effluent permit limit for oil and grease for 07/2007 at outfall 003.

Date: 08/31/2007 (572127)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 101, SubChapter A 101.20(3)  
30 TAC Chapter 113, SubChapter C 113.130  
30 TAC Chapter 115, SubChapter D 115.322(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 H 63.167(a)(1)

Rqmt Prov: PERMIT 19044, SC 2E  
PERMIT 20156, SC 1E  
PERMIT 21303, SC 5E  
PERMIT 21706, SC 6E  
PERMIT 2695A, Special Condition 10E  
PERMIT 2697A, SC 9E  
PERMIT 2703A, SC 5E  
PERMIT 2708A, SC 8E  
PERMIT 3123A, SC 7E  
PERMIT 3857A, 13E  
PERMIT 46640, SC 6E  
PERMIT 46641, SC 14E  
PERMIT 5418A, SC 8E  
PERMIT 6722A, SC 10E  
PERMIT 72654, SC 3E  
PERMIT 9604A/PSD-TX-653, SC18E  
OP FOP O-01423, Special Term & Condition 1A

Description: Failure to equip each open-ended valve or line with a cap, blind flange, plug, or a second valve. According to the TCEQ Enforcement Initiation Criteria, this is a Category C violation, Subcategory 10.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 115, SubChapter D 115.322(2)  
30 TAC Chapter 122, SubChapter B 122.143(4)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-3(g)(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(2)

Rqmt Prov: OP FOP O-01423, Special Term & Condition 1A

Description: Failure to make a first attempt at repair within five days.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.322(2)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 21303, SC 5H  
 PERMIT 2697A, SC 9I  
 PERMIT 2703A, 5I  
 PERMIT 2708A, SC 8I  
 PERMIT 46640, SC 6I  
 PERMIT 46641, SC 14I  
 PERMIT 5418A, SC 8I  
 PERMIT 6722A, SC 10I  
 PERMIT 9604A/PSD-TX-653, SC 18H  
 OP FOP O-1423, Special Term & Condition 1A

Description: Failure to make an effective repair or delay of repair placement within the appropriate time limits.

Date: 09/30/2007 (619546)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
 30 TAC Chapter 305, SubChapter F 305.125(1)

Description: Failure to meet the limit for one or more permit parameter

Date: 10/03/2007 (608617)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)  
 30 TAC Chapter 305, SubChapter F 305.125(17)

Description: NON-RPT VIOS FOR MONIT PER OR PIPE

Date: 08/29/2008 (683983)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)  
 30 TAC Chapter 122, SubChapter B 122.145(2)(A)  
 30 TAC Chapter 122, SubChapter B 122.146(5)(D)

Rqmt Prov: OP.General Terms & Conditions (GT & C)

Description: Failure to include all instances of deviation in Deviation Reports (DRs) which were submitted on March 21, 2007, September 17, 2007 and March 17, 2008 (DR2, DR3 and DR4, respectively). Additionally, by failing to include or reference pertinent deviations in DR2, DR3, and DR4, the company failed to certify an accurate PCC for each of the periods ending February 19, 2007 and February 19, 2008.

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA General Condition (GC) 8 & SC 5

Description: Failure to comply with the VOC short term emission rate in the MAERT for the combined Crude and Vacuum Units. The number of one-hour periods in deviation reports are described in the following: 1. DR1 - Crude Unit - 109 periods in pages 235-237; Vacuum Unit -25 periods in pages 143-144; 2. DR2 - Crude Unit - 209 periods in pages 43-45; Vacuum Unit- page 46. Note: The company has reduced the number of exceedances of the VOC short-term rate since February 2007.

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA SC 4 & SC 6

Description: Failure to demonstrate compliance with the CO and NOx concentrations of 500 ppm and 60 ppm, respectively, for the FCCU regenerator stack (EPN 31-PR-1). On various days from January 15, 2006 through February 2007, hourly records requested on February 28, 2008 indicated concentrations of CO above permitted limits. Additionally, on August 23 and 24, 2007, the 24-hr rolling average of NOx exceeded the permitted concentration limit in SC 6.

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA SC 6

Description: Failure to maintain the rolling 12-month loading limits of alkylate and C5/Platformate at marine Docks 1 and 2. According to records provided on March 4, 2008, alkylate and C5/Platformate exceeded the permitted loading limits of 1.6 million and 1.2 barrels per year, respectively. Alkylate loading was exceeded from April through December 2006. The C5/Platformate loading limit was exceeded all of CY 2006 and January 2007.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
 5C THSC Chapter 382 382.085(b)  
 Rqmt Prov: PA SC 3  
 Description: Failure to maintain the NOx emissions limit below the permitted rate of 0.08 lbs NOx /MMBtu. The emissions limit was exceeded in 27 periods between January 2, 2006 and April 30, 2007. The duration of each period varied from 1 hour to 29 hours. Records of exceedances for 2006 and 2007 were provided on March 4 and March 5, 2008. Exceedances were represented in DR1 (page 150) and DR2 (pages 41 and 42).

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
 5C THSC Chapter 382 382.085(b)  
 Rqmt Prov: PA SC 11E & SC12  
 Description: Failure to include fuel certification statements in quarterly reports and failed to submit a 3Q07 fuel certification report. Additionally, a semiannual report for the second half of 2007 (2H07) was incomplete. The third quarter report for 2007 (3Q07) report was not submitted. Since only the 4Q07 report was submitted, the partial 2H07 was deemed incomplete.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
 30 TAC Chapter 116, SubChapter H 116.814  
 5C THSC Chapter 382 382.085(b)  
 Rqmt Prov: PA SC5, SC8F & SC8H  
 Description: Failure to monitor 1520 components in accordance with the 28MID fugitive monitoring program. According to SC 5, the 28 MID program was to be implemented 180 days after the permit issuance date of October 9, 2003. Additionally, it was determined that Pump No 85-P-105B (FEMS tag No 56233) was not repaired in three instances in 2006 and 2007 when the pump seal leak rate exceeded 500 ppm.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 106, SubChapter A 106.6(b)  
 30 TAC Chapter 116, SubChapter H 116.814  
 5C THSC Chapter 382 382.085(b)  
 Rqmt Prov: PA GC1 & SC 9G  
 Description: Failure to maintain the annual VOC throughputs limits for Tank No. 3101 in calendar year 2006 (CY 06) and Tank No. 3102 in CY 07. Additionally, based on a rolling 12-month period, storage vessels 1001, 1017, and 1031 exceeded the annual emissions limitation for December 2006. Tanks 1001, 1017, 1025, 1028, 3101, and 3102 exceed their emissions limit for various months in CY 07.

Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
 30 TAC Chapter 116, SubChapter H 116.814  
 Rqmt Prov: PA SC 2, SC 12, & SC 13  
 Description: Failure to conduct emissions evaluations of engine performance on three engines (Nos. 4, 5, 6) within 60 days of upgrading engine controls. Additionally, the emission controls project on the Platformer Reactor Heater (EPNs 82, 83, and 84) was completed on December 6, 2002. The SC 2 required completion by October 31, 2002.

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 113, SubChapter C 113.340  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.654(f)(6)  
 5C THSC Chapter 382 382.085(b)  
 Rqmt Prov: OP GT&C; ST&C 1  
 Description: Failure to report in the appropriate Notice of Compliance Status (NOCS) report or Periodic Report (PR) that 13 internal floating roof (IFR) storage vessels had achieved compliance in various periods from October 20, 1998 (tank No. 1030) to June 9, 2004 (tank No. 223).

Self Report? NO Classification: Minor  
 Citation: 30 TAC Chapter 113, SubChapter C 113.340  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.654(g)  
 5C THSC Chapter 382 382.085(b)  
 Rqmt Prov: OP ST&C 1  
 Description: Failure to submit two Periodic Reports (PRs) for the first half 2002 (1H02) and 1H03, 60 days after the end of each 6-month period. The affected reports were due August 29, 2002 and August 29, 2003, respectively. The 1H02 report was

submitted August 20, 2004, and the 1H03 report on August 19, 2004.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.340  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(a)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(1)(i)  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP ST&C 1

Description: Failure to conduct a 5 year primary seal inspection on external floating roof (EFR) storage tank No. 928 within the time allotted by rule. Records provided on August 12, 2008, documented an inspection conducted on June 15, 2007. The required inspection was due to be performed no later than February 18, 2007.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.780  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1575(b)(3)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1575(b)(4)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1575(c)(2)  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP ST&C 1

Description: Failure to postmark or deliver a compliance report (CR) required by § 63.1575(a) no later than January 31, 2007, as specified in § 63.1575(b)(4). Additionally, the company failed to certify a CR submitted on July 29, 2005 as required by § 63.1575(c)(2). Also, the company failed to submit a certified report for the period of July 1 through September 5, 2005.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.6(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA SC 3

Description: Failure to operate the C4SHP Unit at less than a permitted total feed rate of 199,551 pounds per hour (pph) of C4 olefin (raffinate). Specifically, DR1 (pages 98-102) describes at least 296 hours, on various days from March 24 through June 3, 2006, where the feed rate exceeded the permitted rate. Records received on March 11, 2008 state the amount of each exceedance. A PBR registration (No. 79234) was issued by the Agency on July 5, 2006, allowed an increase in the feed rate to 258,839 pph.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
30 TAC Chapter 116, SubChapter H 116.814  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA SC 13

Description: Failure to comply with the NOx emissions standard of 0.05 lbs NOx /MMBtu during normal operations. The Platformer Reactor Heaters (EPNs 82, 83, 84) operated numerous instances in exceedance of the NOx emission rate in numerous.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
30 TAC Chapter 116, SubChapter B 116.115(b)  
30 TAC Chapter 116, SubChapter B 116.115(c)  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA SC1, SC2, & SC4

Description: Failure to maintain compliance with the 250 ppm limit of in-stack concentration of sulfur dioxide at both tail gas incinerators (TGIs). Additionally, the company failed to demonstrate compliance with all MAERT short-term allowables (except sulfur dioxide) at times when the hourly fired duties of the incinerators were exceeded (11.4 MMBtu/hr and 15.0 MMBtu/hr for the TGI 1 and 2, respectively).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
40 CFR Part 60, Subpart A 60.18  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA SC 2  
PA SC 4

Description: Failure to operate the CPI Flare and Fluor Flare at all times and to maintain a constant pilot flame. Additionally, the company failed to maintain in operation the system that senses the pilot flame at each of the flares as directed by the permit and 40 CFR 60.18 (f)(2).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.340  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT Y 63.564(e)(2)  
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA GC 8 & SC 9

Description: Failure to maintain a minimum operating temperature of 1495 degrees Fahrenheit at the Dock 1 and 2 Marine Emissions Control (MEC) vapor combustor (EPN MEC). Additionally, failure to demonstrate compliance with the 98 % destruction efficiency for VOC (SC 9) and the MAERT short-term allowables when the minimum temperatures are not maintained.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.6(b)  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA SC 2

Description: Failure to comply with the fired duty rates (hourly and annual basis) for the Crude Heater (11H-1). In 2007, the fired duty rate averaged on an annual basis was 438 MMBtu/hr. The authorized rate is 411 MMBtu/hr. Additionally, the authorized short term firing rate of 475 MMBtu per hour was exceeded in the following periods as follows: 1. DR1 Crude Unit - pages 238-239; 2. DR3 - page 32.

Self Report? NO Classification: Moderate

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

Rqmt Prov: PA SC 4

Description: Failure to comply with the throughput limit of 15 million barrels per year for Tank No. 5005. In 2006, the throughput for the affected storage vessel was 18.3 million barrels. The throughput exceedance was recorded on page 126 of DR1.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
 30 TAC Chapter 113, SubChapter C 113.780  
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(d)  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1575(c)  
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP ST & C 1

Description: Failure to include SRU TGI 1 and TGI 2 excess emissions incidents in either the NSPS Summary Reports for the first quarter (1Q07) or the Periodic Report for the first half of 2007 (1H07). The March 14 and March 19, 2007, SO2 excursions at the SRU were not represented in applicable reports.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
 30 TAC Chapter 115, SubChapter D 115.322(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)

Rqmt Prov: PA SC 6E

Description: Failure to equip each open-ended valve or lines with a cap, blind flange, plug, or second valve. Specifically, it was reported in DR3 that there were a total of 129 open-ended lines or valves (OELs) discovered at 12 permitted units in a period from February 26 through August 14, 2007 (reference DR3-LDAR section - pages 83-136). The DR4 described a total of 60 OELs discovered at 11 permitted units in a period from August 28, 2007 through February 19, 2008.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
 30 TAC Chapter 113, SubChapter C 113.130  
 30 TAC Chapter 115, SubChapter D 115.322(2)  
 30 TAC Chapter 116, SubChapter B 116.115(c)  
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(f)(1)  
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: PA SC 8I

Description: Failure to repair hydrocarbon leaks at components in a fugitive monitoring program within the time allotted by the applicable rule and permit SC. In a period from October 15, 2007 through February 19, 2008, the DR4 report stated that a total of 34 components in nine permitted units remained leaking after the repair period allotted by rule expired. Note: Affected components were subsequently repaired.

Self Report? NO Classification: Moderate

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

Rqmt Prov: OP ST & C No. 30

Description: Failure to comply with the requirements of the Periodic Monitoring Summary (PMS) storage vessel No. 64-TK0013 and units in Title V Group ID No. GRP1STACK (EPN MEC) and No. GRP2STACK (EPNs 252 and 292).

Self Report? NO Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(6)  
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(7)

Rqmt Prov: OP ST & C No. 10

Description: Failure to submit a certification that all required inspections have been conducted in accordance with the requirements of Subpart FF. Additional noncompliance items were: 1. The facility could not demonstrate that daily monitoring readings were being conducted per § 61.354(d) at the Docks 1 and 2 collection sump (085-SUMP-005) carbon absorption system. 2. The quarterly reports to comply with § 61.357(d)(6) and (d)(7) for the 1Q03 and 2Q03 were submitted late.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2(e)  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: OP ST & C No. 8

Description: Failure to maintain a sealed cover on a downstream refinery wastewater collection box (sump). Specifically, a refinery wastewater collection tank (former API oil-water separator) was discovered on March 27, 2008, with contents open to the atmosphere due to a broken cover.

#### F. Environmental audits.

Notice of Intent Date: 06/24/2004 (334400)

Disclosure Date: 12/21/2004

Viol. Classification: Major

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

Description: Failure to report emission events.

Notice of Intent Date: 07/07/2004 (334338)

No DOV Associated

Notice of Intent Date: 07/27/2004 (509717)

No DOV Associated

Notice of Intent Date: 06/02/2005 (403329)

Disclosure Date: 12/01/2005

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.326(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)

Description: Failed to control 63 open-ended lines by cap, plug, blind, or double block valves.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.326(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(c)

Description: Failure to maintain records of weekly visual inspections documenting inspection of non-leaking pumps.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.326(2)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT R 60.181(d)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(c)

Description: Failure to properly complete DOR forms.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.326  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Description: Failure to submit monitoring reports on time and Reports did not contain all information required by the regulations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.322

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168

Description: Failure to tag components in the ADP and BTX units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(b)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)

Description: The 5 to 15 day report submitted in July 2005 generated by the fugitive software had inaccurate or not probable dates that reported excessive deviations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(2)(v)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)(2)(v)

Description: Failure to identify compressor leaks in semi-annual report for 2004 MACT or HON units.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(3)

Description: Failure to include complete downtime information in several MACT reports for the East Plant.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H)  
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(c)(2)(vii)  
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)(2)(xiii)

Description: Failure to include reason for delay of repair on the 2004 HON and MACT semiannual reports.

Notice of Intent Date: 08/08/2007 (639331)

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