

Executive Summary – Enforcement Matter – Case No. 61102
The Premcor Refining Group Inc.
RN102584026
Docket No. 2021-0982-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

The Premcor Refining Group Inc., 1801 Gulfway Drive, Port Arthur, Jefferson County

Type of Operation:

Petroleum refinery

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: November 5, 2021

Comments Received: No

Penalty Information

Total Penalty Assessed: \$12,500

Amount Deferred for Expedited Settlement: \$2,500

Total Paid to General Revenue: \$10,000

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: June 25, 2021

Date(s) of NOE(s): July 19, 2021

Executive Summary – Enforcement Matter – Case No. 61102
The Premcor Refining Group Inc.
RN102584026
Docket No. 2021-0982-AIR-E

Violation Information

Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,207.9 pounds of volatile organic compounds as fugitive emissions, during an emissions event (Incident No. 358082) that began on May 11, 2021 and lasted 34 hours and 27 minutes. The emissions event occurred due to a design flaw in the level instrument configuration that caused the Alkylate Product Tank 2110 to overfill and spill into the secondary containment, resulting in the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, Special Conditions No. 1, Federal Operating Permit No. O1498, General Terms and Conditions and Special Terms and Conditions No. 22, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days, implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 358082; and
- b. Within 45 days, submit written certification to demonstrate compliance with a.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Kate Dacy, Enforcement Division, Enforcement Team 4, MC 219, (512) 239-4593; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Mark F. Skobel, Vice President and General Manager, The Premcor Refining Group Inc., P.O. Box 909, Port Arthur, Texas 77641

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	26-Jul-2021			
	PCW	19-Aug-2021	Screening	27-Jul-2021	EPA Due

RESPONDENT/FACILITY INFORMATION					
Respondent	The Premcor Refining Group Inc.				
Reg. Ent. Ref. No.	RN102584026				
Facility/Site Region	10-Beaumont	Major/Minor Source	Major		

CASE INFORMATION					
Enf./Case ID No.	61102	No. of Violations	1		
Docket No.	2021-0982-AIR-E	Order Type	1660		
Media Program(s)	Air	Government/Non-Profit	No		
Multi-Media		Enf. Coordinator	Kate Dacy		
		EC's Team	Enforcement Team 4		
Admin. Penalty \$ Limit	Minimum	\$0	Maximum	\$25,000	

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$12,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	0.0%	Adjustment	Subtotals 2, 3, & 7	\$0
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Notes: Since the enhancement for two NOVs with same or similar violations, five NOVs with dissimilar violations, five agreed orders containing a denial of liability, and two orders without a denial of liability and the reduction for 395 notices of intent to conduct an audit and 102 disclosures of violations is below zero, the Adjustment Percentage (Subtotal 2) defaults to zero.

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$403
 Estimated Cost of Compliance: \$10,000
 *Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$12,500
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$12,500
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$12,500
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DEFERRAL	20.0%	Reduction	Adjustment	-\$2,500
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$10,000
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Screening Date 27-Jul-2021

Docket No. 2021-0982-AIR-E

PCW

Respondent The Premcor Refining Group Inc.

Policy Revision 5 (January 28, 2021)

Case ID No. 61102

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN102584026

Media Air

Enf. Coordinator Kate Dacy

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	2	10%
	Other written NOVs	5	10%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	5	100%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	2	50%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	395	-395%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	102	-204%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Since the enhancement for two NOVs with same or similar violations, five NOVs with dissimilar violations, five agreed orders containing a denial of liability, and two orders without a denial of liability and the reduction for 395 notices of intent to conduct an audit and 102 disclosures of violations is below zero, the Adjustment Percentage (Subtotal 2) defaults to zero.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 0%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 0%

Screening Date 27-Jul-2021 **Docket No.** 2021-0982-AIR-E **PCW**
Respondent The Premcor Refining Group Inc. *Policy Revision 5 (January 28, 2021)*
Case ID No. 61102 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN102584026
Media Air
Enf. Coordinator Kate Dacy

Violation Number 1
Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, Special Conditions No. 1, Federal Operating Permit No. 01498, General Terms and Conditions and Special Terms and Conditions No. 22, and Tex. Health & Safety Code § 382.085(b)
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 12,207.9 pounds of volatile organic compounds as fugitive emissions, during an emissions event (Incident No. 358082) that began on May 11, 2021 and lasted 34 hours and 27 minutes. The emissions event occurred due to a design flaw in the level instrument configuration that caused the Alkylate Product Tank 2110 to overfill and spill into the secondary containment, resulting in the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 Tex. Admin. Code § 101.222.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual		x		50.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

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

Adjustment \$12,500

\$12,500

Violation Events

Number of Violation Events Number of violation days

daily	
weekly	x
monthly	
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$12,500

One weekly event is recommended.

Good Faith Efforts to Comply Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$12,500

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

Estimated EB Amount \$403 **Violation Final Penalty Total** \$12,500

This violation Final Assessed Penalty (adjusted for limits) \$12,500

Economic Benefit Worksheet

Respondent The Premcor Refining Group Inc.
Case ID No. 61102
Reg. Ent. Reference No. RN102584026
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	11-May-2021	1-Mar-2022	0.81	\$403	n/a	\$403

Notes for DELAYED costs

Estimated cost to implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 358082. The Date Required is the date the emissions event began and the Final Date is the estimated date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$10,000

TOTAL

\$403

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: PORT ARTHUR REFINERY

Reg Entity Add: 1801 SOUTH GULFWAY DR

Reg Entity City: CITY OF PORT ARTHU

Reg Entity No: RN102584026

EPA Case No: 06-2020-1761

Order Issue Date (yyyymmdd): 20200616

Case Result: Premcor Refining Group

Statute: CWA

Sect of Statute: 301/402

Classification: Minor

Program: NPDES - Base Program

Citation:

Violation Type: Effluent Limit Violations, Not
Otherwise Specified

Cite Sect:

Cite Part:

Enforcement Action: Administrative Compliance Orders

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Compliance History Report

Compliance History Report for CN601420748, RN102584026, Rating Year 2020 which includes Compliance History (CH) components from September 1, 2015, through August 31, 2020.

Customer, Respondent, or Owner/Operator: CN601420748, The Premcor Refining Group Inc. **Classification:** SATISFACTORY **Rating:** 17.16
Regulated Entity: RN102584026, VALERO PORT ARTHUR REFINERY **Classification:** SATISFACTORY **Rating:** 17.16
Complexity Points: 47 **Repeat Violator:** NO
CH Group: 02 - Oil and Petroleum Refineries
Location: 1801 GULFWAY DR IN PORT ARTHUR, JEFFERSON COUNTY, TEXAS
TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

AIR OPERATING PERMITS PERMIT 3423
AIR OPERATING PERMITS ACCOUNT NUMBER JE0042B
AIR OPERATING PERMITS PERMIT 2227
AIR OPERATING PERMITS PERMIT 2229
AIR NEW SOURCE PERMITS PERMIT 6825A
AIR NEW SOURCE PERMITS ACCOUNT NUMBER JE0042B
AIR NEW SOURCE PERMITS EPA PERMIT N65
AIR NEW SOURCE PERMITS REGISTRATION 91911
AIR NEW SOURCE PERMITS REGISTRATION 103875
AIR NEW SOURCE PERMITS REGISTRATION 112591
AIR NEW SOURCE PERMITS REGISTRATION 153157
AIR NEW SOURCE PERMITS REGISTRATION 151145
AIR NEW SOURCE PERMITS REGISTRATION 164522
AIR NEW SOURCE PERMITS REGISTRATION 149487
AIR NEW SOURCE PERMITS REGISTRATION 149620
AIR NEW SOURCE PERMITS PERMIT AMOC42
AIR NEW SOURCE PERMITS REGISTRATION 159451
AIR NEW SOURCE PERMITS REGISTRATION 154606
AIR NEW SOURCE PERMITS REGISTRATION 158672

AIR NEW SOURCE PERMITS REGISTRATION 160501
AIR NEW SOURCE PERMITS REGISTRATION 156587
AIR NEW SOURCE PERMITS REGISTRATION 162009
AIR NEW SOURCE PERMITS REGISTRATION 156161
AIR NEW SOURCE PERMITS PERMIT AMOC127

STORMWATER PERMIT TXR1503AH
WASTEWATER PERMIT WQ0000309000
POLLUTION PREVENTION PLANNING ID NUMBER P00987
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30004
TAX RELIEF ID NUMBER 16122
TAX RELIEF ID NUMBER 17258

AIR OPERATING PERMITS PERMIT 3992
AIR OPERATING PERMITS PERMIT 1498
AIR OPERATING PERMITS PERMIT 2228
AIR NEW SOURCE PERMITS REGISTRATION 17038
AIR NEW SOURCE PERMITS REGISTRATION 13635A
AIR NEW SOURCE PERMITS AFS NUM 4824500004
AIR NEW SOURCE PERMITS REGISTRATION 87917
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX49M1
AIR NEW SOURCE PERMITS REGISTRATION 139815
AIR NEW SOURCE PERMITS PERMIT AMOC54
AIR NEW SOURCE PERMITS PERMIT AMOC123
AIR NEW SOURCE PERMITS REGISTRATION 161890
AIR NEW SOURCE PERMITS REGISTRATION 165928
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX167
AIR NEW SOURCE PERMITS REGISTRATION 144922
AIR NEW SOURCE PERMITS REGISTRATION 159332
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX49M2
AIR NEW SOURCE PERMITS REGISTRATION 156245
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX167M1
AIR NEW SOURCE PERMITS REGISTRATION 160937
AIR NEW SOURCE PERMITS PERMIT 158399
AIR NEW SOURCE PERMITS REGISTRATION 156162
AIR NEW SOURCE PERMITS REGISTRATION 157439
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30004
WASTEWATER EPA ID TX0005991
AIR EMISSIONS INVENTORY ACCOUNT NUMBER JE0042B
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD008090409
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50350

TAX RELIEF ID NUMBER 17257

Compliance History Period: September 01, 2015 to August 31, 2020 **Rating Year:** 2020 **Rating Date:** 09/01/2020

Date Compliance History Report Prepared: July 26, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: July 26, 2016 to July 26, 2021

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

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

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

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

1 Effective Date: 10/26/2016 ADMINORDER 2016-0052-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limits.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limits.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limits.

2 Effective Date: 12/09/2016 ADMINORDER 2013-0839-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 116, SubChapter G 116.715(c)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 6825A/PSD-TX-49, SC 5A PERMIT
O-01498, GENERAL CONDITIONS OP
SPECIAL TERMS AND CONDITIONS 18 OP
SPECIAL TERMS AND CONDITIONS 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.3 pound ("lb") of ammonia ("NH3"), 32.6 lbs of CO, 9.9 lbs of hydrogen sulfide ("H2S"), 4.5 lbs of NOx, 0.3 lb of particulate matter ("PM"), 914.4 lbs of SO2 and 64.4 lbs of VOC from Flare 19, EPN E-19-FLARE, during an emissions event (Incident No. 117587) that began on December 9, 2008 and lasted 45 minutes. The event was caused by an employee improperly setting a pressure controller set point at the atmospheric

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 116, SubChapter G 116.715(c)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 6825A/PSD-TX-49, SC 5A PERMIT
O-01498, GENERAL CONDITIONS OP

SPECIAL TERMS AND CONDITIONS 18 OP
SPECIAL TERMS AND CONDITIONS 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 44,373.3 lbs of VOC, 4.3 lbs of H2S, 48.8 lbs of CO, 132.2 lbs of NOx, 1.1 lbs of PM, and 0.3 lb of SO2 from Flare 15, EPN E-15-FLARE, and Boiler House 15 Fuel Gas Knockout Pot DR-89, EPN F-BH15, during an emissions event (Incident No. 117637) that began on December 10, 2008 and lasted 8 hours and 27 minutes. The event was caused by a freezing condition which inhibited flow from the propane metering skid at SGRU 12

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 116, SubChapter G 116.715(c)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 6825A/PSD-TX-49, SC 5A PERMIT
O-01498, GENERAL CONDITIONS OP
SPECIAL TERMS AND CONDITIONS 18 OP
SPECIAL TERMS AND CONDITIONS 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 39 lbs of CO, 10 lbs of H2S, 5 lbs of NOx, 0.5 lb of PM, 949 lbs of SO2, and 36.12 lbs of VOC from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 117630) that began on December 11, 2008 and lasted five minutes. The event was caused by a frozen restriction at a flow meter impulse line. Since this emissions event could have been prevented by better operational and maintenance practices, the Respon

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 116, SubChapter G 116.715(c)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 6825A/PSD-TX-49, SC 5A PERMIT
GENERAL TERMS AND CONDITIONS OP
SPECIAL TERMS AND CONDITIONS 15A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 47.4 lbs of CO, 24.8 lbs of H2S, 6.4 lbs of NOx, 0.45 lb of PM, 2,288 lbs of SO2, and 6.1 lbs of VOC from Flare 23, EPN E-23-FLARE, 25.13 lbs of CO, 0.1 lb of H2S, 89.6 lbs of NOx, 4.97 lbs of PM, and 963.21 lbs of SO2 from Tail Gas Incinerator ("TGI") 3, EPN E-03-SCOT, and 28.42 lbs of CO, 0.5 lb of H2S, 59.61 lbs of NOx, 0.1 lb of PM and 774.23 lbs of SO2 from TGI 4, EPN E-04-SCOT, during an emissions event (Incid

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 113, SubChapter C 113.780
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 116, SubChapter G 116.715(c)(7)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568(a)(1)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 6825A/PSD-TX-49, Special Condition 23B PERMIT
6825A/PSD-TX-49, Special Condition 3A PERMIT
6825A/PSD-TX-49, Special Condition 5A PERMIT
6825A/PSD-TX-49, Special Condition 5B PERMIT
6825A/PSD-TX-49, Special Condition 7B PERMIT
O-01498, General Terms and Conditions OP

Description: Failed to prevent unauthorized emissions and maintain the SO2 and H2S concentrations below the maximum allowable limits. Specifically, the Respondent released 4,417.18 lbs of SO2, 456.64 lbs of VOC, 658.32 lbs of NOx, 877.71 lbs of CO, 61.17 lbs of H2S, and 183.97 lbs of PM from Flare 23 (EPN E-23-FLARE), TGI 1 (EPN E-01-SCOT), Catalytic Reforming Unit ("CRU") 1344 Heater H-1 (EPN E-01-1344), AVU 146 Heater H-102 A and B (EPN E-02-146), Gulfining Unit ("GFU") 244 Heater F-101 and 102, (EPN E-01

Classification: Moderate

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

Rqmt Prov: Special Conditions 5A PERMIT
Special Terms and Conditions 18 OP

Description: Failed to comply with the VOC emission rates. Specifically, Tank T-31 is permitted to emit 0.01 pound per hour ("lb/hr") of VOC and 0.01 ton per year ("tpy") of VOC, Tank T-82 is permitted to emit 0.73 lb/hr of VOC and 0.04 tpy of VOC, Tank T-100 is permitted to emit 0.01 lb/hr of VOC and 0.01 tpy of VOC, Tank T-103 is permitted to emit 0.22 lb/hr of VOC and 0.24 tpy of VOC, Tank T-1848 is permitted to emit 0.77 lb/hr of VOC and 0.15 tpy of VOC, Tank T-1849 is permitted to emit 0.77 lb/hr of VO

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Conditions 1 OP
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to comply with the allowable rolling 12-month loading throughput rates. Specifically, for the months of January 2011 through June 2011, the Respondent exceeded the rolling 12-month loading throughput rate of 1,100,000 barrels of cyclohexane by 268,578 barrels

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 15 OP
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 12.44 lbs of hydrogen sulfide, 1,147.03 lbs of sulfur dioxide, 86.06 lbs of carbon monoxide, 11.92 lbs of nitrogen oxides, 5.43 lbs of VOC, 1.35 lbs of PM from Flare 23, during an emission event incident no. 162927

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 8.58 lbs of CO, 10 lbs of H2S, 16.95 lbs of NOx, 1.24 lbs of PM, 1,831.7 lbs of SO2, and 0.9 lb of VOC from the Shell Claus Off-Gas Treating ("SCOT") Unit 4, EPN E-04-SCOT, during an emissions event (Incident No. 168577) that began on May 16, 2012 and lasted four hours and 11 minutes. The continuous emissions monitoring system analyzer lost communication with the control room following inclement weather. Once commu

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 63.81 lbs of NH3, 11,774.29 lbs of VOC, and 462.61 lbs of H2S from Tank 88, EPN T-88, during an emissions event (Incident No. 174245) that began on October 1, 2012 and lasted five hours. The emissions event was caused by vapor carry-under from Liquid Control Valve FC-2320 to Tank 88. Since this event could have been avoided by better operational practices, the Respondent is precluded from asserting an affirmative d

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

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

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 339.54 lbs of CO, 31.46 lbs of H2S, 47.01 lbs of NOx, 13 lbs of PM, 2,899.73 lbs of SO2, and 50.44 lbs of VOC from Flare 18, EPN E-18-FLARE, during an emissions event (Incident No. 170893) that began on July 10, 2012 and lasted three hours and 30 minutes. The event occurred when the 125 pounds per square inch gauge steam system slumped during a severe rainstorm due to steam condensation in the header. Since this e

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 2,088.61 lbs of CO, 23.5 lbs of H2S, 13.54 lbs of NOx, 3.67 lbs of PM, 1,548.32 lbs of SO2, and 2.66 lbs of VOC from SCOT 1, EPN E-01-SCOT, during an emissions event (Incident No. 169334) that began on June 5, 2012 and lasted seven hours. The event occurred when a flow meter transmitter tap became plugged. Since this event could have been avoided by better maintenance practices or technically feasible design, the

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 1.1 lbs of NH3, 384.04 lbs of CO, 54.4 lbs of H2S, 53.17 lbs of NOx, 11.83 lbs of PM, 5,013.86 lbs of SO2, and 177.23 lbs of VOC from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 165333) that began on February 24, 2012 and lasted 115 hours. The event occurred when Valve No. 39PCV1922 at Amine Treating Unit 7841 and Valve No. 39PCV1030 at Sour Water Stripper 8747 leaked. Since this event could

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5.55 lbs of CO, 2.02 lbs of H2S, 439.79 lbs of NOx, 5.1 lbs of PM, 17,339.98 lbs of SO2, and 3.69 lbs of VOC from the SCOT 4 TGI, EPN E-04-SCOT, during an emissions event (Incident No. 171566) that began on July 26, 2012 and lasted 21 hours and 50 minutes. The event occurred when a low flow shut down the SCOT 4 in-line heater and auto-diverted the 600 and 700 train tail gas around the SCOT 4 unit directly to the TG

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Terms and Conditions 18 OP

Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 307.5 lbs of CO, 14.7 lbs of

H₂S, 42.6 lbs of NO_x, 4.3 lbs of PM, 1,351.1 lbs of SO₂, and 69.3 lbs of VOC from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 164955) that began on February 16, 2012 and lasted one hour and 21 minutes. The event occurred when a power supply module pair (primary and backup) failed. Since this event could have been avoided by technically feasible design, the Respondent

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

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

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Terms and Conditions 18 OP

Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 110 lbs of CO, 0.27 lb of H₂S, 17.17 lbs of NO_x, 5.25 lbs of PM, 219.43 lbs of SO₂, and 3.8 lbs of VOC from SCOT 1, EPN E-01-SCOT, 109.88 lbs of CO, 18.52 lbs of H₂S, 54.25 lbs of NO_x, 2.9 lbs of PM, 1,672.69 lbs of SO₂, and 2.1 lbs of VOC from SCOT 3, EPN E-03-SCOT, and 81.02 lbs of CO, 4.83 lbs of H₂S, 83.75 lbs of NO_x, 6.34 lbs of PM, 908.01 lbs of SO₂, and 4.59 lbs of VOC from SCOT 4, EPN E-04-SCOT, during an emissions event (Incident No. 172037) that began on July 28, 2012 and lasted 16 hours and 51 minutes. The event occurred when the WWTU 8742 RTO experienced an increase in hydrocarbon vapor from the WWTU treating vessels. Since the Respondent was not able to provide sufficient information to determine if this event could have been avoided, the Respondent is precluded

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.4(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Terms and Conditions 15 OP

Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 165 lbs of VOC from the RTO, EPN E-01-RTO, during an emissions event (Incident No. 172037) that began on July 28, 2012 and lasted 16 hours and 51 minutes. The event occurred when the WWTU 8742 RTO experienced an increase in hydrocarbon vapor from the WWTU treating vessels. Since the Respondent was not able to provide sufficient information to determine if this event could have been avoided, the Respondent is precluded

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

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

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Terms and Conditions 18 OP

Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 361.52 lbs of CO, 49.59 lbs of H₂S, 86.24 lbs of NO_x, 2.72 lbs of PM, 867.04 lbs of SO₂, and 643.14 lbs of VOC from Flare 22, EPN E-22-FLARE, during an emissions event (Incident No. 175987) that began on November 12, 2012 and lasted 32 hours and 17 minutes. The event occurred because the wet gas compressor control was in local mode during startup and compressor speed could not be increased from the control room

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

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

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP

Special Condition 1 PERMIT

Special Terms and Conditions 18 OP

Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 86.56 lbs of CO, 3.74 lbs of H₂S, 27.21 lbs of NO_x, 0.75 lb of PM, 1,073.93 lbs of SO₂, and 0.55 lb of VOC from the SCOT 3 TGI, EPN E-03-SCOT, during an emissions event (Incident No. 177692) that began on January 3, 2013 and lasted four hours. The event occurred when the SRU 545 H-9001 natural gas isolation valve inadvertently closed causing the heater to shut down. Since the Respondent was not able to provide su

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)

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

Rqmt Prov: General Terms and Conditions OP
Special 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.01 lb of CO, 154.95 lbs of NO_x, 89.49 lbs of PM, 62.37 lbs of SO₂, and 11.78 lbs of VOC from AVU 146 Heater 1, EPN E-01-146, 0.01 lb of CO, 19.34 lbs of NO_x, 41.5 lbs of PM, 28.39 lbs of SO₂, and 10.78 lbs of VOC from AVU 146 Heater 2, EPN E-02-146, 0.49 lb of CO, 83.93 lbs of NO_x, 56.11 lbs of PM, 50.08 lbs of SO₂, and 20.3 lbs of VOC from CRU 1344 Heater 1, EPN E-01-1344, 0.01 lb of CO, 38.64 lbs of NO_x, 12.93 l

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 297.02 lbs of CO, 31.39 lbs of H₂S, 6.61 lbs of NO_x, 1.56 lbs of PM, 1,180.57 lbs of SO₂, and 1.13 lbs of VOC from the SCOT 1 TGI, EPN E-01-SCOT, and 47.82 lbs of CO, 75.5 lbs of H₂S, 18.68 lbs of NO_x, 0.62 lb of PM, 2,841.91 lbs of SO₂, and 0.45 lb of VOC from the SCOT 2 TGI, EPN E-02-SCOT, during an emissions event (Incident No. 179180) that began on February 11, 2013 and lasted 15 hours. The event occurred when

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.25 lb of H₂S, 1.44 lbs of VOC, 0.39 lb of hydrocarbons, 0.58 lb of NO_x, 4.19 lbs of CO, 23.47 lbs of SO₂, and 0.15 lb of PM from Flare 23, EPN E-23-FLARE, and 1,386.18 lbs of SO₂, 15.03 lbs of H₂S, 32.23 lbs of NO_x, 247.21 lbs of CO, 88.75 lbs of VOC, 22.80 lbs of hydrocarbons, and 9 lbs of PM from Flare 26, EPN E-26-FLARE, during an emissions event (Incident No. 179771) that began on February 26, 2013 and lasted

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.03 lb of VOC, 5.27 lbs of CO, 42.3 lbs of H₂S, 0.73 lb of NO_x, 0.12 lb of PM, and 3,871.01 lbs of SO₂ from Flare 26, EPN E-26-FLARE, and 21.61 lbs of CO, 3.65 lbs of H₂S, 14.28 lbs of NO_x, 0.35 lb of PM, 666.08 lb of SO₂, and 0.25 lb of VOC from the SCOT 4 TGI, EPN

E-04-SCOT, during an emissions event (Incident No. 176927) that began on December 7, 2012 and lasted nine hours. The event occurred during start up ac

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 81.43 lbs of CO, 10.3 lbs of H₂S, 0.95 lb of NO_x, 0.01 lb of PM, 769.41 lbs of SO₂, and 0.01 lb of VOC from the SCOT 4 TGI, EPN E-04-SCOT, during an emissions event (Incident No. 177006) that began on December 9, 2012 and lasted five hours. The event occurred when the SRU 546 went down due to a failed Inlet Temperature Transmitter, 34TT-2620, which caused the SCOT 4 TGI to trip. Since this event could have been av

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 82.87 pounds ("lbs") of hydrogen sulfide ("H₂S"), 7,638.19 lbs of sulfur dioxide ("SO₂"), 96.46 lbs of carbon monoxide ("CO"), 13.36 lbs of nitrogen oxides ("NO_x"), 12.43 lbs of volatile organic compounds ("VOC"), and 3.75 lbs of particulate matter ("PM") from Flare 23, Emissions Point Number ("EPN") E-23-FLARE, during an emissions event (Incident No. 156604) that began on July 7, 2011 and lasted five hours and

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.4(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 838.54 lbs of VOC from the Regenerative Thermal Oxidizer ("RTO"), EPN E-01-RTO, during an emissions event (Incident No. 157133) that began on July 22, 2011 and lasted 86 hours and 50 minutes. The event occurred when the Wastewater Treating Unit ("WWTU") RTO experienced an increase in hydrocarbon vapor from the WWTU treating vessels. Since the Respondent did not provide sufficient information to determine if

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.4(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 137.92 pounds ("lbs") of volatile organic compounds ("VOC") from the Regenerative Thermal Oxidizer ("RTO"), Emissions Point Number ("EPN") E-01-RTO, during an emissions event (Incident No. 163309) that began on January 2, 2012 and lasted 15 hours and 43 minutes. The event occurred when the Wastewater Treating Unit ("WWTU") RTO tripped due to high temperatures in the first bed caused by mechanical problems

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 897.48 lbs of SO₂, 80.69 lbs of CO, 11.17 lbs of NO_x, 9.74 lbs of H₂S, 9.57 lbs of VOC, and 3.22 lbs of PM from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 167533) that began on April 21, 2012 and lasted six minutes. The release occurred when the recycle compressor, K-2100, developed an inboard seal leak during startup of the Hydrocracker Unit, HCU-942. Since this emissions event could have

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 22,383.11 lbs of SO₂,

1,549.82 lbs of VOC, 930.96 lbs of CO, 242.84 lbs of H2S, 128.89 lbs of NOx, 10.93 lbs of PM, and 3.14 lbs of NH3 from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 167901) that began on April 28, 2012 and lasted 61 hours and six minutes. The release occurred when reflux drum vapor from the hydrocracker fractionator overhead drum, D-1310, was vented to the flare to prevent

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,469.32 lbs of SO2, 93.99 lbs of CO, 59.34 lbs of H2S, 38.05 lbs of VOC, 13.01 lbs of NOx, and 3.40 lbs of PM from Flare 23, EPN E-23-FLARE,

during an emissions event (Incident No. 168486) that began on May 15, 2012 and lasted nine minutes. The release occurred when reactor loop pressure was relieved to the flare during troubleshooting of HCU-942. Since the Respondent did not provide sufficient information to

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 39,756.20 lbs of SO2, 2,444.52 lbs of CO, 465.05 lbs of VOC, 431.32 lbs of H2S, 337.64 lbs of NOx, 58.00 lbs of PM, and 11.42 lbs of NH3 from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 169186) that began on June 1, 2012 and lasted 187 hours and 31 minutes. The release occurred when suction and discharge valves on the hydrocarbon skim pump were left open, allowing gas to flow through the pump

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failed to prevent unauthorized emissions. Specifically, the Respondent released 4,796.69 lbs of SO2, 160.42 lbs of VOC, 91.62 lbs of CO, 52.04 lbs of H2S, 12.68 lbs of NOx, 1.42 lbs of PM, and 0.98 lb of NH3 from Flare 23, EPN E-23-FLARE, during an emissions event (Incident No. 169289) that began on June 4, 2012 and lasted 42 minutes. The release occurred when vapor from the HCU-492 hot high pressure separator, D-1210, carried under to the hot low pressure separator, D-1220, resulting in the

3 Effective Date: 12/09/2016 ADMINORDER 2011-2300-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Conditions 1 PERMIT
Special Terms and Conditions 1.A. OP
Special Terms and Conditions 18 OP

Description: Failed to prevent unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 1 PERMIT
 Special Terms and Conditions 18 OP
 Special Terms and Conditions 1A OP
 Description: Failed to prevent unauthorized emissions.
 Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)

30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 2F OP
 Description: Failed to submit an initial notification within 24 hours after discovery of an emissions event.
 Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 1 PERMIT
 Special Terms and Conditions 18 OP
 Special Terms and Conditions 1A OP
 Description: Failed to prevent unauthorized emissions.
 Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 2F OP
 Description: Failed to submit an initial notification within 24 hours after discovery of an emissions event.
 Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 2F OP
 Description: Failed to submit an initial notification within 24 hours after discovery of an emissions event.
 Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 1 PERMIT
 Special Terms and Conditions 18 OP
 Special Terms and Conditions 1A OP
 Description: Failed to prevent unauthorized emissions.
 Classification: Moderate
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Special Terms and Conditions 18 OP
Special Terms and Conditions 1A OP

Description: Failed to prevent unauthorized emissions.

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Terms and Conditions OP
Special Terms and Conditions 2F OP

Description: Failed to submit an initial notification within 24 hours after discovery of the emissions event.

4 Effective Date: 01/20/2017 ADMINORDER 2016-0678-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limits.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limits.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT
Special Condition 18 OP

Description: Failure to maintain emission rates below the reportable quantity (RQ) emission limits.

Classification: Moderate

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

Rqmt Prov: General Terms and Conditions OP
Special Condition 1 PERMIT

Description: Failure to maintain an emission rate below the allowable emission limits.

- 5 Effective Date: 07/12/2017 ADMINORDER 2016-1587-AIR-E (1660 Order-Agreed Order With Denial)
 Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: O1498 OP
 Special Condition 1 PERMIT
 Description: Failure to prevent unauthorized emissions.
 Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Rqmt Prov: General Terms and Conditions OP
 Special Condition 1 PERMIT
 Description: Failure to prevent unauthorized emissions.
- 6 Effective Date: 02/16/2021 ADMINORDER 2020-0107-IWD-E (1660 Order-Agreed Order With Denial)
 Classification: Major
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
 30 TAC Chapter 305, SubChapter F 305.125(1)
 Rqmt Prov: Effluent Limits PERMIT
 Description: Failed to comply with permitted effluent limitations.

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	August 19, 2016	(1365547)
Item 2	September 06, 2016	(1351064)
Item 3	September 08, 2016	(1351827)
Item 4	September 16, 2016	(1372248)
Item 5	September 21, 2016	(1355398)
Item 6	October 11, 2016	(1355747)
Item 7	October 14, 2016	(1378425)
Item 8	October 19, 2016	(1368800)
Item 9	November 17, 2016	(1384384)
Item 10	December 05, 2016	(1376442)
Item 11	December 15, 2016	(1390521)
Item 12	January 17, 2017	(1397138)
Item 13	February 10, 2017	(1393657)
Item 14	February 20, 2017	(1394309)
Item 16	March 13, 2017	(1395405)
Item 17	March 20, 2017	(1401392)
Item 18	April 03, 2017	(251922)
Item 19	April 05, 2017	(266869)
Item 20	April 06, 2017	(290739)
Item 21	April 18, 2017	(1417626)
Item 22	May 15, 2017	(1425215)
Item 23	May 24, 2017	(1394687)
Item 24	June 05, 2017	(1415850)
Item 25	June 19, 2017	(1431218)
Item 26	July 12, 2017	(1439827)
Item 27	August 07, 2017	(1430716)

Item 28	August 14, 2017	(1443515)
Item 30	November 14, 2017	(1449446)
Item 31	December 18, 2017	(1467822)
Item 32	December 28, 2017	(1454543)
Item 33	January 19, 2018	(1474527)
Item 34	March 19, 2018	(1490430)
Item 35	March 29, 2018	(1473522)
Item 36	April 18, 2018	(1493667)
Item 37	May 22, 2018	(1479329)
Item 38	June 13, 2018	(1447358)
Item 39	June 14, 2018	(1447820)
Item 40	July 19, 2018	(1514019)
Item 41	July 31, 2018	(1466082)
Item 42	August 20, 2018	(1504770)
Item 43	August 21, 2018	(1447795)
Item 44	September 19, 2018	(1527246)
Item 45	October 10, 2018	(1506377)
Item 46	October 18, 2018	(1533604)
Item 47	October 26, 2018	(1523863)
Item 48	November 16, 2018	(1541439)
Item 49	November 20, 2018	(1523171)
Item 50	December 20, 2018	(1545223)
Item 51	January 20, 2019	(1559644)
Item 52	February 14, 2019	(1559642)
Item 53	March 05, 2019	(1548829)
Item 54	March 19, 2019	(1559643)
Item 55	April 12, 2019	(1549300)
Item 56	April 18, 2019	(1571820)
Item 57	May 20, 2019	(1583249)
Item 58	June 20, 2019	(1571283)
Item 59	July 23, 2019	(1580340)
Item 60	August 15, 2019	(1582560)
Item 61	August 20, 2019	(1541225)
Item 62	August 26, 2019	(1589786)
Item 63	September 13, 2019	(1596574)
Item 64	October 08, 2019	(1597043)
Item 65	November 19, 2019	(1606128)
Item 66	November 20, 2019	(1610178)
Item 67	November 21, 2019	(1610780)
Item 68	December 20, 2019	(1626396)
Item 69	January 20, 2020	(1634037)
Item 70	February 14, 2020	(1630047)
Item 71	February 18, 2020	(1640656)
Item 72	February 27, 2020	(1630525)
Item 73	March 20, 2020	(1647176)
Item 74	April 20, 2020	(1653512)
Item 75	April 30, 2020	(1644251)
Item 76	May 17, 2020	(1660098)
Item 77	May 20, 2020	(1646150)
Item 78	May 29, 2020	(1646047)
Item 79	June 04, 2020	(1651799)
Item 80	June 19, 2020	(1666603)
Item 81	July 17, 2020	(1673560)
Item 82	July 28, 2020	(1664502)
Item 84	August 20, 2020	(1680335)
Item 85	September 18, 2020	(1672802)
Item 86	September 23, 2020	(1665010)
Item 87	October 20, 2020	(1673016)
Item 88	October 21, 2020	(1678600)

5 Date: 01/14/2021 (1698842)
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 327 327.3(b)
Description: Failure notify the agency as soon as possible but not later than 24 hours after the discovery of the spill or discharge. EIC B18(r)(1), MOD

6 Date: 06/30/2021 (1708635)
Self Report? NO Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 3E PERMIT
Special Condition 58E(1) PERMIT
Special Condition 5A PERMIT
Description: Failure to install a plug, cap, or blind on an open-ended line (OEL) as reported in the FOP O-01498 semi-annual deviation reports covering the reporting periods of

January 1, 2020, through June 30, 2020, and July 1, 2020, through December 31, 2020.

EIC: C10; Minor 3A
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 7B PERMIT
Description: Failure to maintain the minimum temperature of Marine Vapor Combustors (24/25) as reported in the FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 31B PERMIT
Description: Failure to maintain a Hydrogen Sulfide (H2S) concentration of less than 5 ppmvd from the tail gas incinerator as reported in the FOP O-01498 semi-annual deviation report for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 22D(3) PERMIT
Special Condition 25 OP
Description: Failure to conduct weekly Total Dissolved Solids (TDS) sampling for cooling towers reported in the FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B1; Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 27B PERMIT
Description: Failure to continuously monitor for hydrocarbon layer (HL) thickness by electronic gauge when in service as reported in the FOP O-01498 semi-annual deviation

reports for the reporting period of January 1, 2020 to December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.657(a)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 40E PERMIT
Description: Failure to depressurize coke drum in DCU 843 to a blowdown pressure of 3.50 psig at the top of the coke drum prior to venting to the atmosphere based on a 5-minute average as reported in the FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Description: Special Condition 34B PERMIT
Failure to maintain the hourly average pounds per Million British thermal units (lbs/MMBtu) of NOx and the hourly NH3 parts per million volume dry (PPMVD) concentration as reported in the FOP O-01498 semi-annual deviation reports covering the reporting period of January 1, 2020, through December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 50 PERMIT
Description: Failure to maintain particulate matter (PM) emissions as reported in the FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2019, through December 31, 2019.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 16B PERMIT
Special Condition 17B PERMIT
Special Condition 25 OP
Description: Failure to maintain the 6-minute average pressure and the 15-minute average pressure at the marine loading dock as reported in FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 9J(2) PERMIT
Description: Failure to maintain the maximum hourly flowrate for coker sludge feed Tank 8010 as reported in the FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B18(g)(1); Moderate 2G
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 10A PERMIT
Special Condition 25 OP

Description: Failure to continuously monitor the temperature on Tank 896 during loading activities as reported in the FOP O-01498 semi-annual deviation reports for the reporting period of January 1, 2020, through December 31, 2020.

EIC: B1; Moderate 2G

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(i)(B)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 5A PERMIT
Special Condition 6B PERMIT

Description: Failure to continuously maintain the net heating value of flare combustion zone gas (NHVcz) at or above 270 British thermal units per standard cubic feet (Btu/scf) when regulated material is routed to the flare.

EIC: B18(g)(1); Moderate 2G

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.102a(f)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568
5C THSC Chapter 382 382.085(b)
General Terms and Conditions OP
Special Condition 25 OP
Special Condition 3A(3) PERMIT
Special Condition 5B PERMIT

Description: Failure to meet the work practice standards in Subpart UUU Table 29 for two hours during startup of SRU-544.

EIC: B18(g)(1); Moderate 2G

7 Date: 07/02/2021 (1735125)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter A 335.6

Description: Failure to maintain a current Notice of Registration.

Self Report? NO Classification: Minor

Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i)

Description: Failure to keep containers closed except when adding or removing waste.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter E 335.112(a)(8)

Description: Failure to maintain records of weekly inspections of container storage areas.

F. Environmental audits:

Notice of Intent Date: 01/18/2016 (1306294)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 160, SubChapter E, PT 160, SubPT F 160.107(d)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.107(d)

Description: Instances of sulfur dioxide downtime were documented in every semiannual report examined, which consisted of those covering the 1st half of 2011 through the 1st half of 2015 as well as the draft semiannual report for the 2nd half of 2015. one of these reports included the required representations concerning operation of the sulfur dioxide control system during these periods of missing monitoring data.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.107(c)(4)(ii)

Description: Page 3 of 21 in the semiannual report for the 2nd half of 2012 indicates that there were 117 hours of monitor downtime; however, page 7 of 121 does not indicate whether there were any days with less than 18 hours of valid data and states that "under the CMS Performance Summary table that a performance summary is "NA- Not a CMS". The

ABB Advance Optima Uras 14 is a CEMS, which is therefore a CMS and subject to the requirement to report whether there were any days with less than 18 hours of valid

Notice of Intent Date: 01/18/2016 (1306296)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.700(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.700(d)(2)

Description: On page 18 of the semiannual report dated 1/30/2015, the duration of excess emissions documented for the regulated SRU (all four SRUs1 combined) is 1% when rounded to two significant digits. The excess emissions summary report satisfying § 60.7(d) was included but not an excess emissions report satisfying §60.7(c). Semiannual reports were reviewed dated from 1/27/2012 until 7/28/2015 and the only semiannual period that required an excess emissions report is 2H 2014.

Notice of Intent Date: 01/18/2016 (1306298)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1574(f)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1576(e)

Description: A copy of the current plan must be kept onsite. OMMP Plan is not current because it was prepared before implementation of the Oxygen Enrichment Project on May 29, 2012 that triggered NSPS Subpart Ja, and references to applicable NSPS subparts are no longer accurate.

Notice of Intent Date: 01/18/2016 (1306299)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.10(e)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1564(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1575
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.8(f)

Description: The MACT UUU semiannual reports submitted subsequent to the AMP approval, failed to address the AFM recirculation pump discharge pressure.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1574(f)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1576(e)

Description: A current copy of the revised operation, maintenance, and monitoring procedures (OMMP) plan must be submitted to the permitting authority for review and approval and also be kept onsite. Specifically, the OMMP plan produced during the onsite audit was the version prepared prior to a 9/7/2005 submittal deadline.

Notice of Intent Date: 01/25/2016 (1307364)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)

Description: Eight untagged and unmonitored valves were observed during the field walk through.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(1)
30 TAC Chapter 115, SubChapter D 115.354(2)

Description: Four "normal to monitor" valves were not being monitored quarterly as required. One "difficult to monitor" valve was not being monitored annually as required. These errors were due to the components being improperly labeled "HL" (heavy liquid) in LeakDAS.

Notice of Intent Date: 01/25/2016 (1307385)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)

Description: Twenty nine untagged and unmonitored valves were observed during field walkthrough.

Notice of Intent Date: 01/25/2016 (1307516)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)

Description: Two untagged and unmonitored valves were observed during field walkthrough.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

Description: Two open-ended lines (OEL) were observed during field walkthrough

Notice of Intent Date: 01/25/2016 (1307520)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

Description: One open-ended line (OEL) was observed during field walkthrough.

Notice of Intent Date: 01/28/2016 (1307523)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)

Description: Twenty two untagged and unmonitored valves were observed during field wa!kthrough.

Notice of Intent Date: 01/25/2016 (1307539)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)

Description: Five untagged and unmonitored valves were observed during field walkthrough.

Notice of Intent Date: 01/25/2016 (1307541)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

Description: Three open ended lines were observed during the field walk-through.

Notice of Intent Date: 01/25/2016 (1307547)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-6a(a)(1)

Description: Two open-ended lines were observed during field walkthroughs of one subject refinery process unit.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(2)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(2)(i)

Description: Two untagged and unmonitored valves were observed during field walkthroughs.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(c)(1)(i)

Description: Certain valves were not monitored in the FGR Unit lin the appropriate month of the monitoring quarter.

Notice of Intent Date: 01/28/2016 (1307551)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(c)(1)(i)

Description: Certain valves were not monitored in the SGR Unit in the appropriate month of the monitoring quarter.

Notice of Intent Date: 01/25/2016 (1307555)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(c)(1)(i)

Description: Certain valves were not monitored in the AV Unit in the appropriate month of the monitoring quarter.

Notice of Intent Date: 01/25/2016 (1307558)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(c)(1)(i)

Description: Certain valves were not monitored in the GF unit in the appropriate month of the monitoring quarter.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Description: One open-ended line was observed during a field walkthrough.

Notice of Intent Date: 01/25/2016 (1307561)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(c)(1)(i)

Description: Certain valves were not monitored in the GF Unit in the appropriate month of the monitoring quarter.

Notice of Intent Date: 01/25/2016 (1307562)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(c)(1)(i)

Description: Certain valves were not monitored in the GF Unit in the appropriate month of the monitoring quarter.

Notice of Intent Date: 01/28/2016 (1307564)

Disclosure Date: 07/27/2016

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Description: One open-ended line was observed during field walkthrough.

Notice of Intent Date: 09/26/2017 (1446575)

No DOV Associated

Notice of Intent Date: 05/04/2018 (1484155)

Disclosure Date: 09/17/2018

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 27

Description: Records were not readily available and maintained to show that observations of HF leaks indicated through HF detection paint were specifically documented. In an abundance of caution the Refinery is including this issue as a finding.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 45

Description: Records were not readily available and maintained to show that AVO monitoring every 4 hours for potential HF leaks were tracked. In an abundance of caution the Refinery is including this issue as a finding.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 6D

Description: Records were not readily available and maintained of the actual flare exit velocities that are recorded at least every 15 minutes. In an abundance of caution the Refinery is including this issue as a finding.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 51B

Description: The refinery's marine vapor combustor capture system was monitored inconsistently with valves monitored using Method 21, and flanges / connectors undergoing annual AVO inspection. The permit requires that the entire capture system be inspected for potential leaks through an annual Method 21 Test or through monthly AVO inspections.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 26

Description: The refinery maintained calibration records for heaters, however records of heaters' fuel flow monitor downtimes were not readily available to show that any data loss did not exceed 5% over a rolling 12-month period. In an abundance of caution the Refinery is including this issue as a finding.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 13

Description: The refinery maintained calibration records for the FCCU, however records of FCCU wet gas scrubber liquid flow and pressure monitor downtimes were not readily available to show that any data loss did not exceed 5% over a rolling 12-month period. In an abundance of caution the Refinery is including this issue as a finding.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 23A

Description: The refinery maintained calibration records for the TGI, however records of temperature monitor downtime were not readily available to show that any data loss did not exceed 5% over a rolling 12-month period. In an abundance of caution the Refinery is including this issue as a finding.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 18B

Description: The refinery maintained sour water storage tank records on an hourly basis (rather than every 15 minutes) to demonstrate "continuous" monitoring.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 55

Description: Records were not readily available and maintained to document periodic reports of SRU compliance. In an abundance of caution the Refinery is including this issue as a finding.

Notice of Intent Date: 05/17/2018 (1485091)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485094)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485095)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485097)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485098)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485099)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485100)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485104)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485105)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485109)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485120)
No DOV Associated

Notice of Intent Date: 05/17/2018 (1485122)
No DOV Associated

Notice of Intent Date: 05/24/2018 (1486006)
No DOV Associated

Notice of Intent Date: 05/24/2018 (1486007)
No DOV Associated

Notice of Intent Date: 06/01/2018 (1489899)
No DOV Associated

Notice of Intent Date: 06/01/2018 (1489901)

Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter E 115.426(1)(B)
Description: Records weren't available & maintained to meet recordkeeping requirements to show the total daily usage quantity or the daily average lb VOC/gal coating value of each coating and solvent used in MMPP surface coating. Records did not differentiate between the quantity of coatings used in Misc. Parts & Products (i.e., non-exempt) operations and exempt (i.e., architectural) operations.

Notice of Intent Date: 06/01/2018 (1489903)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 112, SubChapter D, PT 112 112.7
Description: Deviation limits listed in FOP No. O1498 CAM Summary do not match 30 TAC 112.7 limits utilizing latest design parameters for the SRU stacks (SRU 543, 544, 545, and 546).

Notice of Intent Date: 06/07/2018 (1493399)
Disclosure Date: 09/27/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354(11)
Description: Not all connectors (9) are being monitored within 30 days of being placed in service.

Notice of Intent Date: 06/07/2018 (1493400)
Disclosure Date: 09/27/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)
Description: Not all valves (2) are being monitored within 30 days of being placed in service.

Notice of Intent Date: 06/07/2018 (1493401)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493402)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493403)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493405)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493406)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493407)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493409)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493418)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493420)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493421)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493422)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493423)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493425)
No DOV Associated

Notice of Intent Date: 06/07/2018 (1493426)

Disclosure Date: 09/27/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

40 CFR Part 60, Subpart VV 60.482-6

Description: One open ended line was identified on the drain for pump 2010B. The drain is equipped with 2 valves and the second valve was open.

Notice of Intent Date: 06/14/2018 (1497231)

Disclosure Date: 10/10/2018

Viol. Classification: Minor

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

Rqmt Prov: PERMIT MAERT

Description: Hourly Emissions Compliance Demonstrations were not readily available for FCCU ammonia or HCN.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT MAERT

Description: FCCU (EPN E-01-WGS): For annual MAERT compliance demonstrations, ammonia (NH₃), sulfuric acid (H₂SO₄), and hydrogen cyanide (HCN) emissions were not specifically included in the monthly automated reports.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT MAERT

Description: Marine Loading (EPN E-MC-24-25): Nitrogen Oxides (NO_x) and carbon monoxide (CO) emissions were based on a baseline lb/hr constant rather than accounting for fluctuations in product loading and the resultant variability in heat content that affects the emissions of NO_x and CO. This enhanced emission calculation change is being included in this disclosure in an abundance of caution.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT MAERT

Description: Coke Handling (EPNs 843-1 to 17 or EPN F-843PM): The MAERT includes two EPN groups for coke handling (EPN-843-2 to 17 with PM less than 2.5 microns (PM_{2.5}) limit, and EPN F-843PM with PM limits), and the EI references only a single coke handling EPN (EPN F-CONVEYOR) with PM emissions. Also, there were no PM₁₀ limits established (only PM and PM_{2.5}). These inconsistencies are included as findings in an abundance of caution.

Notice of Intent Date: 06/21/2018 (1498555)

Disclosure Date: 08/03/2018

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Permit Cond. 1.b.

PERMIT Permit Condition 10

Description: The refinery TPDES permit application referenced wastewater treatment chemicals that are not representative of the currently utilized commercial products used at the wastewater treatment facility, and documentation of notification(s) to update the application representations to the TCEQ was not readily available.

Viol. Classification: Minor

Citation: 40 CFR Chapter 122, SubChapter D, PT 122, SubPT C 122.44(g)

30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 305, SubChapter F 305.125(11)

30 TAC Chapter 305, SubChapter F 305.125(17)

30 TAC Chapter 305, SubChapter F 305.125(9)(B)(ii)

Rqmt Prov: PERMIT Requirement 1

Description: The refinery TPDES permit requirement to provide notification within 24 hours of daily maximum limitations (including copper) was inadvertently missed at various times over the relevant review period.

Viol. Classification: Moderate

Citation: TWC Chapter 26 26.121

30 TAC Chapter 305, SubChapter F 305.125

Rqmt Prov: PERMIT Permit Condition 1.b.

PERMIT Permit Condition 10

Description: Specific authorization for discharge of certain wastewaters (e.g., utility wastewaters) to stormwater outfalls is not identified in the refinery's TPDES permit and related application representations. Additionally, the

refinery's TPDES permit inconsistently identifies how and where industrial stormwater is authorized for discharge, and the refinery is including the matter in this disclosure in an abundance of caution.

Viol. Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.128

Rqmt Prov: PERMIT Reporting Requirement (MRR) No. 1

Description: The refinery's delegation of authority documentation for submitting discharge monitoring reports (DMRs) electronically is inadvertently out of date and requires resubmission.

Viol. Classification: Minor

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

30 TAC Chapter 305, SubChapter F 305.125(11)

30 TAC Chapter 305, SubChapter F 305.125(12)

30 TAC Chapter 305, SubChapter F 305.127(2)

Rqmt Prov: PERMIT Monit. & Reporting Requirement No. 2

Description: The refinery TPDES permit requires pH probe calibration/verification records to be maintained and some documentation was not readily available/maintained as necessary.

Viol. Classification: Minor

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

30 TAC Chapter 305, SubChapter F 305.125(11)

30 TAC Chapter 305, SubChapter F 305.125(17)

30 TAC Chapter 305, SubChapter F 305.127(2)

Rqmt Prov: PERMIT Requirement No. 3

Description: The refinery TPDES permit requirements for Outfall 001 monitoring documentation and periodic submission were not timely met at certain times over the reporting period.

Viol. Classification: Minor

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

30 TAC Chapter 305, SubChapter F 305.125(11)

30 TAC Chapter 305, SubChapter F 305.125(12)

30 TAC Chapter 305, SubChapter F 305.127(2)

Rqmt Prov: PERMIT Monit. & Reporting Req. No. 5

Description: The refinery TPDES permit requires calibrations records and verification calculations to be documented and maintained, and documents were not readily available as necessary

Viol. Classification: Minor

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

30 TAC Chapter 305, SubChapter F 305.125(11)

30 TAC Chapter 305, SubChapter F 305.125(12)

30 TAC Chapter 305, SubChapter F 305.127(2)

Rqmt Prov: PERMIT Operational Requirement No. 11.f.

Description: The TPDES permit requires wastewater sludge management records to be collected and maintained, and documents were not readily available for review. In an abundance of caution, this issue is being disclosed to the TCEQ.

Notice of Intent Date: 06/21/2018 (1498556)

No DOV Associated

Notice of Intent Date: 06/21/2018 (1498557)

No DOV Associated

Notice of Intent Date: 07/05/2018 (1499774)

Disclosure Date: 10/26/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter C 115.222(1)

Description: The engineering of the onsite gasoline dispensing facility's gasoline tank does not indicate a submerged fill pipe is present.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter C 115.224(2)

30 TAC Chapter 115, SubChapter C 115.226(1)

Description: The records for each gasoline delivery did not include identification number and date of the last leak test for each tanker truck that transferred gasoline to the facility. Records are required to be kept for two years.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter C 115.226(2)(A)

Description: Records of the results of the annual 30 TAC 115.225 testing were not readily available and maintained by the facility. The records should be kept for two years.

Notice of Intent Date: 07/12/2018 (1500447)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.145(f)(6)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6655(f)

Description: Records were not readily available to show hours of operation of engines; e.g., documenting emergency versus non-emergency hours, the type of emergency, and start and end times of emergency.

Viol. Classification: Major

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Based on the documents available for review, it appears the refinery did not obtain permit authorization for all non-emergency engines.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.120
30 TAC Chapter 122, SubChapter B 122.121
30 TAC Chapter 122, SubChapter B 122.136(b)

Rqmt Prov: OP ST&C 1.A.

Description: Refinery did not include certain engines in its Title V permit, and/or the information pertaining to engines was not kept updated to reflect existing use/inventory.

Notice of Intent Date: 07/12/2018 (1500448)

No DOV Associated

Notice of Intent Date: 07/12/2018 (1500449)

No DOV Associated

Notice of Intent Date: 07/12/2018 (1500450)

Disclosure Date: 01/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.304
40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.305(a)

Description: The applicable marine loading control device is subject to an initial performance test to establish compliance, with records of initial and any subsequent stack tests required to be readily accessible and maintained. Records of the initial performance test were not readily available for review. In an abundance of caution, the refinery is including this issue as an audit finding.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.305(b)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT BB 61.305(f)

Description: No formal quarterly reports for NESHAP BB were readily available for 2016 or 2017, but there were no deviations from NESHAP BB requirements for 2016 or 2017 that were observed during the audit. In an abundance of caution, the refinery is including this issue as an audit finding.

Notice of Intent Date: 07/20/2018 (1504850)

No DOV Associated

Notice of Intent Date: 07/20/2018 (1504851)

No DOV Associated

Notice of Intent Date: 07/20/2018 (1504853)

Disclosure Date: 09/27/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter R 335.503
30 TAC Chapter 335, SubChapter R 335.504(2)
30 TAC Chapter 335, SubChapter A 335.6

Description: The refinery's Notice of Registration was not updated to include additional EPA waste codes that were properly utilized in waste shipments and on Annual Waste Summaries during the period of 1/2014-12/2017. In limited instances, the following waste codes were utilized over the relevant period: D002, D007, D008, DOIO, and D018.

Notice of Intent Date: 07/20/2018 (1504856)

No DOV Associated

Notice of Intent Date: 07/20/2018 (1504859)

Disclosure Date: 09/27/2018

Viol. Classification: Minor

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.16(a)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.16(b)
30 TAC Chapter 335, SubChapter E 335.112(a)
30 TAC Chapter 335, SubChapter C 335.69(a)(4)(A)

Description: Although facility personnel involved in management of hazardous waste must complete training specified in 40 CFR 265.16(a) and (b), a review of relevant records indicates that three contractors conducted hazardous waste inspections for 6 weeks, 12 weeks, and 9 months, respectively from 9-16 to 12-17 without completing the required training.

Notice of Intent Date: 07/20/2018 (1504862)
No DOV Associated

Notice of Intent Date: 07/20/2018 (1504863)
No DOV Associated

Notice of Intent Date: 07/20/2018 (1504865)
Disclosure Date: 09/27/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT D 262.40(a)
30 TAC Chapter 335, SubChapter A 335.10

Description: A generator must keep a copy of each manifest for three years or until he receives a signed copy from the designated facility that received the waste. The signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. PAR manifests prior to 2017 were destroyed by flooding during Hurricane Harvey.

Notice of Intent Date: 07/20/2018 (1504868)
No DOV Associated

Notice of Intent Date: 07/25/2018 (1506811)
Disclosure Date: 12/15/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: According to the data available for review, no emissions were reported from Coker feed tanks 108 and 109 for the year 2015.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: According to the data available for review, no emissions were reported for Tank 2111 for the year 2015.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: According to the data available for review, no emissions were reported for Tank 2145 for the year 2015.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: According to the data available for review, no emissions were reported for Tank 2900 for the year 2015.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: According to the data available for review, no VOC or PM emissions were reported for the butane storage cooling tower (EPN: CT-C4 STOR) for the year 2015.
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: The EPN Name in the EIQ structure for EPN F-843 is "DCU-843 PM Fugitives"; however, the emissions reported are for the piping fugitive VOC emissions. The PM emissions associated with coke handling is reported under EPN: F-CONVEYOR.

Notice of Intent Date: 07/25/2018 (1506814)
No DOV Associated

Notice of Intent Date: 08/02/2018 (1506388)
Disclosure Date: 09/27/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)

Description: A review of refinery records indicated that the estimated emissions of carbon monoxide (CO) from EPN E-18-FLARE due to MSAT unit maintenance, startup, and shutdown (MSS) activities for 2017 was 0.05 tons. The CO maximum allowable emission rate for EPN E-18-FLARE MSS is 0.02 tons per year.

Notice of Intent Date: 08/02/2018 (1506391)

Disclosure Date: 09/27/2018

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 16

Description: Documentation was not readily available for review relating to the annual revalidation of estimated emissions from the activities listed in Attachment A.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

Description: Emission point numbers for tanks and fugitive emissions used in the MSAT Unit permit application were different than those used for emissions recordkeeping.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

Description: Permit application representations indicated that MSAT Unit MSS emissions would be routed to E-18-FLARE. Due to the flare gas recovery system configuration, these emissions were accounted for in flares 15, 18, and 20.

Notice of Intent Date: 08/02/2018 (1506392)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511042)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511043)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511045)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511046)

Disclosure Date: 08/02/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.480

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1

40 CFR Part 60, Subpart VV 60.482-2

Description: Missed Component Identification and Monitoring - Reactor OH line had 4 valves on a pressure gauge bridge with only one tagged (#4840). The other three had been incorrectly determined to be in natural gas service, but there was a blind in place, so the three untagged valves were in G/V voe service.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)

40 CFR Part 60, Subpart VV 60.482-6

Description: Open-Ended Line Control - Plug was missing from valve #3229 which had only a single valve seat between process and atmosphere and lacked control by plug, cap, blind flange, or double block valves.

Notice of Intent Date: 08/09/2018 (1511047)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511049)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511052)

Disclosure Date: 10/02/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.352(1)(A)

40 CFR Part 60, Subpart VV 60.482-8

Description: Evidence of a leak was found on a valve in the Sat Gas Recovery Unit.

Notice of Intent Date: 08/09/2018 (1511054)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511055)

No DOV Associated

Notice of Intent Date: 08/09/2018 (1511056)
No DOV Associated

Notice of Intent Date: 08/09/2018 (1511057)
No DOV Associated

Notice of Intent Date: 08/09/2018 (1511058)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Part 60, Subpart VV 60.482-6

Description: Open-Ended Line Control - Plug was missing from valve #5793, which had only a single valve seat between process and atmosphere and lacked control by plug, cap, blind flange, or double block valves.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Part 60, Subpart VV 60.482-6

Description: Open-Ended Line Control - Plug was missing from valve #5072, which had only a single valve seat between process and atmosphere and lacked control by plug, cap, blind flange, or double block valves.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Part 60, Subpart VV 60.482-6

Description: Open-Ended Line Control - Plug was missing from valve #5214, which had only a single valve seat between process and atmosphere and lacked control by plug, cap, blind flange, or double block valves.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352(4)
40 CFR Part 60, Subpart VV 60.482-6

Description: Open-Ended Line Control - Plug was missing from valve #4549, which had only a single valve seat between process and atmosphere and lacked control by plug, cap, blind flange, or double block valves.

Notice of Intent Date: 08/16/2018 (1511403)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511405)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511427)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511429)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: OP GTC 8E
PERMIT SC 46G

Description: AVU-146-HIOI CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2016.

Notice of Intent Date: 08/16/2018 (1511431)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: OP GTC 8E
PERMIT SC 46G

Description: AVU-146-HIOI CEMS analyzer zero and span daily 1 calibration records are missing for 2 consecutive days in CY 2016.

Notice of Intent Date: 08/16/2018 (1511432)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511433)

Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Rqmt Prov: OP GTC 8E
PERMIT SC 46G
Description: AVU-146-H-102A CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2016.

Notice of Intent Date: 08/16/2018 (1511454)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511456)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511458)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511459)
No DOV Associated

Notice of Intent Date: 08/16/2018 (1511460)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Rqmt Prov: OP GTC 83
PERMIT SC 46G
Description: DCU-843-H-1 CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2017.

Notice of Intent Date: 08/16/2018 (1511461)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Rqmt Prov: OP GTC 8E
PERMIT SC 46G
Description: DCU-843-H-1 CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2017.

Notice of Intent Date: 08/16/2018 (1511462)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Rqmt Prov: OP GTC 8E
PERMIT SC 46G
Description: DCU-843-H-2 CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2017.

Notice of Intent Date: 08/16/2018 (1511463)
Disclosure Date: 10/02/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 46G
OP STC 8E

Description: DCU-843-H-2 CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2017.

Notice of Intent Date: 08/16/2018 (1511466)

Disclosure Date: 10/02/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: OP GTC 8E
PERMIT SC 46G

Description: DCU-843-H-3 CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2017.

Notice of Intent Date: 08/16/2018 (1511467)

Disclosure Date: 10/02/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: OP GTC 8E
PERMIT SC 46G

Description: DCU-843-H-3 CEMS analyzer zero and span daily calibration records are missing for 2 consecutive days in CY2017.

Notice of Intent Date: 09/06/2018 (1513837)

Disclosure Date: 12/13/2018

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Description: The CEMS Quality Assurance Plan is incomplete and is not in compliance with the applicable quality control requirements.

Notice of Intent Date: 09/06/2018 (1513839)

No DOV Associated

Notice of Intent Date: 09/06/2018 (1513840)

No DOV Associated

Notice of Intent Date: 09/06/2018 (1513857)

No DOV Associated

Notice of Intent Date: 09/06/2018 (1513858)

Disclosure Date: 12/13/2018

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Description: The CEMS Quality Assurance Plan is incomplete and is not in compliance with the applicable quality control requirements.

Notice of Intent Date: 09/06/2018 (1513859)

No DOV Associated

Notice of Intent Date: 09/06/2018 (1513860)

No DOV Associated

Notice of Intent Date: 09/06/2018 (1513861)

Disclosure Date: 12/13/2018

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Description: The CEMS Quality Assurance Plan is incomplete and is not in compliance with the applicable quality control requirements.

Notice of Intent Date: 09/06/2018 (1513864)
Disclosure Date: 12/13/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Description: SRU 546 - 2nd Quarter 2017 Data Assessment Report (DAR) does not include the required QA report for the quarter. A RATA was performed on 4/24/2017 according to facility personnel, but the RATA report is not include in the 2nd Quarter DAR as is required.

Notice of Intent Date: 09/06/2018 (1513865)
Disclosure Date: 12/13/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Description: SRU 546 - 3rd Quarter 2016 Data Assessment Report (DAR) does not include the H2S Cylinder Gas Audit (CGA) report for the CGA that was performed.

Notice of Intent Date: 09/06/2018 (1513867)
No DOV Associated

Notice of Intent Date: 09/06/2018 (1513868)
No DOV Associated

Notice of Intent Date: 09/06/2018 (1513869)
Disclosure Date: 12/13/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Description: The CEMS Quality Assurance Plan is incomplete and is not in compliance with the applicable quality control requirements.

Notice of Intent Date: 09/06/2018 (1513870)
No DOV Associated

Notice of Intent Date: 09/06/2018 (1513871)
Disclosure Date: 12/13/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13
Description: The CEMS Quality Assurance Plan (QAP) is incomplete and is not in compliance with the applicable quality control requirements.

Notice of Intent Date: 09/06/2018 (1513874)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517933)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517935)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517944)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517945)
Disclosure Date: 10/26/2018
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)
Description: Valves were not monitored within 30 days of being placed back in service (MOC 59308).
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)
Description: Valves were not monitored within 30 days of being placed back in service (MOC 60101).
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.352
40 CFR Part 60, Subpart VV 60.482-6
Rqmt Prov: PERMIT SC 50E
Description: One open end line on FV-1323 drain. Drain is equipped with 2 valves. The second valve was open.

Notice of Intent Date: 09/13/2018 (1517946)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517948)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517950)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517952)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517953)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517955)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517958)
No DOV Associated

Notice of Intent Date: 09/13/2018 (1517960)
Disclosure Date: 10/26/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)

Description: Valve was not monitored within 30 days of being placed back in service (MOC 61005).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)

Description: Valve was not monitored within 30 days of being placed back in service (MOC 53082).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)

Description: Valve was not monitored within 30 days of being placed back in service (MOC 55317).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)

Description: Valve was not monitored within 30 days of being placed back in service (MOC 55364).

Notice of Intent Date: 09/20/2018 (1517974)
Disclosure Date: 12/13/2018

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 40.C.6.

Description: Emission Source: E-01-244, Source Description: Heater 244 F-101/102. In accordance with NSR Permit 6825A SC 40.C.6, stack testing shall occur every five years. The two most recent stack test records on file for EPN E-01-244 are dated February 10, 2006 and November 17, 2017. The time between the two most recent stack test records on file exceeds five years, and in an abundance of caution the refinery is including

this issue in this disclosure.

Notice of Intent Date: 09/20/2018 (1517975)
No DOV Associated

Notice of Intent Date: 09/20/2018 (1517977)
No DOV Associated

Notice of Intent Date: 09/20/2018 (1517978)
Disclosure Date: 12/13/2018

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 40.A.

Description: Emission Source: E-01-SCOT Source Description: SRU TGI 543. A record of the pre-test notification was not readily available on file for the stack test conducted on April 2, 2016. The notification is typically required to be submitted at least 45 days prior to testing (February 17, 2016), and in an abundance of caution the refinery is including this issue in this disclosure.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 40.A.

Description: Emission Source: E-02-SCOT Source Description: SRU TGI 544 A record of the pre-test notification was not readily available on file for the stack test conducted on October 23, 2016. The notification is typically required to be submitted at least 45 days prior to testing (September 8, 2016), and in an abundance of caution the refinery is including this issue in this disclosure.

Viol. Classification: Minor

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

Description: Emission Source: E-01-SCOT Source Description: SRU TGI 543 In accordance with NSR Permit 6825A SC 40.C.6, stack testing shall occur every five years. The most recent two stack test records on file for EPN E-01-SCOT are dated October 13, 2009 and April 2, 2016. The time between the two most recent stack test records on file exceeds five years, and in an abundance of caution the refinery is including this issue in this disclosure.

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 40.C.6.

Description: Emission Source: E-02-SCOT Source Description: SRU TGI 544 In accordance with NSR Permit 6825A SC 40.C.6, stack testing shall occur every five years. The most recent two stack test records on file for EPN E-02-SCOT are dated October 14, 2009 and October 23, 2016. The time between the two most recent stack test records on file exceeds five years, and in an abundance of caution the refinery is including this issue in this disclosure.

Notice of Intent Date: 09/20/2018 (1517979)

No DOV Associated

Notice of Intent Date: 09/20/2018 (1517981)

Disclosure Date: 12/13/2018

Viol. Classification: Minor

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

Rqmt Prov: PERMIT SC 40.C.6.

Description: Emission Source: E-01-246 Source Description: Heater 246-HI In accordance with NSR Permit 6825A SC 40.C.6, stack testing shall occur every five years. The two most recent stack test records on file for EPN E-01-246 are dated March 20, 2007 and April 29, 2017. The time between the two most recent stack test records on file exceeds five years, and in an abundance of caution the refinery is including this issue in this disclosure.

Notice of Intent Date: 09/20/2018 (1517983)

No DOV Associated

Notice of Intent Date: 09/27/2018 (1518857)

No DOV Associated

Notice of Intent Date: 09/27/2018 (1518858)

No DOV Associated

Notice of Intent Date: 10/04/2018 (1523186)

No DOV Associated

Notice of Intent Date: 10/04/2018 (1523187)

Disclosure Date: 10/26/2018

Viol. Classification: Minor

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

Rqmt Prov: OP SC 3(iv)3

OP SC 4

Description: Records were not readily available to show that quarterly visible emissions observations were being conducted periodically on Heater 843 F-1000 (EPN: E-01-843). In an abundance of caution the refinery is including this audit finding.

Viol. Classification: Minor

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

Rqmt Prov: OP SC 4

OP SC. 3(iv)(3)

Description: Records were not readily available to show that quarterly visible emissions observations were being conducted periodically on Heater 843 F-2000 (EPN: E-02-843). In an abundance of caution the refinery is including this audit finding.

Viol. Classification: Minor

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

Rqmt Prov: OP SC (4)
OP SC 3(iv)(3)

Description: Records were not readily available to show that quarterly visible emissions observations were being conducted periodically on Heater F-3000 (EPN: E-03-843). In an abundance of caution the refinery is including this audit finding.

Notice of Intent Date: 10/04/2018 (1523188)
No DOV Associated

Notice of Intent Date: 10/04/2018 (1523189)
No DOV Associated

Notice of Intent Date: 10/04/2018 (1523190)
No DOV Associated

Notice of Intent Date: 10/04/2018 (1523191)
No DOV Associated

Notice of Intent Date: 10/04/2018 (1523192)
No DOV Associated

Notice of Intent Date: 10/04/2018 (1523193)
Disclosure Date: 12/13/2018

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)

Description: A valve was not monitored within 30 days of being placed back into service (MOC 31442).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)

Description: A valve was not monitored within 30 days of being placed back into service (MOC 55122).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)

Description: A valve was not monitored within 30 days of being placed back into service (MOC 56083).

Notice of Intent Date: 10/04/2018 (1523194)
No DOV Associated

Notice of Intent Date: 10/04/2018 (1523195)
Disclosure Date: 12/13/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

Rqmt Prov: PERMIT SC 50

Description: In May of 2012 Unit AVU-146 Naphtha Towers T-102 and T-103 were removed from service per MOC 26056. All LOAR tags were subsequently removed from the LOAR database. About 4 years later, in October 2016, Naphtha Towers T-102 and T-103 were placed back in service. From October 2016 through October 2018, the LOAR components associated with T-102 and T-103 were in service but not tagged or monitored.

Notice of Intent Date: 10/11/2018 (1523374)
Disclosure Date: 01/18/2019
Viol. Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.145(d)
30 TAC Chapter 117, SubChapter B 117.145(f)

Description: Units subject to monitoring requirements in Chapter 117 should report any emission exceedances semiannually, and records must be available upon request. Semiannual reports for the audit period 1/2014 - 12/2017 were not readily available for review.

Notice of Intent Date: 10/18/2018 (1524200)
No DOV Associated

Notice of Intent Date: 10/18/2018 (1524201)
No DOV Associated

Notice of Intent Date: 10/18/2018 (1524202)
No DOV Associated

Notice of Intent Date: 10/25/2018 (1524891)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Notice of Intent Date: 10/25/2018 (1524893)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Notice of Intent Date: 10/25/2018 (1524894)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC. 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524895)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524898)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524899)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524900)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524901)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524902)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a Quality Control (QC) program for each CEMS source as required by 40 CFR 60, Appendix F.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Notice of Intent Date: 10/25/2018 (1524903)

Disclosure Date: 12/20/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.13

Rqmt Prov: PERMIT SC 53.G.

Description: Successive quarterly audits shall occur no closer than 2 months apart. The 2017 Q1 (3/1/2017) and 2017 Q2 (4/25/2017) audits were conducted closer than 2 months apart

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 160, SubChapter E, PT 160, SubPT G 160.130

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a quality control program for each CEMS source as required by 40 CRR 60, Appendix F.

Disclosure Date: 01/18/2019

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 160, SubChapter E, PT 160, SubPT G 160.130

Rqmt Prov: PERMIT SC 53.G.

Description: The facility has not updated and implemented a quality control program for each CEMS source as required by 40 CRR 60, Appendix F.

Notice of Intent Date: 02/14/2019 (1549012)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549849)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549851)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549853)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549854)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549960)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549962)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549963)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549964)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549966)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549967)
No DOV Associated

Notice of Intent Date: 02/21/2019 (1549968)

No DOV Associated

Notice of Intent Date: 02/21/2019 (1549969)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551578)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551579)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551580)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551581)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551583)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551593)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551594)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551595)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551596)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551597)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551598)
No DOV Associated

Notice of Intent Date: 03/07/2019 (1551599)
No DOV Associated

Notice of Intent Date: 03/21/2019 (1552724)
No DOV Associated

Notice of Intent Date: 03/21/2019 (1552725)
Disclosure Date: 06/19/2019

Viol. Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.144

Description: Records of monthly monitoring activities were not readily available on March 28, 2019, to document inspections showing that the degreaser covers were closed when not in use at GRP- WASH1 and GRP-WASH2.

Notice of Intent Date: 03/28/2019 (1553587)
No DOV Associated

Notice of Intent Date: 04/18/2019 (1556172)
No DOV Associated

Notice of Intent Date: 04/18/2019 (1556173)
No DOV Associated

Notice of Intent Date: 04/18/2019 (1556174)
Disclosure Date: 10/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.106a(a)(6)(i)(E)

Description: Based on the records available for review, it appears that not all required flare flow meter biennial

recalibrations were completed during the review period. The last OSI flowmeter recalibration appears to have been performed in 2015; therefore, the 2017 calibrations were likely missed.

Notice of Intent Date: 04/18/2019 (1556177)
Disclosure Date: 10/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568(a)(1)

Description: Field observation indicates sulfur pit vapors are potentially not continuously controlled.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.108(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(c)

Description: Based on records available for review, it appears that not all instances of analyzer issues were reported as analyzer downtime/maintenance in the semi-annual report CEMS performance summary.

Notice of Intent Date: 04/18/2019 (1556180)

Disclosure Date: 10/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.108a(b)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)

Description: A startup notification for the Merichem Flare was not submitted within 15 days of startup.

Notice of Intent Date: 04/18/2019 (1556182)

No DOV Associated

Notice of Intent Date: 04/18/2019 (1556189)

Disclosure Date: 10/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1569(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1576(d)

Description: The semi-annual deviation report misidentified valve HV-2682 as a control bypass for SRU 546. The actual valve was 2806. For compliance purposes, the correct valve (2806) is the one which properly had been reviewed and is now currently being reviewed. The semi-annual report and OMMP need to be updated.

Notice of Intent Date: 04/18/2019 (1556191)

Disclosure Date: 10/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1572(c)(1)

Description: Records were not readily available for the MACT UUU CPMS annual calibration checks for the FCC, CO2, O2, and CO monitors.

Notice of Intent Date: 04/18/2019 (1556197)

Disclosure Date: 10/18/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1572(c)(1)

Description: Records were not readily available for the MACT UUU CPMS annual calibration checks for the CRU temperature sensors.

Notice of Intent Date: 04/25/2019 (1557017)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557018)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557020)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557021)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557024)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557028)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557029)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557030)

No DOV Associated

Notice of Intent Date: 04/25/2019 (1557031)
No DOV Associated

Notice of Intent Date: 04/25/2019 (1557032)
No DOV Associated

Notice of Intent Date: 04/25/2019 (1557034)
No DOV Associated

Notice of Intent Date: 04/25/2019 (1557035)
No DOV Associated

Notice of Intent Date: 05/02/2019 (1557769)
No DOV Associated

Notice of Intent Date: 05/09/2019 (1558709)
No DOV Associated

Notice of Intent Date: 05/09/2019 (1558710)
No DOV Associated

Notice of Intent Date: 05/09/2019 (1558712)
No DOV Associated

Notice of Intent Date: 05/09/2019 (1558713)
No DOV Associated

Notice of Intent Date: 05/09/2019 (1558716)
Disclosure Date: 09/19/2019
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.354
30 TAC Chapter 115, SubChapter D 115.357

Description: Discovered valves in VOC service that were incorrectly designated as Temporarily Out of Service (TOS).
Valves were intermittently submerged under rain water and not consistently monitored quarterly.

Notice of Intent Date: 05/09/2019 (1558719)
Disclosure Date: 09/19/2019
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGGa 60.592a(a)

Description: Discovered valves in VOC service that were incorrectly designated as Temporarily Out of Service (TOS).
Valves were intermittently submerged under rain water and not consistently monitored quarterly.

Notice of Intent Date: 05/09/2019 (1558720)
Disclosure Date: 09/19/2019
Viol. Classification: Minor
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 50F
PERMIT SC No. 50F

Description: Discovered valves in VOC service that were incorrectly designated as Temporarily Out of Service (TOS).
Valves were intermittently submerged under rain water and not consistently monitored quarterly.

Notice of Intent Date: 05/09/2019 (1558721)
Disclosure Date: 09/19/2019
Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.590(a)(3)

Description: Discovered valves in VOC service that were incorrectly designated as Temporarily Out of Service (TOS).
Valves were intermittently submerged under rain water and not consistently monitored quarterly.

Notice of Intent Date: 05/16/2019 (1569202)
Disclosure Date: 09/19/2019
Viol. Classification: Minor
Citation: 5B THSC Chapter 361, SubChapter A 361.343(a)(1)

5B THSC Chapter 361, SubChapter A 361.343(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(b)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(i)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)(3)

Description: At the Oily Residuals Recycling Facility (ORRF), some of the ORRF vessels such as the centrifuge and the DAF may not have been controlled adequately. Additionally, some of the control devices may not have adequate performance demonstration documentation.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(b)(5)

Description: Drain system components, specifically junction boxes or lift stations, had leaks.

Notice of Intent Date: 05/30/2019 (1571025)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571027)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571031)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571032)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571034)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571037)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571038)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571040)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571041)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571042)
No DOV Associated

Notice of Intent Date: 05/30/2019 (1571044)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575944)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575945)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575949)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575950)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575951)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575952)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575953)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(g)(9)(iv)

Description: MACT CC periodic reports for 2015-2018 did not include the total strippable hydrocarbon concentration measured during re-monitoring to verify repair as required by 40 CFR 63.6655(g)(9)(iv) for instances when leaks were detected through cooling tower monitoring.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(g)(9)

Description: Cooling Towers 101 and 136A each had a record of a leak in May 2018 that triggered a timely repair, but was not included on the MACT CC periodic report dated July 30, 2018.

Notice of Intent Date: 06/13/2019 (1575954)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)

Description: Notification of compliance status report was not submitted by May 25th, 2019 (150 days after the maintenance vent compliance date, December 26, 2018).

Notice of Intent Date: 06/13/2019 (1575955)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)

Description: Notification of compliance status report was not submitted by May 25th, 2019 (150 days after the maintenance vent compliance date, December 26, 2018).

Notice of Intent Date: 06/13/2019 (1575956)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)

Description: Notification of compliance status report was not submitted by May 25th, 2019 (150 days after the maintenance vent compliance date, December 26, 2018).

Notice of Intent Date: 06/13/2019 (1575957)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)

Description: Notification of compliance status report was not submitted by May 25th, 2019 (150 days after the maintenance vent compliance date, December 26, 2018).

Notice of Intent Date: 06/13/2019 (1575958)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)

Description: Notification of compliance status report was not submitted by May 25th, 2019 (150 days after the maintenance vent compliance date, December 26, 2018).

Notice of Intent Date: 06/13/2019 (1575959)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)

Description: Notification of compliance status report was not submitted by May 25th, 2019 (150 days after the maintenance vent compliance date, December 26, 2018).

Notice of Intent Date: 06/13/2019 (1575974)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575975)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575977)
No DOV Associated

Notice of Intent Date: 06/13/2019 (1575978)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(h)

Description: Documentation of past 2-hr VE determinations for Flare 5 was not identified during audit.

Notice of Intent Date: 06/14/2019 (1576024)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576025)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576029)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576031)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576036)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576039)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576043)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576044)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576045)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576046)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576106)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576108)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576110)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576111)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576115)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576120)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 433 Light Liquid Sample Station (in liquid service).

Viol. Classification: Minor

requirements at some locations in Unit 433 V15 A/B Propane Lead Sample Station (in Vapor service).

Notice of Intent Date: 06/14/2019 (1576123)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576128)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576132)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576133)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 6341, including the Isobutane Sample Station (in Vapor service).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 6341, including the Gas Oil Grade Bottoms Sample Station (in Vapor service).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 6341, including the Deisobutanizer Charge Sample Station (in Vapor service).

Notice of Intent Date: 06/14/2019 (1576134)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576137)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576138)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576139)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576140)
No DOV Associated

Notice of Intent Date: 06/14/2019 (1576141)
No DOV Associated

Notice of Intent Date: 06/20/2019 (1576619)
No DOV Associated

Notice of Intent Date: 07/02/2019 (1578518)
Disclosure Date: 12/12/2019

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Valero discovered that sampling connection systems did not fully 40 CFR Subpart CC comply with closed-loop sampling requirements at some locations in Unit 1344, including the V4 Platformer Gas Separator Sample Station (in Vapor service).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 1344, including the Butane Sample Station (in Vapor service).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 1344, including the Net Hydrogen Offgas Sample Station (in Vapor service).

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Valero discovered that sampling connection systems did not fully comply with closed-loop sampling requirements at some locations in Unit 1344, including the Depropanizer OVHD Sample Station (in Vapor service).

Notice of Intent Date: 08/15/2019 (1590360)

Disclosure Date: 11/12/2019

Viol. Classification: Moderate

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 1

Description: Crude storage tank (TK 106) was over the voe TPY 12-month rolling average limit from August 2018 until January 2019.

Viol. Classification: Minor

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

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC 1

Description: Crude storage tank (TK 111) was over the VOC TPY 12-month rolling average limit in July 2019.

Notice of Intent Date: 01/30/2020 (1625220)

No DOV Associated

Notice of Intent Date: 01/30/2020 (1625223)

Disclosure Date: 08/18/2020

Viol. Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter B 117.145(d)

Description: The H-101 bypass stacks did not have performance reports or summary reports submitted in the semiannual reports provided.

Notice of Intent Date: 01/30/2020 (1625224)

No DOV Associated

Notice of Intent Date: 02/07/2020 (1629612)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631822)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631826)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631833)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631834)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631837)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631839)

No DOV Associated

Notice of Intent Date: 02/13/2020 (1631841)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631846)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631847)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631849)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631853)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631855)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631861)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631865)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631866)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631869)
No DOV Associated

Notice of Intent Date: 02/13/2020 (1631870)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631878)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631879)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631880)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631881)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631882)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631883)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631884)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631886)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631888)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631891)
No DOV Associated

Notice of Intent Date: 02/20/2020 (1631892)

No DOV Associated
Notice of Intent Date: 02/20/2020 (1631893)
No DOV Associated
Notice of Intent Date: 02/27/2020 (1632434)
No DOV Associated
Notice of Intent Date: 02/27/2020 (1632435)
No DOV Associated
Notice of Intent Date: 02/27/2020 (1632436)
No DOV Associated
Notice of Intent Date: 03/05/2020 (1633740)
No DOV Associated
Notice of Intent Date: 03/05/2020 (1633743)
No DOV Associated
Notice of Intent Date: 03/05/2020 (1633748)
No DOV Associated
Notice of Intent Date: 03/10/2020 (1637635)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637682)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637685)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637688)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637690)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637691)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637693)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637694)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637696)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637697)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637699)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637700)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637702)
No DOV Associated
Notice of Intent Date: 03/12/2020 (1637703)
No DOV Associated

Notice of Intent Date: 03/12/2020 (1637704)
No DOV Associated

Notice of Intent Date: 03/12/2020 (1637705)
No DOV Associated

Notice of Intent Date: 03/12/2020 (1637707)
No DOV Associated

Notice of Intent Date: 03/12/2020 (1637708)
No DOV Associated

Notice of Intent Date: 03/12/2020 (1637710)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639372)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639391)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639392)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639393)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639397)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639401)
No DOV Associated

Notice of Intent Date: 03/26/2020 (1639403)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644418)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644419)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644422)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644426)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644428)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644431)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644432)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644434)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644435)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644436)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644441)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644442)
No DOV Associated

Notice of Intent Date: 04/09/2020 (1644444)
No DOV Associated

Notice of Intent Date: 04/30/2020 (1646013)
No DOV Associated

Notice of Intent Date: 04/30/2020 (1646014)
No DOV Associated

Notice of Intent Date: 04/30/2020 (1646015)
No DOV Associated

Notice of Intent Date: 04/30/2020 (1646016)
No DOV Associated

Notice of Intent Date: 04/30/2020 (1646017)
No DOV Associated

Notice of Intent Date: 04/30/2020 (1646018)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646800)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646801)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646802)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646804)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646805)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646806)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646807)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646808)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646809)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1646810)
No DOV Associated

Notice of Intent Date: 05/14/2020 (1650469)
No DOV Associated

Notice of Intent Date: 05/21/2020 (1651459)

No DOV Associated

Notice of Intent Date: 05/21/2020 (1708548)
No DOV Associated

Notice of Intent Date: 06/19/2020 (1658357)
Disclosure Date: 09/04/2020

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: The particulate emissions with a size less than 2.5 microns (PM2.5) from the FCCU Wet Gas Scrubber (WGS) were underreported. The PM2.5 factor was incorrectly calculated in the workbook "Pages from Nov 8, 2017 Valero PAR (FCCU-1241 WGS) Performance Test Report.xlsx" found in the folder for the 2017 Emission Inventory information. The calculated front-half contribution to the total PM2.5 emission factor was incorrectly divided by 100.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Particulate matter (PM/PM10/PM2.5) from the coker steam vents (EPN CSV843) were not reported. The particulate matter emissions were added to NSR permit 6825a in an amendment that was issued in September 2018 but inadvertently not included in the emissions inventory.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: During review of the tank roof fitting information the following issues were discovered: 1) The fitting factors for slotted guidepoles were entered into ValAir; however, the number of slotted guidepoles for each tank is zero; and 2) The number of access hatches, legs, and vacuum breakers are entered into ValAir; however, the fitting factors are not entered. These errors result in an under-reporting of emissions. This concerns TK0078 New", "TK0088 New", "TK2588 new", & "TK2590 New".

Notice of Intent Date: 06/19/2020 (1658358)
Disclosure Date: 09/04/2020

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Emissions were underreported for heater 146-H101 due to incorrect fuel flow data being used in the emission calculations.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Emissions for heaters 241-B101AB and 242-8201AB were underreported because fuel data used in the emission calculations was in the incorrect units which caused the error.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: The particulate emissions with a size less than 2.5 microns (PM2.5) from the FCCU Wet Gas Scrubber (WGS) were underreported. The PM2.5 factor was incorrectly calculated in the workbook "Pages from Nov 8, 2017 Valero PAR (FCCU-1241 WGS) Performance Test Report.xlsx" found in the folder for the 2017 Emission Inventory information. The calculated front-half contribution to the total PM2.5 emission factor was incorrectly divided by 100

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Particulate matter (PM/PM10/PM2.5) from the coker steam vents (EPN CSV843) were not reported. The particulate matter emissions were added to NSR permit 6825a in an amendment that was issued in September 2018; however, it was inadvertently not included in the emissions inventory.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Emissions were underreported from tanks "TK0078 New", "TK0088 New", "TK2588 new", and "TK2590 New". During review of the tank roof fitting information the following issues were discovered: 1) The fitting factors for slotted guidepoles were entered into ValAir; however, the number of slotted guidepoles for each tank is zero; and 2) The number of access hatches, legs, and vacuum breakers are entered into ValAir; however, the fitting factors are not entered.

Notice of Intent Date: 06/19/2020 (1658359)
Disclosure Date: 09/04/2020

Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: The particulate emissions with a size less than 2.5 microns (PM2.5) from the FCCU Wet Gas Scrubber (WGS) were underreported. The PM2.5 factor was incorrectly calculated in the workbook "Pages from Nov 8, 2017 Valero PAR (FCCU-1241 WGS) Performance Test Report.xlsx" found in the folder for the 2017 Emission Inventory information. The calculated front-half contribution to the total PM2.5 emission factor was incorrectly divided by 100.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Hexane emissions were inadvertently not reported for Flare 103. The emission calculations do calculate hexane emissions from the flare.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Particulate matter (PM/PM10/PM2.5) from the coker steam vents (EPN CSV843) were inadvertently not reported. The particulate matter emissions were added to NSR permit 6825a in an amendment that was issued in September 2018.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: The emissions were underreported from tanks "TK0078 New", "TK0088 New", "TK2588 new", and "TK2590 New". During review of the tank roof fitting information the following issues were discovered: 1) The fitting factors for slotted guidepoles were entered into ValAir; however, the number of slotted guidepoles for each tank is zero; and 2) The number of access hatches, legs, and vacuum breakers are entered into ValAir; however, the fitting factors are not entered.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Tanks TK1790 and TK1791 were added to ValAir and emissions were calculated for 2019. However, the calculated emissions were inadvertently not included in the emission inventory submittal to the TCEQ.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Several engines were added to ValAir and emissions were reported in the 2019 emission inventory. However, PM2.5 emissions were not reported. All particulate emissions from an engine are considered to be less than PM2.5; therefore, the PM2.5 emissions will equal the PM10 emissions that were reported.

Notice of Intent Date: 07/16/2020 (1665765)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665768)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665770)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665772)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665773)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665775)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665776)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665778)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665780)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665781)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665783)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665784)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665785)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665786)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665787)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665788)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665789)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665790)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665791)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665792)

No DOV Associated

Notice of Intent Date: 07/16/2020 (1665793)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665794)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665795)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665796)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665797)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665798)
No DOV Associated

Notice of Intent Date: 07/16/2020 (1665799)
No DOV Associated

Notice of Intent Date: 08/24/2020 (1671653)
No DOV Associated

Notice of Intent Date: 08/24/2020 (1671654)
No DOV Associated

Notice of Intent Date: 09/01/2020 (1672645)
Disclosure Date: 01/21/2021

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)

Rqmt Prov: PERMIT SC 60

Description: The database review identified 1614 connectors in Unit F-1747 that were missing quarterly monitoring events after 1/1/2016.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 116, SubChapter B 116.110

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)(i)

Rqmt Prov: PERMIT SC 58.F.

Description: Twelve (12) components in heavy liquid service according to the LeakDas database were identified in the field as being in light liquid service in the HCU 943.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.486a(g)

Description: A total of six (6) OELs were discovered within the refinery at the Reformer 1344 (1), Delayed Coking Unit (2), Tank Farm (2) and the FCCU (1).

Notice of Intent Date: 06/04/2021 (1725216)
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

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
THE PREMCO REFINING
GROUP INC.
RN102584026**

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§
§
§
§
§

**BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2021-0982-AIR-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding The Premcor Refining Group Inc. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a petroleum refinery located at 1801 Gulfway Drive in Port Arthur, Jefferson County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$12,500 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$10,000 of the penalty and \$2,500 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN.

CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

II. ALLEGATIONS

During a record review conducted on June 25, 2021, an investigator documented that the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, Special Conditions No. 1, Federal Operating Permit No. O1498, General Terms and Conditions and Special Terms and Conditions No. 22, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 12,207.9 pounds of volatile organic compounds as fugitive emissions, during an emissions event (Incident No. 358082) that began on May 11, 2021 and lasted 34 hours and 27 minutes. The emissions event occurred due to a design flaw in the level instrument configuration that caused the Alkylate Product Tank 2110 to overfill and spill into the secondary containment, resulting in the release to the atmosphere. Since the emissions event was not caused by a sudden unavoidable breakdown of equipment or process beyond the control of the owner or operator and could have been avoided by better design and/or better operational and maintenance practices, the Respondent is precluded from asserting an affirmative defense under 30 TEX. ADMIN. CODE § 101.222.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: The Premcor Refining Group Inc., Docket No. 2021-0982-AIR-E" to:

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

2. The Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Order, implement measures and/or procedures designed to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 358082.
 - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Air Section Manager
Beaumont Regional Office
Texas Commission on Environmental Quality
3870 Eastex Freeway
Beaumont, Texas 77703-1830

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.

5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

5/2/2022

Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

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

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

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



Signature

10-7-21

Date

Mark Skobel
Name (Printed or typed)
Authorized Representative of
The Premcor Refining Group Inc.

VP and General Manager

Title

If mailing address has changed, please check this box and provide the new address below:

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