

Executive Summary – Enforcement Matter – Case No. 62253
Flint Hills Resources Corpus Christi, LLC
RN100235266
Docket No. 2022-0481-IWD-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:

WQ

Small Business:

No

Location(s) Where Violation(s) Occurred:

FHR Corpus Christi West Plant, located at 2825 Suntide Road, east and west of Suntide Road and north of Up River Road in the northwest area of, and south side of the end of Tribble Lane, in the northern area of the City of Corpus Christi; and Land Treatment Units 1 and 2 are located approximately 5,000 feet northwest of the intersection of Suntide Road and Up River Road, Corpus Christi, Nueces County

Type of Operation:

Wastewater treatment facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 13, 2023

Comments Received: No

Penalty Information

Total Penalty Assessed: \$45,000

Total Paid to General Revenue: \$22,500

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project (“SEP”) Conditional Offset: \$22,500

Name of SEP: The Guadalupe-Blanco River Trust (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: January 25, 2022

Date(s) of NOE(s): April 6, 2022

**Executive Summary – Enforcement Matter – Case No. 62253
Flint Hills Resources Corpus Christi, LLC
RN100235266
Docket No. 2022-0481-IWD-E**

Violation Information

Failed to comply with permitted effluent limitations for total zinc [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000531000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 004].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

1. The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).
2. The Order will also require the Respondent to, within 130 days, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000531000 including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Cheryl Thompson, Enforcement Division, Enforcement Team 1, MC R-04, (817) 588-5865; 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: The Guadalupe-Blanco River Trust, 933 East Court Street, Seguin, Texas 78155

Respondent: Jeffrey Ramsey, President, Flint Hills Resources Corpus Christi, LLC, 4111 East 37th Street North, Wichita, Kansas 67220

Brook A. Vickery, Vice President & Manufacturing Manager, Flint Hills Resources Corpus Christi, LLC, 4111 East 37th Street North, Wichita, Kansas 67220

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	18-Apr-2022	Screening	20-Apr-2022	EPA Due	5-Mar-2022
	PCW	26-Apr-2022				

RESPONDENT/FACILITY INFORMATION	
Respondent	Flint Hills Resources Corpus Christi, LLC
Reg. Ent. Ref. No.	RN100235266
Facility/Site Region	14-Corpus Christi
Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	62253	No. of Violations	2
Docket No.	2022-0481-IWD-E	Order Type	Findings
Media Program(s)	Water Quality	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Cheryl Thompson
		EC's Team	Enforcement Team 1
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$50,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	-10.0%	Adjustment	Subtotals 2, 3, & 7	-\$5,000
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Notes: Enhancement for three months of self-reported effluent violations, one NOV with same/similar violations, and two NOVs with dissimilar violations. Reduction for High Performer Classification, 27 notices of intent to conduct an audit, and 17 disclosures of violations.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$1,549	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$15,000	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$45,000
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount	\$45,000
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$45,000
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes

No deferral is recommended for Findings Orders.

PAYABLE PENALTY	\$45,000
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Screening Date 20-Apr-2022

Docket No. 2022-0481-IWD-E

PCW

Respondent Flint Hills Resources Corpus Christi, LLC

Policy Revision 5 (January 28, 2021)

Case ID No. 62253

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN100235266

Media Water Quality

Enf. Coordinator Cheryl Thompson

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	4	20%
	Other written NOVs	2	4%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	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 Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	27	-27%
	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>)	17	-34%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Enhancement for three months of self-reported effluent violations, one NOV with same/similar violations, and two NOVs with dissimilar violations. Reduction for High Performer Classification, 27 notices of intent to conduct an audit, and 17 disclosures of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) -10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% -10%

Screening Date 20-Apr-2022 **Docket No.** 2022-0481-IWD-E **PCW**
Respondent Flint Hills Resources Corpus Christi, LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 62253 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100235266
Media Water Quality
Enf. Coordinator Cheryl Thompson

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000531000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 004

Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

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

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes

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

Adjustment \$12,500

\$12,500

Violation Events

Number of Violation Events 2 61 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$25,000

Two monthly events are recommended for the months of May and September 2021.

Good Faith Efforts to Comply

0.0% Reduction \$0

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

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

Violation Subtotal \$25,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$1,549

Violation Final Penalty Total \$22,500

This violation Final Assessed Penalty (adjusted for limits) \$22,500

Economic Benefit Worksheet

Respondent Flint Hills Resources Corpus Christi, LLC
Case ID No. 62253
Reg. Ent. Reference No. RN100235266
Media Water Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$15,000	31-May-2021	24-Jun-2023	2.07	\$1,549	n/a	\$1,549

Notes for DELAYED costs

Estimated delayed cost to determine the cause of noncompliance, make the necessary repairs/adjustments to the Facility, and achieve compliance with the permitted effluent limitations. The Date Required is the end date of the first month of noncompliance, and the Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$15,000

TOTAL

\$1,549

Screening Date 20-Apr-2022 **Docket No.** 2022-0481-IWD-E **PCW**
Respondent Flint Hills Resources Corpus Christi, LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 62253 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100235266
Media Water Quality
Enf. Coordinator Cheryl Thompson

Violation Number 2
Rule Cite(s) 30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a)(1), and TPDES Permit No. WQ0000531000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 004
Violation Description Failed to comply with permitted effluent limitations, as shown in the attached effluent violation table.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
		Actual	x		
Potential					

>> Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	Percent

Human health or the environment has been exposed to pollutants which exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$0

\$25,000

Violation Events

Number of Violation Events 1 31 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty \$25,000

One monthly event is recommended for the month of July 2021.

Good Faith Efforts to Comply 0.0% Reduction \$0

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

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

Violation Subtotal \$25,000

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

Estimated EB Amount \$0 **Violation Final Penalty Total** \$22,500

This violation Final Assessed Penalty (adjusted for limits) \$22,500

Economic Benefit Worksheet

Respondent Flint Hills Resources Corpus Christi, LLC
Case ID No. 62253
Reg. Ent. Reference No. RN100235266
Media Water Quality
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See Economic Benefit Worksheet for Violation No. 1.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$0

TOTAL

\$0

Flint Hills Resources Corpus Christi, LLC
TPDES Permit No. WQ0000531000
Docket No. 2022-0481-IWD-E
Case No. 62253

Effluent Violation Table	
	Total Zinc
	Daily Maximum Concentration
Monitoring Period	Limit = 0.156 milligrams per liter
May 2021	0.31
July 2021	0.67
September 2021	0.51



Compliance History Report

Compliance History Report for CN603741463, RN100235266, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator: CN603741463, Flint Hills Resources
Corpus Christi, LLC

Regulated Entity: RN100235266, FHR CORPUS CHRISTI
WEST PLANT

Complexity Points: 36

CH Group: 02 - Oil and Petroleum Refineries

Location: 2825 Suntide Road, east and west of Suntide Road and north of Up River Road in the northwest area of, and south side of the end of Tribble Lane, in the northern area of the City of Corpus Christi; and Land Treatment Units 1 and 2 are located approximately 5,000 feet northwest of the intersection of Suntide Road and Up River Road, Corpus Christi, Nueces County Texas

TCEQ Region: REGION 14 - CORPUS CHRISTI

Classification: HIGH **Rating:** 0.00

Classification: HIGH **Rating:** 0.00

Repeat Violator: NO

ID Number(s):

AIR OPERATING PERMITS PERMIT 1272
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 1780058
AIR NEW SOURCE PERMITS ACCOUNT NUMBER NE0122D
AIR NEW SOURCE PERMITS REGISTRATION 1914
AIR NEW SOURCE PERMITS REGISTRATION 11278
AIR NEW SOURCE PERMITS REGISTRATION 22451
AIR NEW SOURCE PERMITS PERMIT 6819A
AIR NEW SOURCE PERMITS REGISTRATION 70303
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX777M1
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX413M8
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX413M9
AIR NEW SOURCE PERMITS REGISTRATION 97974
AIR NEW SOURCE PERMITS REGISTRATION 103744
AIR NEW SOURCE PERMITS REGISTRATION 103742
AIR NEW SOURCE PERMITS REGISTRATION 103726
AIR NEW SOURCE PERMITS REGISTRATION 103718
AIR NEW SOURCE PERMITS REGISTRATION 130089
AIR NEW SOURCE PERMITS REGISTRATION 110581
AIR NEW SOURCE PERMITS REGISTRATION 136297
AIR NEW SOURCE PERMITS PERMIT AMOC90
AIR NEW SOURCE PERMITS REGISTRATION 164052
AIR NEW SOURCE PERMITS REGISTRATION 166368
AIR NEW SOURCE PERMITS REGISTRATION 164622
AIR NEW SOURCE PERMITS REGISTRATION 168014
AIR NEW SOURCE PERMITS REGISTRATION 162275
AIR NEW SOURCE PERMITS REGISTRATION 166366
AIR NEW SOURCE PERMITS REGISTRATION 162376
AIR NEW SOURCE PERMITS REGISTRATION 167368
AIR NEW SOURCE PERMITS REGISTRATION 161745
AIR NEW SOURCE PERMITS REGISTRATION 164624
AIR NEW SOURCE PERMITS REGISTRATION 165634
AIR NEW SOURCE PERMITS REGISTRATION 162546
AIR NEW SOURCE PERMITS REGISTRATION 165135
AIR NEW SOURCE PERMITS REGISTRATION 164418
AIR NEW SOURCE PERMITS PERMIT AMOC103
AIR NEW SOURCE PERMITS REGISTRATION 156484

AIR OPERATING PERMITS ACCOUNT NUMBER NE0122D
AIR NEW SOURCE PERMITS PERMIT 8803A
AIR NEW SOURCE PERMITS REGISTRATION 1533
AIR NEW SOURCE PERMITS REGISTRATION 6628
AIR NEW SOURCE PERMITS REGISTRATION 11813
AIR NEW SOURCE PERMITS REGISTRATION 44048
AIR NEW SOURCE PERMITS AFS NUM 4835500017
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX413M7
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX777M2
AIR NEW SOURCE PERMITS REGISTRATION 83266
AIR NEW SOURCE PERMITS REGISTRATION 92351
AIR NEW SOURCE PERMITS REGISTRATION 99042
AIR NEW SOURCE PERMITS REGISTRATION 103677
AIR NEW SOURCE PERMITS REGISTRATION 103725
AIR NEW SOURCE PERMITS REGISTRATION 103732
AIR NEW SOURCE PERMITS REGISTRATION 130259
AIR NEW SOURCE PERMITS REGISTRATION 118983L001
AIR NEW SOURCE PERMITS REGISTRATION 109038
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX39
AIR NEW SOURCE PERMITS REGISTRATION 163966
AIR NEW SOURCE PERMITS REGISTRATION 164286
AIR NEW SOURCE PERMITS REGISTRATION 168635
AIR NEW SOURCE PERMITS REGISTRATION 163048
AIR NEW SOURCE PERMITS REGISTRATION 162591
AIR NEW SOURCE PERMITS REGISTRATION 165908
AIR NEW SOURCE PERMITS REGISTRATION 167801
AIR NEW SOURCE PERMITS REGISTRATION 165272
AIR NEW SOURCE PERMITS REGISTRATION 166851
AIR NEW SOURCE PERMITS REGISTRATION 162006
AIR NEW SOURCE PERMITS REGISTRATION 164626
AIR NEW SOURCE PERMITS REGISTRATION 164167
AIR NEW SOURCE PERMITS REGISTRATION 163503
AIR NEW SOURCE PERMITS REGISTRATION 166849
AIR NEW SOURCE PERMITS REGISTRATION 162483
AIR NEW SOURCE PERMITS PERMIT AMOC101
AIR NEW SOURCE PERMITS REGISTRATION 159521

AIR NEW SOURCE PERMITS REGISTRATION 158584
AIR NEW SOURCE PERMITS REGISTRATION 156061
AIR NEW SOURCE PERMITS PERMIT AMOC150
AIR NEW SOURCE PERMITS REGISTRATION 161671
AIR NEW SOURCE PERMITS REGISTRATION 160464
AIR NEW SOURCE PERMITS REGISTRATION 161343
AIR NEW SOURCE PERMITS REGISTRATION 160467
AIR NEW SOURCE PERMITS REGISTRATION 156619
AIR NEW SOURCE PERMITS PERMIT AMOC193
AIR NEW SOURCE PERMITS REGISTRATION 161443
AIR NEW SOURCE PERMITS REGISTRATION 160010
AIR NEW SOURCE PERMITS REGISTRATION 161088
AIR NEW SOURCE PERMITS REGISTRATION 161893
AIR NEW SOURCE PERMITS REGISTRATION 161170
AIR NEW SOURCE PERMITS REGISTRATION 157681
AIR NEW SOURCE PERMITS REGISTRATION 155852
AIR NEW SOURCE PERMITS PERMIT AMOC114
AIR NEW SOURCE PERMITS REGISTRATION 157318
AIR NEW SOURCE PERMITS REGISTRATION 156621
AIR NEW SOURCE PERMITS REGISTRATION 167599
WASTEWATER LICENSING LICENSE WQ0000531000

STORMWATER PERMIT TXR05BT18
WASTEWATER EPA ID TX0006289
AIR EMISSIONS INVENTORY ACCOUNT NUMBER NE0122D
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50097

INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30529
TAX RELIEF ID NUMBER 20198
TAX RELIEF ID NUMBER 23780
TAX RELIEF ID NUMBER 20204
TAX RELIEF ID NUMBER 20370
TAX RELIEF ID NUMBER 20362

AIR NEW SOURCE PERMITS REGISTRATION 160619
AIR NEW SOURCE PERMITS REGISTRATION 157680
AIR NEW SOURCE PERMITS REGISTRATION 161670
AIR NEW SOURCE PERMITS REGISTRATION 160535
AIR NEW SOURCE PERMITS REGISTRATION 161253
AIR NEW SOURCE PERMITS REGISTRATION 159237
AIR NEW SOURCE PERMITS REGISTRATION 158915
AIR NEW SOURCE PERMITS REGISTRATION 159212
AIR NEW SOURCE PERMITS REGISTRATION 162847
AIR NEW SOURCE PERMITS REGISTRATION 160998
AIR NEW SOURCE PERMITS REGISTRATION 160999
AIR NEW SOURCE PERMITS REGISTRATION 156196
AIR NEW SOURCE PERMITS PERMIT AMOC159
AIR NEW SOURCE PERMITS REGISTRATION 159837
AIR NEW SOURCE PERMITS REGISTRATION 161252
AIR NEW SOURCE PERMITS REGISTRATION 159243
AIR NEW SOURCE PERMITS REGISTRATION 155037
AIR NEW SOURCE PERMITS PERMIT AMOC134
AIR NEW SOURCE PERMITS REGISTRATION 168474
AIR NEW SOURCE PERMITS REGISTRATION 168633

IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30529
WASTEWATER PERMIT WQ0000531000
WASTEWATER PERMIT TXG670231
POLLUTION PREVENTION PLANNING ID NUMBER P00371
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD088474663
TAX RELIEF ID NUMBER 20365

TAX RELIEF ID NUMBER 20200
TAX RELIEF ID NUMBER 23809
TAX RELIEF ID NUMBER 20202
TAX RELIEF ID NUMBER 20358

Compliance History Period: September 01, 2016 to August 31, 2021 **Rating Year:** 2021 **Rating Date:** 09/01/2021

Date Compliance History Report Prepared: April 19, 2022

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: April 19, 2017 to April 19, 2022

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

Name: Cheryl Thompson

Phone: (817) 588-5865

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:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	May 16, 2017	(1425227)	Item 49	February 05, 2020	(1618153)
Item 2	June 15, 2017	(1431230)	Item 50	February 19, 2020	(1640668)
Item 3	July 16, 2017	(1423446)	Item 51	March 18, 2020	(1647188)
Item 4	July 19, 2017	(1439839)	Item 52	March 27, 2020	(1639416)
Item 5	August 02, 2017	(1402376)	Item 53	April 16, 2020	(1653524)
Item 6	August 16, 2017	(1443527)	Item 54	May 19, 2020	(1660111)
Item 7	August 31, 2017	(1434663)	Item 55	May 22, 2020	(1651491)
Item 8	September 19, 2017	(1450154)	Item 56	June 03, 2020	(1652061)
Item 9	November 16, 2017	(1461455)	Item 57	June 17, 2020	(1666615)
Item 10	December 19, 2017	(1467834)	Item 58	June 24, 2020	(1657967)
Item 11	January 17, 2018	(1474539)	Item 59	June 30, 2020	(1651909)
Item 12	February 05, 2018	(1453481)	Item 60	July 15, 2020	(1623420)
Item 13	February 19, 2018	(1486765)	Item 61	July 31, 2020	(1665460)
Item 14	March 19, 2018	(1490442)	Item 62	August 03, 2020	(1665631)
Item 15	April 18, 2018	(1481411)	Item 63	August 07, 2020	(1645466)
Item 16	April 19, 2018	(1493679)	Item 64	August 19, 2020	(1680348)
Item 17	May 10, 2018	(1483741)	Item 65	September 11, 2020	(1673135)
Item 18	May 17, 2018	(1500597)	Item 66	September 17, 2020	(1686916)
Item 19	May 25, 2018	(1483152)	Item 67	October 01, 2020	(1665138)
Item 20	June 20, 2018	(1507714)	Item 68	October 06, 2020	(1664090)
Item 21	August 13, 2018	(1486659)	Item 69	October 15, 2020	(1693263)
Item 22	August 16, 2018	(1520093)	Item 70	November 13, 2020	(1686491)
Item 23	August 22, 2018	(1511396)	Item 71	November 18, 2020	(1712479)
Item 24	September 17, 2018	(1512350)	Item 72	December 04, 2020	(1692497)
Item 25	October 16, 2018	(1523351)	Item 73	December 17, 2020	(1712480)
Item 26	November 14, 2018	(1541451)	Item 74	January 19, 2021	(1712481)
Item 27	November 30, 2018	(1525056)	Item 75	February 18, 2021	(1725534)
Item 28	January 17, 2019	(1559680)	Item 76	March 11, 2021	(1704793)
Item 29	January 18, 2019	(1533145)	Item 77	March 12, 2021	(1705131)
Item 30	January 22, 2019	(1533337)	Item 78	March 18, 2021	(1725535)
Item 31	February 18, 2019	(1559678)	Item 79	April 19, 2021	(1725536)
Item 32	March 15, 2019	(1559679)	Item 80	April 23, 2021	(1707478)
Item 33	March 29, 2019	(1549616)	Item 81	May 19, 2021	(1740073)
Item 34	May 06, 2019	(1557342)	Item 82	June 09, 2021	(1707464)
Item 35	May 16, 2019	(1583273)	Item 83	July 01, 2021	(1738291)
Item 36	June 17, 2019	(1555218)	Item 84	July 19, 2021	(1751712)
Item 37	July 19, 2019	(1593145)	Item 85	September 01, 2021	(1710787)
Item 38	August 01, 2019	(1580316)	Item 86	September 16, 2021	(1766256)
Item 39	August 19, 2019	(1599491)	Item 87	September 24, 2021	(1762768)
Item 40	September 19, 2019	(1606396)	Item 88	October 04, 2021	(1756796)
Item 41	October 03, 2019	(1576171)	Item 89	November 19, 2021	(1783628)
Item 42	October 15, 2019	(1598581)	Item 90	December 17, 2021	(1790654)
Item 43	October 17, 2019	(1613242)	Item 91	January 19, 2022	(1798448)
Item 44	November 18, 2019	(1619056)	Item 92	February 16, 2022	(1806322)
Item 45	December 18, 2019	(1626408)	Item 93	March 16, 2022	(1788650)
Item 46	January 16, 2020	(1634049)	Item 94	March 17, 2022	(1802123)
Item 47	January 28, 2020	(1622229)	Item 95	March 24, 2022	(1789022)
Item 48	January 30, 2020	(1623309)			

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

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

1 Date: 05/31/2021 (1747583)
 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

Date: 06/23/2021 (1692809)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(2)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(2)

Description: Failed to clearly mark the date upon which each period of accumulation begins on each container.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter H 335.261(a)
40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.15(c)(1)

Description: Failed to place universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter H 335.262(c)(2)(F)

Description: Failed to contain paint and paint-related wastes in a container, multiple container package unit, tank, transport vehicle or vessel that is labeled or marked clearly with the words "Universal Waste - Paint and Paint-Related Wastes."

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter H 335.261(a)
40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.14(a)

Description: Failed to label or mark clearly universal waste batteries (i.e., each battery), or a container in which the batteries are contained, with any one of the following phrases: Universal Waste-Battery(ies), or Waste Battery(ies), or Used Battery (ies).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter H 335.261(a)
40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.14(e)

Description: Failed to label or mark clearly each lamp or a container or package in which such lamps are contained with one of the following phrases: Universal Waste Lamp(s), or Waste Lamp(s), or Used Lamp(s).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter H 335.261(a)
40 CFR Chapter 273, SubChapter I, PT 273, SubPT B 273.13(d)

Description: Failed to manage universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, compatible with the contents of the lamps, that remain closed, and that lack evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions.

Self Report? NO Classification: Minor

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

Description: Failed to provide notice to the executive director in writing or using electronic notification software provided by the executive director, of any such changes or additional information to that reported previously within 90 days of the occurrence of such change or of becoming aware of such additional information.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter O 335.431(c)
40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.7(a)

Description: Failed to include all EPA hazardous waste codes with the Land Disposal Restriction notification to the treatment, storage and disposal facility receiving the waste.

Self Report? NO Classification: Moderate

Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(i)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT I 265.173

Description: Failed to keep containers storing hazardous waste closed at all times during accumulation.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125
40 CFR Chapter 264, SubChapter I, PT 264, SubPT G 264.117(d)
PP II. A. 2, Duty to Comply PERMIT
PP VII. G. II, Facility Post Closure Car PERMIT

Description: Failed maintain the cover on Land Treatment Units (Permit Nos. 1 and 2), as applicable, such that the cover promotes drainage, prevents ponding, minimizes surface water infiltration, and minimizes erosion of the cover. Any desiccation cracks, erosion, gulying, or other damage shall be repaired upon observance.

3

Date: 07/31/2021 (1757176)

Self Report? YES Classification: Moderate

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

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

4

Date: 08/26/2021 (1736516)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 Special Term and Condition (STC) 2.F OP
 Description: Failure to create a final record of a non-reportable (recordable) emissions event in a timely manner.
 Self Report? NO Classification: Minor

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 (GTC) OP
 Description: Failure to report all instances of deviations.
 Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 17.E PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 115, SubChapter D 115.322(4)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
 5C THSC Chapter 382 382.085(b)
 Special Condition 32.E PERMIT
 STC 31 OP
 STC 35.A OP
 Description: Failure to equip each open-ended valve or line (OEL) with an appropriately sized cap, blind flange, plug, or second valve to seal the line.
 Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.322(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
 5C THSC Chapter 382 382.085(b)
 Special Condition 32.H PERMIT
 STC 1.A OP
 STC 31 OP
 Description: Failure to repair a leak within the required timeframe.
 Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.322(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-9(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
 5C THSC Chapter 382 382.085(b)
 Special Condition 32.I PERMIT
 STC 1.A OP
 Description: Failure to repair a component within the required timeframe.
 Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 18.F PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 115, SubChapter D 115.324(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
 5C THSC Chapter 382 382.085(b)
 Special Condition 32.F PERMIT
 STC 1.A OP
 STC 31 OP
 STC 35.A OP
 Description: Failure to complete required monitoring of valves in gas/vapor service.
 Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 18.I PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 115, SubChapter D 115.322(2)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(d)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

5C THSC Chapter 382 382.085(b)
STC 1.A OP
STC 35.A OP

Description: Failure to repair leaks of valves in light liquid service within the required timeframe.

Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 18.F PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
5C THSC Chapter 382 382.085(b)
Special Condition 32.F PERMIT
STC 1.A OP
STC 31 OP
STC 35.A OP

Description: Failure to complete the required monitoring of valves in light liquid service.

Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 18.H PERMIT
[PSDTX413M9] Special Condition 18.I PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 115, SubChapter D 115.322(2)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(d)
STC 1.A OP
STC 35.A OP

Description: Failure to repair leaks of connectors in light liquid service within the required timeframe.

Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 19 PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
5C THSC Chapter 382 382.085(b)
Special Condition 33 PERMIT
STC 1.A OP
STC 31 OP
STC 35.A OP

Description: Failure to complete the required monitoring of connectors in light liquid service.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.322(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 1.A OP

Description: Failure to repair a Volatile Organic Compound (VOC) leak within the required timeframe.

Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 18.H PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 115, SubChapter D 115.322(1)
30 TAC Chapter 115, SubChapter D 115.322(2)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(b)(2)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
5C THSC Chapter 382 382.085(b)
STC 1.A OP
STC 35.A OP

Description: Failure to repair leaks of pumps in light liquid service within the required timeframe.

Self Report? NO Classification: Moderate

Citation: [PSDTX413M9] Special Condition 18.F PERMIT
[PSDTX413M9] Special Condition 18.G PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 115, SubChapter D 115.324(1)(A)

30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(e)(3)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)(1)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP
 STC 35.A OP

Description: Failure to complete the required monitoring of pumps in light liquid service.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(5)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP

Description: Failure to monitor a relief valve within 24 hours of a release.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.322(2)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(c)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
 5C THSC Chapter 382 382.085(b)
 Special Condition 32.F PERMIT
 STC 1.A OP
 STC 31 OP

Description: Failure to monitor a connector in heavy liquid service within the required timeframe.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.654(c)(3)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP

Description: Failure to conduct a semi-annual recalibration of the VOC Stripper temperature probe.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP
 STC 14.A OP

Description: Failure to maintain container openings in a closed, sealed position at all times that waste is in the container, except when it is necessary to use the opening for waste loading, removal, inspection, or sampling.
Self Report? NO **Classification:** Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(b)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(f)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP

Description: Failure to conduct visual inspections of containers and complete repairs in a timely manner.
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 61, SubChapter C, PT 61, SubPT FF 61.349(b)
 5C THSC Chapter 382 382.085(b)
 Special Condition 45.B PERMIT
 STC 1.A OP
 STC 14.A OP
 STC 31 OP

Description: Failure to operate control devices at all times when waste is placed in waste management units, except when maintenance or repair of the waste management unit cannot be completed without the shutdown of the control device.
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 61, SubChapter C, PT 61, SubPT FF 61.354(d)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.143(e)(1)
 5C THSC Chapter 382 382.085(b)
 Special Condition 51.A(2) PERMIT
 STC 1.A OP

Description: STC 31 OP
 Failure to conduct breakthrough monitoring of carbon canister control devices on a daily basis.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP
 STC 15.A OP

Description: Failure to complete quarterly visual inspections for applicable individual drain systems (IDS) or closed-vent systems (CVS) and control devices.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP
 STC 15.A OP

Description: Failure to complete the required monitoring of components in closed-vent systems (CVS).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2(a)(3)
 5C THSC Chapter 382 382.085(b)
 STC 9.B OP

Description: Failure to conduct weekly visual inspections for "out of active service" drains.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(4)(iv)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.133(f)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.133(g)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.136(b)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.136(c)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP

Description: Failure to conduct required initial inspections for improper work practices and control equipment failures.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(5)
 5C THSC Chapter 382 382.085(b)
 STC 15.B OP

Description: Failure to repair a leak on an Individual Drain System (IDS) pump within the required timeframe.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(3)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.136(b)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.148(d)(2)
 5C THSC Chapter 382 382.085(b)
 STC 15.A OP
 STC 22.B OP

Description: Failure to repair an Individual Drain System (IDS) connector within the required timeframe.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(A)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(c)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP
 STC 13.A OP

Description: Failure to conduct required No Detectable Emissions (NDE) monitoring and inspections for tanks in wastewater service.

Self Report? NO Classification: Moderate

Citation: [PSD TX413M9] Special Condition 72.A PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 31 OP
 STC 35.A OP

Description: Failure to collect Hydrogen Sulfide (H₂S) samples at the location specified by the permit.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 45.B PERMIT
STC 31 OP
Description: Failure to route frac tank vents or vacuum trucks to a control device while they contained liquids with VOC partial pressure greater than 0.50 pounds per square inch (psi).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 39.C PERMIT
STC 31 OP
Description: Failure to transfer drained liquids to a covered vessel within one hour of being drained.

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 41 OP
Description: Failure to collect a required daily Hydrogen Sulfide (H2S) sample.

Self Report? NO Classification: Moderate
Citation: [PSDTX413M9] Special Condition 54.E PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 16.E PERMIT
STC 31 OP
Description: Failure to submit a notification for Relative Accuracy Test Audit (RATA) at least 30 days prior to conducting the RATA.

Self Report? NO Classification: Moderate
Citation: [PSDTX413M9] Special Condition 1 PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 116, SubChapter G 116.715(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 31 OP
STC 35.A and 35.B OP
Description: Failure to comply with the Individual Emission Limitation for Emission Point No. (EPN) F-28 (PMB Fugitives).

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(c)(2)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT WW 63.1063(d)(1)
5C THSC Chapter 382 382.085(b)
STC 1.A OP
Description: Failure to conduct required external floating roof inspection after tank was completely emptied and degassed.

Self Report? NO Classification: Moderate
Citation: [PSDTX413M9] Special Condition 50.D PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 31 OP
STC 35.A OP
Description: Failure to conduct additional performance stack tests after increasing the sustained operating rates past the rates established by the most recent stack tests.

Self Report? NO Classification: Moderate
Citation: [PSDTX413M9] Special Condition 2 PERMIT
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 31 OP
STC 35.A OP
Description: Failure to maintain emissions of Nitrogen Oxides (NOx) at West Crude Heater (FIN: 40BA101) below the limit of 0.045 pounds per Million British thermal units (lbs/MMBtu) during normal operations.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 3.A(iv)(1) OP
 Description: Failure to conduct quarterly visible emissions observations.

Self Report? NO Classification: Moderate
 Citation: [PSDTX413M9] Special Condition 24 PERMIT
 30 TAC Chapter 101, SubChapter A 101.20(3)
 30 TAC Chapter 116, SubChapter G 116.715(a)
 30 TAC Chapter 122, SubChapter B 122.143(4)
 5C THSC Chapter 382 382.085(b)
 STC 31 OP
 STC 35.A OP
 Description: Failure to submit a critical lift notification to the TCEQ Corpus Christi Region Office at least eight hours prior to conducting work over vessels containing 5% by weight Hydrogen Fluoride (HF) or more.

Self Report? NO Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(B)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.133(b)(1)(ii)
 5C THSC Chapter 382 382.085(b)
 STC 1.A OP
 Description: Failure to maintain tank openings in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.

5 Date: 09/30/2021 (1776719)
 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

6 Date: 04/13/2022 (1787568)
 Self Report? NO Classification: Moderate
 Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
 30 TAC Chapter 305, SubChapter F 305.125(4)
 Permit Conditions No. 2(g), Pg. 8 PERMIT
 TX0006289 PERMIT
 Description: Failed to prevent the unauthorized discharge of wastewater into or adjacent to any water in the state.

F. Environmental audits:

Notice of Intent Date: 07/19/2016 (1350636)
 Disclosure Date: 04/21/2017
 Viol. Classification: Major
 Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
 30 TAC Chapter 122, SubChapter C 122.210(a)
 Description: Failed to obtain permit authorization prior to constructing and operating new or modifying existing totes located at the refinery.
 Viol. Classification: Major
 Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)
 30 TAC Chapter 106, SubChapter K 106.262(a)(3)
 30 TAC Chapter 122, SubChapter C 122.210(a)
 Description: Failed to submit the required Permit by Rule (PBR) registration or Title V permit revisions for two new totes located at the refinery.
 Viol. Classification: Major
 Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(7)
 30 TAC Chapter 122, SubChapter C 122.210(a)
 Description: Failed to submit the required PBR registration or Title V revision for modifying and operating an existing storage tank located at the refinery. Storage tank 42FB I was installed in 1996 at the West Refinery Mid Crude Unit to hold a neutralizer chemical. FHR discovered that tank 42FB 1 met the requirements outlined in 30 TAC 106.261 and 106.478; however, the 106.261 registration was not submitted.
 Viol. Classification: Major
 Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
 Description: Failed to submit a revision to permit O1272 prior to operating an existing storage tank at the refinery. FHR authorized the installation of an internal floating roof and secondary seal (TCEQ Registration No. 141235) and the storage of crude oil (Registration No. 142835) in Tank 08FB 141. The change in service to crude oil triggered Tank 08FB141 to be subject to MACT CC control requirements. A revision to incorporate the NSR authorizations and new control requirements into Permit 0-1272 was not

Disclosure Date: 08/18/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)

Description: Failed to submit a revisions to Title V Permit O1272 prior to operating an existing storage tank at the FHR West Refinery. Specifically, FHR authorized an increase in annual emissions from Tank 40FB3041 as a result of increasing the true vapor pressure from 0.02 psi, as previously represented, to 0.07 psia; however, a revision to Title V Permit O1272 was not submitted.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)

Description: Failed to submit a revision to Title V Permit O1272 prior to operating an existing storage tank at the FHR West Refinery. Specifically, there was a change in the chemical concentration of the material stored in storage tank 42FB751 at the West Refinery Mid Crude Unit. The change in concentration was authorized under 30 TAC § 106.261, but an Off-Permit Notification for the increase in tank VOC emissions authorized under 30 TAC § 106.261 was not submitted.

Disclosure Date: 04/20/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

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

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGGa 60.592a

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

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to include: one valve in gas/vapor service in the Distillate Desulfurization Unit ("DDS") on October 24, 2011; 11 valves in gas/vapor service in the Coker Unit between June 6, 2008 and July 31, 2015; and five valves in light liquid service in the Coker Unit between May 21, 2008 and July 31, 2014, in the LDAR program for monitoring, as discovered during the LDAR "True-up Project." Specifically, these valves were inadvertently deleted from the LeakDas database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

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

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to accurately classify components in the LeakDas database. Specifically, 11 gas/vapor valves in the Coker Unit were mistakenly classified as connectors between December 21, 1998 and November 20, 2014; one light liquid valve in the Coker Unit was mistakenly classified as a connector on July 15, 2000; and two light liquid valves in the Meta unit were mistakenly classified as connectors on August 11, 1998.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

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

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGGa 60.592a

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

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

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to tag several components in the field and add them to the computer database, as discovered during the LDAR "True-up Project": two valves in gas/vapor service, four valves in gas/vapor service, 11 valves in light liquid service, 19 connectors in gas/vapor service, five valves in light liquid service, and 41 connectors in light liquid service in the DDS Unit; 125 valves in gas/vapor service, 36 valves in light liquid service, 15 valves in gas/vapor service, 130 connectors in gas/vapor ser

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to tag several components in the field and add them to the computer database, as discovered during the LDAR "True-up Project": eight valves in gas/vapor service, 11 valves in light liquid service, five connectors in gas/vapor service, and four connectors in light liquid service in the LSG Unit and three valves in light liquid service and eight connectors in light liquid service in the Meta Unit.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag 248 Closed Vent System and 357 Individual Drain System components in the DDS, Coker LSG, and Meta Units and add them to the computer database, as discovered during the LDAR "True-up Project."

Disclosure Date: 05/09/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.487a(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Description: Failed to include the failure to tag and monitor components (noted as previous violations) in the Title V deviation reports because FHR was unaware of the violations.

Disclosure Date: 04/25/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(B)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.133(b)(1)(ii)

Description: Failed to ensure that a third-party that operates a sludge management area, which includes a concrete containment area that has an open collection trench draining into a FHR owned sump operates a closed system. Specifically, in order to drain the trench of the non-BWON waste and storm water, the sump must be temporarily opened to allow the water to flow into it.

Notice of Intent Date: 12/19/2016 (1383004)

Disclosure Date: 04/24/2017

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to include seven valves in light liquid service (between April 26, 2012 and August 10, 2016); one valve in light liquid service (on September 26, 2014); two valves in light liquid service, three connectors in light liquid service, and four valves in gas/vapor service (on February 27, 2013) in the #1 Parex Unit and one valve in gas/vapor service (on September 26, 2014) and three valves in light liquid service (between January 29, 2014 and April 29, 2015) in the #2 Parex Unit in the LeakDa.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to accurately classify components in LeakDas database. Specifically, one valve in gas/vapor service on April 1, 1991 (resolved February 21, 2017) and two valves in light liquid service in the #1 Parex Unit on April 1, 1991 (resolved February 20, 2017) and two valves in light liquid service in the #2 Parex Unit on April 1, 1991, resolved February 21, 2017) were mistakenly classified as connectors.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to tag several components in the field and add them to the computer database, as discovered during the LDAR "True-up Project": 34 valves in gas/vapor service, 80 valves in light liquid service, 11 valves in gas/vapor service, and 124 connectors in gas/vapor service in the Sat Gas #1 Unit; 24 valves in gas/vapor service, 65 valves in light liquid service, seven valves in gas/vapor service, and 146 connectors in gas/vapor service in the Sat Gas #2 Unit; eight valves in gas/vapor service, 3

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(2)(i)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Rqmt Prov: PERMIT Special Condition 17.F.

Description: Failed to tag several components in the field and add them to the computer database, as discovered during the LDAR "True-up Project": six valves in gas/vapor service, 13 valves in light liquid service, 12 connectors in gas/vapor service, 85 connectors in light liquid service, three valves in gas/vapor service, 15 connectors in gas/vapor service, 16 valves in light liquid service, three connectors in light liquid service, 70 connectors in light liquid service, two valves in gas/vapor service, 12

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag 355 Closed Vent System and 541 Individual Drain System components in the Sat Gas #1, Sat Gas #2, #1 Parex, and #2 Parex Units to ensure monitoring, as discovered during the LDAR "True-up Project."

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Description: Failed to include the failure to tag components in the Sat Gas #1, Sat Gas #2, #1 Parex, and #2 Parex Units and add to the LeakDas database to ensure appropriate monitoring in historic periodic and/or Title V deviation reports (because FHR was unaware of the deviations).

Notice of Intent Date: 04/19/2017 (1410935)

Disclosure Date: 07/31/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 266, SubChapter I, PT 266, SubPT O 268.7(a)(5)(i)

Description: Failed to include testing frequency and detailed chemical and physical analysis of treated waste streams in the Waste Analysis Plan (WAP).

Viol. Classification: Moderate

Citation: 40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.7(a)(5)

Description: Failed to follow the Waste Analysis Plan.

Disclosure Date: 11/20/2017

Viol. Classification: Moderate

Citation: 40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.7(a)(2)
40 CFR Chapter 266, SubChapter I, PT 266, SubPT O 268.7(a)(3)
40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.7(a)(4)
40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.9(d)

Description: Failed to maintain on-site or provide to a Transporter, Storage, and Disposal facility, a one-site notification and certification of treatment of hazardous characteristic waste (hazardous wastewater with hydrogen sulfide treated under the WAP to remove the characteristic of D003).

Viol. Classification: Minor

Citation: 40 CFR Chapter 268, SubChapter I, PT 268, SubPT A 268.7(a)(7)

Description: Failed to update the one-time notification (required when managing a prohibited waste) to include the management of Process Filters and Oil Bearing Material.

Notice of Intent Date: 06/08/2017 (1422103)

No DOV Associated

Notice of Intent Date: 06/13/2017 (1422921)

Disclosure Date: 10/20/2017

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to include one valve in light liquid service (in the Mobile Selective Toluene Disproportionation Process Unit ("MSTDP")) in the LeakDas database for monitoring. Specifically, the valve was deleted from the database on March 24, 2010.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to include on connector in light liquid service (in the MSTDP Unit) in the LeakDas database for monitoring. Specifically, the connector was deleted from the database on July 26, 2014.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag nine valves in gas/vapor service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 10 valves in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 27 connectors in gas/vapor service and 62 connectors in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag one valve in gas/vapor service in the MSTDP Unit and to add it to the computer database for monitoring.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag six connectors in gas/vapor service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag five valves in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 24 connectors in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag seven valves in gas/vapor service in the Orthoxylene Complex ("Ortho") Unit and to add them to the computer database for monitoring.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag six valves in gas/vapor service in the Ortho Unit and to add them to the computer database for monitoring.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 16 valves in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 12 connectors in gas/vapor service and 133 connectors in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag one valve in gas/vapor service in the Ortho Unit and to add it to the computer database for monitoring.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 13 valves in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 59 connectors in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag eight Closed Vent System and 101 Individual Drain System components in the MSTDP and Ortho Units and to add them to the LeakDas database for monitoring.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to report the failure to appropriately tag and monitor components in the MSTDP and Ortho Units (disclosed as Violation Nos. 3 through 14 in the October 20, 2017 Disclosure of Violations) in the historic periodic reports. FHR did not report these violations because it was not aware of them.
Disclosure Date: 01/30/2018
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to include one valve in light liquid service (in the Mobile Selective Toluene Disproportionation Process

Unit ("MSTDP") in the LeakDas database for monitoring. Specifically, the valve was deleted from the database on March 24, 2010.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to include on connector in light liquid service (in the MSTDP Unit) in the LeakDas database for monitoring. Specifically, the connector was deleted from the database on July 26, 2014.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag nine valves in gas/vapor service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 10 valves in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 27 connectors in gas/vapor service and 62 connectors in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

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

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag one valve in gas/vapor service in the MSTDP Unit and to add it to the computer database for monitoring.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag six connectors in gas/vapor service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag five valves in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 24 connectors in light liquid service in the MSTDP Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag seven valves in gas/vapor service in the Orthoxylene Complex ("Ortho") Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag six valves in gas/vapor service in the Ortho Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 16 valves in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 12 connectors in gas/vapor service and 133 connectors in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag one valve in gas/vapor service in the Ortho Unit and to add it to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 13 valves in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 59 connectors in light liquid service in the Ortho Unit and to add them to the computer database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag eight Closed Vent System and 101 Individual Drain System components in the MSTDP and Ortho Units and to add them to the LeakDas database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to report the failure to appropriately tag and monitor components in the MSTDP and Ortho Units (disclosed as Violation Nos. 3 through 14 in the October 20, 2017 Disclosure of Violations) in the historic periodic reports. FHR did not report these violations because it was not aware of them.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database 66 valves in gas/vapor service in the Mobile Selective Toluene Disproportionation Process Unit "MSTDP."

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database 70 valves in light liquid service in the MSTDP.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag in the field and add to the LDAR database 270 connectors in gas/vapor service and 243 connectors in light liquid service in the MSTDP.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database sic valves in gas/vapor service in the MSTDP.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag in the field and add to the LDAR database 19 connectors in gas/vapor service in the MSTDP.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database 26 valves in light liquid service in the MSTDP.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag in the field and add to the LDAR database 98 connectors in light liquid service in the MSTDP.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database five valves in gas/vapor service in the Orthozylene Complex "Ortho."

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database five valves in gas/vapor service in the Ortho.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database 101 valves in light liquid service in the Ortho.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag in the field and add to the LDAR database 50 connectors in gas/vapor service and 477 connectors in light liquid service in the Ortho.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.482-7a(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database seven valves in gas/vapor service in the Ortho.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag in the field and add to the LDAR database 21 connectors in gas/vapor service in the Ortho.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database 33 valves in light liquid service in the Ortho.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag in the field and add to the LDAR database 116 connectors in light liquid service in the Ortho.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag in the field and add to the LDAR database 23 valves in gas/vapor service in the Ortho.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag in the field and add to the LDAR database 53 Closed Vent System and 273 Individual Drain System components in the MSTDP and Ortho.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to report include many components (such as valves, connectors, etc.), that had not been appropriately tagged in the field and added to the LDAR database, in the historic periodic reported (since FHR was unaware of them at the time).

Notice of Intent Date: 06/22/2017 (1423858)

Disclosure Date: 02/22/2018

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.112(b)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter C 122.210
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.646(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(g)

Rqmt Prov: PERMIT Special Conditions No. 32

Description: Failed to limit true vapor pressure of the No. 6 fuel oil to 0.5 psia (Permit No. 8803A, SC 32), 0.75 psia (NSPS Kb and MACT CC), and 1.5 psia (30 TAC 115.112(b)) for materials stored in storage tanks 08FB145 and 08FB146. During the months when the true vapor pressure was exceeded, triggering additional requirements, the storage tanks were not equipped with a floating roof or closed vent system and control device. Additionally, the Title V Operating Permit was not revised to reflect the applic

Notice of Intent Date: 01/16/2018 (1465942)

Disclosure Date: 04/19/2018

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly identify two valves in gas/vapor service in the Alkylation Unit ("Alky") in the LDAR database on December 16, 1998 to ensure the appropriate LDAR regulations are applied and that the valves are in compliance with those regulations.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to place one valve in gas/vapor service in the Alky Unit as normal to monitor in the LDAR database on November 13, 2016. Specifically, the valves was mistakenly placed as the difficult to monitor in the database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to place one valve in light liquid service in the Cumene Unit ("Cumene") as normal to monitor in the LDAR database on July 2, 2007. Specifically, the valves was mistakenly placed as the difficult to monitor in the database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)

30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly identify one valve in light liquid service in the Cumene Unit in the LDAR database on September 27, 1997. Specifically, it was identified as a connector.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to include one valve in light liquid service in the Cumene Unit in the LDAR database. Specifically, the valve was deleted.

Viol. Classification: Minor
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to include four connectors in light liquid service in the Cumene Unit in the LDAR database between July 22, 2010 and June 28, 2012. Specifically, the connectors were deleted.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly identify two valves in gas/vapor service in the Cumene Unit in the LDAR database. Specifically, the valves were classified as connectors between September 27, 1997 and November 18, 2014.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly identify two valves in light liquid service in the Cumene Unit in the LDAR database. Specifically, the valves were classified as connectors between September 24, 1997 and October 2, 1997.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly identify two valves in light liquid service in the Udex Unit ("Udex") in the LDAR database. Specifically, the valves were classified as connectors between March 12, 1999 and July 16, 2001.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 62 valves in gas/vapor service in the Alkyl Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 116 valves in light liquid service in the Alkyl Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 39 valves in gas/vapor service for the flare system in the Alkyl Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 149 connectors in gas/vapor service in the Alkyl Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag one valve in light Liquid service in the Alkyl Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 14 connectors in light Liquid service in the Alkyl Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag three valves in gas/vapor service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 14 valves in gas/vapor service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 23 valves in light liquid service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 102 connectors in gas/vapor service and 280 connectors in light liquid service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag two valves in gas/vapor service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 13 connectors in gas/vapor service and 280 connectors in light liquid service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 30 valves in light liquid service in the Cumene Unit and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 189 connectors in light Liquid service in the Cumene Unit and add them to the LDAR database

to ensure they are appropriately monitored.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(3)
 Description: Failed to tag 3 pumps in light Liquid service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.
 Description: Failed to tag 22 valves in gas/vapor service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.
 Description: Failed to tag 14 valves in gas/vapor service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.
 Description: Failed to tag 22 valves in light liquid service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to tag 75 connectors in gas/vapor service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.
 Description: Failed to tag five valves in gas/vapor service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to tag 25 connectors in gas/vapor service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.
 Description: Failed to tag 36 valves in light liquid service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
 Description: Failed to tag 151 connectors in light liquid service in the Udex Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)
 Description: Failed to tag five drains in light liquid service in the Alky Unit and add them to the LDAR database to ensure they are appropriately monitored.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)
 Description: Failed to tag 237 Closed Vent System ("CVS") and 425 Individual Drain System ("IDS") components in the Alky, Cumene, and Udex Units and add them to the LDAR database to ensure they are appropriately monitored.

Viol. Classification: Minor
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to report that the various components had not been tagged in the field and added to the LDAR database for appropriate monitoring (Disclosed Violation Nos. 10 through 33) in the historic periodic reports, because FHR was not aware of the violations.

Disclosure Date: 08/13/2018

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to apply LDAR regulations to one valve in gas/vapor service in the Alkylation Unit ("Alky.") Specifically, the valve was in the LDAR database with NESHAP FF applied, but not LDAR regulations.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly classify two valves in gas/vapor service in the LDAR database as connectors between November 13, 2014 and November 18, 2014.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly classify one valve in gas/vapor service in the Cumene Unit ("Cumene") in the LDAR database as a connector on September 25, 1997.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to include 11 valves in light liquid service in the Cumene in the LDAR database on February 27, 2007. Specifically, the valves were mistakenly deleted from the database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
4F TWC Chapter 63, SubChapter A 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly classify three valves in light liquid service in the Cumene Unit in the LDAR database as connectors between April 1, 1991 and September 25, 1997.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to correctly classify four valves in gas/vapor service in the Cumene Unit in the LDAR database as connectors on September 25, 1997.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to classify two valves in gas/vapor service in the Cumene Unit in the LDAR database as connectors between January 8, 2013 and June 27, 2013.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to include one valve in gas/vapor service in the Cumene Unit in the LDAR database. Specifically, the valve was mistakenly deleted.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to include two valves in light liquid service in the Udex Unit ("Udex") in the LDAR database on April 26, 2017. Specifically, the valve was mistakenly deleted.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to include one valve in gas/vapor service in the Udex in the LDAR database on January 16, 2018.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to include one valve in light liquid service in the Udex in the LDAR database on September 6, 2016. Specifically, the valve was mistakenly placed in out of service status.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Description: Failed to include one connector in light liquid service in the Udex in the LDAR database on January 16, 2018. Specifically, the connector was mistakenly placed in out of service status.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)
Description: Failed to include one drain in light liquid service in the Udex in the LDAR database on July 30, 2013. Specifically, the drain was incorrectly deleted.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to tag 84 valves in gas/vapor service in the Alky in the field and add to the LDAR database.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to tag 302 valves in light liquid service in the Alky and add to the LDAR database.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.
Description: Failed to tag 115 valves in gas/vapor service in the Alky in the field and add to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
Description: Failed to tag 474 connectors in gas/vapor service in the Alky in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag six valves in light liquid service in the Alky in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 21 connectors in light liquid service in the Alky in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag 17 drains in light liquid service in the Alky in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 11 valves in gas/vapor service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 60 valves in light liquid service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 147 connectors in gas/vapor service and 405 connectors in light liquid service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 121 valves in gas/vapor service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 101 valves in light liquid service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 18 valves in gas/vapor service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 70 connectors in gas/vapor service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 38 valves in light liquid service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 191 connectors in light liquid service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag two drains in light liquid service in the Cumene in the field and add to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 10 valves in gas/vapor service in the Selective Hydrogenation Process Unit ("SHP") in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag eight valves in light liquid service in the SHP in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.f.

Description: Failed to tag one valve in gas/vapor service in the SHP in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag six connectors in gas/vapor service in the SHP in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
4F TWC Chapter 63, SubChapter A 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 37 valves in gas/vapor service in the Udex in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
4F TWC Chapter 63, SubChapter A 63.168(b)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 30 valves in light liquid service in the Udex in the field and add to the LDAR database.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 184 connectors in gas/vapor service and 180 connectors in light liquid service in the Udex in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 22 valves in gas/vapor service in the Udex in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag five valves in light liquid service in the Udex in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
4F TWC Chapter 63, SubChapter A 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 13 valves in gas/vapor service in the Udex in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag three relief valves in gas/vapor service in the Udex in the field and add to the LDAR database.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag 45 connectors in gas/vapor service in the Udex in the field and add to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to tag 65 valves in light liquid service in the Udex in the field and add to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag 190 connectors in light liquid service in the Udex in the field and add to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag three drains in light liquid service in the Udex in the field and add to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag 745 Closed Vent System and 511 Individual Drain System components in the Alky, Cumene, SHP, and Udex in the field and add to the LDAR database.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to report the unmonitored components in the historic periodic report. Specifically, during the LDAR "True-up Project" FHR discovered many components (such as valves, connectors, etc..) that had not been appropriately tagged in the field and added to the LDAR database (Disclosure of Violation Nos. 36-80) and failed to include the unmonitored components in the report because FHR was unaware of them.

Notice of Intent Date: 08/07/2018 (1511039)
 Disclosure Date: 03/05/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC No. 30.D.

Description: Failed to retest the Light Ends Unit Hot Oil Heater (previously named Saturates Gas No. 3 Hot Oil Heater) as required by Permit No. 6819A.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.15(d)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(c)

Description: Failed to submit the NSPS notification of start of reconstruction for the NHT/CCR Hot Oil Heater (HOH) reconstruction under 40 CFR § 60, Subpart Ja (NSPS Ja) as part of the West Domestic Crude Project and to include the HOH in the NSPS Ja compliance program nor designated for NSPS Ja applicability for NOx in the Title V permit.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Description: Failed to report the failure to timely submit notification of the fuel gas treatment system modification under 40 CFR § 60, Subpart GGGa (NSPS GGGa) as part of the West Domestic Crude Project as a Title V deviation. Prior to this audit, this deficiency was noted and addressed by the notice of start of operation submitted pursuant to 40 CFR § 60.7(a)(3), but was not report in the Title V deviation report.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)

Description: Failed to submit NSPS notifications and update the Title V permit to reflect NSPS QQQ applicability for the new Light Ends Unit individual drain system (IDS) constructed as part of the West Domestic Crude Project

that triggered 40 CFR § 60, Subpart QQQ.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(4)

Description: Failed to submit NSPS notifications for the Sat Gas #2 and the SRU #2 modifications as part of the West Domestic Crude Project that triggered 40 CFR § 60, Subpart GGGa (NSPS GGGa).

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter C 122.210(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.15(d)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.5(d)

Description: Failed to submit NSPS Db or MACT DDDDD notifications or update the Title V permit to properly reflect the applicability of MACT DDDDD for the NHT/CCR Hot Oil Heater (HOH) reconstruction under 40 CFR § 60, Subpart Db (NSPS Db) and 40 CFR § 63, Subpart DDDDD (MACT DDDDD) as part of the West Domestic Crude Project.

Notice of Intent Date: 10/11/2018 (1524682)

Disclosure Date: 03/26/2019

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Condition No. 17.F.

Description: Failed to monitor one valve in light liquid service in the West Truck Rack ("West Terminal"). Specifically, the valve was mistakenly placed in out of service status in the LDAR database on March 27, 2013 and was therefore not monitored.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor one valve in light liquid service in the West Terminal. Specifically, the valve was incorrectly deleted from the LDAR database on April 15, 2010 and was therefore not monitored.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Condition No. 17.F.

Description: Failed to monitor one valve in light liquid service in the West Terminal. Specifically, the valve was incorrectly deleted from the LDAR database on September 20, 2010 and therefore was not monitored.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to monitor two connectors in light liquid service in the West Terminal. Specifically, the connectors were incorrectly deleted from the LDAR database on September 20, 2010 and therefore were not monitored.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor one valve in gas/vapor service in the Pseudocumene Unit. Specifically, the valve was incorrectly deleted from the LDAR database and therefore was not monitored.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 24 valves in gas/vapor service in the Pseudocumene Unit. Specifically, the valves were incorrectly deleted from the LDAR database on November 20, 2018 and therefore were not monitored.

Viol. Classification: Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.G.

Description: Failed to monitor one pump in light liquid service in the Sulfur Recovery No. 2 Unit ("SRU No. 2"). Specifically, the pump was incorrectly deleted from the LDAR database on August 10, 2016 and therefore was not monitored.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to monitor one connector in light liquid service in the SRU No. 2. Specifically, the connector was incorrectly deleted from the LDAR database and therefore was not monitored.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to appropriately identify and monitor two valves in gas/vapor service in the SRU No. 2. Specifically, the valves had NESHAP FF regulations applied in the LDAR database on December 12, 1998, but did not include the additional LDAR requirements.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to appropriately identify and monitor two connectors in gas/vapor service in the SRU No. 2. Specifically, the connectors had NESHAP FF regulations applied in the LDAR database on June 5, 2207, but did not include the additional LDAR regulations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 17 valves in gas/vapor service in the 06BF657 No. 7 Boiler, 06BF658 No. 8 Boiler, 06BF659 No. 9 Boiler Unit ("Boilerhouse"). Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to monitor four connectors in gas/vapor service in the Boilerhouse. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor two valves in gas/vapor service in the West Terminal. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor eight valves in light liquid service in the West Terminal. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor six valves in light liquid service in the West Terminal. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor 48 connectors in light liquid service in the West Terminal. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor three valves in gas/vapor service in the Fram 6 Cogen Unit ("Cogen"). Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor two valves in gas/vapor service in the Cogen Unit. Specifically, the valves had not been tagged in the field and added to the LDAR database.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to monitor 11 connectors in gas/vapor service in the Cogen Unit. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to monitor two valves in light liquid service in the Cogen Unit. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor four connectors in light liquid service in the Cogen Unit. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 38 valves in gas/vapor service in the Pseudocumene Unit. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 98 valves in light liquid service in the Pseudocumene Unit. Specifically, the valves had not been tagged in the field and added to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor seven valves in gas/vapor service in the Pseudocumene Unit. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to monitor 22 connectors in gas/vapor service in the Pseudocumene Unit. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor 13 connectors in light liquid service in the Pseudocumene Unit. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor two valves in gas/vapor service in the Marine Vapor Combustor Unit ("MVRU"). Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to monitor three connectors in gas/vapor service in the MVRU. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 22 valves in gas/vapor service in the MVRU. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor 241 connectors in gas/vapor service in the MVRU. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(A)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-3(h)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.G.

Description: Failed to monitor seven compressors in gas/vapor service in the MVRU. Specifically, the compressors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 35 valves in light liquid service in the MVRU. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor 210 connectors in light liquid service in the MVRU. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
 Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor one valve in gas/vapor service in the SRU No. 2. Specifically, the valve had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor one relief valve in gas/vapor service in the SRU No. 2. Specifically, the relief valve had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 11 valves in gas/vapor service in the SRU No. 2. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to monitor 83 connectors in gas/vapor service in the SRU No. 2. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor seven valves in light liquid service in the SRU No. 2. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor 211 connectors in light liquid service in the SRU No. 2. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 11 valves in gas/vapor service in the Sulfur Recovery No. 3 Unit ("SRU No. 3"). Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to monitor 47 connectors in gas/vapor service in the SRU No. 3. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
 PERMIT Special Conditions No. 17.G.

Description: Failed to monitor one pump in light liquid service in the SRU NO. 3. Specifically, the pump had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Conditions No. 17.F.

Description: Failed to monitor 17 valves in light liquid service in the SRU No. 3. Specifically, the valves had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to monitor 27 connectors in light liquid service in the SRU No. 3. Specifically, the connectors had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to monitor 11 drains in light liquid service in the Boilerhouse. Specifically, the drains had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to monitor one drain in light liquid service in the West Terminal. Specifically, the drain had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to monitor one drain in light liquid service in the Cogen Unit. Specifically, the drain had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to monitor 15 drains in light liquid service in the Pseudocumene Unit. Specifically, the drains had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to monitor one drain in light liquid service in the SRU No. 2. Specifically, the drain had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to monitor 475 Closed Vent System ("CVS") and 586 Individual Drain System ("IDS") components in the Boilerhouse, West Terminal, Cogen Unit, Pseudocumene Unit, MVRU, SRU No. 1, SRU No. 2, and SRU No. 3. Specifically the CVS and IDS components had not been tagged in the field and added to the LDAR database for monitoring.

Viol. Classification: Moderate
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.487a(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGGa 60.592a
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to include many components in historic periodic reports. Specifically, during the LDAR "True-up Project" FHR discovered many components (such as valves, connectors, etc.) that had not been appropriately tagged in the field and added to the LDAR database (Violation Nos. 1 through 51). Such components should have been reported in the historic periodic reports but were not because FHR was unaware of them.

Notice of Intent Date: 11/16/2018 (1531624)
 Disclosure Date: 04/26/2019
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Conditions ("SC") No.17.F

Description: Failed to monitor 38 valves in gas/vapor service in the Flare CVS ("Flare System") Unit. Specifically, NESHAP FF regulations were applied to the valves between December 12, 1998 and January 3, 2013, but

the LDAR regulations were not.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor 13 valves in gas/vapor service in the Flare System Unit. Specifically, the valves were incorrectly deleted from the LDAR database between July 28, 2009 and July 27, 2018.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to identify and monitor eight connectors in gas/vapor service in the Flare System Unit. Specifically, the valves were incorrectly deleted from the LDAR database between July 19, 2009 and July 27, 2018.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)

Description: Failed to identify and monitor one piping connection in gas/vapor service in the Flare System Unit. Specifically, the connector was incorrectly deleted from the LDAR database on April 24, 2012.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to monitor one pump in light liquid service in the Flare System Unit. Specifically, NESHAP FF regulations were applied to the pump on December 31, 1998, but the LDAR regulations were not.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(3)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to monitor one connector in light liquid service in the Flare System Unit. Specifically, NESHAP FF regulations were applied to the connector on July 17, 2006, but the LDAR regulations were not.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to monitor 96 valves in light liquid service in the Flare System Unit. Specifically, NESHAP FF regulations were applied to the valves between December 31, 1998 and October 1, 2015, but the LDAR regulations were not.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor one valve in light liquid service in the Flare System Unit. Specifically, the valve was incorrectly deleted from the LDAR database on October 27, 2015.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor 3 valves in gas/vapor service in the Fuel Gas Supply System Fugitives ("Fuel Gas System") Unit. Specifically, the valves were incorrectly deleted from the LDAR database on August 10, 2016.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor one valve in gas/vapor service in the Fuel Gas System Unit. Specifically, the valves were incorrectly deleted from the LDAR database on November 28, 2018.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to correctly identify and monitor 3 valves in gas/vapor service in the Fuel Gas System Unit. Specifically, the valves were incorrectly classified as connectors in the LDAR database between April 1, 1991 and June 8, 2014.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to monitor one pump in light liquid service in the VOC Tank and Loading Fugitives ("Tank Farm") Unit. Specifically, NESHAP FF regulations were incorrectly applied to the pump on December 23, 1998 and did not include LDAR regulations.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(3)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to monitor five connector pumps in light liquid service in the Tank Farm Unit. Specifically, NESHAP FF regulations were applied to the pumps on July 17, 2006, but the LDAR regulations were not.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(3)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to monitor nine pumps in light liquid service in the Tank Farm Unit. Specifically, NESHAP FF regulations were applied to the pumps between November 20, 1998 and October 13, 2016, but the LDAR regulations were not.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to monitor 240 valves in light liquid service in the Tank Farm Unit. Specifically, NESHAP FF regulations were applied to the valves between May 1, 1998 and February 21, 2018, but the LDAR regulations were not.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC 17.F

Description: Failed to identify and monitor two relief valves in light liquid service in the Flare System Unit. Specifically, the valves were incorrectly deleted from the LDAR database on November 15, 2018.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor five valves in gas/vapor service in the Tank Farm Unit. Specifically, the valves were incorrectly deleted from the LDAR database between July 27, 2012 and November 15, 2018.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor 23 valves in light liquid service in the Tank Farm Unit. Specifically, the valves were incorrectly deleted from the LDAR database between April 6, 2007 and November 15, 2018.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to correctly identify one valve in light liquid service in the Tank Farm Unit. Specifically, the valve was incorrectly classified as a connector in the LDAR database on April 1, 1991.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to correctly identify and one relief valve in light liquid service in the Tank Farm Unit. Specifically, the relief valve was incorrectly classified as a connector in the LDAR database on August 9, 1999.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to correctly identify and one valve in light liquid service in the Tank Farm Unit. Specifically, the valve was incorrectly classified in the LDAR database on July 28, 1998.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
4F TWC Chapter 63, SubChapter A 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346(c)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor one valve in light liquid service in the HON Tank and Loading Piping Fugitives ("Tank Farm HON") Unit. Specifically, the valve was incorrectly deleted from the LDAR database on July 30, 2015.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to monitor four valves in light liquid service in the Tank Farm HON Unit. Specifically, NESHAP FF regulations were applied to the valves and the LDAR regulations were not.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to monitor seven valves in light liquid service in the Tank Farm HON Unit. Specifically, NESHAP FF regulations were applied to the valves, but the LDAR regulations were not.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor one valve in gas/vapor service in the Tank Farm HON Unit. Specifically, the valve was incorrectly deleted from the LDAR database on December 19, 2018.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to identify and monitor 19 valves in light liquid service in the Tank Farm HON Unit. Specifically, the valves were incorrectly deleted from the LDAR database between June 23, 2007 and May 29, 2018.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to identify and monitor 25 connectors in light liquid service in the Tank Farm HON Unit. Specifically, the connectors were incorrectly deleted from the LDAR database between June 23, 2007 and May 29, 2018.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to identify and monitor one pump in light liquid service in the Wastewater Treatment ("Waste Management") Unit. Specifically, the pump was incorrectly deleted from the LDAR database on July 30, 2012.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to identify and monitor one connector pump in light liquid service in the Waste Management Unit. Specifically, the pump was incorrectly deleted from the LDAR database on October 15, 2013.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to identify and monitor two valves in light liquid service in the Waste Management Unit. Specifically, the valves were incorrectly deleted from the LDAR database June 23, 2007 and May 29, 2018.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to identify and monitor one connector in light liquid service in the Waste Management Unit. Specifically, the connector was incorrectly deleted from the LDAR database on March 29, 2011.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(C)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor one relief valve in gas/vapor service in the Flare System Unit. Specifically, the valve was not in the LDAR database.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor 55 valves in gas/vapor service in the Flare System Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag and monitor 245 connectors in gas/vapor service in the Flare System Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to tag and monitor three piping connections in gas/vapor service in the Flare System Unit. Specifically, the connections were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
 30 TAC Chapter 115, SubChapter D 115.324(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to tag and monitor on pump in light liquid service in the Flare System Unit. Specifically, the pump was not added to the LDAR database.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT SC No. 17.F
Description: Failed to tag and monitor 29 valves in light liquid service in the Flare System Unit. Specifically the valves were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Description: Failed to tag and monitor 128 connectors in light liquid service in the Flare System Unit. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT SC No. 17.F
Description: Failed to tag and monitor 346 valves in gas/vapor service in the Fuel Gas System Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT SC No. 17.F
Description: Failed to tag and monitor four valves in gas/vapor service in the Fuel Gas System Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
Description: Failed to tag and monitor 58 connectors in gas/vapor service in the Fuel Gas System Unit. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
Rqmt Prov: PERMIT SC No. 17.F
Description: Failed to tag and monitor one valve in light liquid service in the Fuel Gas System Unit. Specifically, the valves was not added to the LDAR database.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT SC No. 17.F
Description: Failed to tag and monitor 17 valves in light liquid service in the Fuel Gas System Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Description: Failed to tag and monitor 111 connectors in light liquid service in the Fuel Gas System. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEEE 63.2346(c)
Rqmt Prov: PERMIT SC No. 17.F
Description: Failed to tag and monitor 12 valves in light liquid service in the Tank Farm HON Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.169(b)
 Rqmt Prov: PERMIT SC No. 17.F
 Description: Failed to tag and monitor seven relief valves in light liquid service in the Tank Farm HON Unit. Specifically, the relief valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT SC No. 17.F
 Description: Failed to tag and monitor 361 valves in light liquid service in the Tank Farm HON Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed tag and monitor three connectors in gas/vapor service in the Tank Farm HON Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
 Rqmt Prov: PERMIT SC No. 17.F
 Description: Failed to tag and monitor four valves in gas/vapor service in the Tank Farm HON Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to tag and monitor 24 connectors in gas/vapor service in the Tank Farm HON Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
 Rqmt Prov: PERMIT SC No. 17.F
 Description: Failed to tag and monitor 17 valves in light liquid service in the Tank Farm HON Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
 Description: Failed to tag and monitor 30 connectors in light liquid service in the Tank Farm HON Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
 30 TAC Chapter 115, SubChapter D 115.324(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(2)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)
 Rqmt Prov: PERMIT SC No. 17.G
 Description: Failed to tag and monitor one pump in light liquid service in the Tank Farm Unit. Specifically, the pump was not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
 30 TAC Chapter 115, SubChapter D 115.324(3)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC No. 17.G
 Description: Failed to tag and monitor one connector pump in light liquid service in the Tank Farm Unit. Specifically, the pump was not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Rqmt Prov: PERMIT SC No. 32.G

Description: Failed to tag and monitor one agitator in light liquid service in the Tank Farm Unit. Specifically, the agitator was not added to the LDAR databases.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-8(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor seven relief valves in light liquid service in the Tank Farm Unit. Specifically, the relief valves were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor 41 valves in gas/vapor service in the Tank Farm Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor 839 valves in light liquid service in the Tank Farm Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-4(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor 33 valves in gas/vapor service in the Tank Farm Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag and monitor 248 connectors in gas/vapor service in the Tank Farm Unit. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Minor

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to tag and monitor one piping connection in gas/vapor service in the Tank Farm Unit. Specifically, the piping connection was not added to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to tag and monitor one pump in light liquid service in the Tank Farm Unit. Specifically, the pump was not added to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(A)
30 TAC Chapter 115, SubChapter D 115.324(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT SC No. 17.G

Description: Failed to tag and monitor one connector pump in light liquid service in the Tank Farm Unit. Specifically, the pump was not added to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2(c)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor two valves in light liquid service in the Tank Farm (QQQ) Unit. Specifically, the valves were no added to the LDAR database.
Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor six relief valves in light liquid service in the Tank Farm Unit. Specifically, the relief valves were not added to the LDAR database.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
Rqmt Prov: PERMIT SC No. 17.F

Description: Failed to tag and monitor 160 valves in light liquid service in the Tank Farm Unit. Specifically, the valves were not added to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor three piping connections in light liquid service in the Tank Farm Unit. Specifically, the piping connections were not added to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor 1,120 connectors in light liquid service in the Tank Farm Unit. Specifically, the connectors were not added to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to tag and monitor one relief valve in gas/vapor service in the Waste Management Unit. Specifically, the relief valve was not added to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to tag and monitor two vents in gas/vapor service in the Waste Management Unit. Specifically, the vents were not added to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to tag and monitor 14 valves in gas/vapor service in the Waste Management Unit. Specifically, the valves were not added to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(i)

Description: Failed to tag and monitor 78 connectors in gas/vapor service in the Waste Management Unit. Specifically, the connectors were not added to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor four pumps in light liquid service in the Waste Management Area. Specifically, the pumps were not added to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor four connector pumps in light liquid service in the Waste Management Unit. Specifically, the connectors were not added to the LDAR database.
Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor one relief valve in light liquid service in the Waste Management Unit. Specifically, the relief valve was not added to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor 252 valves in light liquid service in the Waste Management Unit. Specifically, the valves were not added to the LDAR database.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to tag and monitor 911 connectors in light liquid service in the Waste Management Unit. Specifically,

the connectors were not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag and monitor one drain in light liquid service in the Fuel Gas System Unit. Specifically, the drain was not added to the LDAR database.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag and monitor 14 drains in light liquid service in the Tank Farm HON Unit. Specifically, the drains were not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag and monitor five drains in light liquid service in the Tank Farm Unit.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(C)

Description: Failed to tag and monitor six drains in light liquid service in the Waste Management Unit. Specifically, the drains were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failed to tag and monitor 835 Closed Vent System ("CVS") and 3,169 Individual Drain System ("IDS") components in the Flare System, Fuel Gas System, Tank Farm HON, Tank Farm, and Waste Management Units. Specifically, the CVS and IDS components were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.487a(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGG 60.592(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Description: Failed to include Violation Nos. 1 through 51 in the historic periodic reports because FHR was unaware of them.

Disclosure Date: 05/24/2019

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Condition No. 17.F

Description: Failed to identify and monitor two valves in light liquid service in the VOC Tank & Loading Fugitives ("Tank Farm") Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Minor
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Description: Failed to identify and monitor two connectors in light liquid service in the Wastewater Treatment ("Waste Management") Unit. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Condition No. 17.F

Description: Failed to identify and monitor one valve in gas/vapor service in the Parex No. 1 Unit ("#1 Parex") Unit. Specifically, the valve was not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Condition No. 17.F

Description: Failed to identify and monitor five valves in light liquid service in the #1 Parex Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to identify and monitor one connector in gas/vapor service and 12 connectors in light liquid service in the #1 Parex Unit. Specifically, the connector and valves were not added to the LDAR database.

Viol. Classification: Minor
Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor three valves in gas/vapor service in the Parex No. 2 ("#2 Parex") Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor eight valves in light liquid service in the #2 Parex Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to identify and monitor three connectors in gas/vapor service in the #2 Parex Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(2)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor three valves in gas/vapor service in the Continuous Catalytic Regeneration Fractionation ("CCR Frac") Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor 20 valves in light liquid service in the CCR Frac Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to identify and monitor three connectors in gas/vapor service and 25 connectors in light liquid service in the CCR Frac Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor four valves in light liquid service in the Cumene Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to identify and monitor four connectors in light liquid service in the Cumene Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor 11 valves in light liquid service in the Mobile Selective Toluene Disproportionation Process ("MSTDP") Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
 Description: Failed to identify and monitor 12 connectors in light liquid service in the MSTDP Unit. Specifically, the connectors were not added to the LDAR database.
 Viol. Classification: Minor
 Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
 30 TAC Chapter 116, SubChapter B 116.115(c)
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
 Rqmt Prov: PERMIT Special Condition No. 17.F
 Description: Failed to identify and monitor seven valves in light liquid service in the Orthoxylene Fractionation ("Ortho") Unit. Specifically, the valves were not added to the LDAR database.
 Viol. Classification: Moderate
 Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to identify and monitor 12 connectors in light liquid service in the Ortho Unit. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter B 116.115(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: PERMIT Special Condition No. 17.F

Description: Failed to identify and monitor 37 valves in light liquid service in the UDEX Unit. Specifically, the valves were not added to the LDAR database.

Viol. Classification: Minor

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to identify and monitor three connectors in gas/vapor service in the UDEX Unit. Specifically, the connectors were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 5B THSC Chapter 361, SubChapter A 361.343(a)(1)
5B THSC Chapter 361, SubChapter A 361.343(c)

Description: Failed to identify and monitor three connectors in gas/vapor service and two valves in light liquid service in the 08FB137 45FB703 Unit. Specifically, the connectors and valves were not added to the LDAR database.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.487a(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGGa 60.592a
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(8)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.648(a)

Description: Failed to include Violation Nos. 86 through 105 in the historic periodic reports because FHR was unaware of them.

Notice of Intent Date: 02/07/2019 (1549593)

Disclosure Date: 03/29/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT Monitoring & Reporting Requirement 9.b.i

Description: Failed to submit notification to the TCEQ that an activity had occurred that resulted in a discharge on a non-routine basis that exceeded the highest "notification level" set out in Monitoring and Reporting Requirements 9.b.i. of the permit (five hundred micrograms per liter). This value was exceeded for benzene and xylenes on a non-routine basis on the following dates: Benzene on May 23, 2018 and Xylene on February 20, 2018, May 23, 2018, and August 14, 2018.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.7(e)(1)

Description: Failed to conduct additional performance testing when the characteristics of the wastewater change. Specifically, although past performance tests were conducted at representative conditions of the time in accordance with 40 CFR 21 63.145(a)(4), the facility has a general duty when wastewater influent conditions change to evaluate the new wastewater conditions and conduct additional performance testing as appropriate. With the shutdown of the MTBE unit in 2006 timeframe, the characteristics of

Notice of Intent Date: 03/26/2019 (1553956)

Disclosure Date: 10/15/2019

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.324(1)(B)
30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

Rqmt Prov: OP Special Condition No. 17.F

Description: Failed to tag one valve in light liquid service (Metaxylene Unit) and add it to the LDAR database after a valve replacement. The valve was placed in service on 11/6/018.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)

Description: Failed to tag one connector in light liquid service (Metaxylene Unit) in the field and add to the LDAR database.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.322(4)
30 TAC Chapter 116, SubChapter G 116.715(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(2)

Rqmt Prov: OP Special Condition No. 17.E

Description: Failed to equip each open-ended valve or line (OEL) with an appropriately sized cap, bling, flange, plug, or a second valve to seal the line (Metaxylene Unit). Specifically, there was one instance of a leaking OEL discovered on 8/6/2019.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component in the Metaxylene Unit was leaking.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 115, SubChapter D 115.322(4)
30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.648(a)

Rqmt Prov: PERMIT Special Condition No. 17.E

Description: Failed to prevent fugitive emissions. Specifically, there was one instance (Tag No. 112144) of a leaking OEL discovered on July 18, 2019 in the No. 4 Crude Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Condition No. 33

Description: Failed to tag in the field and add one connector in light liquid service to the LDAR database in the Mid-Crude Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter G 116.715(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)

Rqmt Prov: PERMIT Special Condition No. 33

Description: Failed to tag in the field and enter into the LDAR database one connector in the No. 4 Crude Unit.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component in the No. 4 Crude Unit was found leaking.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component in the No. 4 Crude Unit was found leaking.

Disclosure Date: 01/30/2020

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component in the Metaxylene Unit was found leaking.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, three non-LDAR components in the No. 4 Crude Unit were found to be leaking.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component was found leaking in the No. 4 Crude Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component was found leaking in the No. 4 Crude Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.110

Description: Failed to prevent fugitive emissions. Specifically, one non-LDAR component was found leaking in the No. 4 Crude Unit.

Viol. Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter G 116.715(a)
30 TAC Chapter 122, SubChapter B 122.145(2)

Rqmt Prov:

PERMIT Special Conditions No. 33

Description: Failed to tag in the field 31 connectors in gas vapor service (No. 4 Crude Unit) and add them to the LDAR database: Tag Nos. 103471.1, 103527.1, 103554.1, 103583.1, 103611.1, 103638.1, 103667.1, 103695.1, 103750.1, 103778.1, 103806.1, 103834.1, 103890.1, 103919.1, 103969.1, 1036997.1, 103772.1, 103862.1, 104025.1, 104053.1, 104081.1, 104109.1, 104137.1, 104165.1, 104193.1, 104220.1, 104249.1, 104035.1, 104360.1, 104388.1, and 103499.1 and components were not reported in historic T5 reports.

Viol. Classification: Minor

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.487(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VVa 60.487a(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT GGGa 60.592a(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.655(d)

Description: Failed to submit accurate periodic reports. Specifically, FHR discovered components that had not been appropriately tagged in the field and added to the LDAR database (referencing violations 1, 2, 6, and 7 in the disclosure) and these were not reported in the historic period reports because FHR was unaware of them.

Notice of Intent Date: 03/26/2019 (1554368)

No DOV Associated

Notice of Intent Date: 05/06/2019 (1569132)

Disclosure Date: 10/28/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.342(c)(1)(ii)

Description: Failed to remove or destroy the benzene contained in the waste using a treatment process or wastewater treatment system that complies with the standards specified in 40 CFR § 61.348. Specifically, the John Zink thermal oxidizer was equipped with a water boot along the Closed Vent System, which freely drained to an open sump and the water draining to the sump contained benzene.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(B)

Description: Failed to maintain each opening in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair. Specifically, Tank 137 was equipped with two overflow pipes which were covered, but not tightly sealed.

Viol. Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(a)(1)(ii)(B)

Description: Failed to secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration, for systems not using a flow meter. Specifically, at Tank 2105 a bypass valve was observed located in the closed system to the John Zink Thermal Oxidizer with a cap but not with a car-seal.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)

Description: Failed to maintain each opening in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that waste is in the container except when it is necessary to use the opening for waste loading, removal, inspection, or sampling. Specifically a NESHAP drum No. N-0072-W was observed near the truck rack with the lid propped open by a hatch.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.355(j)

Description: Failed to determine the benzene quantity for the purposes of the calculation required by 40 CFR § 61.342 (c)(3)(ii)(B). Specifically, water contaminated by exhaust from the Pumphouse knock engines was drained to sewers that were not part of the BWON controlled program and this stream was not included in the TAB under the pumphouse unit.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(b)

Description: Failed to ensure all openings operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, initially and thereafter at least once per year and failed to visually inspect each cover and all openings initially and quarterly thereafter to ensure that they are closed and gasketed properly. Specifically, NESHAP drum N-0098-W was in service but deleted from waste inspection database.

Notice of Intent Date: 06/20/2019 (1579165)

Disclosure Date: 11/14/2019
Viol. Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)
Description: Failed to postmark a notification of the actual date of initial startup of an affected facility within 15 days after such date. Specifically, Tank 08FB118 is a fixed roof tank with no control which was subject to a 7/20/05 start of operation notice indicating it is subject to NSPS Kb; however, no start of construction notice, no analysis of maximum true vapor pressure, and no applicability of NSPS Kb records were available.
Viol. Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.146(4)
Description: Failed to on base the compliance certification on at a minimum, but not limited to, the monitoring method (or recordkeeping method, if appropriate) required by the permit to be used to assess compliance. Specifically, Tank 62FB2102 is a fixed roof tank directed to the John Zink control device; however, the Title V compliance demonstration indicated that this tank achieves compliance using an internal floating roof.

Notice of Intent Date: 10/14/2019 (1604406)
No DOV Associated

Notice of Intent Date: 11/27/2019 (1616569)
Disclosure Date: 04/27/2020
Viol. Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1564(b)(2)
Description: Failed to include soot blowing events during particulate matter performance tests for the FCC. Specifically, soot blowing inclusion is not specified in the rule but is included in the preamble to the rule outlined during RSR finalization.

Notice of Intent Date: 01/23/2020 (1625952)
No DOV Associated

Notice of Intent Date: 05/07/2020 (1650366)
Disclosure Date: 11/06/2020
Viol. Classification: Moderate
Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Rqmt Prov: PERMIT Monitoring/Reporting Requirements No. 5
Description: Failed to calibrate the flow meter used to measure Outfall 004 flows at least annually.

Notice of Intent Date: 06/01/2020 (1657516)
No DOV Associated

Notice of Intent Date: 09/10/2020 (1678743)
Disclosure Date: 11/10/2020
Viol. Classification: Moderate
Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.11
30 TAC Chapter 335, SubChapter R 335.504
Description: Failed to identify and conduct a complete solid and hazardous waste determination on cloth rags in the maintenance shops at the point of generation.

Notice of Intent Date: 11/17/2020 (1697475)
No DOV Associated

Notice of Intent Date: 04/26/2021 (1712022)
No DOV Associated

Notice of Intent Date: 05/20/2021 (1735171)
No DOV Associated

Notice of Intent Date: 06/11/2021 (1736215)
Disclosure Date: 10/26/2021
Viol. Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT R 63.428(g)(1)
Description: Failed to include cargo tank loads for which vapor tightness documentation had not been confirmed in past periodic reports due to the manual override.
Viol. Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)

Description: Failed to report deviations in prior Title V semiannual reporting periods associated with Disclosed Violation Nos. 1 and 2, above.

Notice of Intent Date: 11/03/2021 (1772259)
No DOV Associated

Notice of Intent Date: 11/12/2021 (1774361)
No DOV Associated

Notice of Intent Date: 12/03/2021 (1782369)
No DOV Associated

Notice of Intent Date: 01/19/2022 (1788350)
No DOV Associated

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
FLINT HILLS RESOURCES CORPUS
CHRISTI, LLC
RN100235266

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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2022-0481-IWD-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Flint Hills Resources Corpus Christi, LLC (the "Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. 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 refining facility located at 2825 Suntide Road, east and west of Suntide Road and north of Up River Road in the northwest area of, and south side of the end of Tribble Lane, in the northern area of the City of Corpus Christi; and Land Treatment Units 1 and 2 are located approximately 5,000 feet northwest of the intersection of Suntide Road and Up River Road in Corpus Christi, Nueces County, Texas (the "Facility"). The Facility is near or adjacent to water in the state as defined in TEX. WATER CODE § 26.001(5).
2. During a record review conducted on January 25, 2022, an investigator documented that the Respondent did not comply with permitted effluent limitations, as shown in the effluent violation table below:

Effluent Violation Table	
	Total Zinc
	Daily Maximum Concentration
Monitoring Period	Limit = 0.156 milligrams per liter
May 2021	0.31
July 2021	0.67
September 2021	0.51

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. WATER CODE ch. 26 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, the Respondent failed to comply with permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a)(1), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0000531000, Effluent Limitations and Monitoring Requirements No. 1, Outfall No. 004.
3. 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.
4. An administrative penalty in the amount of \$45,000 is justified by the facts recited in this Order. The Respondent paid \$22,500 of the penalty. Pursuant to TEX. WATER CODE § 7.067, \$22,500 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. 4 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: Flint Hills Resources Corpus Christi, LLC, Docket No. 2022-0481-IWD-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The Respondent shall implement and complete the SEP as set forth in Conclusion of Law No. 4. The amount of \$22,500 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. The Respondent shall, within 130 days, submit written certification of compliance with the permitted effluent limitations of TPDES Permit No. WQ0000531000 including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with all permitted effluent limitations. The certification shall include detailed supporting documentation including photographs, receipts, or other records to demonstrate compliance with the permitted effluent limitations. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

Enforcement Division
Texas Commission on Environmental Quality
2309 Gravel Drive
Fort Worth, Texas 76118-6951

with a copy to:

Water Section Manager
Corpus Christi Regional Office
Texas Commission on Environmental Quality
500 North Shoreline Boulevard, Suite 500
Corpus Christi, Texas 78401

4. All relief not expressly granted in this Order is denied.
5. 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 Facility operations referenced in this Order.
6. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
7. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
8. 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.
9. 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.
10. 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.
11. 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.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



For the Executive Director

5/2/2023

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.



Signature

12/12/2022

Date

BROOK A. VICKERY

Name (Printed or typed)
Authorized Representative of
Flint Hills Resources Corpus Christi, LLC

VP + MANUFACTURING

Title
MANAGER

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: 2022-0481-IWD-E
SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	Flint Hills Resources Corpus Christi, LLC
Payable Penalty Amount:	\$45,000
SEP Offset Amount:	\$22,500
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	The Guadalupe-Blanco River Trust
Project Name:	<i>Shorebird and Waterfowl Habitat Conservation and Restoration Project</i>
<u>Location of SEP:</u> Aransas, Atascosa, Bandera, Bastrop, Bee, Bexar, Blanco, Caldwell, Calhoun, Comal, DeWitt, Fayette, Gillespie, Goliad, Gonzales, Guadalupe, Hays, Jackson, Karnes, Kendall, Kerr, Lavaca, Live Oak, Medina, Nueces, Real, Refugio, San Patricio, Travis, Victoria, and Wilson 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 Third-Party Administrator named above. The contribution will be to **The Guadalupe-Blanco River Trust** for the *Shorebird and Waterfowl Habitat Conservation and Restoration Project*. The contribution will be used in accordance with the SEP between the Third-Party Administrator and the TCEQ (the “Project”). Specifically, the SEP Offset Amount will be used to conduct due diligence, purchase conservation easements from private landowners, conduct restoration activities, and provide property stewardship.

After a property has been identified for conservation easement acquisition, the Third-Party Administrator shall submit a proposal to TCEQ that includes property owner information, metes and bounds, purchase price, amount of SEP Offset Amount to be used for due diligence and purchase, deed encumbrance language, and any other information that may be requested by TCEQ. Upon written approval by TCEQ, the Third-Party Administrator may use the SEP Offset Amount for approved due diligence activities and purchase of the conservation easement. The Third-Party Administrator shall address and remedy all encumbrances to the property title, including mortgages and other liens, prior to closing on the conservation easement purchase. The Third-Party Administrator shall not sell conservation easements or any other land interests

acquired with the SEP Offset Amount. The Third-Party Administrator shall record a copy of each conservation easement in the county deed records within 15 days of closing. After a conservation easement is acquired, the Third-Party Administrator shall use the SEP Offset Amount for property stewardship to ensure that the terms of the easement are followed. Property stewardship activities include monitoring the property, compliance enforcement, and providing continual resources to the property owner. The SEP Offset Amount shall not be used for any legal fees associated with property stewardship. The Third-Party Administrator certifies that the conservation easements purchased for this Project will not be part of a mitigation project.

The Third-Party Administrator shall also use the SEP Offset Amount for habitat restoration and enhancement, including planting native species, removal of invasive species, and grading. Restoration activities will be conducted by a contractor and will take place on public land managed by entities such as the Texas Parks and Wildlife Department and U.S. Fish and Wildlife Services or private property protected by a conservation easement. Restoration activities will take place on former wetlands with effectively drained hydric soil map units, filled areas with no development, impounded areas, excavated areas, or farmed wetlands as well as degraded wetlands that are partially drained, impounded, excavated, farmed, or contain tidal restrictions. Prior to starting restoration activities, the Third-Party Administrator shall submit a proposal to TCEQ that includes the exact property location and description, property owner information, specific restoration activities to be conducted, amount of the SEP Offset Amount to be used for restoration activities, and any other information that may be requested by TCEQ. Upon written approval by TCEQ, the Third-Party Administrator may use the SEP Offset Amount for the approved restoration activities. The SEP will be done in accordance with all federal, state, and local environmental laws and regulations.

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

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

b. Environmental Benefit

This Project is needed because important wildlife habitats for wetland-dependent and other species are under threat from an expanding human footprint into previously undeveloped areas. Conserving properties through conservation easements will ensure that those lands are permanently protected from environmentally harmful activities and use. Restoring habitats through native plantings, removal of invasive species, and grading will protect water quality and provide habitat for native birds and other aquatic and coastal species, such as the whooping crane, piping plover, reddish egret, sooty

tern, white-faced ibis, white-tailed hawk, black-spotted newt, sheet frog, and northern Aplomado falcon. Potential property acquisition areas have been identified and prioritized as the highest quality habitat based on data derived from the U.S. Fish and Wildlife Service with input from Texas Parks and Wildlife Department, Ducks Unlimited, Gulf Coast Bird Observatory, and the International Crane Foundation. Protection of these strategic sites will also protect and improve both water quality and quantity through increased filtration into groundwater sources and increased filtration of pollutants. Potential restoration activity areas have been identified and prioritized based on maps of historic wetlands from the National Wetland Inventory and local wetland maps that have been detailed by U.S. Fish and Wildlife Services through the Coastal Prairie Conservation Initiative.

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 **The Guadalupe-Blanco River Trust SEP** and shall mail the contribution with a copy of the Agreed Order to:

The Guadalupe-Blanco River Trust SEP
Attention: Executive Director
933 East Court Street
Seguin, Texas 78155

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

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.