TCEQ Interoffice Memorandum

То:	Mary Smith, General Counsel
Thru: <i>^{MB(}</i>	² Melissa Cordell, Assistant Deputy Director Enforcement Division
From: MP	Michael Parrish, Team Leader Special Functions Team
Date:	August 22, 2024
Subject:	Backup Revision August 28, 2024 Commission Agenda

Item No. 13 – The Premcor Refining Group, Inc. Docket No. 2021-1634-AIR-E

Enclosed please find the following:

Penalty Calculation Worksheet

• Page 1, Penalty Calculation Section – Correct the calculations for the Total Base Penalty, Adjustments to Subtotal, Sum of Subtotals, Final Penalty Amount, Final Assessed Penalty, and Payable Penalty.

Please do not hesitate to call Michael Parrish at (512) 239-2548 if you have any questions regarding this matter.

 cc: Garrett Arthur, Public Interest Counsel Melissa Schmidt, Public Interest Counsel Gill Valls, Office of General Counsel Katherine McKenzie, Agenda Coordinator, Litigation Division Amy Settemeyer, Deputy Director, Enforcement Division Melissa Cordell, Assistant Deputy Director, Enforcement Division Rebecca Margain-Nunez, Executive Assistant, Enforcement Division Brett Lanham, Manager, Special Functions and Compliance Monitoring, Enforcement Division Michael De La Cruz, Manager, Air Section, Enforcement Division Danielle Porras, Technical Specialist, Air Section, Enforcement Division

Policy R	Penalty Calculat vision 5 (January 28, 2021)	ion Workshe	`	vision February 11, 2021				
DATES Assigned PCW	6-Dec-2021 13-May-2024 Screening 16-Dec-20	21 EPA Due						
RESPONDENT/FACIL								
Respondent	The Premcor Refining Group Inc.							
Reg. Ent. Ref. No. Facility/Site Region		Major/Mine	or Source Major					
CASE INFORMATION								
Enf./Case ID No.			/iolations <mark>7</mark>					
Docket No. Media Program(s)	2021-1634-AIR-E Air	OI Government/N	rder Type <mark>Findings</mark> Ion-Profit No					
Multi-Media			ordinator Danielle Porra C's Team Enforcement 1					
Admin. Penalty \$	imit Minimum \$0 Maximum							
	/	ulation Section)					
TOTAL BASE PENA	LTY (Sum of violation base pe	nalties)	Subtotal 1	<u>\$72,750</u>				
ADJUSTMENTS (+	(-) TO SUBTOTAL 1 rained by multiplying the Total Base Penalty (Subt	atal 1) by the indicated perc	ontago					
Compliance Hi	, ,, , , , , , , , , , , , , , , , , , ,		<u>Subtotals 2, 3, & 7</u>	<u>-\$7,275</u>				
Notes	Notes Since the enhancement for four NOVs with same/similar violations, three NOVs with dissimilar violations, and three orders containing a denial of liability and the reduction for 225 Notices of Intent to conduct an audit and 31 Disclosures of Violations is below zero, the Adjustment Percentage (Subtotal 2) defaults to zero. Reduction for High Performer classification.							
Culpability	No 0. ()% Enhancement	Subtotal 4	\$0				
Notes	The Respondent does not meet	the culpability criteria	.					
Good Faith Eff	rt to Comply Total Adjustments		Subtotal 5	-\$17,062				
Economic Ben)% Enhancement*	Subtotal 6	\$0				
Estimated	Total EB Amounts \$588 *C Cost of Compliance \$62,750	apped at the Total EB \$ Amc	bunt					
SUM OF SUBTOTA	S 1-7		Final Subtotal	<u>\$48,413</u>				
OTHER FACTORS	S JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0				
Reduces or enhances the Fina	Subtotal by the indicated percentage.							
Notes								
			Final Penalty Amount	<u>\$48,413</u>				
STATUTORY LIMI	ADJUSTMENT	F	Final Assessed Penalty	<u>\$48,413</u>				
DEFERRAL		0.0%	Reduction Adjustment	\$0				
	alty by the indicated percentage.							
Notes	No deferral is recommended	for Findings Orders.						
PAYABLE PENALT	•			<u>\$48,413</u>				

A ROUMENTAL OF	Policy	Pe Revision 5 (January 28	nalty Cal	culatio	n Works	heet (PC	,	ision February 11, 2021
DATES	Assigned	6-Dec-2021						
	PCW		Screening 1	6-Dec-2021	EPA Due			
RESPO	NDENT/FACTI	ITY INFORMATI	ON					
KLSF U		The Premcor Ref		_				
	g. Ent. Ref. No	RN102584026					-	
Facili	ty/Site Regior	10-Beaumont			Major/I	Minor Source	Major	
CASE I	NFORMATION							
	f./Case ID No				No.	of Violations		
		2021-1634-AIR-	E		6	Order Type		
мес	lia Program(s) Multi-Media					t/Non-Profit Coordinator	Danielle Porras	3
		-					Enforcement T	
Adı	min. Penalty \$	Limit Minimum	\$0 M	aximum	\$25,000			
			,		tion Secti	ion		
ΤΟΤΑ	L BASE PEN	ALTY (Sum of	violation ba	ase penal	ties)		Subtotal 1	\$72,750
ADJU	STMENTS (+	-/-) TO SUBTO	OTAL 1					
	Subtotals 2-7 are of	obtained by multiplying		, ,				+7 075
	Compliance H	Since the enhand		-10.0%	Adjustment		tals 2, 3, & 7	-\$7,275
	Note:	NOVs with dissi liability and the and 31 Dise	imilar violations, reduction for 2 closures of Viola btotal 2) default	, and three o 25 Notices o itions is belo	orders containing of Intent to cond w zero, the Ad	ng a denial of duct an audit justment		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	5 The Re	spondent does r	not meet the	culpability crit	eria.		
	Cood Faith Ef	fort to Comply T		nto			Subtatal E	¢17.062
	GOOD Faith Er	fort to Comply T	otal Aujustme	nts			Subtotal 5	-\$17,062
	Faculta Day	- 6 h		0.00/			Subtatal C	*0
	Economic Ber	Total EB Amounts	\$588		Enhancement* d at the Total EB \$	Amount	Subtotal 6	\$0
	Estimate	d Cost of Compliance	\$62,750					
SUM (151-7				F	inal Subtotal	\$48,413
5011							mai Subtotai	<i>ų</i> 10/120
OTHE	R FACTORS	AS JUSTICE M	1AY REQUIR	E	0.0%		Adjustment	\$0
Reduces of	or enhances the Fin	al Subtotal by the indic	cated percentage.				1	
	Notes							
						Final Per	alty Amount	\$48,413
STAT	UTORY LIMI		NT			Final Asse	ssed Penalty	\$48,413
DEFE	RRAL				0.0%	Reduction	Adjustment	\$0
		enalty by the indicated	d percentage.				1	
	Notes	No c	leferral is recom	mended for	Findings Order	S.		
DAVA	BLE PENALT	v						+ 40 410
PATA	DLE PENALI							\$48,413

Executive Summary – Enforcement Matter – Case No. 61710 The Premcor Refining Group Inc. RN102584026 Docket No. 2021-1634-AIR-E

Order Type: Findings Agreed Order Findings Order Justification: People or environmental receptors have been exposed to pollutants which exceed levels that are protective Media: AIR **Small Business:** No Location(s) Where Violation(s) Occurred: Valero Port Arthur Refinery, 1801 Gulfway Drive, Port Arthur, Jefferson County **Type of Operation:** Petroleum refinery **Other Significant Matters:** Additional Pending Enforcement Actions: Yes, Docket Nos. 2024-0289-AIR-E and 2024-0434-AIR-E Past-Due Penalties: No Other: N/A Interested Third-Parties: None Texas Register Publication Date: July 5, 2024 Comments Received: No

Penalty Information

Total Penalty Assessed: \$48,413
Total Paid to General Revenue: \$24,207
Total Due to General Revenue: \$0
Payment Plan: N/A
Supplemental Environmental Project ("SEP") Conditional Offset: \$24,206
Name of SEP: Southeast Texas Regional Planning Commission (Third-Party Pre-Approved)
Compliance History Classifications:
Person/CN - High
Site/RN - High
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 1, 2021, October 29, 2021, December 20, 2021, January 20, 2022, January 25, 2022, and June 14, 2022 **Date(s) of NOE(s):** June 30, 2021, November 30, 2021, January 21, 2021, February 4, 2022, March 14, 2022, and July 1, 2022

Executive Summary – Enforcement Matter – Case No. 61710 The Premcor Refining Group Inc. RN102584026 Docket No. 2021-1634-AIR-E

Violation Information

1. Failed to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 25, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 01498, GTC and STC No. 2.F., and TEX. HEALTH & SAFETY CODE § 382.085(b)].

4. Failed to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

5. Failed to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

6. Failed to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7. Failed to prevent unauthorized emissions [30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. 01498, GTC and STC No. 25, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

Executive Summary – Enforcement Matter – Case No. 61710 The Premcor Refining Group Inc. RN102584026 Docket No. 2021-1634-AIR-E

a. By March 25, 2021, upgraded the spring metallurgy for Pressure Safety Valve 9115 to Inconel in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 351934;

b. By October 22, 2021, removed and demolished the switchover structure and all associated breakers in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 368444;

c. On November 1, 2021, submitted the initial notification for Incident No. 369505;

d. By November 9, 2021, performed a review of every unit's Intellatrac rounds, verified that the pumps on oil mist included manual draining of the reclassifier, and implemented a lock nut procedure for fabricated thrust bearing jigs in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 359960;

e. By December 30, 2021, added a step to the One Riser Operation procedure to coordinate with the Gas Oil Hydrotreater Unit personnel to raise the charge rate to provide a higher proportion of hot feed to the Fluid Catalytic Cracking Unit in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 369505;

f. By January 17, 2022, removed the indicator light from the circuit in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 371549; and

g. By August 25, 2022, repaired Flow Control Valve 1232, returned the Fluidized Catalytic Cracking Unit 1241 Main Fractionator to stable operation, and implemented an emergency procedure "High Level in Distillate Drums or Loss of Distillate Pumps" in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 378545.

Technical Requirements:

The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Danielle Porras, Enforcement Division, Enforcement Team 2, MC R-12, (713) 767-3682; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

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

SEP Third-Party Administrator: Southeast Texas Regional Planning Commission, Transportation & Environmental Resources, 2210 Eastex Freeway, Beaumont, Texas 77703

Respondent: Jerry D. Stumbo, General Manager and Vice President, The Premcor Refining Group Inc., P.O. Box 909, Port Arthur, Texas 77641 **Respondent's Attorney:** N/A

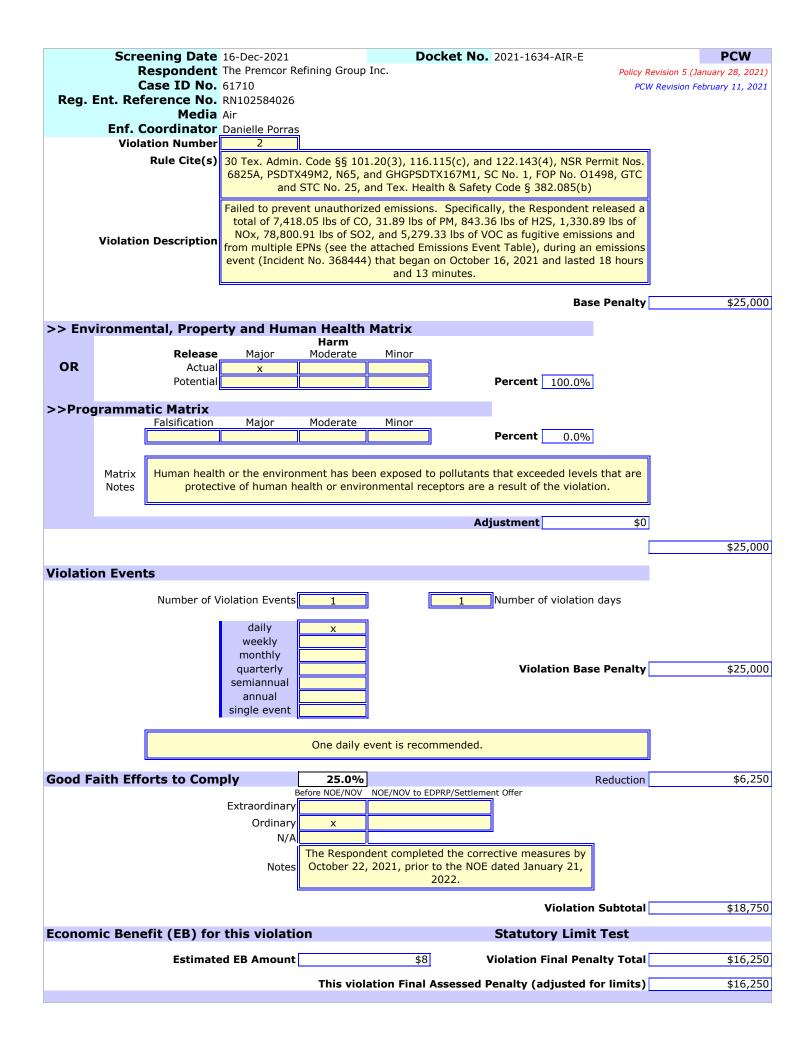
Policy R	Pei evision 5 (January 28,	nalty Calc	culatio	n Works	heet (PC		vision February 11, 2021
DATES Assigned PCW	6-Dec-2021 13-May-2024	Screening 16-	-Dec-2021	EPA Due			
RESPONDENT/FACILI							
-	The Premcor Refi RN102584026			Major/I	Minor Source	Major	
CASE INFORMATION							
Enf./Case ID No. Docket No. Media Program(s)	2021-1634-AIR-E				of Violations Order Type t/Non-Profit	Findings	
Multi-Media					Coordinator	Danielle Porras Enforcement T	
Admin. Penalty \$ I	Limit Minimum	\$0 Ma x	ximum	\$25,000	Le 3 ream		
		Penalty	Calcula	tion Secti	on		
TOTAL BASE PENA	LTY (Sum of	violation bas	se penal	ties)		Subtotal 1	\$75,515
ADJUSTMENTS (+ Subtotals 2-7 are of	/-) TO SUBTO	TAL 1 the Total Base Penal	ltv (Subtotal 1	L) by the indicated	percentage.		
Compliance Hi			-10.0%	Adjustment		tals 2, 3, & 7	-\$7,551
Notes	Since the enhanc NOVs with dissir liability and the and 31 Disc Percentage (Sub	nilar violations, a reduction for 22 losures of Violati total 2) defaults	and three o 5 Notices o ions is belo	orders containing of Intent to con	ng a denial of duct an audit justment		
Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
Notes	The Res	pondent does no	ot meet the	e culpability crit	eria.		
Good Faith Eff	ort to Comply To	otal Adjustmen	ts			Subtotal 5	-\$17,062
Economic Ben				Enhancement*	• •	Subtotal 6	\$0
Estimated	Total EB Amounts I Cost of Compliance	\$588 \$62,750	*Cappe	d at the Total EB \$	Amount		
SUM OF SUBTOTA	LS 1-7				F	inal Subtotal	\$50,902
OTHER FACTORS A Reduces or enhances the Final	AS JUSTICE M	AY REQUIRE		0.0%		Adjustment	\$0
Notes		ited percentage.					
					Final Per	alty Amount	\$50,902
STATUTORY LIMIT	ADJUSTMEN	т			Final Asse	ssed Penalty	\$50,902
DEFERRAL Reduces the Final Assessed Pe	nalty by the indicated	percentage.		0.0%	Reduction	Adjustment	\$0
Notes	No de	eferral is recomn	nended for	Findings Order	s.		
PAYABLE PENALTY	Y					-	\$50,902

		ing Date 16-Dec-2021 Docket No. 2021-1634-AIR-E		PCW					
		pondent The Premcor Refining Group Inc.	Policy Revis	sion 5 (January 28, 2021)					
_		e ID No. 61710	PCW Re	evision February 11, 202					
Reg	. Ent. Refer	ence No. RN102584026							
	Enf Coo	Media Air ordinator Danielle Porras							
	EIII. C00								
>> Co	mplianco Hist	Compliance History Worksheet ory Site Enhancement (Subtotal 2)							
00	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>)	4	20%					
		Other written NOVs	3	6%					
		Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	3	60%					
	Orders	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	0	0%					
	Judgments and Consent	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%					
	Decrees	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 (number of events)	0	0%					
	Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	225	-225%					
	Audits	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>)	31	-62%					
		Environmental management systems in place for one year or more	No	0%					
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%					
	other	Participation in a voluntary pollution reduction program	No	0%					
	Early compliance with, or offer of a product that meets future state or federal No 0%								
		Adjustment Perc	centage (Sub	ototal 2) 0%					
>> Re	epeat Violator	(Subtotal 3)							
	No	Adjustment Perc	centage (Sub	ototal 3) 0%					
>> Co	mpliance Hist	ory Person Classification (Subtotal 7)							
	High Perf	ormer Adjustment Perc	centage (Sub	ototal 7) -10%					
>> Co	mpliance Hist	ory Summary							
	Compliance History Notes	Since the enhancement for four NOVs with same/similar violations, three NOVs with violations, and three orders containing a denial of liability and the reduction for 2 Intent to conduct an audit and 31 Disclosures of Violations is below zero, the A Percentage (Subtotal 2) defaults to zero. Reduction for High Performer class	25 Notices of Adjustment						
		Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7) -10%					
>> Fina	al Compliance	History Adjustment	/						

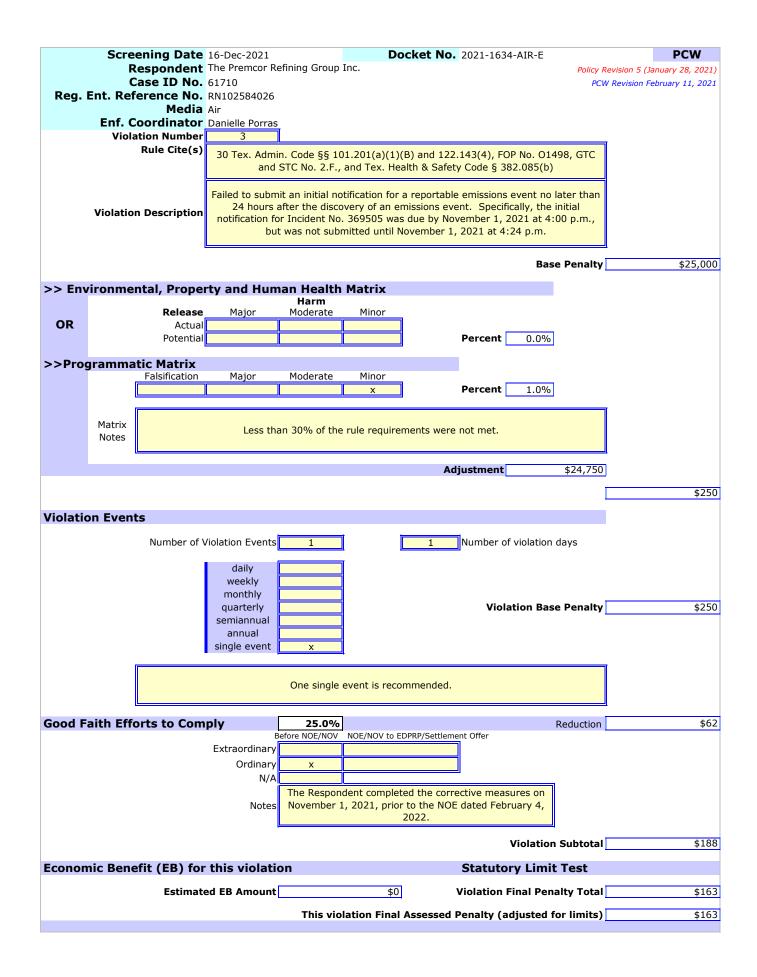
Final Adjustment Percentage *capped at 100% -10%

Case ID No. 61710 PCW Revision February 11, 2021 Reg. Ent. Reference No. RNID2SB026 Media Ar Enf. Coordinator Danielle Porras Violation Number 1 Rule Cite(s) 3 Tex. Admin. Code \$\$ 101.20(3), 116.115(c), and 122.143(4), New Source Review ("NSR") Permit No. 6325A, PSDTM3992, NS5, and GHGPSDTX16791, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("SC") No. 1, Federal Operating Permit ("FOP") IS-34.7186 of sub of CO. 259 No. 014016 ("SD"), 10.042.50 No. 014016 ("S	Case 1D No. 61710 CPC Revolute Reference No. 618028006 Reg. Ent. Reference No. 618028006 Air Fir. Coordinatory Danielle Porms 3 Tox. Admin. Code 55 1D1.20(3). 116.115(c), and 122.143(d), New Source Review ("NSP1) Rule Cite(s) 3 Tox. Admin. Code 55 1D1.20(3). 116.115(c), and 122.143(d), New Source Review ("NSP1) Rule Cite(s) Permit. Nos. 6525A, PSD174992. NOS, and CHCPEDTX16791. Special Conditions ("GTC") and Special Terms and Conditions ("GTC") and Terms State ("GTC") and Terms State ("GTC") and Terms State ("GTC") and Terms State ("GTC") and Special Terms and Conditions ("GTC") and Special Terms and Conditions ("GTC") and Special Terms State ("GTC		Scree	ening Date	16-Dec-2021		Docket	10. 2021-1634-AIR	-E	PCW
Reg. Ent. Reference No. RY102594026 Media Ar Enf. Coordinator Danielle Porras Violation Number Ruie Cite(s) 30 Tex. Admin. Code §5 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSR*) Permit Nos. 6825A, P3DTX4992, No5, and GRGPSDTX167M1, Special Conditions (*CT) and Special Terms and Condition (*CT) and Special Te	Reg. Ent. Reference No. NH102384026 Media Ar Ent. Coordinator Danielle Porras Violation Number Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSR*) Permit New. 66326, FSDTV4942, NSS, and Cite@SDTX16741, Special Conditions (*SC*) No. 1, tederal Operating Permit (*Port) No. 25, and Tex. Health & Safety Code 98 582.085(b) Failed to prevent number Cite@Timesion.Specifically, the Respondent released 153.01 of nitroge novides (*NC*). 10, 342.23 bis discut dovide (*SC*), 0.01 bit of particulate matter (*PM*), and 204.85 libs of volatile organic compounds (*VC*) from Times Suicap. Emissions Point Number (*PM*), 23.47.48,6 statue dovide No. 359.000 (hat occurred on June 10, 2021 and lasted ten hours and 12 minutes. Violation Description Human Health Matrix Harm Harm Mojor Moderate Minor Actual x Potential Percent Sol.0%) Sol.0%) >> Programmatic Matrix Harm Harm Mojor Moderate Minor Actual x Violation Events Sol.0%) See Penalty \$12,500 Violation Events Sol.0%) Violation Events Number of violation days Matrix Mumber of viol					efining Group	Inc.		Policy F	Revision 5 (January 28, 2021)
Media Air Enf. Coordinator Danielle Porras Violation Number Ruie Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSR*) Permit Nos. 625A, PSDTX4942, N65, and GK-GRSDTX167M1, Special Conditions (*SC*) No. 1, Federal Operating Permit (*DP*) No. 01498, General Terms and Conditions (*SC*) No. 1, Federal Operating Permit (*DP*), No. 01498, General Terms and Conditions (*SC*) No. 1, Pederal Operating Permit (*DP*), No. 01498, General Terms and Conditions (*SC*) No. 1, Pounds (*DP*) of carbon monoxide (*C0*), 11.266 bis of Mydorgen sulfide (*H25*), 20.87 bis of nitrogen oxides (*Noc*), 10.342.231 bis of sulfur dioxide (*SC2*), No. 10.492.1387 bis of nitrogen oxides (*Noc*), 10.342.231 bis of volt from released 613.93 of nitrogen oxides (*Noc*), 10.342.231 bis of volt from released 613.94 bis of Nox, 233.48 bis of SO2, and 15.39 bis of VOC from Flare Subcap. Emissions Point Number (*TEN*) = 6.29 FLARE, released 279.66 bis of CO. 259 bis of H25, 54.88 bis of Nox, 233.48 bis of SO2, and 15.39 bis of VOC from Flare Subcap. Emissions, during an emissione sevent (Incident No. 399960) that occurs. S4.88 bis of Nox, 233.48 bis of SO2, and 15.39 bis of VOC from Hare Subcap. Environmental, Property and Human Health Matrix Not Actual Aigin Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment S12.500	Media Ar First. Coordinatory banelle perros Violation Number Rule Cite(s) 3 Tox. Adm. Code 55 D1.20(3), 116.115(c), and 122.147(d), New Source Review (*NSP) Permit Nox. 6525A, PSDTX4992, NS5, and CiteCPSDTX1697M, Special Conditions (*CC7) and Special Terms and Condit Terms and Special								PCV	N Revision February 11, 2021
Enf. Coordinator Danielle Poras Violation Number Ruie Cite(s) 30 Tex. Admin. Code §5 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSK*), Premit Nos. 6828A, PSDTX49942, MSS, and CHGPSDTX167M1, Special Conditions (*SC*) No. 1, Federal Operating Permit (FOP*) No. 0.1498, General Terms and Conditions (*SC*) No. 1, Federal Operating Permit (FOP*) No. 0.1498, General Terms and Conditions (*SC*). No. 1, Special Terms and Conditions (*SC*) No. 23, and Tex. Health & Safety Code § 382.085(b) Violation Description Failed to prevent unaithorized emissions. Specifically, the Respondent releases 01.55.1 pounds (*No*), 10.342.218 of sof subtriviolation (*SC*), 20.01 to of particulate matter (*PM*), and 20.45 lbs of volatile organic compounds (*OC*), 10.01 by 25 lbs of H25, 54.88 lbs of Nox, 238.34 lbs of SO2, and 16.39 lbs of VOC from the Here: Subap, Emissions Point Number (*PM*) = 6.32-4.748, reisease 12.95 do to Cox. 359960 ltat occurred on June 10, 2021 and lasted ten hours and 12 minutes. Violation Description Name OR Release Major Moderate Major Moderate Potential Percent 50.0% >>Programmatic Matrix Falsification Major Notes Major Moderate Minor Adjustment \$12,500 \$12,500 \$12,500 Violation Events 1 Number of violation days \$12,500 \$12,500 \$12,500 </th <th>Enf. Coordinator Daniele Porras Violation Number Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSR*), redeating Permit (*DP*) No. 01.46, General Tems and Conditors (*SC*) No. 1, redeat Operating Permit (*DP*) No. 01.46, General Tems and Conditors (*SC*) No. 1, redeat Operating Permit (*DP*) No. 01.46, General Tems and Conditors (*SC*) No. 1, redeat Operating Permit (*DP*) No. 01.46, Section 2011 (*DP*) N</th> <th>Reg. I</th> <th>Ent. Refe</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th>	Enf. Coordinator Daniele Porras Violation Number Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSR*), redeating Permit (*DP*) No. 01.46, General Tems and Conditors (*SC*) No. 1, redeat Operating Permit (*DP*) No. 01.46, General Tems and Conditors (*SC*) No. 1, redeat Operating Permit (*DP*) No. 01.46, General Tems and Conditors (*SC*) No. 1, redeat Operating Permit (*DP*) No. 01.46, Section 2011 (*DP*) N	Reg. I	Ent. Refe							
Violation Number 1 Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSR*) Perms. Nos. 6825A, PSDTX49H2, NS5, and CHGPSDTX157H1, Special Conditions (*SC*) No. 1, Federal Operating Permit (*TOP*) No. 01496, General Terms and Conditions (*SC*) No. 1, Federal Operating Permit (*TOP*) No. 02.498, General Terms and Conditions (*SC*) No. 1015 of particulate of nitrogen oxides (*Nox*). 10.342.23 bs of suffur dioxide (*SO*). 10.36 bs of hydrogen suffice (*HSY*), 120.87 bs of nitrogen oxides (*Nox*). 10.342.23 bs of suffur dioxide (*SO*). 10.01 b of particulate matter (*PM*), and 20.45 bis of volation cognaic compounds (*VOC*) from fines Subcap, Emissions Point Number (*EPN*) = 2-3-FLARE, released 279.66 bis of CO, 2.59 bis of H25, 54.88 bis of Nox, 233.34 bit of SO2, and 15.39 bs of VOC cos FLARE, and released 13.46 bis of CO, 0.52 bit of Nox, 336.60 bs of PM, and 2.22 bis of VOC cos FLARE, and released 13.46 bis of CO, 0.52 bit of Nox, 336.60 bs of PM, and 2.22 bis of VOC cos Flagting emissions, during a memissions event (Incident Nox 33960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >> Environmental, Property and Human Health Matrix Release Minor Actual X Y Particular Percent 50.0% >> Programmatic Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. \$12,500 Violation Events 1 Number of violation days \$12,500	Violation Number 1 Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3).116.115(c), and 122.143(4). New Source Review (*NSR*). Permit Nex 6825A, PSDTX49422, N65, and CHGPSDTX167ML, Special Conditions (*SC*) No. 1, and Special Terms and Conditions (*STC*) No. 25, and Tex. Health & Sofety Code § 382.085(b) Failed to prevent unauthorized emissions. Specifically, the Respondent released 615.91 poinds (*Ibs*) of carbon monoxide (*C0*), 11.26 fb to flydrogen sulfide (*Ibs*), 10.047.1bs of nitrogen oxides (*No.*), 10.342.23 bis of solitur dioxide (*SO*), 0.10.047.1bs of nitrogen oxides (*No.*), 10.342.32 bis of solitur dioxide (*SO*), 20.10.87 lbs of nitrogen oxides (*No.*), 10.342.32 bis of solitur dioxide (*SO*), 20.10.87 lbs of nitrogen oxides (*No.*), 10.342.32 bis of solitur dioxide (*SO*), 20.27 lbs of H25, 55.88 lbs of No.72, 40.22 bis of VOC and the ICU 493 Have. Sole Sole Sole CO, 2.59 lbs of H25, 55.88 lbs of No.72, 40.22 bis of VOC and 122 minutes. Environmental, Property and Human Health Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events 1 Number of Violation Events 1 One weekly event is recommended. 512.500		Enf. C.							
Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(d), New Source Review (*NSR') Permit Nos. 6822A, PSDTX49H2, MSS, and CHGPSDTX15/H1, Special Conditions (*SC') No. 1, Federal Operating Permit (FDP') No. 0.1498, General Terms and Conditions (*SC') No. 1, Special Terms and Conditions (*SC'). No. 1, Special Terms Special Terms and Conditions (*SC'). No. 1, Special Terms and Conditions (*SC'). No. 1, Speci	Rule Cite(s) 30 Tex. Admin. Code §§ 101.20(3), 116.115(c), and 122.143(4), New Source Review (*NSK*), Permit Nos. 6825A, PSDIX4942, NSS, and CindPSDIX1677H1, Special Conditions (*SC*) No. 1, Federal Operating Permit (*PCP) No. 0.149, General Terms and Conditions (*SC*) No. 1, Federal Operating Permit (*PCP) No. 0.149, General Terms and Conditions (*SC*) No. 1, Federal Operating Permit City (*PCP) No. 0.149, General Terms and Conditions (*SC*) No. 1, Federal Operating Permit City (*PCP) No. 0.249, Benefalt Terms and Conditions (*SC*) No. 1, Federal Operating Permit City (*PCP) No. 214.201 Benefalt Septical (*PCP) (*PC) *PLAEL, and research of hydrogen suffic (*PCP), 12.02-14.84, Stafet 2002*), 0.01 Its 59 particulate anter (*PM*), and 20.45 Bis of volatile organic compounds (*OC*) for Plares Subcap, Emissions Point Number (*PCP) (*PC) *PLAEL, Released 23.64 Bis of Vol2, 38 and 16.39 Bis of Vol2 from the KC) 945 Part. PRIE : 52-54.88 Bis of Noz, 238 Jis of CO, 2.59 Ibis of Vol2 First Subcap, Emissions Point Number (*PCP) (*PC) *PLAEL, Released 23.64 Bis of Vol2, 38 U So of Noz, 38.24 Bis of CO, 2.59 Ibis of Vol2 First Subcap, Emissions Point Number (*PCP) *PC : 52-14.84, Released 23.64 Bis of VOC as fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. See Penalty \$25,000 >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 >> Programmatic Matrix Number of Noderate Minor Percent 0.0% \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 \$12,500 <th></th> <th></th> <th></th> <th>1</th> <th>; 1</th> <th></th> <th></th> <th></th> <th></th>				1	; 1				
Winterform Permit Nos. 6825A, PSDTX49M2, No5, and GHGPSDTX167M1, Special Conditions ("SC") No. 1, Pederal Departing Permit ("POP") No. 0.1498, General Terms and Conditions ("GC") and Special Terms and Conditions ("GC") and Special Terms and Conditions ("GC") No. 25, and Tex. Health & Safety Code § 382.085(b) Violation Description Paleid to prevent unauthorized emissions. Specifically, the Respondent released 615.91 pounds ("PO"), 12.06 libs of hydrogen suffice ("PA"), and 2.045 libs of value organic compounds ("VOC") for Theres Subcap, S48.08 libs of value organic compounds ("VOC") for Theres Subcap, S48.08 libs of value organic compounds ("VOC") for Theres Subcap, S48.08 libs of value organic compounds ("VOC") for Theres Subcap, S48.08 libs of value organic compounds ("VOC") for Theres Subcap, S48.08 libs of value organic compounds ("VOC") for Theres Subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the subcap, S48.08 libs of value organic compounds ("VOC") for the value organic compound ("Voc	Permit Nos. 6825A, PSDTX49M2, NSS, and GHGPSDTX167M1, Special Conditions ("SC") No. 1, Federal Operating Permit ("OP") No. 0.1496, General Terms and Conditions ("GC") and Special Terms and Conditions ("GC") No. 25, and Tex. Health & Safety Code § 382.088(b) Violation Description Failed to prevent inavitorized emissions, Specifically, the Respondent released 615.91 points ("Bs") of carbon monoxide ("CO"), 10.342.26 bb of hydrogen subfic ("H35"), 12.362 bb of H35. 54.88 bb of NOx, 233.34 lbs of SO2, and 16.39 lbs of VOC from Flares Subcept. Emissions point Number (PSP): E-32-HRE, released 27.96 bb sof CO, 2.59 bb of H25. 54.88 bb of NOx, 233.34 lbs of SO2, and 16.39 lbs of VOC from the H0.93 Flare, EPN E-36- FLARE, and released 13.46 bs of CO, 0.52 bit of HX0, 35.09 bb of H25. 54.88 bb of NOx, 233.34 lbs of SO2, and 16.39 lbs of VOC from the H0.93 Flare, EPN E-36- FLARE, and released 13.46 bs of CO, 0.52 bit of HX0, 35.09 bb of H25. 55.95 Environmental, Property and Human Health Matrix Harm OR Release Major Moderate Minor Potential Percent 50.0% S5.00 >>Programmatic Matrix Harm Percent 50.0% S12,500 Violation Events 1 Number of violation. S12,500 S12,500 Violation Events 1 Number of violation days S12,500 S12,500 Violation Events 1 Number of violation days S12,500 One weekly event is recommended. S12,500 S12,500 S12,500 <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>1</th>									1
Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") and Special Terms and Special Terms and Special Terms and Special Terms and Special Terms and Special Terms and Conditions ("STC")	Federal Operating Permit ("FOP") No. 01496, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 25, and Tex. Health & Safety Code 532.085(b) Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 615,91 pounds ("Ibs") of carbon menoxide ("NOC"), 10, 142, 23 bits of safut dioded ("SO2"), 0.01 io for articulate and nitrogen oxides ("NOC"), 10, 142, 23 bits of safut dioded ("SO2"), 0.01 io for articulate matter ("PM"), and 204,85 bits of volatile organic compounds ("NOC") from Flares Subcep, Emissions of thumber ("PM") F 23-14.REF, released 27, 96 bits of CO, 25 bits of 125, 57, 87, 87, 87, 80, 31, 34 de af CO, 0. 52 bit of NOC, 38 60 bits of PM, und 2, 221 bits of NOC 2 es fugitive emissions, during an emissions event (Indext NL S. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. OR Actual Amm Release Major Moderate Minor Potential Percent 50.0% >>Programmatic Matrix Human Health Matrix Harm Agiustment \$12,500 Violation Events 1 Number of violation Levents Violation Events 1 1 Number of Violation Events 1 1 OR Actual \$12,500 Violation Events 1 1 Number of Violation Events 1 1 OR			Rule Cite(s)						
Failed to prevent unauthorized emissions. Specifically, the Respondent released 615.91 pounds ("bs") of carbon monoxide ("CO"), 112.66 lbs of hydrogen sulfide ("H2S"), 120.87 lbs of nitrogen oxides ("Nox"), 10,342 lbs of sulfide ("SO2"), 0.01 lb of particulate matter ("PM"), and 204.85 lbs of volatile organic compounds ("COC") from Flares Subcap, Emissions Point Number ("ENP") = 2-32-FLARE, released 279.66 lbs of CO, 2:90 lbs of H2S, 54.88 lbs of NOx, 233.34 lbs of SO2, and 16.39 lbs of VOC from the HCU 943 Flare, EPN E-26-FLARE, released 13.46 lbs of CO, 0:52 lb of NOX, 38.60 lbs of PM, and 2.22 lbs of VOC cas fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >>> Environmental, Property and Human Health Matrix Harm OR Actual Harm Violation Education Major Moderate Minor Falification Major Moderate Minor Falification Major Moderate Minor Falification Major Moderate Minor Falification Major Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed Ievels that are protective of human health or environmental receptors as a result of the violation. \$12,500	Failed to prevent unauthorized emissions. Specifically, the Respondent released 615.91 Pounds ('lbs') of carbon monoxide ('CO'), 112.66 lbs of hydrogen suides ('NCY'), 10.342.03 lbs of suffic divides ('SO2'), 0.01 lb of particulate organic compounds ('VOC') from Fares Subcap, Emissions Spent Number ('EW'), E.2.4 LREF, release 279.66 lbs of CO, 2.5 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOC from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOS from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOS from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOS from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOS from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOS from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.83.4 lbs of SO2, and 16.39 lbs of VOS from the HCU 493 First, DVE 25 lbs of HZS, 5.8 lbs of VOS, 2.90.1 lbs of HZS, 5.8 lbs of VOS, 2.91 and lasted ten hours and 12 minutes. See Penalty \$225,000 >> Environmental, Property and Human Health Matrix Mam OR Release Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events 1 1 Number of violation Events 1 1 Number of violation Events 1 1 Ore weekly event is recommen									
Violation Description Dounds ("Ust") of carbon monoxide ("CO"), 112.66 lbs of violatio ("H2S"), 120.87 lbs violation Description File ("No"), 10, 34.22 lbs of violatio (socie, "Soci"), 0.01 lb of particulate matter ("PM"), and 204.85 lbs of violatile organic compounds ("VOC") from Flares Subcap, Emissions Point Number ("ENP"), 5-32-FLARE, released 279.66 lbs of (CO, 2.9 lbs do H2S, 5-54.88 lbs of NOx, 238.34 lbs of SO2, and 16.39 lbs of VOC from H2U 943 Flare, EPN E-26-FLARE, field and 2.22 lbs of VOC as fugitive emissions, during an emissions event. (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor Actual Percent Sol.0% Sol.0% >>Programmatic Matrix Harm Falsification Major Moderate Minor Actual Percent 0.0% >>Programmatic Matrix Percent 0.0% Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed \$12,500 Violation Events 1 1 Number of violation days Matrix Mumber of Violation Events 1 1 Number of Violation Events 1 1 Number of violat	violation Description pounds ("be") of carbon monoxide ("CO"), 112, 66 lbs of hydrogen suides ("Norv", 10, 342, 231 bb of soluri duivide ("SO2"), 0.01 lb of particulate matter ("PM"), and 204.85 lbs of volatile organic compounds ("COC") from Flares Subcap, Emissions Point Number ("EW"), E27, ELREF, released 279, 66 lbs of CO, 25 lbs of H2S, 54.88 lbs of NOx, 239.34 lbs of SO2, and 16.39 lbs of VOC from the HCU 943 Flare, FN E-26-FLARE, released 279, 66 lbs of CO, 25 lbs of H2S, 54.88 lbs of NOx, 239.34 lbs of SO2, and 16.39 lbs of VOC from the HCU 943 Flare, FN E-26-FLARE, released 279, 66 lbs of CO, 25 lbs of H2S, 54.88 lbs of NOx, 239.34 lbs of SO2, and 16.39 lbs of VOC from the HCU 943 Flare, FN E-26-FLARE, released 279, 66 lbs of CO, 25 lbs of VO.25 lbs of VO.25 lbs of NOX, 36.0 lbs of PM, and 2.22 lbs of VOC.26 s fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm Harm Notes Harm OR Actual X Percent 50.0% \$25,000 >> Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor S0.0% \$25,000 >> Programmatic Matrix Falsification Major Matrix S0.0% \$25,000 \$212,500 \$12,500 Violation Events 1 1 Number of violation days \$12,500 <				Special Term	ns and Conditio	ons ("STC") No. 25,	and Tex. Health & S	Safety Code § 382.085(b)	
of nitrogen oxides ("NOX"), 10,342,22 ibs of suffur dioxide ("SO2"), 0.01 ib of particulate matter ("PM"), and 204.85 libs of volatile organic compounds ("VOC") from Fares Subcen, Emissions Point Number ("ENN") E-23-FLARE; released 270,56 libs of CO, 2.59 libs of H23, 54,88 libs of NOX, 238,54 libs of SO2, 30, and 16.39 libs of YOC from the HCU 943 Fiare, PN E-26- FLARE, and released 13.46 libs of CO, 0.52 lib of NOX, 38,66 libs of CM, and 12.0 libs of PM, and 2.22 libs of VOC as frugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >>> Environmental, Property and Human Health Matrix Harm OR Harm Release Actual X Potential Yearent Solong Major Moderate Minor Percent 0.0% Notes Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events 1 Number of violation days daily X yeakeky \$12,500	Violation Description of nitrogen oxides ('NOX'), 10,342,23 lbs of sulfur dioxide ("SOC') form Fares Subcap, Emissions Point Number ('EPN') = 23-FLARE, released 279.66 lbs of CO2, 259 lbs of H2S, 54.88 lbs of NOX, 238.41 bs of SO2, and 16.39 lbs of VOC from the HCU 943 Flare, EPN E-26-FLARE, and released 13.46 lbs of CO2, 0.52 lb of Nox, 338.40 lbs of VOC as fugitive emissions, during an emissions event (Incident Nox, 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >> Environmental, Property and Human Health Matrix Ham Release Major Moderate Hord Percent 50.0% >> Programmatic Matrix Falsfication Major Release Major Moderate Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events 1 Number of violation Events Number of Violation Events 1 Number of violation days Gene weekly event is recommended. One weekly event is recommended. 512,500				Failed to pr	event unautho	prized emissions. S	pecifically, the Resp	oondent released 615.91	
Violation Description matter ("PM"), and 204.85 libs of volatile organic compounds ("VOC") from Flare's Subcap, Existions Point Number ("EM"), 2-32-ELABE, released 279.66 libs of CO, 2.59 lib of H2S, 54.88 libs of NOX, 238.34 libs of SO2, and 16.39 libs of VOC from the HCU 948 Flare, EPN E-26-FLARE, and released 13.46 libs of CO, 0.52 lib of NOX, 358.60 libs of PM, and 2.22 libs of VOC as fugilive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 Actual Major Moderate Minor OR Actual Percent 50.0% >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% State of pollutants that did not exceed State of pollutants that did not exceed Notes Human health or the environment has been exposed to significant amounts of pollutants that did not exceed \$12,500 Violation Events 1 Number of violation days \$12,500 Violation Events 1 1 Number of violation days	Violation Description matter ("PM"), and 204.85 lis of volatile organic compounds ("SUCC") from Flares Subcep, Emissions Point Number ("EN") 15-32 HLARE, released 279.66 lips of CO, 259 lips of WA, and 2.22 lips of VOC as tradition to the HCU 943 Flare, EPN E-26- FLARE, and released 13.46 lips of CO, 352 lip of NOX, 38.60 lips of PM, and 2.22 lips of VOC as tradition and 12 minutes. >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 >> Forgrammatic Matrix Harm Percent 50.0% >> Programmatic Matrix Harm Percent 0.0% Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. \$12,500 Violation Events									
Violation Description Emissions Point Number (*EPN*) E-23-FLARE, released 270.66 lbs of CO, 2.59 lbs of H25, 54.88 lbs of NOC, 73.83 lbs of SOC, 33.41 lbs of SOC, 33.61 lbs of NOC, 750 lbs of PN E-36-FLARE, and released 13.46 lbs of CO, 0.52 lb of NOX, 33.60 lbs of PM, and 2.22 lbs of VOC as fugitive emissions, during an emissions event (Indent No. 335960) lbd a occurred on June 10, 2021 and lasted ten hours and 12 minutes. >>> Environmental, Property and Human Health Matrix Base Penalty \$25,000 >>> Environmental, Property and Human Health Matrix Harm Release Major No Actual X Percent 50.0% >>> Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0% Notes Human health or the environment has been exposed to significant amounts of pollutants that did not exceed \$12,500 Violation Events 1 Number of violation days \$12,500 Violation Events 1 Number of violation days \$12,500	Violation Description Emissions Point Number ("EPN") E-23-FLARE, released 279.66 bs of CO, 2.59 bbs of H25, 54.88 bis of NO2, 33.43 bbs of CO, 0.52 b of NOX, 33.60 bbs of PM, and 2.22 bis of VOC as fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 Notes Major Moderate Minor OR Actual X Percent 50.0% >> Programmatic Matrix Faisfication Major Moderate Minor Actual X Percent 0.0% \$12,500 >> Programmatic Matrix Faisfication Major Moderate Minor Violation Events Human health or the environment has been exposed to significant amounts of pollutants that did not exceed \$12,500 Violation Events 1 Number of violation days \$12,500 Violation Events 1 1 Number of violation days One weekly event is recommended. Good Faith Efforts to Comply 25.0% Reduction \$12,500									
54.88 lbs of NOx, 238.34 lbs of SO2, and 16.39 lbs of VOX 56.01 lbs of VOX 238.34 lbs of NOx, 38.60 lbs of PN, and 2.22 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 Actual Name Percent 50.0% >> Programmatic Matrix Falsification Major Moderate Minor Potential X Percent 50.0% \$0.0% >> Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0% Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$12,500 Violation Events 1 Number of violation days daily x yeartery \$12,500	S4.88 lbs of NOX, 238.34 lbs of SQ2, and 16.39 lbs of VOC from the HCU 943 Flare, EPN E-26-FLARE, and released 13.66 lbs of CV, 36.50 lbs of PM, and 2.22 lbs of VOC cs a fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Base Penalty \$25,000 Actual Marrix Harm Percent \$0.0% >> Programmatic Matrix Marrix Percent \$0.0% Actual Major Moderate Minor Actual Major Moderate Minor Falsification Major Moderate 0.0% Notes Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. \$12,500 Violation Events 1 Number of violation days \$12,500 One weekly event is recommended. 0 \$12,500		Violation	Description						
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2021 and lasted ten hours and 12 minutes. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm Release Major Moderate Minor OR Actual X Percent 50.0% >> Programmatic Matrix Potential Percent 0.0% // Potential Percent 0.0% // Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Violation Events \$12,500 Violation Events 1 Number of violation days daily x y y annual single event	2021 and lasted ten hours and 12 minutes. Base Penalty \$25,000 >> Environmental, Property and Human Health Matrix Harm Release Major Actual x Percent 50.0% >> Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$12,500 Violation Events 1 Number of Violation Events 1 One weekly event is recommended. Single event One weekly event is recommended. Single event									
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OR Actual x Percent 50.0% >>Programmatic Matrix Falsification Major Moderate Minor Percent 0.0% Matrix Falsification Major Moderate Minor Matrix Falsification Major Moderate Minor Matrix Full Percent 0.0% Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed Invotes Adjustment \$12,500 Violation Events 1 Number of violation days Image: Semiannual annual single event \$12,500	OR Actual x Percent 50.0% >>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Percent 0.0% Matrix Human health or the environment has been exposed to significant amounts of pollutants that did not exceed levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$12,500 Violation Events 1 Number of violation days \$12,500 Violation Events 1 Number of violation days \$12,500 Violation Events 1 Number of violation days \$12,500 Good Faith Efforts to Comply 25.0% Reduction \$3,125			Deleger	Marian		Miner			
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Notes levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$12,500 Violation Events \$12,500 Number of Violation Events 1 Adjustment \$12,500 Violation Events 1 Violation Events 1 Violation Base Penalty \$12,500	Notes levels that are protective of human health or environmental receptors as a result of the violation. Adjustment \$12,500 \$12,500 \$12,500 Violation Events 1 Number of Violation Events 1 daily x weekly x monthly semiannual annual single event One weekly event is recommended. \$3,125		Matrix	Human healt	h or the environ	ment has bee	n exposed to signif	cant amounts of pol	lutants that did not exceed	
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Number of Violation Events 1 Number of violation days daily	Number of Violation Events 1 Number of violation days daily							Adjus	tment \$12,500	
daily weekly x monthly quarterly semiannual annual single event	daily	Violatio	n Evont	6				Adjus	tment \$12,500	
weekly x monthly Quarterly Violation Base Penalty \$12,500 semiannual annual single event	weekly x monthly	Violatic	on Event	S				Adjus	tment \$12,500	
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semiannual annual single event	semiannual annual single event	Violatic	on Event		daily		<u>1</u>			
annual single event	annual single event One weekly event is recommended. Good Faith Efforts to Comply 25.0% Reduction \$3,125	Violatic	on Event		daily weekly					
single event	single event One weekly event is recommended. Good Faith Efforts to Comply 25.0% Reduction \$3,125	Violatic	on Event		daily weekly monthly				ation days	\$12,500
	One weekly event is recommended. Good Faith Efforts to Comply 25.0% Reduction \$3,125	Violatio	on Event		daily weekly monthly quarterly semiannual				ation days	\$12,500
One weekly event is recommended.	Good Faith Efforts to Comply 25.0% Reduction \$3,125	Violatic	on Event		daily weekly monthly quarterly semiannual annual				ation days	\$12,500
		Violatic	on Event		daily weekly monthly quarterly semiannual annual		<u>1</u>		ation days	\$12,500
		Violatio	on Event		daily weekly monthly quarterly semiannual annual		eekly event is reco	Number of viola	ation days	\$12,500
	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		[Number of Y	daily weekly monthly quarterly semiannual annual single event	x x 	eekly event is reco	Number of viola	ation days Violation Base Penalty	\$12,500 \$12,500
Extraordinary			[Number of Y	daily weekly monthly quarterly semiannual annual single event			Number of viola	ation days Violation Base Penalty	\$12,500 \$12,500
Ordinary			[Number of Y	daily weekly monthly quarterly semiannual annual single event			Number of viola	ation days Violation Base Penalty	\$12,500 \$12,500
	Ordinary x		[Number of Y	daily weekly monthly quarterly semiannual annual single event	X X One w One w 25.0% Sefore NOE/NOV		Number of viola	ation days Violation Base Penalty	\$12,500 \$12,500
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N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November	Ordinary x N/A The Respondent completed the corrective measures by November 9, Notes 2021, prior to the Notice of Enforcement ("NOE") dated November		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary N/A	X X One w 25.0% Sefore NOE/NOV X The Responded	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	violation Base Penalty Reduction	\$12,500 \$12,500
N/A The Respondent completed the corrective measures by November 9,	Ordinary x N/A The Respondent completed the corrective measures by November 9, Notes 2021, prior to the Notice of Enforcement ("NOE") dated November		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary N/A	X X One w 25.0% Sefore NOE/NOV X The Responded	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	violation Base Penalty Reduction	\$12,500 \$12,500
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021.	Ordinary x N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021.		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary N/A	X X One w 25.0% Sefore NOE/NOV X The Responded	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	ation days Violation Base Penalty Reduction by November 9, ated November	\$12,500 \$12,500 \$12,500 \$3,125
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021.	Ordinary x N/A Notes The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375	Good Fa	aith Effo	Number of Y	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	Cone w Cone w 25.0% Before NOE/NOV X The Responde 2021, prior t	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	ation days Violation Base Penalty Reduction by November 9, ated November Violation Subtotal	\$12,500 \$12,500 \$12,500 \$3,125
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test	Ordinary x N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test	Good Fa	aith Effo	Number of Y rts to Com fit (EB) for	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	x x	NOE/NOV to EDPRP/Se ent completed the o to the Notice of Enf 30	Mumber of viola Mended. Mend	ation days Violation Base Penalty Reduction by November 9, ated November Violation Subtotal imit Test	\$12,500 \$12,500 \$12,500 \$3,125 \$9,375
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$94	Ordinary x N/A N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$94 Violation Final Penalty Total \$8,125	Good Fa	aith Effo	Number of Y rts to Com fit (EB) for	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	x x	NOE/NOV to EDPRP/Se ent completed the of to the Notice of Enf 30	Number of viola Number of viol	ation days Violation Base Penalty Reduction by November 9, ated November Violation Subtotal imit Test lation Final Penalty Total	\$12,500 \$12,500 \$3,125 \$9,375 \$8,125
Ordinary			[Number of Y	daily weekly monthly quarterly semiannual annual single event			Number of viola	ation days Violation Base Penalty	\$12,500 \$12,500
			[Number of Y	daily weekly monthly quarterly semiannual annual single event	X X One w One w 25.0% Sefore NOE/NOV		Number of viola	ation days Violation Base Penalty	\$12,500 \$12,500
N/A	Ordinary x N/A		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary	X X One w 25.0% Sefore NOE/NOV X X	NOE/NOV to EDPRP/Se	nmended.	ation days Violation Base Penalty Reduction	\$12,500 \$12,500
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November	Ordinary x N/A The Respondent completed the corrective measures by November 9, Notes 2021, prior to the Notice of Enforcement ("NOE") dated November		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary N/A	X X One w 25.0% Sefore NOE/NOV X The Responded	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	violation Base Penalty Reduction	\$12,500 \$12,500
N/A The Respondent completed the corrective measures by November 9, Notes 2021, prior to the Notice of Enforcement ("NOE") dated November	Ordinary x N/A The Respondent completed the corrective measures by November 9, Notes 2021, prior to the Notice of Enforcement ("NOE") dated November		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary N/A	X X One w 25.0% Sefore NOE/NOV X The Responded	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	violation Base Penalty Reduction	\$12,500 \$12,500
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021.	Ordinary x N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021.		[Number of Y	daily weekly monthly quarterly semiannual annual single event pply Extraordinary Ordinary N/A	X X One w 25.0% Sefore NOE/NOV X The Responded	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	ation days Violation Base Penalty Reduction by November 9, ated November	\$12,500 \$12,500 \$12,500 \$3,125
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375	Ordinary x N/A Notes The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375	Good Fa	aith Effo	Number of Y	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	Cone w Cone w 25.0% Before NOE/NOV X The Responde 2021, prior t	NOE/NOV to EDPRP/Se not completed the of to the Notice of Enf	mmended.	ation days Violation Base Penalty Reduction by November 9, ated November Violation Subtotal	\$12,500 \$12,500 \$12,500 \$3,125
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test	Ordinary x N/A Notes The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test	Good Fa	aith Effo	Number of Y rts to Com fit (EB) for	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	x x	NOE/NOV to EDPRP/Se ent completed the o to the Notice of Enf 30	Mumber of viola Mended. Mend	ation days Violation Base Penalty Reduction by November 9, ated November Violation Subtotal imit Test	\$12,500 \$12,500 \$12,500 \$3,125 \$9,375
N/A The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$94	Ordinary x N/A Notes The Respondent completed the corrective measures by November 9, 2021, prior to the Notice of Enforcement ("NOE") dated November 30, 2021. Violation Subtotal \$9,375 Economic Benefit (EB) for this violation Statutory Limit Test Estimated EB Amount \$94 Violation Final Penalty Total \$8,125	Good Fa	aith Effo	Number of Y rts to Com fit (EB) for	daily weekly monthly quarterly semiannual annual single event Extraordinary Ordinary N/A Notes	x x	NOE/NOV to EDPRP/Se ent completed the of to the Notice of Enf 30	Number of viola Number of viol	ation days Violation Base Penalty Reduction by November 9, ated November Violation Subtotal imit Test lation Final Penalty Total	\$12,500 \$12,500 \$3,125 \$9,375 \$8,125

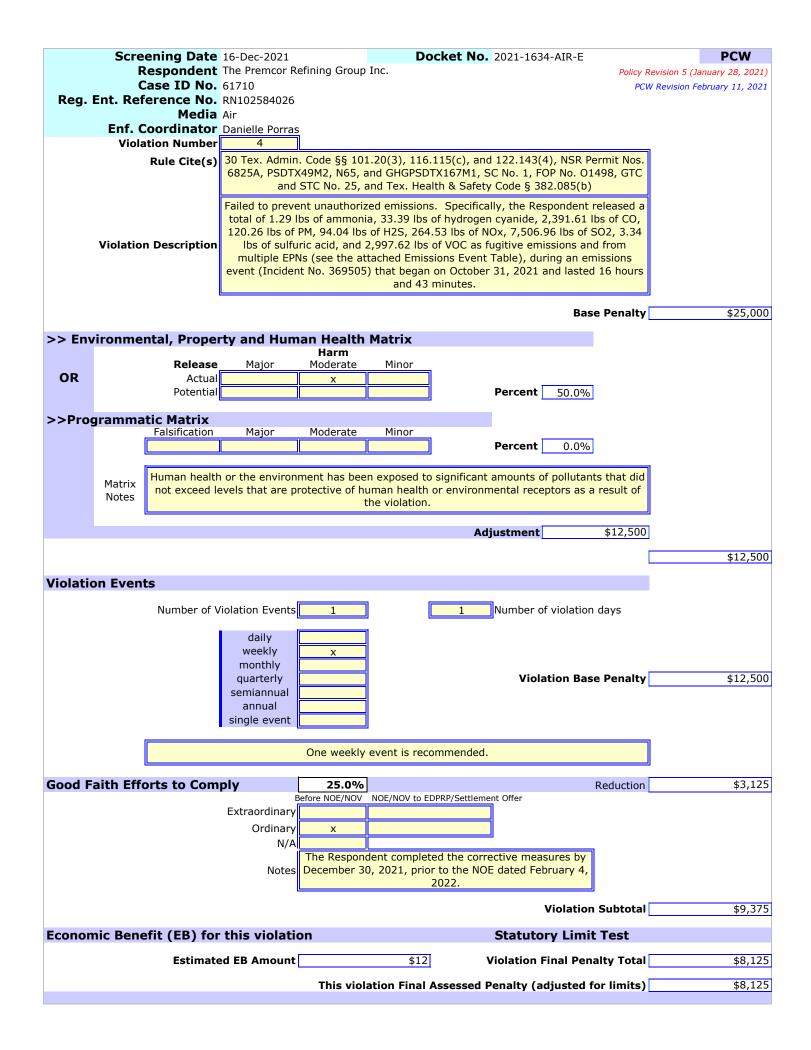
	E C	conomic	Benefit	wor	rksheet		
		lefining Group Inc					
Case ID No.							
Reg. Ent. Reference No.	RN102584026						
Media	Air					Percent Interest	Years of
Violation No.	1					r creent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Item Description							
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 Other (as needed)						n/a n/a verify that the pump redure for fabricated	
Permit Costs	Estimated c include manua jigs in order	cost to perform a line of the received of the	review of every reclassifier, and currence of emis	0.42 unit's Ir impleme	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre	n/a	\$94 os on oil mist I thrust bearing es as Incident
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions ev e emissi complia	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre ance.	n/a verify that the pump edure for fabricated ame or similar caus d and the Final Date	\$94 bs on oil mist I thrust bearing es as Incident e is the date of
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions ev e emissi complia tering	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre ance. item (except for	n/a verify that the pump edure for fabricated ame or similar caus d and the Final Date one-time avoided	\$94 bs on oil mist I thrust bearing es as Incident e is the date of I costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions ev e emissi complia tering 0.00	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre ance. item (except for \$0	n/a verify that the pump eedure for fabricated ame or similar caus d and the Final Date one-time avoided \$0	\$94 bs on oil mist I thrust bearing es as Incident e is the date of I costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme sions ev e emissi complia tering 0.00	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre ance. item (except for \$0 \$0	n/a verify that the pump edure for fabricated ame or similar caus d and the Final Date one-time avoided \$0 \$0	\$94 bs on oil mist thrust bearing es as Incident e is the date of i costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions ev e emissi complia tering 0.00	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre ance. item (except for \$0	n/a verify that the pump eedure for fabricated ame or similar caus d and the Final Date one-time avoided \$0	\$94 bs on oil mist I thrust bearing es as Incident e is the date of I costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions ev e emissi complia tering 0.00 0.00	\$94 Itellatrac rounds, v ent a lock nut proc vents due to the s ons event occurre ance. item (except for \$0 \$0 \$0	n/a verify that the pump edure for fabricated ame or similar caus d and the Final Date one-time avoided \$0 \$0 \$0	\$94 bs on oil mist I thrust bearing es as Incident e is the date of I costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions e e emissi complia tering 0.00 0.00 0.00	\$94 Intellatrac rounds, year and a lock nut proceed yearts due to the sons event occurre ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a verify that the pump edure for fabricated ame or similar caus d and the Final Date one-time avoided \$0 \$0 \$0 \$0	\$94 bs on oil mist I thrust bearing es as Incident e is the date of I costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions e e emissi complia complia tering 0.00 0.00 0.00	\$94 Intellatrac rounds, we ent a lock nut proce- vents due to the sons event occurre ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a verify that the pump redure for fabricated ame or similar cause d and the Final Date one-time avoided \$0 \$0 \$0 \$0 \$0 \$0	\$94 bs on oil mist I thrust bearing es as Incident e is the date of 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated c include manua jigs in order No. 359960.	cost to perform a Il draining of the r to prevent the rea The Date Require	review of every reclassifier, and currence of emis ed is the date the	0.42 unit's Ir impleme ssions e e emissi complia tering 0.00 0.00 0.00 0.00 0.00	\$94 Intellatrac rounds, we went a lock nut proce- vents due to the sons event occurre ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a verify that the pump edure for fabricated ame or similar caused d and the Final Date one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$94 bs on oil mist I thrust bearing es as Incident e is the date of 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	E	conomic	Benefit	Woi	rksheet		
Respondent	The Premcor F	efining Group Inc					
Case ID No.		· ·					
Reg. Ent. Reference No.							
Media							Years of
						Percent Interest	
Violation No.	2						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs							
Delayed Costs				0.00	\$0	\$0	\$0
Equipment 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	16-Oct-2021	22-Oct-2021	0.00	\$8	n/a	\$8
other (as needed)	\$10,000	10-001-2021	22-001-2021	0.02	<u> </u>	11/ a	<u>\$0</u>
Notes for DELAYED costs	prevent the re Date Req	ecurrence of emise uired is the date t	sions events due he emissions ev	e to the rent beg	same or similar ca Jan and the Final D	II associated breake uses as Incident No Date is the date of c	o. 368444. The ompliance.
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d 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		\$8



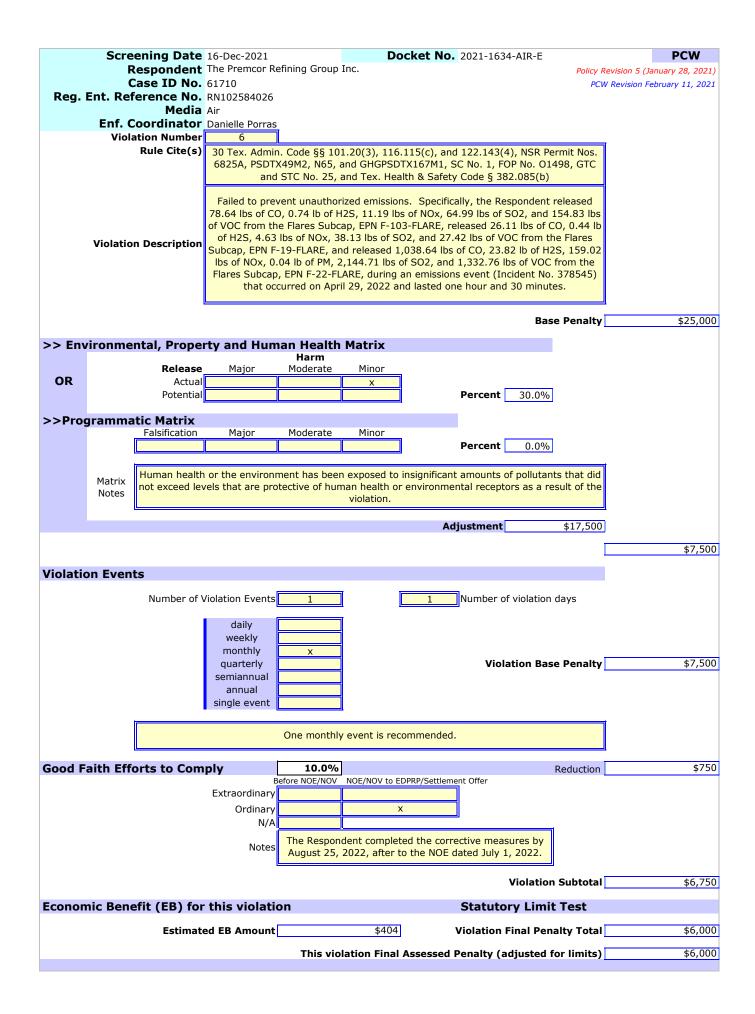
	E	conomic	Benefit	IOW	'ksheet		
Respondent	The Premcor F	Refining Group Inc					
Case ID No.		- .					
Reg. Ent. Reference No.		1					
Media							Years of
Violation No.						Percent Interest	Depreciation
violation No.	3						-
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
-							
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)	\$250	1-Nov-2021	1-Nov-2021	0.00	\$0	n/a	\$0
Notes for DELAYED costs		initial notifica	tion was due an	d the Fi	nal Date is the dat	·	
Avoided Costs	ANNU	ALIZE avoided o	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel	-			0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Supplies/Equipment				0.00	\$0	\$0 \$0	\$0 \$0
Financial Assurance ONE-TIME avoided costs	-			0.00	\$0 \$0	\$0 \$0	\$0 \$0
				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$ U	<u>\$U</u>
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$250			TOTAL		\$0



	E	conomic	Benefit	Woi	rksheet		
Respondent	The Premcor F	Refining Group Inc	2.				
Case ID No.	61710						
Reg. Ent. Reference No.	RN102584026	i i					
Media	Air					Deveryt Testeverst	Years of
Violation No.	4					Percent Interest	Depreciation
						5.0	15
	Itom Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Them: Description		Date Required	Final Date	115	Interest Saveu	Costs Saveu	EB Allount
Item Description							
Delayed Costs	Ĩ r	1			+0	+0	+0
Equipment Buildings				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction		1		0.00	\$0	\$0	\$0
Lingineering/construction				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)	\$1,500	31-Oct-2021	30-Dec-2021	0.16	\$12	n/a	\$12
Notes for DELAYED costs	Hydrotreater Catalytic Cra	Unit personnel to acking Unit in orde	raise the charge or to prevent the 5. The Date Re	e rate to recurre quired i	o provide a higher ence of emissions e	to coordinate with the proportion of hot fere events due to the sate ssions event began	ed to the Fluid ame or similar
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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 \$0	<u>\$0</u> \$0
Other (as needed)		<u>JI</u> J		0.00	\$0	\$U	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$12

		ening Date				cket No. 2021-1634-AIR-	E	PCW
		lespondent Case ID No.	The Premcor R	efining Group	Inc.			Revision 5 (January 28, 2021) W Revision February 11, 2021
Reg.			RN102584026				PC.	w Revision rebidary 11, 2021
_		Media						
		Coordinator	Danielle Porras					
	VIOI	Rule Cite(s)		1. Code §§ 10	1.20(3), 116.	115(c), and 122.143(4), NSF	R Permit Nos.	
		Rule elle(5)	6825A, PSDT>	(49M2, N65, a	and GHGPSD	TX167M1, SC No. 1, FOP No.	01498, GTC	
				,		Ith & Safety Code § 382.085	()	
						is. Specifically, the Respond lbs of NOx, 1,671.50 lbs of S		
	Violatio	n Description	lbs of VOC fro	m the Flares	Subcap, EPN	E-23-FLARE, and released 4.	39 lbs of CO,	
		····				lbs of SO2, and 1.47 lbs of V an emissions event (Incident		
						4, 2021 and lasted 12 minute		
							Base Penalty	\$25,000
	_					•	base Fenalty	\$25,000
>> En	vironme	ntal, Prope	rty and Hum	han Health Harm	Matrix			
0.0		Release	Major	Moderate	Minor			
OR		Actual Potential			<u>x</u>	Percent 30.0)%	
][]			
>>Pro	gramma	tic Matrix Falsification	Major	Moderate	Minor			
						Percent 0.0)%	
			the arthe any inc	nmont has he	an avraged t	e incignificant amounts of no	llutanta that	
	Matrix				•	o insignificant amounts of po Ith or environmental recepto		
	Notes			of	f the violatior	1.		
						Adjustment	\$17,500	
								\$7,500
								¢7,000
Violati	on Even	ts						
		Number of V	iolation Events/	1] [1 Number of violat	ion days	
			daily		1			
			weekly					
			monthly quarterly	X		Violation I	Base Penalty	\$7,500
			semiannual			, induction i	Sube Fenancy	¢7,500
			annual single event					
			Single event		<u> </u>			1
				One monthly	y event is rec	ommended.		
Good F	aith Eff	orts to Com	nlv	25.0%			Reduction	\$1,875
Good I			E	Before NOE/NOV		DPRP/Settlement Offer	Reduction	φ1/0/ S
			Extraordinary					
			Ordinary N/A					
					dent complet	ed the corrective measures b	<mark>yy</mark>	
			Notes	January 17		to the NOE dated March 14, 2022.		
							ion Subtotal	\$5,625
Econor	mic Ben	efit (EB) for	this violati	on				\$5,625
Econor	mic Bene		• this violationed EB Amount		\$7	Violat	nit Test	\$5,625 \$4,875

	E	conomic	Benefit	Wor	'ksheet		
Respondent	The Premcor F	Refining Group Inc					
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
	5					= -	
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
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)	\$1,500	14-Dec-2021	17-Jan-2022	0.09	\$7	n/a	\$7
Notes for DELAYED costs		e to the same or s	imilar causes as	Inciden		revent the recurren e Date Required is t e of compliance.	
Avoided Costs	ANNU	ALIZE avoided o	osts before en	terina	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		\$1,500			TOTAL		\$7



	E	conomic	Benefit	Wor	rksheet		
Respondent	The Premcor R	efining Group Inc	2.				
Case ID No.	61710						
leg. Ent. Reference No.	RN102584026						
Media	Air						Years of
Violation No.						Percent Interest	Depreciation
	-					5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
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
Kemediation/ Disposal							
Permit Costs Other (as needed)						n/a n/a Catalytic Cracking U e "High Level in Dist	
Permit Costs	Estimated co Fractionator to Loss of Distilla	ost to repair Flow o stable operatior ate Pumps" in ord	Control Valve 12 a, and implement er to prevent the . The Date Requ	0.32 232, ret t an em e recurr uired is	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis	n/a	\$404 nit 1241 Main illate Drums or same or similar
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is ne date	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance.	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre	\$404 nit 1241 Main illate Drums or same or similar d and the Final
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is ne date tering	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided	\$404 nit 1241 Main illate Drums or same or similar d and the Final d costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is ne date tering 0.00	\$404 urn the Fluidized (ergency procedur ence of emissions the date the emis of compliance. item (except for \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0	\$404 nit 1241 Main iillate Drums or same or similar d and the Final d costs) \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is te date tering 0.00 0.00	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for \$0 \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0 \$0	\$404 nit 1241 Main illate Drums or ame or similar d and the Final d and the Final 1 costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is ne date tering 0.00 0.00	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for \$0 \$0 \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0 \$0 \$0	\$404 nit 1241 Main illate Drums or same or similar d and the Final d and the Final d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel inspection/Reporting/Sampling Supplies/Equipment	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 0.32, ret t an em e recurr uired is te date tering 0.00 0.00 0.00	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for \$0 \$0 \$0 \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0 \$0 \$0 \$0	\$404 nit 1241 Main illate Drums or same or similar d and the Final d and the Final 50 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is ne date tering 0.00 0.00	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for \$0 \$0 \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0 \$0 \$0	\$404 nit 1241 Main illate Drums or same or similar d and the Final d and the Final d costs) \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is ne date tering 0.00 0.00 0.00 0.00	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$404 nit 1241 Main cillate Drums or same or similar d and the Final d and the Final so so \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co Fractionator to Loss of Distilla causes as Inc	ost to repair Flow o stable operatior ate Pumps" in ord ident No. 378545	Control Valve 12 a, and implement er to prevent the . The Date Requ Date is th	0.32 232, ret t an em e recurr uired is he date 0.00 0.00 0.00 0.00 0.00 0.00	\$404 urn the Fluidized (ergency procedure ence of emissions the date the emis of compliance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a Catalytic Cracking U e "High Level in Dist events due to the s sions event occurre one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$404 nit 1241 Main iillate Drums or same or similar d and the Final d and the Final so t costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

		ening Date		G		ocket No. 2021-1634-AIR-E		PCW	
		lespondent Case ID No.	The Premcor Re	efining Group	Inc.			evision 5 (January 28, 20 V Revision February 11, 20	- C
Reg.			RN102584026				101		,21
		Media							
		Coordinator	Danielle Porras	[
	101	Rule Cite(s)	I	. Code 55 10	1,20(3), 116	.115(c), and 122.143(4), NSR Pe	ermit Nos.	[
						TX167M1, SC No. 1, FOP No. 01			
			and	STC No. 25, 8	and Tex. Hea	alth & Safety Code § 382.085(b)			
						ns. Specifically, the Respondent			
						b of SO2, and 1.94 lbs of VOC f ased 68.83 lbs of CO, 31.74 lb of			
	Violatio	n Description	lbs of NOx, 2,	923.88 lbs of	SO2, and 1	14.78 lbs of VOC from the HCU 9	43 Flare,		
			EPN E-26-FLAR			ent (Incident No. 351934) that o nd lasted six hours.	ccurred on		
			<u> </u>		, _o a.				
						Bas	e Penalty	\$25,0)00
>> Env	vironme	ntal, Prope	rty and Hum	an Health	Matrix				
		Release		Harm Moderate					
OR		Actual	Major	Moderate	Minor x	1			
		Potential				Percent 30.0%			
>>Pro	aramma	tic Matrix							
	granne	Falsification	Major	Moderate	Minor				
						Percent 0.0%			
		Human health	or the environr	nent has beer	a exposed to	insignificant amounts of pollutan	ts that did		
	Matrix Notes					r environmental receptors as a re			
	Notes				violation.				
						Adjustment	\$17,500		
								\$7,5	500
								ψ, γς	
Violatio	on Even	ts							
		Number of V	/iolation Events	1		1 Number of violation	days		
			daily		T				
			weekly						
			monthly	Х					
			quarterly semiannual			Violation Bas	e Penalty	\$7,5	00
			annual						
			single event						
				One menthly	, avant is rad	anmandad			
				One monthly	vevent is rec	commended.			
Good F	aith Eff	orts to Com	ply	25.0%			Reduction	\$1,8	375
				efore NOE/NOV	NOE/NOV to E	DPRP/Settlement Offer			
			Extraordinary Ordinary	x					
			N/A	~					
			Nahaa	The Respon	dent comple	ted the corrective measures by			
			Notes	March 25, 2	021, prior to	the NOE dated June 30, 2021.			
			Ľ			Violation	Subtotal	\$5,6	575
								\$5,0	,23
Econon	nic Bene	efit (EB) for	this violatio	on		Statutory Limit	t Test		
		Estimate	ed EB Amount		\$63	Violation Final Pen	alty Total	\$4,8	375
				This vio	lation Final	Assessed Penalty (adjusted f	or limits)	\$4,8	375
									-

	E	conomic	Benefit	Wor	'ksheet		
Respondent	The Premcor F	Refining Group Inc					
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
VIOIALIOII NO.	/						•
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description	1						
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)				0.06	\$63 Pressure Safety V	n/a alve 9115 to Incone	\$63 el in order to
Other (as needed) Notes for DELAYED costs	Estimated prevent the re	cost to upgrade th ecurrence of emiss	ne spring metall sions events due	0.06 urgy for to the	\$63 Pressure Safety V same or similar ca	n/a	\$63 el in order to o. 351934. The
	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the ent occu	\$63 Pressure Safety V same or similar ca rred and the Final	n/a alve 9115 to Incone buses as Incident No	\$63 el in order to o. 351934. The compliance.
Notes for DELAYED costs	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the ent occu tering 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0	n/a alve 9115 to Incone buses as Incident No Date is the date of one-time avoideo \$0	\$63 el in order to b. 351934. The compliance. d costs) \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the ent occu tering 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0	n/a alve 9115 to Incone buses as Incident No Date is the date of one-time avoided \$0 \$0	\$63 el in order to 5, 351934. The compliance. 1 costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 0.06 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0	n/a 'alve 9115 to Incone uses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0	\$63 el in order to . 351934. The compliance. 1 costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the nt occu tering 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone uses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to . 351934. The compliance. 1 costs) \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the nt occu tering 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone uses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to b. 351934. The compliance. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the the ccu tering 0.00 0.00 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone puses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to 5, 351934. The compliance. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the nt occu tering 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone uses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to 5, 351934. The compliance. 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the the ccu tering 0.00 0.00 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone puses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to 5, 351934. The compliance. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the the ccu tering 0.00 0.00 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone puses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to 5, 351934. The compliance. 4 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs Other (as needed)	Estimated prevent the re Date Requ	cost to upgrade th ecurrence of emis: ired is the date th	ne spring metall sions events due ne emissions eve	0.06 urgy for to the the ccu tering 0.00 0.00 0.00 0.00 0.00 0.00	\$63 Pressure Safety V same or similar ca rred and the Final item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a alve 9115 to Incone puses as Incident No Date is the date of one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$63 el in order to 5. 351934. The compliance. 4 costs) 50 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

The Premcor Refining Group Inc. Docket No. 2021-1634-AIR-E; Case No. 61710 Emissions Event Table (Incident No. 368444)

Source Name	Pollutants (lbs)							
	EPN	CO	PM	H2S	NOx	SO2	VOC	
SRU 546 and SRUs Subcap	E-04-SCOT	156.55	1.25	8.92	12.08	1,085.64	0.90	
HCU - Fractionator Feed Furnace	E-02-943	0.94	8.32	0.00	33.42	120.88	0.29	
Flares Subcap	F-15-FLARE	365.07	0.02	1.08	68.19	99.61	288.72	
Heater 843-H1	E-01-843	0.0001	4.54	0.00	33.44	51.55	0.16	
Flares Subcap	F-13-FLARE	87.48	0.00	0.00	12.23	0.00	3.95	
Heater 843-H2	E-02-843	0.0002	9.20	0.00	84.49	104.44	0.33	
Heater 147-F-1200	E-02-147	1.25	0.99	0.00	6.84	11.16	0.05	
Flares Subcap	F-19-FLARE	87.38	0.002	0.41	14.07	32.88	116.78	
Heater 147-F-1100	E-01-147	3.83	2.68	0.00	12.94	32.92	0.27	
Flares Subcap	F-22-FLARE	568.99	0.00	31.12	86.78	2,222.15	1,208.30	
SRU 544 and SRUs Subcap	E-02-SCOT	21.89	0.66	0.07	13.44	742.35	0.48	
Flares Subcap	F-103-FLARE	1,174.62	0.04	126.29	189.64	11,630.04	1,514.94	
Flares Subcap	F-20-FLARE	344.94	0.00	18.37	67.69	1,690.85	170.85	
Flares Subcap	E-23-FLARE	2,811.27	0.14	627.91	551.71	57,837.25	1,848.24	
SRU 543 and SRUs Subcap	E-01-SCOT	1,167.04	1.99	0.61	7.23	917.52	1.44	
WWTU-8742 Fugitives	N/A	0.00	0.00	0.00	0.00	0.00	30.60	
Flares Subcap	F-18-FLARE	65.10	0.00	2.57	12.36	236.44	43.87	
SRU 545 and SRUs Subcap	E-03-SCOT	23.18	0.53	6.92	7.42	197.28	0.39	
HCU - Reactor 1 and Reactor 2 Furnaces	E-01-943	1.90	1.53	0.00	11.61	29.92	0.03	
HCU 943 FLARE	E-26-FLARE	536.62	0.00	19.09	105.31	1,758.03	48.74	
	Totals:	7,418.05	31.89	843.36	1,330.89	78,800.91	5,279.33	

Source	Pollutants (lbs)									
Name	EPN	Ammonia (NH3)	Hydrogen Cyanide (HCN)	СО	РМ	H2S	NOx	SO2	Sulfuric Acid (H2SO4)	VOC
FCCU Wet Gas Scrubber	E-01- WGS	1.29	33.39	768.31	15.95	0.00	25.60	1.32	3.34	5.03
Refinery Fugitives VOC Subcap	F-1241	0.00	0.00	36.37	104.31	0.00	1.41	71.96	0.00	6.00
Flares Subcap	F-19- FLARE	0.00	0.00	15.22	0.00	0.72	2.68	52.13	0.00	18.11
Flares Subcap	F-22- FLARE	0.00	0.00	1,480.79	0.00	90.10	221.42	7,087.38	0.00	2,765.26
Flares Subcap	F-103- FLARE	0.00	0.00	90.92	0.00	3.22	13.42	294.17	0.00	203.22
	Totals:	1.29	33.39	2,391.61	120.26	94.04	264.53	7,506.96	3.34	2,997.62

The Premcor Refining Group Inc. Docket No. 2021-1634-AIR-E; Case No. 61710 Emissions Event Table (Incident No. 369505)

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



Compliance History Report

Compliance History Report for CN601420748, RN102584026, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator:	CN601420748, The Premcor Refining Group Inc.		ssification: HIGH	Rating: 0.00		
Regulated Entity:	RN102584026, VALERO PORT ARTH REFINERY	UR Cla	assification: HIGH	Rating: 0.00		
Complexity Points:	45	Re	peat Violator: NO			
CH Group:	02 - Oil and Petroleum Refineries					
Location:	1801 South Gulfway Drive, Port Art	hur, Jeffers	on County, Texas 77640-44	16		
TCEQ Region:	REGION 10 - BEAUMONT					
ID Number(s):						
AIR OPERATING PERMITS	PERMIT 3423	AIR OPER	ATING PERMITS PERMIT	3992		
AIR OPERATING PERMITS	ACCOUNT NUMBER JE0042B	AIR OPER	ATING PERMITS PERMIT	1498		
AIR OPERATING PERMITS	PERMIT 2227	AIR OPER	ATING PERMITS PERMIT	2228		
AIR OPERATING PERMITS	PERMIT 2229	AIR NEW	SOURCE PERMITS REGIST	FRATION 17038		
AIR NEW SOURCE PERMIT	S PERMIT 6825A	AIR NEW	SOURCE PERMITS REGIST	FRATION 13635A		
AIR NEW SOURCE PERMIT	S ACCOUNT NUMBER	AIR NEW	SOURCE PERMITS REGIST	FRATION 166295		
JE0042B AIR NEW SOURCE PERMIT	S AFS NUM 4824500004	AIR NEW	SOURCE PERMITS EPA PE	RMIT N65		
AIR NEW SOURCE PERMIT			SOURCE PERMITS REGIST			
AIR NEW SOURCE PERMIT	S REGISTRATION 112591		SOURCE PERMITS PERMIT			
AIR NEW SOURCE PERMIT	S PERMIT AMOC123	AIR NEW	SOURCE PERMITS REGIST	TRATION 166565		
AIR NEW SOURCE PERMIT	S REGISTRATION 161890	AIR NEW SOURCE PERMITS REGISTRATION 167168				
AIR NEW SOURCE PERMIT	S EPA PERMIT GHGPSDTX167	AIR NEW	SOURCE PERMITS PERMIT	ΓΑΜΟC42		
AIR NEW SOURCE PERMIT	S REGISTRATION 159332	AIR NEW SOURCE PERMITS REGISTRATION 159451				
AIR NEW SOURCE PERMIT	S EPA PERMIT PSDTX49M2	AIR NEW SOURCE PERMITS REGISTRATION 158672				
AIR NEW SOURCE PERMIT GHGPSDTX167M1	S EPA PERMIT	AIR NEW	SOURCE PERMITS REGIST	FRATION 160937		
AIR NEW SOURCE PERMIT	S PERMIT 158399	AIR NEW	SOURCE PERMITS REGIST	FRATION 162009		
AIR NEW SOURCE PERMIT	S REGISTRATION 156162	AIR NEW	SOURCE PERMITS PERMIT	Г АМОС127		
AIR NEW SOURCE PERMIT	S REGISTRATION 174427	AIR NEW SOURCE PERMITS REGISTRATION 173749				
AIR NEW SOURCE PERMIT	S REGISTRATION 174426	AIR NEW SOURCE PERMITS REGISTRATION 171554				
AIR NEW SOURCE PERMIT	S REGISTRATION 172262	AIR NEW SOURCE PERMITS REGISTRATION 171934				
AIR NEW SOURCE PERMIT	S REGISTRATION 175101	AIR NEW SOURCE PERMITS REGISTRATION 175921				
IHW CORRECTIVE ACTION REGISTRATION # (SWR) 300		WASTEWATER EPA ID TX0005991				
WASTEWATER PERMIT WQC		AIR EMIS	SIONS INVENTORY ACCO	UNT NUMBER		
POLLUTION PREVENTION P00987	PLANNING ID NUMBER		IAL AND HAZARDOUS WA	ASTE EPA ID		
INDUSTRIAL AND HAZARD			IAL AND HAZARDOUS WA	ASTE PERMIT 50350		
REGISTRATION # (SWR) 300 TAX RELIEF ID NUMBER 245		TAX RELIEF ID NUMBER 16122				
TAX RELIEF ID NUMBER 172			TAX RELIEF ID NUMBER 17258			
TAX RELIEF ID NUMBER 258			EF ID NUMBER 25805			
Compliance History Per	iod: September 01, 2018 to August	31, 2023	Rating Year: 2023	Rating Date: 09/01/2023		
Date Compliance Histor	y Report Prepared: April 03, 20	024				
Agency Decision Requir	ing Compliance History: Enfo	rcement				
Component Period Sele	cted: April 03, 2019 to April 03, 2	024				

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

Name: Danielle Porras

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:
 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.

2 Effective Date: 06/17/2022 ADMINORDER 2021-0982-AIR-E (1660 Order-Agreed Order With Denial) Classification: Moderate Citation: 30 TAC Chapter 101, SubChapter A 101.20(3) 30 TAC Chapter 116, SubChapter B 116.115(c) 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 1 9 OP Description: Failure to maintain an emission rate below the allowable emission limits.

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.):

The uppion	an dates of investigation	IS (CCEDO III)
Item 1	April 12, 2019	(1549300)
Item 2	April 18, 2019	(1571820)
Item 3	May 20, 2019	(1583249)
Item 4	June 20, 2019	(1571283)
Item 5	July 23, 2019	(1580340)
Item 6	August 15, 2019	(1582560)
Item 7	August 20, 2019	(1541225)
Item 8	August 26, 2019	(1589786)
Item 9	September 13, 2019	(1596574)
Item 10	October 08, 2019	(1597043)
Item 11	November 19, 2019	(1606128)
Item 12	November 20, 2019	(1610178)
Item 13	November 21, 2019	(1610780)
Item 14	December 20, 2019	(1626396)
Item 15	January 20, 2020	(1634037)
Item 16	February 14, 2020	(1630047)
Item 17	February 18, 2020	(1640656)
Item 18	February 27, 2020	(1630525)
Item 19	March 20, 2020	(1647176)
Item 20	April 20, 2020	(1653512)
Item 21	April 30, 2020	(1644251)
Item 22	May 17, 2020	(1660098)
Item 23	May 20, 2020	(1646150)
Item 24	May 29, 2020	(1646047)
Item 25	June 04, 2020	(1651799)
Item 26	June 19, 2020	(1666603)

Item 27	July 17, 2020	(1673560)
Item 28	July 28, 2020	(1664502)
Item 30	August 20, 2020	(1680335)
Item 31	September 18, 2020	(1672802)
Item 32	September 23, 2020	(1665010)
Item 33	October 20, 2020	(1673016)
Item 34	October 21, 2020	(1678600)
Item 36	November 19, 2020	(1712443)
Item 37	December 16, 2020	(1691215)
Item 38	January 19, 2021	(1712445)
Item 39	January 20, 2021	(1699043)
		. ,
Item 40	February 11, 2021	(1725498)
Item 41	February 12, 2021	(1700435)
Item 42	February 24, 2021	(1703309)
Item 43	March 12, 2021	(1704054)
Item 44	April 20, 2021	(1709171)
Item 45	May 03, 2021	(1706406)
Item 46	May 12, 2021	(1707730)
Item 47	May 18, 2021	(1740055)
Item 48	June 07, 2021	(1725122)
Item 49	July 20, 2021	(1751700)
Item 50	August 17, 2021	(1754999)
Item 51	August 19, 2021	(1757164)
Item 52	September 15, 2021	(1766244)
Item 53	September 23, 2021	(1703499)
Item 54	October 12, 2021	(1764196)
Item 55	October 15, 2021	(1776707)
Item 56	November 16, 2021	(1783616)
Item 57	November 28, 2021	(1772396)
Item 58	December 01, 2021	
		(1774262)
Item 59	December 16, 2021	(1790642)
Item 60	January 13, 2022	(1798436)
Item 61	January 27, 2022	(1744986)
Item 62	February 11, 2022	(1806310)
Item 63	February 16, 2022	(1790433)
Item 64	April 19, 2022	(1819948)
Item 65	May 18, 2022	(1811430)
Item 66	May 20, 2022	(1812011)
Item 67	June 06, 2022	(1818963)
Item 68	June 17, 2022	(1835079)
Item 69	July 20, 2022	(1842284)
Item 70	July 26, 2022	(1832853)
Item 71	August 19, 2022	(1839083)
Item 72	October 11, 2022	(1862572)
Item 73	October 17, 2022	(1847577)
Item 74	October 18, 2022	(1806095)
Item 75	October 20, 2022	(1805478)
Item 76	November 17, 2022	(1869486)
Item 78	November 22, 2022	(1860646)
Item 79	December 19, 2022	(1875335)
Item 80		
	January 18, 2023	(1882156)
Item 81	January 23, 2023	(1868913)
Item 82	January 24, 2023	(1868690)
Item 83	February 06, 2023	(1874366)
Item 84	February 13, 2023	(1874741)
Item 85	February 16, 2023	(1889972)
Item 86	March 10, 2023	(1898531)
Item 87	April 18, 2023	(1905319)
Item 88	April 24, 2023	(1860760)
Item 89	June 15, 2023	(1902340)
Item 90	June 20, 2023	(1919105)

Item 91	July 13, 2023	(1926069)
Item 92	August 09, 2023	(1918265)
Item 93	August 15, 2023	(1933033)
Item 94	August 28, 2023	(1918676)
Item 95	September 18, 2023	(1939169)
Item 96	October 02, 2023	(1930483)
Item 97	October 30, 2023	(1932802)
Item 98	December 20, 2023	(1961474)
Item 99	January 19, 2024	(1968069)
Item 100	February 01, 2024	(1924977)
Item 101	February 12, 2024	(1960688)
Item 102	March 12, 2024	(1965594)
Item 103	March 15, 2024	(1902570)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.): A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

a regulated	rentity. A not	ice of violation is not a final enforcement action, nor proof that a violation has actua
1	Date: 04/	30/2023 (1912503)
	Self Report?	YES Classification: Moderate
	Citation:	2D TWC Chapter 26, SubChapter A 26.121(a)
		30 TAC Chapter 305, SubChapter F 305.125(1)
	Description:	Failure to meet the limit for one or more permit parameter
2	D.1. 07/	20/2022 (1022500)
2		28/2023 (1902589)
	Self Report?	NO Classification: Moderate
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b)
		Special Condition 1 PERMIT
	Description:	Failure to prevent unauthorized emissions to the atmosphere during an
	Beschption	emissions event that was discovered on April 6, 2023, TCEQ STEERS Incident
		No. 398551.
3		21/2023 (1917104)
	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 Ja 60.102a(b)(4)
		40 CFR Chapter 63, SubChapter C, PT 63, SubPT JUU 63.1565(a)(1)
		5C THSC Chapter 382 382.085(b)
		General Terms and Conditions OP
		Special Condition 25 OP
		Special Condition 3A PERMIT
	Decerintian	Special Condition 5B PERMIT
	Description:	Failure to maintain the concentration limit for CO (500 parts per million volume, dry basis) from WGS
	Self Report?	NO Classification: Moderate
	Citation:	30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)
		30 TAC Chapter 116, SubChapter B 116.115(c)
		30 TAC Chapter 122, SubChapter B 122.143(4)
		40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(1)
		5C THSC Chapter 382 382.085(b) General Terms and Conditions OP
		Special Condition 25 OP
		Special Condition 6D PERMIT
	Description:	Failure to operate the flare with no visible emissions except for periods not to
		exceed a total of five minutes in any two consecutive hours.
	Self Report?	NO Classification: Moderate
	Citation:	30 TAC Chapter 115, SubChapter D 115.352(4)
		30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122, 143(4)
		30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
		40 CFR Part 60, Subpart VV 60.482-6
		5C THSC Chapter 382 382.085(b)
		General Terms and Conditions OP
		Special Condition 25 OP
		Special Condition 5C PERMIT
		Special Condition 60E PERMIT

Description:	Failure to operate without a cap, blind flange, plug, or a second valve installed on equipment in Volatile Organic Compound (VOC) service.
Self Report? Citation:	NO Classification: Moderate 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 35B PERMIT
Description:	Failure to maintain the hourly Ammonia concentration of 10 ppmvd from the HCU 943 heater.
Self Report? Citation:	NO Classification: Moderate 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 24C DEDMIT
Description:	Special Condition 34C PERMIT Special Condition 35B PERMIT Failure to maintain the hourly lbs/MMBtu of NOx from the HCU heaters.
Self Report? Citation:	NO Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(c)
	30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
	5C THSC Chapter 382 382.085(b) General Terms and Conditions OP Special Condition 25 OP
Description:	Special Condition 6B PERMIT Failure to operate the Flare below the required 300 Btu/scf.
Self Report? Citation:	NO Classification: Moderate 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 51 PERMIT
Description: Self Report?	Failure to prevent visible coke emissions into the atmosphere. NO Classification: Moderate
Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)
	30 TAC Chapter 122, SubChapter B 122.144(1)(G) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP
	Special 32A PERMIT Special Condition 25 OP
Description:	Failure to generate quality assured data when waste gas is being fed to the Tail Gas Incinerator (TGI).
Self Report? Citation:	NO Classification: Moderate 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 28B PERMIT
Description: Self Report?	Failure to continuously monitor the sponge oil level in Tank-88. 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
Descriptions	Special Condition 23D PERMIT Special Condition 25 OP
Description: Self Report?	Failure to conduct weekly Total Dissolved Solids (TDS) sampling for cooling tower 432 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 25 OP Special Condition 28D PERMIT Failure to maintain the minimum sour water 3-day retention time.
	Page No. 5

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)(1)(i) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP
	Special Condition 25 OP
Description:	Special Condition 41E PERMIT Failure to depressure each coke drum to a coke drum vessel pressure
Self Report?	average of 2 psig or less determined on a rolling 60-event average. 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 Ja 60.102a(f)(1)(i) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568(a)(1) 5C THSC Chapter 382 382.085(b)
	General Terms and Conditions OP Special Condition 25 OP
Description:	Special Condition 5B PERMIT Failure to maintain the SO2 concentration on SRU-543.
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 Ja 60.102a(f)(1)(i) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568(a)(1) 5C THSC Chapter 382 382.085(b)
	General Terms and Conditions OP Special Condition 25 OP
	Special Condition 32 PERMIT Special Condition 3A PERMIT
	Special Condition 5B PERMIT
Description:	Failure to maintain the the SO2 and H2S concentrations from the SRU-544 TGI stack gas.
Self Report? Citation:	NO Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(c)
citation	30 TAC Chapter 122, SubChapter B 122.143(4)
	40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.102a(f)(1)(i) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568(a)(1) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP
	Special Condition 25 OP
	Special Condition 32 PERMIT Special Condition 3A PERMIT
Description:	Special Condition 5B PERMIT Failure to maintain SO2 and H2S concentrations from SRU-546 incinerator
	stack gas.
Self Report? Citation:	NO Classification: Moderate 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 94C-4 PERMIT
Description: Self Report?	Failure to change the carbon canister within 24 hours. 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 35C PERMIT
Description: Self Report?	Failure to maintain the hourly CO concentration of 100 ppm. 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 Y 63.563(b)(4)(ii)
	5C THSC Chapter 382 382.085(b) General Terms and Conditions OP
	Special Condition 25 OP Special Condition 5D PERMIT
Description:	Failure to maintain the minimum stack tested temperature from the vapor
	combustor unit (VCU) MC24/25.

	Self Report? Citation:	NO Classification: Moderate 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 Y 63.563(a)(4)(iv) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP Special Condition 16B PERMIT			
	Description:	Special Condition 25 OP Failure to maintain the six-minute average pressure and the 15-minute			
	Self Report?	average pressure while loading an inland barge. NO Classification: Moderate			
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(A) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP			
	Description: Self Report?	Failure to report all instances of deviations. NO Classification: Moderate			
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.165(a)(8) 5C THSC Chapter 382 382.085(b) General Terms and Conditions OP			
	Description:	Failure to correctly certify the semiannual deviation report covering the compliance period of January 1, 2022,- June 30, 2022.			
4		30/2023 (1946020)			
	Self Report? Citation:	YES Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)			
	Description:	Failure to meet the limit for one or more permit parameter			
5	Date: 10/3	31/2023 (1951712)			
		YES Classification: Moderate 2D TWC Chapter 26, SubChapter A 26.121(a)			
	Description:	30 TAC Chapter 305, SubChapter F 305.125(1) Failure to meet the limit for one or more permit parameter			
6	Date: 01/0 Self Report?	09/2024 (1932021) NO Classification: Major			
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 5C THSC Chapter 382 382.085(b) 6825A PERMIT			
	Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on August 6, 2023, TCEQ/STEERS Incident No. 407707.			
7	Date: 01/1	12/2024 (1949664)			
		•			
	Citation:	40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(h) General Terms and Conditions OP Special Condition 23 OP			
	Description:	Special Condition 5A PERMIT Failure to submit the 3rd quarter 2023 benzene fenceline report within 45			
		days following September 30.			
F. Envi	ronmental audits Notice of Intent Date Disclosure Date: Viol.				
		AC Chapter 122, SubChapter B 122.144 ds 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- WASHI and GRP-WASH2.					
	Notice of Intent Date No DOV Associa				

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. Minor 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.106a(a)(6)(i)(E) Citation: 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. 04/18/2019 (1556177) Notice of Intent Date: Disclosure Date: 10/18/2019 Viol. Minor 40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2) Citation: 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. 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. 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. 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. Minor Viol. Citation: Classification: 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, 02, and CO monitors. Notice of Intent Date: 04/18/2019 (1556197) Disclosure Date: 10/18/2019 Viol. Minor Classification: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1572(c)(1) Citation: 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: No DOV Associate	04/25/2019 d	(1557018)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557020)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557021)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557024)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557028)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557029)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557030)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557031)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557032)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557034)
Notice of Intent Date: No DOV Associate	04/25/2019 d	(1557035)
Notice of Intent Date: No DOV Associated	05/02/2019 d	(1557769)
Notice of Intent Date: No DOV Associate	05/09/2019 d	(1558709)
Notice of Intent Date: No DOV Associate	05/09/2019 d	(1558710)
Notice of Intent Date: No DOV Associate	05/09/2019 d	(1558712)
Notice of Intent Date: No DOV Associate	05/09/2019 d	(1558713)
Classification:	05/09/2019 09/19/2019 inor	
		ubChapter D 115.354 ubChapter D 115.357
Description: Discover	ed valves in VC alves were inter	OC service that were incorrectly designated as Temporarily Out of Service mittently submerged under rain water and not consistently monitored
Notice of Intent Date: Disclosure Date: Viol. M	05/09/2019 09/19/2019 inor	(1558719)
Classification: Citation: 40 CFR	Chapter 60, Su	bChapter C, PT 60, SubPT VVa 60.482-7a bChapter C, PT 60, SubPT GGGa 60.592a(a)
	alves were inter	OC service that were incorrectly designated as Temporarily Out of Service mittently submerged under rain water and not consistently monitored

05/09/2019 (1558720) Notice of Intent Date: Disclosure Date: 09/19/2019 Viol. Minor Classification: Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) Ramt 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. Minor Classification: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.590(a)(3) Citation: Discovered valves in VOC service that were incorrectly designated as Temporarily Out of Service Description: (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 Minor Classification: 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. Minor Classification: 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: No DOV Associated	05/30/2019 (1571041)			
Notice of Intent Date: No DOV Associated	05/30/2019 (1571042)			
Notice of Intent Date: No DOV Associated	05/30/2019 (1571044)			
Notice of Intent Date: No DOV Associated	06/13/2019 (1575944)			
Notice of Intent Date: No DOV Associated	06/13/2019 (1575945)			
Notice of Intent Date: No DOV Associated	06/13/2019 (1575949)			
Notice of Intent Date: No DOV Associated	06/13/2019 (1575950)			
Notice of Intent Date: No DOV Associated	06/13/2019 (1575951)			
Notice of Intent Date: No DOV Associated	06/13/2019 (1575952)			
Notice of Intent Date: 06/13/2019 (1575953) Disclosure Date: 12/12/2019 Viol. Minor Classification: Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(g)(9)(iv)				
Description: MACT CC concentrat	periodic reports for 2015-2018 did not include the total strippable hydrocarbon ion measured during re-monitoring to verify repair as required by 40 CFR 63.6655(g)(9)(iv) es when leaks were detected through cooling tower monitoring.			
Classification: 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.				
Viol. Min Classification:	06/13/2019 (1575954) 12/12/2019 lor hapter 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).				
Viol. Min Classification:	06/13/2019 (1575955) 12/12/2019 lor hapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)			
Description: 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: Disclosure Date: Viol. Min	06/13/2019 (1575956) 12/12/2019 Nor			
Classification: Citation: 40 CFR C	hapter 63, SubChapter C, PT 63, SubPT CC 63.655(f)			
	n of compliance status report was not submitted by May 25th, 2019 (150 days after the ce vent compliance date, December 26, 2018).			

Notice of Intent Date: 06/13/2019 (1575957) Disclosure Date: 12/12/2019 Viol. Minor Classification: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f) Citation: 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. Minor Classification: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f) Citation: 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. Minor Classification: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(f) Citation: 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. Minor Classification: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(h) Citation: 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. 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. 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 433 Isobutane Recycle Sample Station (in Vapor service). Viol. 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 433 Deethanizer OVHD Sample Station (in Vapor service). Viol. Minor
Viol. Citation: Classification: 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 433 BB Sample Station (in Vapor service). Viol. Minor
Classification: 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 433 Isobutane Charge Sample Station (in Vapor service). Viol. Minor
Classification: 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 433 Propane Sample Station (in Vapor service). Viol. Minor
Classification: 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 433 Dethanizer Bottoms Sample Station (in Vapor service). Viol. Minor
Classification: 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 433 Reactor Charge to	R201 Sample Station (in Vapor
service). Viol. Minor	
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not fur requirements at some locations in Unit 433 Reactor Effluent from the samples of	
service). Viol. Minor	
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not furequirements at some locations in Unit 433 KOH Treater Efflue Viol. Minor	
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not fur requirements at some locations in Unit 433 Butane KOH Treated	ully comply with closed-loop sampling
service). Viol. Minor	
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not fur requirements at some locations in Unit 433 E6 A/B Butane Lea	ully comply with closed-loop sampling
Viol. Minor Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 62, SubChapter C, PT 60, SubPT CC 63 648(
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(Description: Valero discovered that sampling connection systems did not fu	ully comply with closed-loop sampling
requirements at some locations in Unit 433 V22/V23 Butane Le Viol. Minor	ead Sample Station (in Vapor service).
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not fur requirements at some locations in Unit 433 V15 A/B Propane L	
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. Minor	
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not fur requirements at some locations in Unit 6341, including the loo	ully comply with closed-loop sampling
service). Viol. Minor	
Classification: Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(
Description: Valero discovered that sampling connection systems did not furequirements at some locations in Unit 6341, including the Gas Vapor service).	
Viol. Minor Classification:	

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a) Citation: 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) Disclosure Date: 01/06/2020 Viol Minor Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) Rgmt Prov: PERMIT SC 10A PERMIT SC 10B PERMIT SC 18 Description: Records were not readily available to indicate continuous monitoring of the bulk liquid temperature of the liquid stored in the tank authorized for marine loading and records of the annual calibration checks of the temperature monitor were not available. Viol. Minor Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) Rqmt Prov: PERMIT SC 18 PERMIT SC 9F Description: Records were not readily available to document that the true vapor pressure of any liquid stored at this facility in an atmospheric tank did not exceed 11.0 PSIA. Viol. Minor Classification: Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) 30 TAC Chapter 116, SubChapter B 116.115(c) Description: Maximum marine loading rates for materials less than and greater than 0.5 PSIA are not available for all products. Viol Minor Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) Description: Records were not readily available to indicate a vacuum of at least 1.5 inches of water was regularly maintained by the vacuum-assist vapor collection system during negative pressure loading of inland barges with a vapor pressure of greater than 0.5 PSIA; evidence suggests during certain loading activities the pressure limitation of -1.5 inches of water has been outside the permit limit; and records were not available for annual calibration checks of the pressure monitors. Viol. Minor Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) Ramt Prov: PERMIT SC 17B Description: Records were not readily available to demonstrate compliance with 17.B. It states "The pressure at

the vapor collection connection of an inerted marine vessel must be maintained such that the

Viol.	pressure in a vessels' cargo tanks do not go below 0.2 PSIG or exceed 80% of the lowest setting of any vessel's PRV." The pressure shall be recorded and continuously monitored; and evidence suggests that during certain loading activities of inerted marine vessels the pressure limitation has been outside the
Classificatio	Minor on:
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 56B
Viol.	Records were not readily available to document that AVOs were conducted for H2S and NH3 twice per shift and that actions were taken to repair the AVO leaks, if needed. Minor
Classificatic 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 2B PERMIT SC 2E
Viol.	Records were not readily available to indicate each tank truck receiving liquid sulfur from each storage pit being loaded with liquid sulfur was tested for H2S monthly. Moderate
Classificatic 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:	It appears cooling tower 316 is over the annual VOC TPY 12-month rolling average as required in the MAERT.
Notice of Inte Disclosure Viol.	
Classificatic Citation:	on: 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)
Viol.	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). Minor
Classificatio Citation:	on: 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: Viol.	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). Minor
Classificatio Citation:	on: 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)
Viol.	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). Minor
Classificatio Citation:	on: 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 Inte Disclosure Viol.	
Classificatic Citation:	30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov:	
Description:	Crude storage tank (TK 106) was over the voe TPY 12-month rolling average limit from August 2018 until January 2019.

Viol. Minor Classification: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(H) Citation: 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. Minor Classification: 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 nrovided. 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: No DOV Associated	02/13/2020	(1631866)
Notice of Intent Date: No DOV Associated	02/13/2020	(1631869)
Notice of Intent Date: No DOV Associated	02/13/2020	(1631870)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631878)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631879)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631880)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631881)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631882)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631883)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631884)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631886)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631888)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631891)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631892)
Notice of Intent Date: No DOV Associated	02/20/2020	(1631893)
Notice of Intent Date: No DOV Associated	02/27/2020	(1632434)
Notice of Intent Date: No DOV Associated	02/27/2020	(1632435)
Notice of Intent Date: No DOV Associated	02/27/2020	(1632436)
Notice of Intent Date: No DOV Associated	03/05/2020	(1633740)
Notice of Intent Date: No DOV Associated	03/05/2020	(1633743)
Notice of Intent Date: No DOV Associated	03/05/2020	(1633748)
Notice of Intent Date: No DOV Associated	03/10/2020	(1637635)

Notice of Intent Date: No DOV Associated	03/12/2020	(1637682)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637685)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637688)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637690)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637691)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637693)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637694)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637696)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637697)
Notice of Intent Date:	03/12/2020	(1637699)
No DOV Associated		
Notice of Intent Date: No DOV Associated	03/12/2020	(1637700)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637702)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637703)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637704)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637705)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637707)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637708)
Notice of Intent Date: No DOV Associated	03/12/2020	(1637710)
Notice of Intent Date: No DOV Associated	03/26/2020	(1639372)
Notice of Intent Date: No DOV Associated	03/26/2020	(1639391)
Notice of Intent Date: No DOV Associated	03/26/2020	(1639392)
Notice of Intent Date: No DOV Associated	03/26/2020	(1639393)

Notice of Intent Date: No DOV Associated	03/26/2020	(1639397)
Notice of Intent Date: No DOV Associated	03/26/2020	(1639401)
Notice of Intent Date: No DOV Associated	03/26/2020	(1639403)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644418)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644419)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644422)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644426)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644428)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644431)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644432)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644434)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644435)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644436)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644441)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644442)
Notice of Intent Date: No DOV Associated	04/09/2020	(1644444)
Notice of Intent Date: No DOV Associated	04/30/2020	(1646013)
Notice of Intent Date: No DOV Associated	04/30/2020	(1646014)
Notice of Intent Date: No DOV Associated	04/30/2020	(1646015)
Notice of Intent Date: No DOV Associated	04/30/2020	(1646016)
Notice of Intent Date: No DOV Associated	04/30/2020	(1646017)
Notice of Intent Date: No DOV Associated	04/30/2020	(1646018)
Notice of Intent Date:	05/07/2020	(1646800)

No DOV Associated

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Notice of Intent I Disclosure Da Viol.	
Citation: 30	TAC Chapter 101, SubChapter A 101.10
Description: Th (Wo Nov 201	particulate emissions with a size less than 2.5 microns (PM2.S) from the FCCU Wet Gas Scrubber 6) were underreported. The PM2.S factor was incorrectly calculated in the workbook "Pages from 8, 2017 Valero PAR (FCCU-1241 WGS) Performance Test Report.xlsx" found in the folder for the Emission Inventory information. The calculated front-half contribution to the total PM2.S sion factor was incorrectly divided by 100. Minor
Citation: 30	TAC Chapter 101, SubChapter A 101.10
	iculate matter (PM/PM10/PM2.S) 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 ptember 2018 but inadvertently not included in the emissions inventory. Minor
Citation: 30	TAC Chapter 101, SubChapter A 101.10
fact eac Val	ng review of the tank roof fitting information the following issues were discovered: 1) The fitting rs for slotted guidepoles were entered into ValAir; however, the number of slotted guidepoles for tank is zero; and 2) The number of access hatches, legs, and vacuum breakers are entered into r; however, the fitting factors are not entered. These errors result in an under-reporting of sions. This concerns TK0078 New", "TK0088 New", "TK2588 new", & "TK2590 New".
Notice of Intent	ate: 06/19/2020 (1658358)
Disclosure Da Viol	: 09/04/2020 Minor

Viol. Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Description: Viol.	Emissions were underreported for heater 146-HI0I due to incorrect fuel flow data being used in the emission calculations. Minor
Citation:	30 TAC Chapter 101, SubChapter A 101.10
Description:	Emissions for heaters 241-BIOIAB and 242-8201AB were underreported because fuel data used in the emission calculations was in the incorrect units which caused the error.
Viol.	Minor
Citation:	30 TAC Chapter 101, SubChapter A 101.10
Description: Viol.	The particulate emissions with a size less than 2.5 microns (PM2.S) from the FCCU Wet Gas Scrubber (WGS) were underreported. The PM2.S 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 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.
Viol.	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. Minor
Viol. Citation:	
Classificatio	on: 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 Inte	ent Date: 06/19/2020 (1658359)
Disclosure	e Date: 09/04/2020
Viol.	Minor
Classificatio Citation:	30 TAC Chapter 101, SubChapter A 101.10
Description: Viol.	The particulate emissions with a size less than 2.5 microns (PM2.S) from the FCCU Wet Gas Scrubber (WGS) were underreported. The PM2.S 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.S emission factor was incorrectly divided by 100.
Classificatio Citation:	
	Hexane emissions were inadvertently not reported for Flare 103. The emission calculations do
	calculate hexane emissions from the flare.
Viol. Classificatio	Minor on:
Citation:	30 TAC Chapter 101, SubChapter A 101.10
Description: Viol.	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. Minor
Classificatio	on:
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. Classificatio	Minor an'
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. Classificatio	Minor
Classificatio Citation:	on: 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 PMIO emissions that were reported.

Notice of Intent Date: No DOV Associated	07/16/2020	(1665765)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665768)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665770)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665772)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665773)
Notice of Intent Date:	07/16/2020	(1665775)
No DOV Associated		
Notice of Intent Date: No DOV Associated	07/16/2020	(1665776)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665778)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665780)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665781)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665783)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665784)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665785)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665786)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665787)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665788)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665789)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665790)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665791)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665792)
Notice of Intent Date: No DOV Associated	07/16/2020	(1665793)

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 Minor Classification: 30 TAC Chapter 116, SubChapter B 116.110(a) Citation: Rgmt Prov: PERMIT SC 60 Description: The database review identified 1614 connectors in Unit F-1747 that were missing guarterly monitoring events after 1/1/2016. Viol. Minor Classification: 30 TAC Chapter 115, SubChapter D 115.354(2)(C) Citation: 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 Minor Classification: 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 Notice of Intent Date: 07/30/2021 (1749827) Disclosure Date: 01/20/2022 Viol. Minor Classification: 30 TAC Chapter 116, SubChapter B 116.110 Citation: Description: Failure to timely submit a notification for emissions associated with testing propane for moisture. Notice of Intent Date: 08/11/2022 (1838746) No DOV Associated Notice of Intent Date: 08/31/2022 (1840933) No DOV Associated Notice of Intent Date: 09/09/2022 (1848080) No DOV Associated

Notice of Intent Date: 10/10/2022 (1848322) No DOV Associated

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Notice of Intent Date: 04/28/2023 (1904601)
No DOV Associated
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- G. Type of environmental management systems (EMSs): $_{\mbox{$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

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: PORT ARTHUR REFINERY					
<i>Reg Entity Add:</i> 1801 SOUTH GULFWA	Y DR				
<i>Reg Entity City:</i> CITY OF PORT ARTHU	Reg Entity No: RN102584026				
EPA Case No: 06-2020-1761 Order Issue Date (yyyymmdd): 20200616					
Case Result: CWA Sect of Statute: 301/402					
Classification: Minor					
<i>Violation Type:</i> Effluent Limit Violations,Not Otherwise Specified					
Enforcement Action: Administrative Complia	ance Orders				

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING THE PREMCOR REFINING GROUP INC. RN102584026 BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2021-1634-AIR-E

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 presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated 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. The duties and responsibilities imposed by this Order are binding upon the Respondent.

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

I. FINDINGS OF FACT

- 1. The Respondent 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. During a record review for the Plant conducted on October 29, 2021, an investigator documented that the Respondent released 615.91 pounds ("lbs") of carbon monoxide ("CO"), 112.66 lbs of hydrogen sulfide ("H2S"), 120.87 lbs of nitrogen oxides ("NOX"), 10,342.23 lbs of sulfur dioxide ("SO2"), 0.01 lb of particulate matter ("PM"), and 204.85 lbs of volatile organic compounds ("VOC") from Flares Subcap, Emissions Point Number ("EPN") E-23-FLARE, released 279.66 lbs of CO, 2.59 lbs of H2S, 54.88 lbs of NOx, 238.34 lbs of SO2, and 16.39 lbs of VOC from the HCU 943 Flare, EPN E-26-FLARE, and released 13.46 lbs of CO, 0.52 lb of NOx, 38.60 lbs of PM, and 2.22 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 359960) that occurred on June 10, 2021 and lasted ten hours and 12 minutes.
- 3. During a record review for the Plant conducted on December 20, 2021, an investigator documented that the Respondent released a total of 7,418.05 lbs of CO, 31.89 lbs of PM,

843.36 lbs of H2S, 1,330.89 lbs of NOx, 78,800.91 lbs of SO2, and 5,279.33 lbs of VOC as fugitive emissions and from multiple EPNs as shown in the table below, during an emissions event (Incident No. 368444) that began on October 16, 2021 and lasted 18 hours and 13 minutes.

Source Name	EPN	Pollutants (lbs)					
		СО	PM	H2S	NOx	SO2	VOC
SRU 546 and							
SRUs Subcap	E-04-SCOT	156.55	1.25	8.92	12.08	1,085.64	0.90
HCU -							
Fractionator							
Feed Furnace	E-02-943	0.94	8.32	0.00	33.42	120.88	0.29
Flares Subcap	F-15-FLARE	365.07	0.02	1.08	68.19	99.61	288.72
Heater 843-H1	E-01-843	0.0001	4.54	0.00	33.44	51.55	0.16
Flares Subcap	F-13-FLARE	87.48	0.00	0.00	12.23	0.00	3.95
Heater 843-H2	E-02-843	0.0002	9.20	0.00	84.49	104.44	0.33
Heater 147-F-							
1200	E-02-147	1.25	0.99	0.00	6.84	11.16	0.05
Flares Subcap	F-19-FLARE	87.38	0.002	0.41	14.07	32.88	116.78
Heater 147-F-							
1100	E-01-147	3.83	2.68	0.00	12.94	32.92	0.27
Flares Subcap	F-22-FLARE	568.99	0.00	31.12	86.78	2,222.15	1,208.30
SRU 544 and							
SRU 544 and SRUs Subcap	E-02-SCOT	21.89	0.66	0.07	13.44	742.35	0.48
SRUS Subcap	E-02-3CO1	21.09	0.00	0.07	15.44	742.33	0.40
Flares Subcap	F-103-FLARE	1,174.62	0.04	126.29	189.64	11,630.04	1,514.94
Flares Subcap	F-20-FLARE	344.94	0.00	18.37	67.69	1,690.85	170.85
Flares Subcap	E-23-FLARE	2,811.27	0.14	627.91	551.71	57,837.25	1,848.24
SRU 543 and			0.11	01101	001111	51,001.20	1,010121
SRUs Subcap	E-01-SCOT	1,167.04	1.99	0.61	7.23	917.52	1.44
WWTU-8742		_,					
Fugitives	N/A	0.00	0.00	0.00	0.00	0.00	30.60
Flares Subcap	F-18-FLARE	65.10	0.00	2.57	12.36	236.44	43.87
SRU 545 and							
SRUs Subcap	E-03-SCOT	23.18	0.53	6.92	7.42	197.28	0.39
HCU - Reactor							
1 and Reactor							
2 Furnaces	E-01-943	1.90	1.53	0.00	11.61	29.92	0.03
Flares Subcap	E-26-FLARE	536.62	0.00	19.09	105.31	1,758.03	48.74
, <u>1</u>	Totals:	7,418.0503	31.892	843.36	1,330.89	78,800.91	5,279.33

4. During a record review for the Plant conducted on January 25, 2022, an investigator documented that:

- a. The initial notification for Incident No. 369505 was due by November 1, 2021 at 4:00 p.m., but was not submitted until November 1, 2021 at 4:24 p.m.
- b. The Respondent released a total of 1.29 lbs of ammonia, 33.39 lbs of hydrogen cyanide, 2,391.61 lbs of CO, 120.26 lbs of PM, 94.04 lbs of H2S, 264.53 lbs of NOx, 7,506.96 lbs of SO2, 3.34 lbs of sulfuric acid, and 2,997.62 lbs of VOC as fugitive emissions and from multiple EPNs as shown in the table below, during an emissions event (Incident No. 369505) that began on October 31, 2021 and lasted 16 hours and 43 minutes.

Courses		Pollutants (lbs)								
Source Name	EPN	Ammonia (NH3)	Hydrogen Cyanide (HCN)	СО	РМ	H2S	NOx	SO2	Sulfuric Acid (H2SO4)	VOC
FCCU Wet Gas Scrubber	E-01- WGS	1.29	33.39	768.31	15.95	0	25.6	1.32	3.34	5.03
Refinery Fugitives VOC Subcap	F-1241	0	0	36.37	104.31	0	1.41	71.96	0	6
Flares Subcap	F-19- FLARE	0	0	15.22	0	0.72	2.68	52.13	0	18.11
Flares Subcap	F-22- FLARE	0	0	1,480.79	0	90.1	221.42	7,087.38	0	2,765.26
Flares Subcap	F-103- FLARE	0	0	90.92	0	3.22	13.42	294.17	0	203.22
	Totals:	1.29	33.39	2,391.61	120.26	94.04	264.53	7,506.96	3.34	2,997.62

- 5. During a record review for the Plant conducted January 20, 2022, an investigator documented that the Respondent released 54.05 lbs of CO, 18.15 lbs of H2S, 10.61 lbs of NOx, 1,671.50 lbs of SO2, and 6.46 lbs of VOC from the Flares Subcap, EPN E-23-FLARE, and released 4.39 lbs of CO, 1.72 lbs of H2S, 0.86 lb of NOx, 158.72 lbs of SO2, and 1.47 lbs of VOC from the HCU 943 Flare, EPN E-26-FLARE, during an emissions event (Incident No. 371549) that occurred on December 14, 2021 and lasted 12 minutes.
- 6. During a record review for the Plant conducted on June 14, 2022, an investigator documented that the Respondent released 78.64 lbs of CO, 0.74 lb of H2S, 11.19 lbs of NOx, 64.99 lbs of SO2, and 154.83 lbs of VOC from the Flares Subcap, EPN F-103-FLARE, released 26.11 lbs of CO, 0.44 lb of H2S, 4.63 lbs of NOx, 38.13 lbs of SO2, and 27.42 lbs of VOC from the Flares Subcap, EPN F-19-FLARE, and released 1,038.64 lbs of CO, 23.82 lb of H2S, 159.02 lbs of NOx, 0.04 lb of PM, 2,144.71 lbs of SO2, and 1,332.76 lbs of VOC from the Flares Subcap, EPN F-22-FLARE, during an emissions event (Incident No. 378545) that occurred on April 29, 2022 and lasted one hour and 30 minutes.

- 7. During a record review for the Plant conducted on June 1, 2021, an investigator documented that the Respondent released 12.34 lbs of CO, 2.42 lbs of NOx, 0.17 lb of SO2, and 1.94 lbs of VOC from the Flares Subcap, EPN E-23-FLARE and released 68.83 lbs of CO, 31.74 lb of H2S, 9.53 lbs of NOx, 2,923.88 lbs of SO2, and 114.78 lbs of VOC from the HCU 943 Flare, EPN E-26-FLARE, during an emissions event (Incident No. 351934) that occurred on March 2, 2021 and lasted six hours.
- 8. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
 - a. By March 25, 2021, upgraded the spring metallurgy for Pressure Safety Valve 9115 to Inconel in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 351934;
 - b. By October 22, 2021, removed and demolished the switchover structure and all associated breakers in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 368444;
 - c. On November 1, 2021, submitted the initial notification for Incident No. 369505;
 - d. By November 9, 2021, performed a review of every unit's Intellatrac rounds, verified that the pumps on oil mist included manual draining of the reclassifier, and implemented a lock nut procedure for fabricated thrust bearing jigs in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 359960;
 - e. By December 30, 2021, added a step to the One Riser Operation procedure to coordinate with the Gas Oil Hydrotreater Unit personnel to raise the charge rate to provide a higher proportion of hot feed to the Fluid Catalytic Cracking Unit in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 369505;
 - f. By January 17, 2022, removed the indicator light from the circuit in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 371549; and
 - g. By August 25, 2022, repaired Flow Control Valve 1232, returned the Fluidized Catalytic Cracking Unit 1241 Main Fractionator to stable operation, and implemented an emergency procedure "High Level in Distillate Drums or Loss of Distillate Pumps" in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 378545.

II. CONCLUSIONS OF LAW

- 1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
- 2. As evidenced by Finding of Fact No. 2, 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 ("NSR") Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, Special Conditions ("SC") No. 1, Federal Operating Permit ("FOP") No. 01498, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 25, and Tex. HEALTH & SAFETY CODE § 382.085(b).

- 3. As evidenced by Finding of Fact No. 3, the Respondent failed to prevent unauthorized emissions, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 4. As evidenced by Finding of Fact No. 4.a., the Respondent failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 Tex. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 01498, GTC and STC No. 2.F., and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 5. As evidenced by Finding of Fact No. 4.b., the Respondent failed to prevent unauthorized emissions, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 6. As evidenced by Finding of Fact No. 5, the Respondent failed to prevent unauthorized emissions, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 7. As evidenced by Finding of Fact No. 6, the Respondent failed to prevent unauthorized emissions, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 8. As evidenced by Finding of Fact No. 7, the Respondent failed to prevent unauthorized emissions, in violation of 30 Tex. ADMIN. CODE §§ 101.20(3), 116.115(c), and 122.143(4), NSR Permit Nos. 6825A, PSDTX49M2, N65, and GHGPSDTX167M1, SC No. 1, FOP No. O1498, GTC and STC No. 25, and Tex. HEALTH & SAFETY CODE § 382.085(b).
- 9. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
- 10. An administrative penalty in the amount of \$48,413 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$24,207 penalty. Pursuant to TEX. WATER CODE § 7.067, \$24,206 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of a Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms and conditions of this Order, which

includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 10 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that 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. 2021-1634-AIR-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality 12100 Park 35 Circle Austin, Texas 78753

- 2. The Respondent shall implement and complete the SEP as set forth in Conclusion of Law No. 10. The amount of \$24,206 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
- 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. 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.
- 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 in this Order.
- 7. 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.

- 8. 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.
- 9. 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.
- 10. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

For the Executive Director

__**7/16/2024**_____ 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 OAG 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 OAG 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.

Jun P. Atum

Signature

Jerry D. Stumbo

Name (Printed or typed) Authorized Representative of The Premcor Refining Group Inc.

July 11, 2024 Date

Vice Resident 220 General Monager

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.

Attachment A

Docket Number: 2021-1634-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	The Premcor Refining Group Inc.
Payable Penalty Amount:	\$48,413
SEP Offset Amount:	\$24,206
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Southeast Texas Regional Planning Commission
Project Name:	Southeast Texas Regional Air Monitoring Network
Total Project Budget:	\$1,500,000
Location of SEP:	Jefferson and Orange Counties

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

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the **Southeast Texas Regional Planning Commission**, as a Third-Party Administrator, for the *Southeast Texas Regional Air Monitoring Network* project (the "Project"). This Project involves air quality monitoring throughout Jefferson and Orange Counties, and specifically the Beaumont and Port Arthur area. The Third-Party Administrator operates nine air monitors in this area.

The Third-Party Administrator shall use the SEP Offset Amount to pay a contractor for monthly operation and maintenance of the sites, acquisition of all data from the monitors, processing and validating all data, monthly reporting of data, and performance of Quality Assurance Audits on all hardware systems. The air monitors will operate on a continuous basis, 24 hours per day, 365 days per year. The Third-Party Administrator shall ensure that the data is validated and sent to TCEQ's Leading Environmental Analysis and Display System ("LEADS") in a format acceptable to TCEQ. The Project will be done in accordance with all federal, state, and local environmental laws and regulations. The contribution will be used in accordance with the Supplemental Environmental Project between the Third-Party Administrator and the TCEQ.

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

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

B. Environmental Benefit

The Project will provide environmental benefits to the Beaumont and Port Arthur area by providing measurements of concentrations of certain air pollutants and an evaluation of those air pollutants. Continued air monitoring in this area will help with better understanding air quality pollutants and will enable better identification of emissions sources. The data will focus

The Premcor Refining Group Inc. Docket No. 2021-1634-AIR-E Agreed Order - Attachment A

on specific chemicals that may raise air quality concerns. The information obtained from this network will provide the area's community with more knowledge of the types and quantities of pollutants emitted from the industries in this area. In addition, data obtained from the monitoring sites and made available to the public may be used by TCEQ and EPA.

C. Minimum Expenditure

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

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Administrator. The Respondent shall make the check payable to Southeast Texas Regional Planning Commission SEP and shall mail the contribution with a copy of the Agreed Order to:

Southeast Texas Regional Planning Commission Attention: Director Transportation & Environmental Resources 2210 Eastex Freeway Beaumont, Texas 77703

3. Records and Reporting

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

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

4. Failure to Fully Perform

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

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

Texas Commission on Environmental Quality Litigation Division Attention: SEP Coordinator, MC 175 P.O. Box 13087 Austin, Texas 78711-3087 The Premcor Refining Group Inc. Docket No. 2021-1634-AIR-E Agreed Order - Attachment A

5. Publicity

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

6. Recognition

The Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

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