

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



October 7, 2022

Laurie Gharis, Chief Clerk
Texas Commission on Environmental Quality
P.O. Box 13087, MC 105
Austin, Texas 78711-3087

Re: Agenda Backup Materials
Western Refining Terminals, LLC - Air Quality Permit No. 93546
TCEQ Docket No. 2022-1156-AIR

Dear Ms. Gharis:

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

1. The draft permit, including the Special Conditions;
2. The Maximum Allowable Emission Rate Table;
3. The Air Quality Analysis Audit;
4. The Technical Review Summary; and
5. A Compliance History report for the Applicant.

If you have any questions, please do not hesitate to call me at extension 6033.

Sincerely,

A handwritten signature in blue ink, appearing to read "Betsy Peticolas".

Betsy Peticolas,
Staff Attorney
Environmental Law Division

Enclosures



Texas Commission on Environmental Quality Air Quality Permit

A Permit Is Hereby Issued To
Western Refining Terminals, LLC
Authorizing the Continued Operation of
Marathon El Paso Refinery
Located at El Paso, El Paso County, Texas
Latitude 31° 46' 3" Longitude -106° 23' 43"

Permit: 93546

Issuance Date: _____

Expiration Date: _____

For the Commission

- Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)]¹
- Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
- Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
- Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
- Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
- Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
- Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and

operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources-- Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to "air pollution" as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLCmax = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	hp = horsepower
CFR = Code of Federal Regulations	hr = hour lb/day = pound per day
CN = customer ID number	lb/hr = pound per hour
CNG = compressed natural gas	lb/MMBtu = pound per million British thermal units
CO = carbon monoxide	LDAR = Leak Detection and Repair (Requirements)
COMS = continuous opacity monitoring system	LNG = liquefied natural gas
CPMS = continuous parametric monitoring system	LPG = liquefied petroleum gas
DFW = Dallas/ Fort Worth (Metroplex)	LT/D = long ton per day
DE = destruction efficiency	m = meter
DRE = destruction and removal efficiency	m ³ = cubic meter
dscf = dry standard cubic foot or feet	m/sec = meters per second
dscfm = dry standard cubic foot or feet per minute	MACT = maximum achievable control technology
ED = (TCEQ) Executive Director	MAERT = Maximum Allowable Emission Rate Table
EF = emissions factor	MERA = Modeling and Effects Review Applicability
EFR = external floating roof tank	mg = milligram
EGU = electric generating unit	mg/g = milligram per gram
EI = Emissions Inventory	mL = milliliter
ELP = El Paso	MMBtu = million British thermal units
EPA = (United States) Environmental Protection Agency	MMBtu/hr = million British thermal units per hour
EPN = emission point number	MSDS = material safety data sheet
ESL = effects screening level	MSS = maintenance, startup, and shutdown
ESP = electrostatic precipitator	MW = megawatt
FCAA = Federal Clean Air Act	NAAQS = National Ambient Air Quality Standards
FCCU = fluid catalytic cracking unit	NESHAP = National Emission Standards for Hazardous Air Pollutants
FID = flame ionization detector	NGL = natural gas liquids
FIN = facility identification number	NNSR = nonattainment new source review
ft = foot or feet	NO _x = total oxides of nitrogen
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

NSPS = New Source Performance Standards
PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Special Conditions

Permit Number 93546

Emission Standards

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

T0044, T0045, T0079, T0084, T0085, T0086, T0087, T0088, T0157, T0158, T0159, T0160, T0161, T1062, T4052, T4053, T4054, T4055, T4060, T4061, T4125, T4126, T4287, and T4288.

Federal Applicability

3. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):
 - A. Subpart A, General Provisions.
 - B. Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984
 - C. Subpart GGG, Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced after January 4, 1983, and on or Before November 7, 2006.
 - D. Subpart GGGa, Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After November 7, 2006.
 - E. Subpart QQQ, Standards of Performance for VOC Emissions From Petroleum Refinery Wastewater Systems.
4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants in 40 CFR Part 61:
 - A. Subpart A, General Provisions.
 - B. Subpart FF, National Emission Standard for Benzene Waste Operations.
5. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63:

- A. Subpart A, General Provisions.
- B. Subpart CC, National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries.
- C. Subpart EEEE, National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).
- D. Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

Fugitive Monitoring

6. Piping, Valves, Pumps, and Compressors in Hydrogen Sulfide (H₂S) Service

This condition applies to all components that contain streams with greater than 1 weight percent H₂S.

- A. Audio, olfactory, and visual checks for leaks within the operating area shall be made once per shift. Where fixed area monitors exist, monitoring may be performed once per shift instead of the audio, olfactory, and visual check.
- B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall take the following actions:
 - (1) Isolate the leak.
 - (2) Commence repair or replacement of the leaking component.
 - (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the Texas Commission on Environmental Quality (TCEQ) upon request.

7. Piping, Valves, Connectors, Pumps, Agitators, and Compressors - 28VHP

Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment and to equipment in service at the Hydrogen Plant No. 1:

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

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

- piping and instrumentation diagram (PID);
- a written or electronic database or electronic file;

- color coding;
 - a form of weatherproof identification; or
 - designation of exempted process unit boundaries.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak checking during plant operation. Difficult-to-monitor and unsafe-to-monitor valves, as defined by Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115), shall be identified in a list to be made readily available upon request. The difficult-to-monitor and unsafe-to-monitor valves may be identified by one or more of the methods described in Paragraph A above. If an unsafe-to-monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe-to-monitor times. A difficult-to-monitor component for which quarterly monitoring is specified may instead be monitored annually.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open-ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period:

- (1) the line or valve must have a cap, blind flange, plug, or second valve installed; or
- (2) the open-ended valve or line shall be monitored for leaks above 500 ppmv daily; or
- (3) the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once at the end of the 72 hour period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings 20 ppmv above background and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.

- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity.
- (1) A check of the reading of the pressure-sensing device to verify disc integrity shall be performed weekly and recorded in the unit log or equivalent. Pressure-sensing devices that are continuously monitored with alarms are exempt from recordkeeping requirements specified in this paragraph. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.
 - (2) The gas analyzer shall conform to requirements listed in Method 21 of Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If mixtures of VOCs are being monitored, the response factor shall be calculated for the average composition of the process fluid. A calculated average is not required when all of the compounds in the mixture have a response factor less than 10 using methane. If a response factor less than 10 cannot be achieved using methane, then the instrument may be calibrated with one of the VOC to be measured or any other VOC so long as the instrument has a response factor of less than 10 for each of the VOC to be measured.
 - (3) Replacements for leaking components shall be re-monitored within 15 days of being placed back into VOC service.
- G. Except as may be provided for in the special conditions of this permit, all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly or be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. Seal systems designed and operated to prevent emissions or seals equipped with an automatic seal failure detection and alarm system need not be monitored. These seal systems may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.
- H. Damaged or leaking valves or connectors found to be emitting VOC in excess of 500 parts per million by volume (ppmv) or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Damaged or leaking pump, compressor, and agitator seals found to be emitting VOC in excess of 2,000 ppmv or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. A first attempt to repair the leak must be made within 5 days and a record of the attempt shall be maintained.
- I. A leaking component shall be repaired as soon as practicable, but no later 15 days after the leak is found. If the repair of a component would require a unit shutdown that would create more emissions than the repair would eliminate, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging within 15 days of the detection of the leak. A listing of all components that qualify for delay of repair shall be maintained on a delay

of repair list. The cumulative daily emissions from all components on the delay of repair list shall be estimated by multiplying by 24 the mass emission rate for each component calculated in accordance with the instructions in 30 TAC § 115.782(c)(1)(B)(i)(II). The calculations of the cumulative daily emissions from all components on the delay of repair list shall be updated within ten days of when the latest leaking component is added to the delay of repair list. When the cumulative daily emission rate of all components on the delay of repair list times the number of days until the next scheduled unit shutdown is equal to or exceeds the total emissions from a unit shutdown as calculated in accordance with 30 TAC § 115.782(c)(1)(B)(i)(I) or 500 pounds, whichever is greater, the TCEQ Executive Director may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

- J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. Records of physical inspections shall be noted in the operator's log or equivalent.
 - K. Alternative monitoring frequency schedules of 30 TAC §§ 115.352 - 115.359 or National Emission Standards for Organic Hazardous Air Pollutants, 40 CFR Part 63, Subpart H, may be used in lieu of Items F through G of this condition.
 - L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standard (NSPS), or an applicable National Emission Standard for Hazardous Air Pollutants (NESHAPS) and does not constitute approval of alternative standards for these regulations.
8. Contractors or other personnel may conduct the weekly inspection task in Special Condition No. 7.E in lieu of operating personnel.
 9. All process drains shall be monitored annually in accordance with Method 21 of 40 CFR Part 60, Appendix A, at a leak threshold of 500 ppmv. If a leak is detected, the holder of this permit shall conduct corrective actions to eliminate the leak (flush the drain, repair the water trap, etc). A first attempt to repair the leak must be made within five days. Records of all leaking drains and repairs shall be maintained on-site for a period of five years and made available to representative of the TCEQ upon request.
 10. All pressure relief valves in vapor service shall be fitted with either a rupture disk with a pressure sensing device, routed to a control device, or routed back to the process.

Carbon Adsorbers

11. The following sources shall vent through the respective, specified carbon adsorber system (CAS) which consists of at least two activated carbon canisters that are connected in series.

Facility Description	FIN	CIN	EPN	Breakthrough Threshold (1)
Tank	T4064	CARB5	T4064	5 ppmv Benzene

(1) Notes: Lead canister breakthrough definition.

- A. The CAS shall be sampled and recorded weekly to determine breakthrough of benzene or VOC, as appropriate. The sampling point shall be at the outlet of the initial canister but before the inlet to the second or final polishing canister. For Control Identification No. (CIN) CARB5, sampling shall occur during tank filling.
- B. The method of benzene sampling and analysis shall be by flame ionization detector (FID), or a TCEQ-approved equivalent. On each day that sampling is required; the FID shall be calibrated prior to sampling with a certified gas mixture at 0 ppmv \pm 10 percent and at 100 ppmv \pm 10 percent.
- C. Breakthrough shall be defined for each canister system as tabulated in this special condition. Within 24 hours of detection of breakthrough, a fresh canister shall be placed as the new final polishing canister. Sufficient new activated carbon canisters shall be maintained at the site to replace spent carbon canisters such that replacements can be done in the above specified time frame.
- D. Records of the CAS monitoring maintained at the plant site shall include the following:
 - (1) Sample time and date.
 - (2) Monitoring results (ppmv).
 - (3) Monitoring instrument calibration records.
 - (4) Corrective action taken including the time and date of that action.
 - (5) Process operations occurring at the time of sampling.

Storage and Loading Controls

12. Storage tanks are subject to the following requirements: The control requirements specified in paragraphs A-E of this condition shall not apply (1) where the VOC has an aggregate partial pressure of less than 0.5 psia at the maximum feed temperature or 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.
 - A. The tank emissions must be controlled as specified in one of the paragraphs below :
 - (1) An internal floating deck or "roof" or equivalent control shall be installed. A domed external floating roof tank is equivalent to an internal floating roof tank.. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal.
 - (2) An open-top tank shall contain a floating roof (external floating roof tank) which uses double seal or secondary seal technology provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weathershield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.
 - B. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and any seal gap measurements specified in Title 40 Code of Federal Regulations § 60.113b (40 CFR § 60.113b) Testing and Procedures (as amended at 54 FR 32973, Aug. 11, 1989) to verify fitting and seal integrity. Records shall be maintained of the dates inspection was performed, any measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies

noted. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998, except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.

- C. Storage tanks newly constructed after September 28, 2015 shall be designed so that each tank completely drains its entire contents to a sump in a manner that leaves no more than 9 gallons of free-standing liquid in the tank or the sump.
 - D. Tanks shall be constructed or equipped with a connection to a vapor recovery system that routes vapors from the vapor space under the landed roof to a control device.
 - E. For all non-insulated, non-heated tanks used for storing VOC, the exterior surfaces exposed to the sun shall be white or aluminum. For tank exterior surfaces represented as "new" in the permit application using the calculation methodology provided in Chapter 7 of AP-42 dated June 2020, the paint must retain a fresh shine of having been recently applied or for mill-finish aluminum, the surface must maintain a shiny finish. For such "new" exterior tank surface representations, the permit holder must maintain this "new" condition and review the exterior tank conditions at least once every 12 months and record this observation. The records must include, but not limited to, the observation personnel, locations, date, and pictures of the tanks in observation. Storage tanks must be equipped with permanent submerged fill pipes.
 - F. Up to 75% of the shell surface area of Tank 137 (not including tank roof) is exempt from the exterior surface requirement described in 13.F.
 - G. For purposes of assuring compliance with VOC emission limitations, the permit holder shall maintain a monthly emissions record which describes calculated emissions of VOC from all storage tanks. The record shall include tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, VOC throughput for the previous month and year-to-date. Records of VOC monthly average temperature are not required to be kept for unheated tanks which store liquids that are at or below ambient temperatures.
13. Emissions for storage tanks shall be calculated using (a) (i) AP-42 "Compilation of Air Pollution Emission Factors," current edition (June 2020) and subsequent updates as represented in the permit applications. The true vapor pressure of any liquid stored at this facility in an atmospheric tank shall not exceed 11.0 psia.
14. Only one of Tanks T4602 and T4603 (EPNs 119 and 120) shall be filled at any given time. The start time, stop time, and date of each tank fill shall be recorded, maintained on site, and made available at the request of personnel from TCEQ or any air pollution control agency.
15. Only one of Tanks TANK517, TANK518, and TANK519 (EPNs TK-517, VENT518, and VENT519) shall be filled at any given time. The start time, stop time, and date of each tank fill shall be recorded, maintained on site, and made available at the request of personnel from TCEQ or any air pollution control agency.
16. Loading operations at the Marketing Terminal (FIN LRACK) and the Asphalt Plant Loading Rack (FIN TTLR/TCLR) are subject to the following requirements. The control requirements specified in paragraph A of this condition shall not apply where the VOC has an aggregate partial pressure of

less than 0.5 psia at the maximum expected operating temperature or where products are loaded into pressurized transportation vessels.

- A. Tank truck loading vapors shall be routed through a rack to the VRU (EPN CA-SK), unless otherwise specified by this permit. Gasoline tank trucks shall not be loaded unless the vapor collection system is properly connected and the entire collection and recovery system is working as designed.
 - B. The emission rate at the VRU exhaust stack shall not exceed 0.083 pound (lb) of VOC per 1,000 gallons of gasoline transferred across the loading rack (or 10 milligrams of VOC per liter of gasoline transferred) using the methods described in 40 CFR Part 63, Subpart R, or equivalent methods.
 - C. For purposes of assuring compliance with the VOC cap emissions limit, the permit holder shall maintain a monthly emissions record which describes calculated emissions of VOC from all liquid loading operations. The record shall include loading rack identification number, control method used, pumping rate, name of the material loaded, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC equilibrium partial pressure in psia at the monthly average material temperature, and VOC throughput on a rolling 12-month basis.
 - D. Emissions for loading operations shall be calculated using: (a) AP-42 "Compilation of Air Pollution Emission Factors," current edition, "Transportation and Marketing of Petroleum Liquids" and (b) the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations."
17. All tank truck and railcar loading operations must utilize submerged fill pipes. Exempt from this condition are the loading of materials with a true vapor pressure less than 0.005 psia under actual storage conditions. Records of material vapor pressure shall be maintained for all loading operations. The records shall be made available at the request of personnel from TCEQ or any air pollution control agency.
18. Each tank truck shall pass vapor-tight testing every 12 months using the methods described in 40 CFR Part 63, Subpart R. The permittee shall not allow a tank truck to be filled or emptied unless the tank being filled or emptied has passed a leak-tight test within the past year as evidenced by a prominently displayed certification affixed near the Department of Transportation Certification Plate which:
- A. Shows the date the tank truck last passed the leak-tight test required by this condition, and
 - B. Shows the identification number of the tank truck.

The control requirements specified in this condition shall not apply where the VOC loaded has an aggregate partial pressure of less than 0.5 psia at the maximum expected operating temperature.

VRU Operation

- 19. There shall be no visible emissions from the VRU stack.
- 20. The holder of this permit shall install, calibrate, maintain, and operate a monitoring system which:
 - A. Prevents start of gasoline loading operations until the VRU is operational;

- B. Prevents gasoline loading if the truck to be filled has not passed the vapor-tight testing required by Special Condition No. 18; and
 - C. Records of all alarms that are triggered when the VRU malfunctions must be maintained that include the date, time, and duration of each malfunction and the mitigation actions taken when the alarms are triggered and the dates of the subsequent VRU repairs
21. The loading rack vapor collection system shall vent through a regenerating carbon adsorption VRU consisting of three Carbon Vessels (EPN CA-SK). Two parallel carbon vessels operate and regenerate simultaneously. A third vessel with twice the capacity as the single vessels shall operate and regenerate alternately with the first two vessels.
- A. The exhaust stack shall be painted white and visual inspection for carbon buildup around the stack shall occur once a week. If carbon buildup is noticed, it shall be recorded, the loading rack shall be shut down, and corrective action shall be taken in accordance with the system maintenance manual.
 - B. The holder of this permit shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) to measure and record the VRU exhaust in-stack concentration of VOC. The following requirements will apply.
 - (1) The method of VOC sampling and analysis shall be by flame ionization detector, nondispersive infrared analyzer, or a TCEQ-approved equivalent.
 - (2) The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in Performance Specification 8 in 40 CFR Part 60, Appendix B (or equivalent procedures specified by the appropriate TCEQ Regional Manager).
 - (3) The CEMS shall trigger an alarm when monitored stack emissions exceed a preset 1-hour rolling average ppm threshold. The alarm VOC concentration shall be equivalent to the VRU emission rate of 10 mg/l derived based on performance test data. If an alarm occurs, the operator shall commence troubleshooting procedures in accordance with the operations manual and shall make a record of the episode. This alarm is independent of the compliance operating parameter established in 40 CFR §63.425(b).
 - (4) Records of the monitoring maintained at the terminal site shall include the following:
 - a. Monitoring results documenting compliance with the operating parameter and averaging time period established under 40 CFR §63.425(b) as representative of the 10 mg/l emission standard;
 - b. Monitoring results, including each episode where the measured 1-hour rolling VOC concentration exceeded the alarm VOC concentration; and
 - c. Corrective action taken for each alarm, including the time and date of that action.

Asphalt Plant

- 22. Throughput for the Asphalt Plant shall not exceed 3,200 barrels (134,400 gallons) per day.
- 23. The permit holder shall maintain a record of Asphalt Plant throughput, updated on a daily basis.

24. The Asphalt Plant Furnace shall meet the following:
- A. The Asphalt Plant Furnace firebox exit temperature shall be maintained at not less than 1,400 °F and waste gas flows shall be limited to assure at least a 0.5 second residence time in the fire box.
 - B. The Asphalt Plant Furnace exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurements shall be made at intervals of six minutes or less and recorded at that frequency.

The minimum temperature specified in Paragraph A shall be maintained prior to the completion of initial satisfactory stack sampling as specified in Special Condition No. 30. After stack sampling, the six-minute average temperature shall be maintained above the minimum one hour average temperature maintained during the last satisfactory stack test.

Within 180 days of permit issuance the temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^\circ\text{C}$.

25. The Asphalt Plant shall not conduct blowstill operations.
26. All vapors from the Asphalt Plant Loading Rack (EPN TTLR/TCLR) shall be routed to and combusted in the Asphalt Plant Furnace (EPN XF-3601).
27. Asphalt Storage Tanks (EPNs D-3601 through D-3602, D-3605 through D-3612, D-3623 through D-3625, D-3627 through D-3630, and D-3670 through D-3672) shall meet all applicable requirements for fixed roof storage tanks as specified in Special Condition No. 12 except the submerge fill requirement, provided the true vapor pressure of the stored material does not exceed 0.021 psia at the maximum liquid surface temperature.
28. Asphalt Plant Fugitive Components (EPN FUELFUG) are subject to all applicable requirements of Special Condition No. 7 (28VHP).
29. Emissions from the Asphalt Plant Furnace (EPN XF-3601) shall not exceed a NO_x emission rate of 0.071 lb/MMBtu or a CO emission rate of 0.472 lb/MMBtu.

Initial and Continuous Compliance Demonstrations

30. The permit holder shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the following sources:
- A. The Marketing Terminal VRU (EPN CA-SK) shall be sampled for VOC and benzene.
 - B. Asphalt Plant Furnace (EPN XF-3601) shall be sampled for NO_x , CO, PM, and VOC. Sampling results for total PM may be used to show compliance with authorized emission limits for PM_{10} and $\text{PM}_{2.5}$.

31. Sampling ports and platform(s) shall be incorporated into the design of all sources subject to Special Condition No. 30 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" of the TCEQ Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.
32. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with the appropriate or EPA Reference Methods.

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

- A. The appropriate TCEQ Regional Office shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.
- (6) Procedure/parameters to be used to determine worst case emissions during the sampling period.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for the test reports. A written proposed description of any deviation from sampling procedures specified in permit conditions, TCEQ, or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director must approve any deviation from specified sampling procedures.

- B. Air contaminants to be tested for include (but are not limited to) those specified in Special Condition No. 30.
- C. Sampling shall be completed at five year intervals since the most recent sampling. Sampling of the Marketing Terminal VRU (EPN CA-SK) shall be completed within 60 days after achieving maximum production rate, but not later than 180 days after initial start-up and at five year intervals thereafter. Requests for additional time to perform sampling shall be submitted to the appropriate TCEQ Regional Office.
- D. The facility being sampled shall operate at maximum rates during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission standard or rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the

test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods.

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

One copy to the appropriate TCEQ Regional Office.

One copy to each local air pollution control program.

Recordkeeping

33. A copy of this permit shall be kept at the plant site and made available at the request of personnel from TCEQ or any air pollution control agency. In addition, the holder of this permit shall maintain an accurate list of all equipment at the property that has the potential to emit air contaminants. Permitted emission points shall be identified by emission point numbering on the MAERT. Exempt facilities shall be identified by the facility identification number (FIN) used in the most recent emissions inventory submitted to TCEQ.
34. For existing monitoring devices, written procedures that provide adequate assurance that equipment will monitor accurately may be used in lieu of manufacturer's specifications for one year. A request for the use of these written procedures beyond that period must be submitted to the TCEQ Air Permits Division and approved for use.
35. The permit holder shall adhere to the representations for installing controls and the schedules for implementation in the revised implementation plan received by the TCEQ on January 3, 2007 ("the plan"). The emission reduction projects may be implemented in an order that differs from what is represented in the plan, provided that the permit holder complies with the established final caps included in the attached MAERT. (Completed)
36. Compliance with annual (tons per year [TPY]) emissions shall be demonstrated on a 12 month rolling period. Compliance with hourly emissions should be based on an hourly basis and compliance will be demonstrated upon request. Emissions calculations for verifying compliance with the emission caps shall be performed at least once every month to demonstrate compliance with the annual rolling basis requirement. The holder of this permit shall maintain all records necessary to demonstrate compliance with the short-term (lb/hr) and annual TPY emissions cap and provide such demonstration of compliance to the TCEQ Regional Office upon request.

The emissions shall be determined using the following techniques:

Unit	Control Technique
Fugitives	For monitored fugitive components, using actual monitored concentrations using Method 21 under the LDAR program and correlation equations in EPA "Protocol for Equipment Leak Emission Estimates" dated November 1995; for unmonitored components, using actual component counts and the emission factors and method specified in the Technical Guidance Document, "Fugitive Guidance," dated June 2018 and/or subsequent

Unit	Control Technique
	updates corresponding to the LDAR program required for each area of the plant.
Tanks	As specified for storage tank calculations in Special Condition No. 12.
Loading	As specified for loading calculations in Special Condition No. 16.
Boilers, Heaters, Furnaces, and Compressors	Using CEMS, AP-42 factors, fuel gas flow rate measurements and fuel gas heating value records, stack sampling with EPA methods, and/or portable analyzers prior to stack sampling.
Asphalt Plant	Using AP-42 factors, TCEQ approved emission factors, stack sampling data, AP-42 equations, or other sampling and calculation methods as approved by TCEQ or EPA.

Planned Maintenance, Startup, and Shutdown (MSS) Activities

37. This permit authorizes emissions from those points listed in the attached table entitled “Emission Sources - Maximum Allowable Emission Rates,” and the facilities covered by this permit are authorized to emit subject to the emission rate limits on the MAERT table and other requirements specified in the special conditions.

Any planned MSS activities that are not described in these special conditions are not authorized by this permit. These emissions are subject to the maximum allowable emission rates indicated on the MAERT. The performance of each planned startup and shutdown activity and the emissions associated with it shall be recorded and the rolling 12-month emissions shall be updated on a monthly basis.

Planned startup and shutdown emissions due to the activities identified in Special Condition No. 38 are authorized from facilities and emission points identified in Attachment D in other construction permits at the site provided the facility and emissions are compliant with the respective MAERT and special conditions, or Special Condition No. 47 of this permit.

38. This permit authorizes the emissions from the facilities identified in Attachment D for the planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachment C) attached to this permit.

Attachment A identifies the inherently low emitting MSS activities that may be performed at the plant. Emissions from activities identified in Attachment A shall be considered to be equal to the potential to emit represented in the permit application. The estimated emissions from the activities listed in Attachment A must be revalidated annually. This revalidation shall consist of the estimated emissions for each type of activity and the basis for that emission estimate.

Routine maintenance activities, as identified in Attachment B may be tracked through the work orders or equivalent. Emissions from activities identified in Attachment B shall be calculated using the number of work orders or equivalent that month and the emissions associated with that activity identified in the permit application.

The performance of each planned MSS activity not identified in Attachments A or B and the emissions associated with it shall be recorded and include at least the following information:

- A. The physical location at which emissions from the MSS activity occurred, including the emission point number and common name for the point at which the emissions were released into the atmosphere;
- B. The type of planned MSS activity and the reason for the planned activity;
- C. The common name and the facility identification number, if applicable, of the facilities at which the MSS activity and emissions occurred;
- D. The date and time of the MSS activity and its duration; and
- E. The estimated quantity of each air contaminant or mixture of air contaminants, emitted with the data and methods used to determine it. The emissions shall be estimated using the methods identified in the permit application, consistent with good engineering practice.

All MSS emissions shall be summed monthly and the rolling 12-month emissions shall be updated on a monthly basis.

39. Process units and facilities, with the exception of those identified in Special Condition Nos. 42, 43, and 45 and Attachment A shall be depressurized, emptied, degassed, and placed in service in accordance with the following requirements.
- A. The process equipment shall be depressurized to a control device or a controlled recovery system prior to venting to atmosphere, degassing, or draining liquid. Equipment that only contains material that is liquid with VOC partial pressure less than 0.50 psi at the normal process temperature and 95°F may be opened to atmosphere and drained in accordance with paragraph C of this special condition. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded.
 - B. If mixed phase materials must be removed from process equipment, the cleared material shall be routed to a knockout drum or equivalent to allow for managed initial phase separation. If the VOC partial pressure is greater than 0.50 psi at either the normal process temperature or 95°F, any vents in the system must be routed to a control device or a controlled recovery system. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. Control must remain in place until degassing has been completed or the system is no longer vented to atmosphere.
 - C. All liquids from process equipment or storage vessels must be removed to the maximum extent practical prior to opening equipment to commence degassing and/or maintenance. Liquids must be drained into a closed vessel or closed liquid recovery system unless prevented by the physical configuration of the equipment. If it is necessary to drain liquid into an open pan or sump, the liquid must be covered or transferred to a covered vessel within one hour of being drained.
 - D. If the VOC partial pressure is greater than 0.50 psi at the normal process temperature or 95°F, facilities shall be degassed using good engineering practice to ensure air contaminants are removed from the system through the control device or controlled recovery system to the extent allowed by process equipment or storage vessel design. The vapor pressure at 95°F may be used if the actual temperature of the liquid is verified to be less than 95°F and the temperature is recorded. The facilities to be degassed shall not be vented directly to atmosphere, except as necessary to establish isolation of the work area or to monitor VOC concentration following controlled depressurization. The venting shall be minimized to the maximum extent practicable and actions taken recorded. The control device or recovery

system utilized shall be recorded with the estimated emissions from controlled and uncontrolled degassing calculated using the methods that were used to determine allowable emissions for the permit application.

- (1) For MSS activities identified in Attachment B the following option may be used in lieu of (2) below. The facilities being prepared for maintenance shall not be vented directly to atmosphere, except as necessary to verify an acceptable VOC concentration and establish isolation of the work area, until the VOC concentration has been verified to be less than 10 percent of the lower explosive limit (LEL) per the site safety procedures.
- (2) The locations and/or identifiers where the purge gas or steam enters the process equipment or storage vessel and the exit points for the exhaust gases shall be recorded (process flow diagrams [PFDs] or piping and instrumentation diagrams [P&IDs] may be used to demonstrate compliance with the requirement). If the process equipment is purged with a gas, two system volumes of purge gas must have passed through the control device or controlled recovery system before the vent stream may be sampled to verify acceptable VOC concentration prior to uncontrolled venting. The VOC sampling and analysis shall be performed using an instrument meeting the requirements of Special Condition No. 40. The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged. If there is not a connection (such as a sample, vent, or drain valve) available from which a representative sample may be obtained, a sample may be taken upon entry into the system after degassing has been completed. The sample shall be taken from inside the vessel so as to minimize any air or dilution from the entry point. The facilities shall be degassed to a control device or controlled recovery system until the VOC concentration is less than 10,000 ppmv or 10 percent LEL. Documented site procedures used to de-inventory equipment to a control device for safety purposes (i.e., hot work or vessel entry procedures) that achieve at least the same level of purging may be used in lieu of the above.

E. Gases and vapors with VOC partial pressure greater than 0.50 psi may be vented directly to atmosphere if all the following criteria are met:

- (1) It is not technically practicable to depressurize or degas, as applicable, into the process.
- (2) There is not an available connection to a plant control system (flare).
- (3) There is no more than 50 lb of air contaminant to be vented to atmosphere during shutdown or startup, as applicable.

All instances of venting directly to atmosphere per Special Condition No. 39.E must be documented when occurring as part of any MSS activity. The emissions associated with venting without control must be included in the work order or equivalent for those planned MSS activities identified in Attachment B.

40. Air contaminant concentration shall be measured using an instrument/detector meeting one set of requirements specified below.

A. The VOC concentration shall be measured using an instrument meeting all the requirements specified in EPA Method 21 (40 CFR Part 60, Appendix A) with the following exceptions:

- (1) The instrument shall be calibrated within 24 hours of use with a calibration gas such that the response factor (RF) of the VOC (or mixture of VOCs) to be monitored shall be less than 2.0. The calibration gas and the gas to be measured, and its approximate response factor shall be recorded.
 - (2) Sampling shall be performed as directed by this permit in lieu of section 8.3 of Method 21. During sampling, data recording shall not begin until after two times the instrument response time. The date and time shall be recorded, and VOC concentration shall be monitored for at least five minutes, recording VOC concentration each minute. As an alternative the VOC concentration may be monitored over a five-minute period with an instrument designed to continuously measure concentration and record the highest concentration read. The highest measured VOC concentration shall not exceed the specified VOC concentration limit prior to uncontrolled venting.
 - (3) If a TVA-1000 series FID analyzer calibrated with methane is used to determine the VOC concentration, a measured concentration of 34,000 ppmv may be considered equivalent to 10,000 ppmv as VOC.
- B. Colorimetric gas detector tubes may be used to determine air contaminant concentrations if they are used in accordance with the following requirements.
- (1) The air contaminant concentration measured as defined in (3) is less than 80 percent of the range of the tube and is at least 20 percent of the maximum range of the tube.
 - (2) The tube is used in accordance with the manufacturer's guidelines.
 - (3) At least two samples taken at least five minutes apart must satisfy the following prior to uncontrolled venting:
measured contaminant concentration (ppmv) < release concentration
Where the release concentration is:
10,000*mole fraction of the total air contaminants present that can be detected by the tube.
The mole fraction may be estimated based on process knowledge. The release concentration and basis for its determination shall be recorded.
- Records shall be maintained of the tube type, range, measured concentrations, and time the samples were taken.
- C. Lower explosive limit measured with a lower explosive limit detector.
- (1) The detector shall be calibrated monthly with a certified pentane gas standard at 25 percent of the lower explosive limit (LEL) for pentane. Records of the calibration date/time and calibration result (pass/fail) shall be maintained.
 - (2) A daily functionality test shall be performed on each detector using the same certified gas standard used for calibration. The LEL monitor shall read no lower than 90 percent of the calibration gas certified value. Records, including the date/time and test results, shall be maintained.
 - (3) A certified methane gas standard equivalent to 25 percent of the LEL for pentane may be used for calibration and functionality tests provided that the LEL response is within 95 percent of that for pentane.

41. This condition applies only to piping and components subject to leak detection and repair monitoring requirements identified in other NSR permits. Each open-ended valve or line shall be equipped with an appropriately sized cap, blind flange, plug, or a second valve to seal the line. Except during sampling, both valves shall be closed. If the isolation of equipment for hot work or the removal of a component for repair or replacement results in an open ended line or valve, it is exempt from the requirement to install a cap, blind flange, plug, or second valve for 72 hours. If the repair or replacement is not completed within 72 hours, the permit holder must complete either of the following actions within that time period;
- A. a cap, blind flange, plug, or second valve must be installed on the line or valve; or demonstrate that the line, valve, component, etc. has been double blocked from the process;
 - or
 - B. the open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer and the results recorded. For all other situations, the open-ended valve or line shall be monitored once by the end of the 72 hours period following the creation of the open ended line and monthly thereafter with an approved gas analyzer and the results recorded. For turnarounds and all other situations, leaks are indicated by readings of 500 ppmv and must be repaired within 24 hours or a cap, blind flange, plug, or second valve must be installed on the line or valve.
42. This permit authorizes emissions from the storage tanks identified in the attached facility list during planned floating roof landings. Tank roofs may only be landed for changes of tank service or tank inspection/maintenance as identified in the permit application. Emissions from change of service tank landings, for which the tank is not cleaned and degassed, shall not exceed 10 tons of VOC in any rolling 12-month period. Tank roof landings include all operations when the tank floating roof is on its supporting legs. These emissions are subject to the maximum allowable emission rates indicated on the MAERT. The following requirements apply to tank roof landings.
- A. The tank liquid level shall be continuously lowered after the tank floating roof initially lands on its supporting legs until the tank has been drained to the maximum extent practicable without entering the tank. Liquid level may be maintained steady for a period of up to two hours if necessary to allow for valve lineups and pump changes necessary to drain the tank. This requirement does not apply where the vapor under a floating roof is routed to control or a controlled recovery system during this process.

This requirement does not apply if the level is lowered to allow for maintenance that is expected to be completed in less than 24 hours. In that case, the tank must be filled and the roof floated within 24 hours of landing the roof and the evolution documented in accordance with Special Condition No. 42.E.
 - B. If the VOC partial pressure of the liquid previously stored in the tank is greater than 0.50 psi at 95°F, tank refilling or degassing of the vapor space under the landed floating roof must begin within 24 hours after the tank has been drained unless the vapor under the floating roof is routed to control or a controlled recovery system during this period. The tank shall not be opened except as necessary to set up for degassing and cleaning. Floating roof tanks with liquid capacities less than 100,000 gallons may be degassed without control if the VOC partial pressure of the standing liquid in the tank has been reduced to less than 0.02 psia prior to ventilating the tank. Controlled degassing of the vapor space under landed roofs shall be completed as follows:

- (1) Any gas or vapor removed from the vapor space under the floating roof must be routed to a control device or a controlled recovery system and controlled degassing must be maintained until the VOC concentration is less than 10,000 ppmv or 10 percent LEL. The locations and identifiers of vents other than permanent roof fittings and seals, control device or controlled recovery system, and controlled exhaust stream shall be recorded. There shall be no other gas/vapor flow out of the vapor space under the floating roof when degassing to the control device or controlled recovery system.
 - (2) The vapor space under the floating roof shall be vented using good engineering practice to ensure air contaminants are flushed out of the tank through the control device or controlled recovery system to the extent allowed by the storage tank design.
 - (3) A volume of purge gas equivalent to twice the volume of the vapor space under the floating roof must have passed through the control device or into a controlled recovery system, before the vent stream may be sampled to verify acceptable VOC concentration. The measurement of purge gas volume shall not include any make-up air introduced into the control device or recovery system. The VOC sampling and analysis shall be performed as specified in Special Condition No 40.
 - (4) The sampling point shall be upstream of the inlet to the control device or controlled recovery system. The sample ports and the collection system must be designed and operated such that there is no air leakage into the sample probe or the collection system downstream of the process equipment or vessel being purged.
 - (5) If ventilation is to be maintained with emission control, the VOC concentration shall be recorded once an hour.
 - (6) Degassing must be performed every 24 hours unless there is no standing liquid in the tank or the VOC partial pressure of the remaining liquid in the tank is less than 0.15 psia.
- C. The tank may be opened without restriction and ventilated without control, after all standing liquid has been removed from the tank or the liquid in the tank has a VOC partial pressure less than 0.02 psia. These criteria may be demonstrated in any one of the following ways.
- (1) Low VOC partial pressure liquid that is soluble with the liquid previously stored may be added to the tank to lower the VOC partial pressure of the liquid mixture remaining in the tank to less than 0.02 psia. This liquid shall be added during tank degassing if practicable. The estimated volume of liquid remaining in the drained tank and the volume and type of liquid added shall be recorded. The liquid VOC partial pressure may be estimated based on this information and engineering calculations.
 - (2) If water is added or sprayed into the tank to remove standing VOC, one of the following must be demonstrated:
 - (a) Take a representative sample of the liquid remaining in the tank and verify no visible sheen using the static sheen test from 40 CFR Part 435 Subpart A, Appendix 1.
 - (b) Take a representative sample of the liquid remaining in the tank and verify hexane soluble VOC concentration is less than 1,000 ppmw using EPA Method 1664 (may also use 8260B or 5030 with 8015 from SW-846).
 - (c) Stop ventilation and close the tank for at least 24 hours. When the tank manway is opened after this period, verify VOC concentration is less than 1,000 ppmv through the procedure in Special Condition No. 40.

- (3) No standing liquid verified through visual inspection.

The permit holder shall maintain records to document the method used to release the tank.

- D. Tanks shall be refilled as rapidly as practicable until the roof is off its legs with the following exceptions:

- (1) For floating roof tanks listed below storing liquids with a vapor pressure greater than 0.5 psia at 95°F the filling rate shall not exceed any of the following limits while the floating roof is on its legs, except as noted in Special Condition No. 42.D(2). Only one tank shall be allowed to be filled while its roof is on its legs at any time.
 - (a) Tank 512: 8,400 gal/hr from the bottom of the tank to the height of the inlet piping, and 84,000 gal/hr from the height of the inlet piping to the leg height;
 - (b) Tank 513: 8,400 gal/hr; and
 - (c) Tank 514: 8,400 gal/hr.
- (2) The vapor space below the tank roof is directed to a control device when the tank is refilled until the roof is floating on the liquid. The control device used and the method and locations used to connect the control device shall be recorded. All vents from the tank being filled must exit through the control device.

- E. The occurrence of each roof landing and the associated emissions shall be recorded and the rolling 12-month tank roof landing emissions shall be updated on a monthly basis. These records shall include at least the following information:

- (1) The identification of the tank and emission point number, and any control devices or recovery systems used to reduce emissions.
- (2) The reason for the tank roof landing.
- (3) For the purpose of estimating emissions, the date, time, and other information specified for each of the following events:
 - (a) the roof was initially landed,
 - (b) all liquid was pumped from the tank to the extent practical,
 - (c) start and completion of controlled degassing, and total volumetric flow,
 - (d) all standing liquid was removed from the tank or any transfers of low VOC partial pressure liquid to or from the tank including volumes and vapor pressures to reduce tank liquid VOC partial pressure to <0.02 psi,
 - (e) if there is liquid in the tank, VOC partial pressure of liquid, start and completion of uncontrolled degassing, and total volumetric flow,
 - (f) refilling commenced, liquid filling the tank, and the volume necessary to float the roof, and
 - (g) tank roof off supporting legs, floating on liquid.
- (4) The estimated quantity of each air contaminant, or mixture of air contaminants, emitted between events c and h with the data and methods used to determine it. The emissions associated with roof landing activities shall be calculated using the methods described in Sections 7.1.3.3 and 7.1.3.4 of AP-42 "Compilation of Air Pollution

Emission Factors, Chapter 7 – Liquid Storage Tanks" dated June 2020 and the permit application..

43. Fixed-roof tanks shall not be ventilated without control, until either all standing liquid has been removed from the tank or the liquid in the tank has a VOC partial pressure less than 0.02 psia. This shall be verified and documented through one of the criteria identified in Special Condition No. 42.C. Fixed roof tanks manways may be opened without emission controls when there is standing liquid with a VOC partial pressure greater than 0.02 psi vapor as necessary to set up for degassing and cleaning. One manway may be opened to allow access to the tank to remove or de-volatilize the remaining liquid. The emission control system shall meet the requirements of Special Condition No. 42.B(1) through 42.B(4) and records maintained per Special Condition No. 42.E(3)(c) through 42.E(3)(e), and 42.E(4). Low vapor pressure liquid may be added to and removed from the tank as necessary to lower the vapor pressure of the liquid mixture remaining in the tank to less than 0.02 psia.
44. The following requirements apply to vacuum and air mover truck operations to support planned MSS at this site:
 - A. Prior to initial use, identify any liquid in the truck. Record the liquid level and document the VOC partial pressure. After each liquid transfer, identify the liquid, the volume transferred, and its VOC partial pressure.
 - B. If vacuum pumps or blowers are operated when liquid is in or being transferred to the truck, the following requirements apply:
 - (1) If the VOC partial pressure of the liquid in or being transferred to the truck is greater than 0.50 psi at 95°F, the vacuum/blower exhaust shall be routed to a control device or a controlled recovery system.
 - (2) Equip fill line intake with a "duckbill" or equivalent attachment if the hose end cannot be submerged in the liquid being collected.
 - (3) A daily record containing the information identified below is required for each vacuum truck in operation at the site each day.
 - (a) For each liquid transfer made with the vacuum operating, record the duration of any periods when air may have been entrained with the liquid transfer. The reason for operating in this manner and whether a "duckbill" or equivalent was used shall be recorded. Short, incidental periods, such as those necessary to walk from the truck to the fill line intake, do not need to be documented.
 - (b) If the vacuum truck exhaust is controlled with a control device other than an engine or oxidizer, VOC exhaust concentration upon commencing each transfer, at the end of each transfer, and at least every hour during each transfer shall be recorded, measured using an instrument meeting the requirements of Special Condition 40.A or B.
 - C. Record the volume in the vacuum truck at the end of the day, or the volume unloaded, as applicable.
 - D. The permit holder shall determine the vacuum truck emissions each month using the daily vacuum truck records and the calculation methods utilized in the permit application. If records of the volume of liquid transferred for each pick-up are not maintained, the emissions shall be determined using the physical properties of the liquid vacuumed with the greatest

potential emissions. Rolling 12 month vacuum truck emissions shall also be determined on a monthly basis.

- E. If the VOC partial pressure of all the liquids vacuumed into the truck is less than 0.10 psi, this shall be recorded when the truck is unloaded or leaves the plant site and the emissions may be estimated as the maximum potential to emit for a truck in that service as documented in the permit application. The recordkeeping requirements in Special Condition 44.A through 44.D do not apply.
45. The following requirements apply to frac, or temporary, tanks and vessels used in support of MSS activities.
- A. Except for labels, logos, etc. not to exceed 15 percent of the tank/vessel total surface area, the exterior surfaces of these tanks/vessels that are exposed to the sun shall be white or aluminum. This requirement does not apply to tanks/vessels that only vent to atmosphere when being filled.
 - B. These tanks/vessels must be covered and equipped with fill pipes that discharge within 6 inches of the tank/vessel bottom.
 - C. These requirements do not apply to vessels storing less than 100 gallons of liquid that are closed such that the vessel does not vent to atmosphere.
 - D. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all frac tanks during the previous calendar month and the past consecutive 12-month period. This record must be updated by the last day of the month following. The record shall include tank identification number, dates put into and removed from service, control method used, tank capacity and volume of liquid stored in gallons, name of the material stored, VOC molecular weight, and VOC partial pressure at the estimated monthly average material temperature in psia. Filling emissions for tanks shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations" and standing emissions determined using: the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."
 - E. If the tank/vessel is used to store liquid with VOC partial pressure less than 0.10 psi at 95°F, records may be limited to the days the tank is in service and the liquid stored. Emissions may be estimated based upon the potential to emit as identified in the permit application.
46. Additional occurrences of MSS activities authorized by this permit may be authorized under permit by rule only if conducted in compliance with this permit's procedures, emission controls, monitoring, and recordkeeping requirements applicable to the activity.
47. All permanent facilities must comply with all operating requirements, limits, and representations in the permits identified in Attachment D during planned startup and shutdown unless alternate requirements and limits are identified in this permit. Alternate requirements for emissions from routine emission points are identified below.
- A. Combustion units, with the exception of flares, at this site are exempt from NO_x and CO operating requirements identified in special conditions in other NSR permits during planned startup and shutdown if the following criteria are satisfied.
 - (1) The maximum allowable emission rates in the permit authorizing the facility are not exceeded.

- (2) The startup period does not exceed eight hours in duration and the firing rate does not exceed 75 percent of the design firing rate. The time it takes to complete the shutdown does not exceed four hours.
 - (3) Control devices are started and operating properly when venting a waste gas stream.
 - B. The limits identified below apply to the operations of the specified facilities during startup and shutdown. Emissions shall be measured by methods specified in Permit Number 18897.
 - (1) Combustion devices
 - CO: 1,000 ppmv (corrected to 3% O₂), hourly average
 - NO_x: 100 ppmv (corrected to 3% O₂), hourly average
 - Time allowed for startup/shutdown: 96 hours maximum
 - C. A record shall be maintained indicating that the start and end times each of the activities identified above occur and documentation that the requirements for each have been satisfied.
48. Control devices required by this permit for emissions from planned MSS activities are limited to those types identified in this condition. Control devices shall be operated with no visible emissions except periods not to exceed a total of five minutes during any two consecutive hours. Each device used must meet all the requirements identified for that type of control device.

Controlled recovery systems identified in this permit shall be directed to an operating refinery process or to a collection system that is vented through a control device meeting the requirements of this permit condition.

- A. Carbon Adsorption System (CAS).
 - (1) The CAS shall consist of two carbon canisters in series with adequate carbon supply for the emission control operation.
 - (2) The CAS shall be sampled downstream on the first can and the concentration recorded at least once every hour of CAS run time to determine breakthrough of the VOC. The sampling frequency may be extended using either of the following methods:
 - (a) It may be extended to up to 30 percent of the minimum potential saturation time for a new can of carbon. The permit holder shall maintain records including the calculations performed to determine the minimum saturation time.
 - (b) The carbon sampling frequency may be extended to longer periods based on previous experience with carbon control of a MSS waste gas stream. The past experience must be with the same VOC, type of facility, and MSS activity. The basis for the sampling frequency shall be recorded. If breakthrough is monitored on the initial sample of the upstream can when the polishing can is put in place, a permit deviation shall be recorded.
 - (3) The method of VOC sampling and analysis shall be by detector meeting the requirements of Special Condition No. 40.
 - (4) Breakthrough is defined as the highest measured VOC concentration at or exceeding 100 ppmv above background. When the condition of breakthrough of VOC from the initial saturation canister occurs, the waste gas flow shall be switched to the second canister and a fresh canister shall be placed as the new final polishing canister within four hours. Sufficient new activated carbon canisters shall be maintained at the site to

replace spent carbon canisters such that replacements can be done in the above specified time frame.

- (5) Records of CAS monitoring shall include the following:
 - (a) Sample time and date.
 - (b) Monitoring results (ppmv).
 - (c) Canister replacement log.
- (6) Single canister systems are allowed if the time the carbon canister is in service is limited to no more than 30 percent of the minimum potential saturation time. The permit holder shall maintain records for these systems, including the calculations performed to determine the saturation time. The time limit on carbon canister service shall be recorded and the expiration date attached to the carbon can.

B. Thermal Oxidizer.

- (1) The thermal oxidizer firebox exit temperature shall be maintained at not less than 1400°F and waste gas flows shall be limited to assure at least a 0.5 second residence time in the fire box while waste gas is being fed into the oxidizer.
- (2) The thermal oxidizer exhaust temperature shall be continuously monitored and recorded when waste gas is directed to the oxidizer. The temperature measurements shall be made at intervals of six minutes or less and recorded at that frequency.

The temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^\circ\text{C}$.

C. Internal Combustion Engine.

- (1) The internal combustion engine shall have a VOC destruction efficiency of at least 99 percent.
- (2) The engine must have been stack tested with butane to confirm the required destruction efficiency within the past 12 months. VOC shall be measured in accordance with the applicable United States Environmental Protection Agency (EPA) Reference Method during the stack test and the exhaust flow rate may be determined from measured fuel flow rate and measured oxygen concentration. A copy of the stack test report shall be maintained with the engine. There shall also be documentation of acceptable VOC emissions following each occurrence of engine maintenance which may reasonably be expected to increase emissions including oxygen sensor replacement and catalyst cleaning or replacement. Stain tube indicators specifically designed to measure VOC concentration shall be acceptable for this documentation, provided a hot air probe or equivalent device is used to prevent error due to high stack temperature, and three sets of concentration measurements are made and averaged. Portable VOC analyzers meeting the requirements of Special Condition No. 40 are also acceptable for this documentation.
- (3) The engine shall be operated with an oxygen sensor-based air-to-fuel ratio (AFR) controller. Documentation for each AFR controller that the manufacturer's, or supplier's recommended maintenance has been performed, including replacement of the oxygen sensor as necessary for oxygen sensor based controllers shall be

maintained with the engine. The oxygen sensor shall be replaced at least quarterly in the absence of a specific written recommendation.

- D. A closed loop refrigerated vapor recovery system
 - (1) The vapor recovery system shall be installed on the facility to be degassed using good engineering practice to ensure air contaminants are flushed from the facility through the refrigerated vapor condensers and back to the facility being degassed. The vapor recovery system and facility being degassed shall be enclosed except as necessary to insure structural integrity (such as roof vents on a floating roof tank).
 - (2) VOC concentration in vapor being circulated by the system shall be sampled and recorded at least once every 4 hours at the inlet of the condenser unit with an instrument meeting the requirements of Special Condition No. 40.
 - (3) The quantity of liquid recovered from the tank vapors and the tank pressure shall be monitored and recorded each hour. The liquid recovered must increase with each reading and the tank pressure shall not exceed one inch water pressure while the system is operating.
 - E. Other control devices approved by the TCEQ through a permit amendment application or a pollution control permit application.
49. If spray guns are used to apply paint, they shall be airless, high volume low pressure (HVLP) or have the same or higher transfer efficiency as airless or HVLP spray guns.
50. The permit holder shall maintain records of paint information. The following documentation is required for each compound:
- A. Chemical name(s), composition, and chemical abstract registry number if available.
 - B. Material Safety Data Sheet.
 - C. Maximum concentration of the chemical in weight percent
 - D. Paint usage and the associated emissions shall be recorded each month and the rolling 12 month total emissions updated.
51. No visible emissions shall leave the property due to painting or abrasive blasting.
52. Black Beauty and Garnet Sand may be used for abrasive blasting. The permit holder may also use blast media that meet the criteria below:
- A. The media shall not contain asbestos or greater than 1.0 weight percent crystalline silica.
 - B. The weight fraction of any metal in the blast media with a short term effects screening level (ESL) less than 50 micrograms per cubic meter as identified in the most recently published TCEQ ESL list shall not exceed the $ESL_{metal}/1000$.
 - C. The MSDS for each media used shall be maintained on site.
- Blasting media usage and the associated emissions shall be recorded each month and the rolling 12-month total emissions updated.

Consent Decree Requirements

53. The permit holder shall comply with applicable requirements of the Consent Decree (“CD”), Civil Action No. 3:11-cv-276, including the provisions outlined below.
- A. Benzene Waste Operations NESHAP (BWON) Subpart FF Compliance, CD Paragraph 64. The permit holder shall comply with the compliance option set forth in 40 C.F.R. § 61.342(e).
 - B. BWON Subpart FF Compliance, CD Paragraph 68, Section c. For dual carbon canister systems, “breakthrough” between the primary and secondary canister is defined as any reading equal to or greater than 50 ppm VOC or 5 ppm benzene (depending on the constituent that the permit holder decides to monitor).
 - C. LDAR Compliance, CD Paragraph 87, Section a. The permit holder shall use an internal leak definition of 500 ppm VOCs for valves in light liquid and/or gas/vapor service, excluding pressure relief devices.
 - D. LDAR Compliance, CD Paragraph 87, Section b. The permit holder shall use an internal leak definition of 2,000 ppm for pumps in light liquid and/or gas/vapor service. Reciprocating pumps shall retain their applicable regulatory leak definition.

Referenced PBRs and Standard Permits

54. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106) or under a Standard Permit by 30 TAC Subchapter F and Texas Health and Safety Code 382.05195. These lists are not intended to be all inclusive and can be altered without modifications to this permit.

Registration No.	Authorization	Source or Activity
PBR No. 140939	30 TAC §106.261/§106.262 (effective 11/01/2003)	Evaluate Dryness of LPG per ASTM D2713 (LPG Freeze Test)
Standard Permit No. 159720	Non-rule PCP Standard Permit (effective 02/09/2011)	Portable combustion system comprised of a Portable Equalizer Tank and Vapor Burner to control emissions from loading and unloading operations (Portable Vapor Combustion Unit)
PBR No. 162737	30 TAC 106.263 (effective 11/01/2001); 30 TAC 106.472 (effective 09/04/2000)	Replacement tank; Replace T-106 with Tank T-102b (Normal and MSS Operations)
Claimed PBR/Not Registered	30 TAC §106.263 (effective 11/01/2001)	TK-136 MSS
Claimed PBR/Not Registered	30 TAC §106.261 (effective 11/01/2003)	TK-136 Fugitives
Claimed PBR/Not Registered	30 TAC §106.511 (effective 09/04/2000)	Wacker Neuson G 100 mobile generator

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Attachment A

Inherently Low Emitting Activities

Activity	Emissions				
	VOC	NO _x	CO	PM	H ₂ S/SO ₂
Comfort heating system repair					
Comfort air conditioning system repair					
Lab sampling and analysis	x				
Maintenance shop activities				x	
Vacuum cleaning systems				x	
Domestic refrigeration system repair	x				
Hydroblasting	x			x	
Degreasing	x				
Lubrication	x				
Waste water treatment system maintenance	x				
Chemical addition	x			x	
Sample station maintenance	x				
Cooling tower maintenance	x			x	
Concrete work				x	
Non-hazardous domestic waste transfer and cleanup activities				x	
Tank dewatering activities	x				
Wastewater drain maintenance	x				
Refinery road maintenance	x			x	
Earthwork				x	
Building repair and maintenance				x	
Yard work, gardening, landscaping	x			x	
Pesticides, insecticides, fumigation	x			x	
Meter proving	x				x
Decoking	x			x	
Acid and caustic washing	x				
Aerosol cans	x				
Calibration of analytical equipment including CEMS		x	x		x
Combustion shutoff devices					
Facility/building maintenance including roof repair				x	
Insulation addition or removal				x	

Activity	Emissions				
	VOC	NO _x	CO	PM	H ₂ S/SO ₂
Pipeline pigging	X			X	
Pneumatic starts on reciprocating engines, turbines, compressors					
Sampling		X	X		X
Ultrasonic cleaning	X			X	
Treater vents	X			X	

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Attachment B

Routine Maintenance Activities

Small equipment repair/replacement, including:

Pump repair/replacement

Fugitive component (valve, pipe, flange, PRV) repair/replacement

Compressor repair/replacement

Heat exchanger repair/replacement

Condenser repair/replacement

Portable storage tanks

Drum washing

Catalyst regeneration

Catalyst/salt loading and unloading

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Attachment C

MSS Activity Summary

Facilities	Description	Emissions Activity	EPN
all process units, pressure vessels and all tanks	process vessel and tanks abrasive blasting	PM from blasting media	List 2 and all tanks listed in Attachment D
all process units, pressure vessels and all tanks	all production related refinery facilities	surface coating	List 3 and all tanks listed in Attachment D
temporary equipment at all process units	Temporary equipment used, such as air compressors, generators, and cranes	combustion emissions from temporary equipment	List 2
all floating roof tanks	tank roof landing and degassing	tank roof landing and controlled/ uncontrolled degassing	floating roof tanks listed in Attachment D
all tanks	tank cleaning	cleaning activity and solvents	all tanks listed in Attachment D
all floating roof tanks	tank refilling	tank refilling	floating roof tanks listed in Attachment D
all floating roof tanks	tank service change	tank refilling	floating roof tanks listed in Attachment D
all tanks	tank ventilation	post-degassing ventilation activities	all tanks listed in Attachment D
all production-related	all production related facilities	welding activities	List 2
all process units	vacuum trucks	vacuum truck tank filling	List 1
fire training	fire training	fuel combustion during fire training	Fire training
see Attachment A	miscellaneous low emitting activities	see Attachment A	
see Attachment B	routine maintenance activities	see Attachment B	

EPN List 1	EPN List 2	EPN List 3	EPN List 4
NLR6	F-10N-T	NLR6	XF3601
NLR2-5	F-16S-T	NLR2-5	
F-10N-T		F-10N-T	
F-16S-T		F-16S-T	
VACLR			

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Attachment D

Facility List

This permit authorizes MSS emissions from the permanent site facilities identified below. Emissions may occur from temporary facilities (frac tanks, containers, vacuum trucks, facilities used for painting or abrasive blasting, portable control devices or controlled recovery systems) to support the MSS activities performed at the permanent site facilities listed below as represented in the permit application. The headings for each group of facilities (Process Units, Tanks, etc.) are used in the MSS Activity Summary to identify all facilities in the respective group.

Process Units

Description	FIN
Loading Racks	NLR6
Loading Racks	NLR2
Loading Racks	NLR3
Loading Racks	NLR4
Loading Racks	NLR5
Loading Racks	VACLR
North Boiler Plant	P-10-T
Receiving, Pumping, and Storage	PU-6-T
Fire Training	Fire Training
Asphalt Plant Furnace F-3601	F-3601

TANKS

External Floating Roof Tank

Description	FIN
Tank 52	TK-52
Tank 69	TK-69
Tank 76	TK-76
Tank 90	TK-90
Tank 92	TK-92
Tank 95	TK-95
Tank 96	TK-96
Tank 97	TK-97
Tank 98	TK-98
Tank 99	TK-99
Tank 101	TK-101
Tank 102	TK-102

Description	FIN
Tank 107	TK-107
Tank 110	TK-110
Tank 113	TK-113
Tank 114	TK-114
Tank 115	TK-115
Tank 116	TK-116
Tank 117	TK-117
Tank 118	TK-118
Tank 119	TK-119
Tank 123	TK-123
Tank 124	TK-124
Tank 125	TK-125
Tank 126	TK-126
Tank 127	TK-127
Tank 129	TK-129
Tank 130	TK-130
Tank 131	TK-131
Tank 132	TK-132
Tank 133	TK-133
Tank 137	TK-137
Tank 140	TK-140
Tank 141	TK-141
Tank 142	TK-142
Tank 143	TK-143
Tank 144	TK-144
Tank 145	TK-145
Tank 146	TK-146
Tank 164	TK-164
Tank 165	TK-165
Tank 166	TK-166
Tank 167	TK-167
Tank 181	TK-181
Tank 183	TK-183
Tank 190	TK-190
Tank 191	TK-191

Description	FIN
Tank 192	TK-192
Tank 202	TK-202
Tank 210	TK-210
Tank 211	TK-211
Tank 4035	T4035
Tank 4050	T4050
Tank 4057	T4057
Tank 4065*	T4065
Tank 4118	T4118
Tank 4119	T4119
Tank 4120	T4120
Tank 4121*	T4121
Tank 4122*	T4122
Tank 4123	T4123
Tank 4124	T4124
Tank 4285	T4285
Tank 4601*	T4601
Tank 4605	T4605
Tank 512	TANK512

*A dome roof has been installed on top of the external floating roof of Tank 4065, Tank 4121, Tank 4122, and T 4601, effectively making the external roof an internal roof for purposes of complying with tank inspection requirements.

Internal Floating Roof Tank

Description	FIN
Tank 4001	T4001
Tank 4040	T4040
Tank 4049	T4049
Tank 4064	T4064
Tank 504	TANK504
Tank 508	TANK508
Tank 509	TANK509
Tank 513	TANK513
Tank 514	TANK514
Tank 515	TANK515
Tank 516	TANK516
Tank 520	TANK520

Description	FIN
Tank 521	TANK521
Tank 522	TANK522

Fixed-Roof Tank

Description	FIN
Tank 100	TK-100
Tank 101	TK-101
Tank 132	TK-132
Tank 139	TK-139
Tank 524	TK-524
Tank 4007	T4007
Tank 4008	T4008
Tank 4012	T4012
Tank 4013	T4013
Tank 4041	T4041
Tank 4046	T4046
Tank 4051	T4051
Tank 4113	T4113
Tank 4115	T4115
Tank 4116	T4116
Tank 4602	T4602
Tank 4603	T4603
Tank 506	TANK506
Tank 507	TANK507
Tank 517	TANK517
Tank 518	TANK518
Tank 519	TANK519
Vacuum Residue	VACRESID

Date: {DRAFT - TBD}

Emission Sources - Maximum Allowable Emission Rates

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

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
T-69	TK-069 (6)	VOC	0.74	1.93
		Benzene	<0.01	0.01
T-76	TK-076 (6)	VOC	0.89	2.05
		Benzene	0.01	0.01
T-90	TK-090 (6)	VOC	1.22	1.63
		Benzene	0.01	0.01
T-95	TK-095 (6)	VOC	1.64	2.52
		Benzene	0.01	0.01
T-96	TK-096 (6)	VOC	1.61	2.85
		Benzene	0.01	0.01
T-97	TK-097 (6)	VOC	1.61	2.81
		Benzene	0.01	0.01
T-98	TK-098 (6)	VOC	0.93	0.08
T-99	TK-099 (6)	VOC	0.28	0.08
T-100	TK-100 (6)	VOC	3.85	0.89
T-101	TK-101 (6)	VOC	0.78	0.02
T-107	TK-107 (6)	VOC	3.41	8.58
		Benzene	0.02	0.03
T-113	TK-113 (6)	VOC	0.08	0.05
		Benzene	<0.01	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
T-114	TK-114 (6)	VOC	1.06	2.41
		Benzene	0.01	0.01
T-115	TK-115 (6)	VOC	1.65	2.47
		Benzene	0.01	0.01
T-116	TK-116 (6)	VOC	2.21	3.27
		Benzene	0.01	0.01
T-117	TK-117 (6)	VOC	2.08	2.91
		Benzene	0.01	0.01
		Toluene	<0.01	<0.01
		Xylene	<0.01	<0.01
T-118	TK-118 (6)	VOC	1.25	3.67
		Benzene	<0.01	0.01
T-119	TK-119 (6)	VOC	2.05	2.95
		Benzene	<0.01	0.01
T-123	TK-123 (6)	VOC	2.16	3.17
		Benzene	0.01	0.01
T-124	TK-124 (6)	VOC	2.07	3.05
		Benzene	0.01	0.01
T-125	TK-125 (6)	VOC	1.98	2.89
		Benzene	<0.01	0.04
T-126	TK-126 (6)	VOC	1.02	2.99
		Benzene	<0.01	0.01
T-127	TK-127 (6)	VOC	2.50	3.55
		Benzene	0.01	0.05
T-129	TK-129 (6)	VOC	0.96	2.82
		Benzene	<0.01	0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
T-130	TK-130 (6)	VOC	2.36	3.32
		Benzene	0.01	0.04
T-131	TK-131 (6)	VOC	1.23	3.81
		Benzene	<0.01	0.01
T-132	TK-132 (6)	VOC	1.66	3.00
T-133	TK-133 (6)	VOC	10.76	13.85
		Benzene	0.04	0.05
T-136	TK-136	VOC	1.39	3.28
		Benzene	<0.01	0.01
T-137	TK-137 (6)	VOC	3.75	8.64
		Benzene	0.01	0.02
T-139	TK-139 (6)	VOC	1.17	0.85
T-140	TK-140 (6)	VOC	4.21	9.60
		Benzene	0.02	0.04
T-141	TK-141 (6)	VOC	2.17	5.06
		Benzene	0.01	0.02
T-142	TK-142 (6)	VOC	1.23	3.48
		Benzene	0.01	0.05
T-143	TK-143 (6)	VOC	1.48	4.25
		Benzene	0.01	0.02
T-144	TK-144 (6)	VOC	1.42	3.62
		Benzene	0.01	0.01
T-145	TK-145 (6)	VOC	1.54	3.99
		Benzene	0.01	0.02
T-146	TK-146 (6)	VOC	1.48	4.33
		Benzene	0.01	0.02
T-164	TK-164 (6)	VOC	1.03	2.77

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		Benzene	<0.01	0.01
T-165	TK-165 (6)	VOC	2.07	3.99
		Benzene	0.01	0.02
T-166	TK-166 (6)	VOC	1.01	2.70
		Benzene	<0.01	0.01
T-167	TK-167 (6)	VOC	1.61	3.93
		Benzene	0.01	0.01
T-181	TK-181 (6)	VOC	2.06	5.77
		Benzene	0.01	0.02
T-182	TK-182 (6)	VOC	5.96	15.02
		Benzene	0.03	0.05
T-183	TK-183 (6)	VOC	2.27	6.54
		Benzene	0.01	0.02
T-190	TK-190 (6)	VOC	2.89	8.11
		Benzene	0.01	0.03
T-191	TK-191 (6)	VOC	2.85	7.97
		Benzene	0.01	0.03
T-192	TK-192 (6)	VOC	2.63	7.73
		Benzene	0.01	0.03
T-202	TK-202 (6)	VOC	1.90	2.60
		Benzene	0.01	0.01
T-210	TK-210 (6)	VOC	1.47	2.75
		Benzene	<0.01	<0.01
T-211	TK-211 (6)	VOC	2.33	6.94
		Benzene	<0.01	0.03
71	TK-4008 (6)	VOC	1.05	0.24
66	TK-4012 (6)	VOC	0.50	0.17

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
52	TK-4013 (6)	VOC	1.28	0.32
79	TK-4035 (6)	VOC	1.00	2.42
		Benzene	0.01	0.01
53	TK-4046 (6)	VOC	10.72	0.46
28	TK-4050 (6)	VOC	7.50	19.99
		Benzene	0.03	0.07
67	TK-4051 (6)	VOC	0.73	0.19
29	TK-4057 (6)	VOC	0.14	0.13
T4064	TK-4064 (6)	VOC	1.41	0.06
		Benzene	0.01	<0.01
45	TK-4065 (6)	VOC	1.05	1.15
		Benzene	0.01	<0.01
46	TK-4113 (6)	VOC	1.86	0.36
48	TK-4115 (6)	VOC	0.06	0.03
49	TK-4116 (6)	VOC	2.69	0.82
38	TK-4118 (6)	VOC	1.61	3.73
		Benzene	0.01	0.01
39	TK-4119 (6)	VOC	1.30	3.83
		Benzene	0.01	0.05
40	TK-4120 (6)	VOC	1.41	3.91
		Benzene	0.01	0.05
42	TK-4121 (6)	VOC	0.67	1.77
		Benzene	<0.01	0.01
43	TK-4122 (6)	VOC	0.70	1.75
		Benzene	<0.01	0.01
47	TK-4123 (6)	VOC	1.33	3.88
		Benzene	<0.01	0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
44	TK-4124 (6)	VOC	1.57	4.49
		Benzene	0.01	0.02
116	TK-4285 (6)	VOC	2.47	6.88
		Benzene	0.01	0.02
118	TK-4601 (6)	VOC	1.10	1.21
		Benzene	0.01	0.01
119	TK-4602 (6)	VOC	4.13	1.39
120	TK-4603 (6)	VOC	4.49	1.40
124	TK-4605 (6)	VOC	2.55	6.63
		Benzene	0.01	0.03
TANK504	TK-504 (6)	VOC	0.88	0.03
		Benzene	0.01	<0.01
TANK506	TK-506 (6)	VOC	0.46	<0.01
VENT507	TK-507 (6)	VOC	0.46	<0.01
TANK508	TK-508 (6)	VOC	0.98	1.39
		Benzene	0.01	0.01
TANK509	TK-509 (6)	VOC	56.27	9.28
PRV512	TK-512 (6)	VOC	1.21	2.05
		Benzene	0.01	0.01
TANK513	TK-513 (6)	VOC	1.15	1.49
		Benzene	0.01	0.01
		Toluene	0.01	0.02
		Xylene	0.01	0.03
TANK514	TK-514 (6)	VOC	1.07	1.19
		Benzene	0.01	0.01
		Toluene	0.01	0.01
		Xylene	0.01	0.02

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
TANK515	TK-515 (6)	VOC	0.88	1.11
		Benzene	0.01	<0.01
TANK516	TK-516 (6)	VOC	0.84	1.15
		Benzene	0.01	<0.01
TK-517	TK-517 (6)	VOC	2.97	0.15
VENT518	TK-518 (6)	VOC	2.97	0.11
VENT519	TK-519 (6)	VOC	2.97	0.07
TANK520	TK-520 (6)	VOC	1.36	1.88
		Benzene	0.01	0.01
TANK521	TK-521 (6)	VOC	1.14	0.20
TANK522	TK-522 (6)	VOC	0.94	0.23
T-524	TK-524 (6)	VOC	0.17	0.03
F-10N-T	North Plant Utilities Fugitives (5) (6)	VOC	0.28	1.23
		H ₂ S	<0.01	<0.01
WWCTS-T	North API Separator Fugitives (5) (6)	VOC	<0.01	<0.01
		Benzene	<0.01	<0.01
		H ₂ S	<0.01	<0.01
		NH ₃	<0.01	<0.01
TNK-FUG-T	Tank Field Piping Fugitives (5) (6)	VOC	17.94	77.96
		Benzene	0.20	0.86
		H ₂ S	<0.01	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
F-16S-T	Receiving, Pumping, and Shipping Fugitives (5) (6)	VOC	11.54	50.52
		Benzene	0.10	0.44
		H ₂ S	<0.01	<0.01
FUG-T	Terminal Fugitives (5) (6)	VOC	5.16	22.59
		Benzene	0.05	0.18
		H ₂ S	<0.01	<0.01
SLR1	South Railcar Loading Rack (6)	VOC	3.89	0.31
		H ₂ S	<0.01	<0.01
SLR2	South LPG Tank truck Loading Rack (6)	VOC	0.10	0.01
SLR4	South Acid/Caustic Tank truck Loading Rack (6)	VOC	10.53	1.05
		H ₂ S	<0.01	<0.01
NLR2-5 (FIN: NLR2)	North Railcar and Tank truck Loading Rack (6)	VOC	2.16	4.76
NLR 2-5 (FIN: NLR3)	North Loading Rack NLR3 (6)	VOC	8.27	0.81
		Toluene	1.18	0.11
		Xylene	0.61	0.06
NLR2-5 (FIN: NLR4)	North Caustic Loading Rack (6)	VOC	5.28	0.09
		H ₂ S	<0.01	<0.01
NLR-6	Solid Waste Gondola Loading Rack (6)	PM	3.24	0.19
		PM ₁₀	1.62	0.10
		PM _{2.5}	1.62	0.10
NLR-7	North Asphalt Feed Loading Rack (6)	VOC	0.04	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
LLPG-TC	North LPG Railcar and Tank truck Loading Rack (6)	VOC	0.40	0.09
CA-SK (FIN: LRACK)	Terminal Tank Truck Loading Rack VRU (6)	VOC	1.58	2.76
LRACK-FUG	Terminal Loading Rack Hose Fugitives (6)	VOC	0.72	0.71
VACLR	Vacuum Residue Loading (6)	VOC	0.01	0.01
CA-SK (FIN: S-1)	Marketing Terminal Sump-1 (6)	VOC	0.14	0.60
CA-SK (FIN:S-2)	Marketing Terminal Sump-2 (6)	VOC	0.14	0.60
Compliance Caps - Final	Compliance Caps - Final (5)(6)	PM	3.24	0.19
		PM10	1.62	0.10
		PM2.5	1.62	0.10
		VOC	243.00	282.00
		Benzene	0.55	1.20

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
MSS CAP	Sitewide MSS Sources Excluding Flares	VOC	348.76	66.92
		NO _x	1.49	9.94
		CO	0.44	2.19
		SO ₂	0.19	0.75
		PM	8.86	1.72
		PM ₁₀	8.86	1.72
		PM _{2.5}	8.86	1.72
		H ₂ S	0.01	0.01
XF 3601	Asphalt Plant – Furnace F-3601	VOC	0.72	3.15
		NO _x	1.99	8.72
		CO	14.16	62.01
		SO ₂	1.98	8.67
		PM	0.63	2.76
		PM ₁₀	0.63	2.76
		PM _{2.5}	0.63	2.76
		H ₂ S	0.06	0.26
TTLR/TCLR	Asphalt Plant – Loading Rack	VOC	0.12	0.11
		H ₂ S	<0.01	<0.01
D-3601	Asphalt Tank D-3601	VOC	0.28	0.81
		H ₂ S	<0.01	<0.01
D-3602	Asphalt Tank D-3602	VOC	0.28	0.81
		H ₂ S	<0.01	<0.01
D-3605	Asphalt Tank D-3605	VOC	0.22	0.63
		H ₂ S	<0.01	<0.01
D-3606	Asphalt Tank D-3606	VOC	0.22	0.63
		H ₂ S	<0.01	<0.01
D-3607		VOC	0.01	0.04

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
	Asphalt Tank D-3607	H ₂ S	<0.01	<0.01
D-3608	Asphalt Tank D-3608	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3609	Asphalt Tank D-3609	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3610	Asphalt Tank D-3610	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3611	Asphalt Tank D-3611	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3612	Asphalt Tank D-3612	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3623	Asphalt Tank D-3623	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3624	Asphalt Tank D-3624	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3625	Asphalt Tank D-3625	VOC	0.01	0.06
		H ₂ S	<0.01	<0.01
D-3627	Asphalt Tank D-3627	VOC	0.01	0.06
		H ₂ S	<0.01	<0.01
D-3628	Asphalt Tank D-3628	VOC	<0.01	0.02
		H ₂ S	<0.01	<0.01
D-3629	Asphalt Tank D-3629	VOC	<0.01	0.02
		H ₂ S	<0.01	<0.01
D-3630	Asphalt Tank D-3630	VOC	0.01	0.04
		H ₂ S	<0.01	<0.01
D-3670		VOC	<0.01	0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
	Asphalt Tank D-3670	H ₂ S	<0.01	<0.01
D-3671	Asphalt Tank D-3671	VOC	<0.01	0.01
		H ₂ S	<0.01	<0.01
D-3672	Asphalt Tank D-3672	VOC	<0.01	0.01
		H ₂ S	<0.01	<0.01
FUELFUG	Asphalt Plant Fugitives (5)	VOC	1.80	7.90
		H ₂ S	0.01	0.03

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented

PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

H₂S - hydrogen sulfide

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.

(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

(6) Total emission rates from these emission points shall comply with compliance caps contained in this MAERT.

Date: DRAFT - TBD

TCEQ Interoffice Memorandum

To: Chris Loughran, P.E.
Energy Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Robert Scalise
ADMT

Date: March 18, 2022

Subject: Air Quality Analysis Audit – Western Refining Terminals, LLC (RN100213016)

1. Project Identification Information

Permit Application Number: 93546
NSR Project Number: 322798
ADMT Project Number: 7726
County: El Paso
Published Map: \\tceq4avmgisdata\GISWRK\APD\MODEL_PROJECTS\7726\7726.pdf

Air Quality Analysis: Submitted by Trinity Consultants, November 2021, on behalf of Western Refining Terminals, LLC. Additional information provided January and February 2022.

2. Report Summary

The air quality analysis is acceptable for all review types and pollutants. The results are summarized below.

A. Minor Source NSR Air Toxics Analysis

Table 1. Generic Modeling Results

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
29	275.51	14.43
39	96.68	4.01
40	128.3	5.45
44	449.55	43.34
45	212.53	8.6
46	121.04	13.18
47	180.11	7.05
48	103.37	6.86

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Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
49	63.29	3.55
53	81.8	1.48
54	51.26	1.96
70	76.95	1.58
71	81.66	1.42
79	51.13	3.13
116	215.88	11.75
118	217.16	9.11
119	82.47	1.51
120	61.96	1.38
ASPSAS1	31.25	1.23
ASPSAS2	30.29	1.48
ASPSAS3	30.39	1.94
ASPSAS4	22.75	1.34
ASPSAS5	17.95	0.91
ASPSAS6	14.79	0.68
ASPSAS7	31.39	3
ASPSAS8	56.52	6.03
CASK	305.58	12.69
LRACKFUG	352.46	33.22
MKSNAS1	12.71	0.87
MKSNAS2	14.64	1.09
MKSNAS3	12.85	0.92

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
MKSNAS4	12.9	0.93
MKSNAS5	27.54	2.39
MKSNAS6	35.82	2.89
MKSNAS7	7.58	0.49
MKSNAS8	7.62	0.49
MKSNAS9	6.13	0.36
PRV512	141.68	8.27
T100	36.98	0.65
T101	53.64	0.82
T107	57.85	1.07
T114	32.21	1.08
T115	31.3	0.78
T116	31.43	0.56
T117	31.92	0.41
T118	63.92	3.14
T119	42.42	1.36
T123	22.97	0.51
T124	26.71	0.75
T125	39.96	1.22
T126	62.78	2.35
T127	22.59	0.61
T130	25.05	0.67
T133	96.19	1.87

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
T136	38.02	0.45
T137	46.67	0.56
T139	91.65	2.33
T140	69.88	1.79
T141	40.21	0.7
T142	32.63	0.42
T143	28.14	0.33
T145	21.86	0.34
T164	35.83	0.41
T165	30.67	0.32
T167	22.96	0.29
T181	26.96	0.29
T182	22.58	0.22
T191	28.11	0.26
T202	111.55	5.14
T211	36.84	0.33
T4064	55.42	2
T524	109.59	7.79
T69	221.94	14.95
T76	358.43	18.72
T90	318.81	24.13
T95	48.58	0.63
T96	52.43	0.73

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
T97	53.58	0.86
T98	55.67	0.99
TANK506	65.04	3.12
TANK508	99.72	2.62
TANK513	140.62	8.28
TANK514	106.98	5.81
TANK515	90.02	4.63
TANK516	108.49	5.81
TANK520	88.73	3.46
TANK521	82.66	3.53
TANK522	77.33	3.56
TBNPAS1	1.27	0.01
TBNPAS10	0.66	0.01
TBNPAS11	0.49	0.01
TBNPAS12	0.52	0.01
TBNPAS13	0.6	0.01
TBNPAS14	0.68	0.02
TBNPAS15	0.79	0.02
TBNPAS16	0.86	0.04
TBNPAS17	2.33	0.17
TBNPAS18	0.49	0.01
TBNPAS19	0.45	0.02
TBNPAS2	0.98	0.01

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
TBNPAS20	0.5	0.02
TBNPAS21	0.47	0.02
TBNPAS22	0.47	0.03
TBNPAS23	0.55	0.04
TBNPAS24	0.49	0.03
TBNPAS25	1.13	0.08
TBNPAS26	0.5	0.02
TBNPAS27	0.59	0.02
TBNPAS28	0.69	0.02
TBNPAS29	0.7	0.01
TBNPAS3	0.99	0.01
TBNPAS30	0.69	0.02
TBNPAS31	0.66	0.02
TBNPAS32	0.69	0.03
TBNPAS33	0.68	0.04
TBNPAS34	0.96	0.06
TBNPAS35	0.92	0.03
TBNPAS36	0.89	0.03
TBNPAS37	0.77	0.02
TBNPAS38	0.88	0.02
TBNPAS39	1.19	0.04
TBNPAS4	0.74	0.01
TBNPAS40	1.29	0.05

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
TBNPAS41	1.29	0.07
TBNPAS42	1.28	0.09
TBNPAS43	0.92	0.02
TBNPAS44	1.12	0.03
TBNPAS45	0.97	0.03
TBNPAS46	1.11	0.04
TBNPAS47	1.06	0.06
TBNPAS48	4.1	0.38
TBNPAS49	1.81	0.15
TBNPAS5	0.76	0.01
TBNPAS50	20.05	2.14
TBNPAS6	0.84	0.02
TBNPAS7	0.62	0.01
TBNPAS8	0.66	0.01
TBNPAS9	0.54	0.01
TBSAS1	1.2	0.08
TBSAS10	1.14	0.07
TBSAS11	0.8	0.05
TBSAS12	1.29	0.04
TBSAS13	0.99	0.03
TBSAS14	1.16	0.04
TBSAS15	1.13	0.07
TBSAS16	2.39	0.17

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
TBSAS17	4.51	0.39
TBSAS18	1.47	0.09
TBSAS19	1.03	0.06
TBSAS2	1.96	0.15
TBSAS20	1.05	0.05
TBSAS21	1.47	0.1
TBSAS22	1.84	0.12
TBSAS23	4.45	0.39
TBSAS24	2.32	0.2
TBSAS25	1.19	0.09
TBSAS26	2.28	0.19
TBSAS27	0.9	0.07
TBSAS28	1.37	0.1
TBSAS29	1.13	0.08
TBSAS3	2.2	0.16
TBSAS30	1.22	0.09
TBSAS31	1.41	0.1
TBSAS32	1.65	0.13
TBSAS33	1.58	0.12
TBSAS34	3.44	0.3
TBSAS35	5.62	0.58
TBSAS36	1.66	0.12
TBSAS37	1.66	0.12

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
TBSAS38	1.74	0.13
TBSAS39	1.57	0.12
TBSAS4	2.93	0.21
TBSAS40	1.43	0.11
TBSAS41	1.32	0.09
TBSAS42	1.2	0.08
TBSAS43	1.1	0.07
TBSAS44	1	0.07
TBSAS45	0.89	0.06
TBSAS46	0.95	0.05
TBSAS47	0.94	0.04
TBSAS48	1.17	0.04
TBSAS5	3.52	0.28
TBSAS6	2.2	0.15
TBSAS7	2.53	0.18
TBSAS8	3.12	0.23
TBSAS9	5.75	0.5
TK136	38.02	0.45
TK137	46.67	0.56
TK509	92.82	2.58
TK517	68.94	4.79
VENT507	66.65	3.15
VENT518	66.27	4.72

TCEQ Interoffice Memorandum

Source ID	1-hr GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)	Annual GLCmax ($\mu\text{g}/\text{m}^3$ per lb/hr)
VENT519	67.61	4.94

Table 2. Minor NSR Production Project-Related Modeling Results for Health Effects since Most Recent Site-wide Modeling

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	25% ESL ($\mu\text{g}/\text{m}^3$)
Diesel fuel	68334-30-5	1-hr	98	250
gasoline	8006-61-9	1-hr	511	875
Jet fuel	N/A	1-hr	78	250

Table 3. Minor NSR Production Project-Related Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	10% ESL ($\mu\text{g}/\text{m}^3$)
Diesel fuel	68334-30-5	1-hr	98	100
gasoline	8006-61-9	1-hr	319	350
Jet fuel	N/A	1-hr	78	100

Table 4. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	GLCmax Location	ESL ($\mu\text{g}/\text{m}^3$)
ethanol	64-17-5	1-hr	5223	E Property Line	18000

3. Model Used and Modeling Techniques

AERMOD (Version 19191) was used in a refined screening mode. Updated modeling runs were conducted using AERMOD version 21112. The use of two different versions of AERMOD will not significantly affect the modeling results.

A unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The unitized emission rate of 1 lb/hr from EPNs FUELFUG, TNK-FUG-T, F-16S-T, and FUG-T was evenly distributed across source IDs ASPAS1-8, TBNPAS1-9, TBSAS1-48, and MKNAS1-9, respectively. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant. These concentrations were used in steps 3 and 7 of the MERA. Three pollutants which did not meet the criteria for step 3 were further evaluated at step 4 of the MERA.

TCEQ Interoffice Memorandum

For the 1-hr diesel fuel analysis, the applicant represented that only one of EPNs T-139, 119 or 120 will be loaded at one time together with all other project emissions. The impacts associated with the worst-case operating scenario are reported in tables 2 and 3 above.

For the 1-hr jet fuel analysis, the applicant represented that only one of EPNs TK-517, VENT518, or VENT519 will be loaded at the same time as only one of EPNs 53 or 71 together with all other project emissions. The impacts associated with the worst-case of these six operating scenarios is reported in tables 2 and 3 above.

A. Land Use

Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of medium roughness is reasonable.

B. Meteorological Data

Surface Station and ID: El Paso, TX (Station #: 23044)
Upper Air Station and ID: Santa Teresa, NM (Station #: 3020)
Meteorological Dataset: 2016
Profile Base Elevation: 1193.6 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.

The ADMT identified several receptors modeled at elevations significantly different from NED data. However, given the distance of these receptors from the GLCmax, this discrepancy has no effect on the model results.

A single property line designation (SPLD) exists between Western Refining Terminals, LLC and Veolia North America Regeneration Services, LLC (RN104477161). The single property line boundary was used in the modeling demonstration for the property line receptors, as well as all other parts of Western Refining Terminals, LLC property.

D. Building Wake Effects (Downwash)

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

4. Modeling Emissions Inventory

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

As noted above, a single property line designation (SPLD) exists between Western Refining Terminals, LLC and Veolia North America Regeneration Services, LLC (RN104477161). For the

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pollutants triggering site-wide modeling analyses, according to the applicant, there are no emissions from the other entity to be included in the modeling.

Maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.

**Permit Renewal & Amendment
Source Analysis & Technical Review**

Company	Western Refining Terminals LLC	Permit Number	93546
City	El Paso	Project Numbers	322798
County	El Paso	Regulated Entity Number	RN100213016
Project Types	Renewal and Amendment	Customer Reference Number	CN604485763
Project Reviewer	Meenu Pillai and Christopher Loughran, P.E.	Received Date	December 10, 2020
Site Name	Marathon El Paso Refinery		

Project Overview

Western Refining Terminals, LLC (WRT) operates assets at an integrated petroleum refinery in El Paso, Texas (El Paso Refinery) owned by Marathon Petroleum Corporation (Marathon). Permit No. 93546, which authorizes the refinery's support facilities including tanks, was due to expire on May 23, 2021; therefore, the applicant submitted a renewal application on December 10, 2020, and the permit is therefore still valid in accordance with 30 TAC 116.314(d). A separate permit at the site authorizes the refinery's process facilities, which is outside the scope of Permit No. 93546. Other actions included with this renewal include incorporating by reference and by consolidation several Permits by Rule (PBRs) and a Standard Permit (SP) in accordance with 30 TAC 116.116(d)(2) and 30 TAC 116.615(3), respectively, and including updated tank emission calculation methodologies based on the current version of Chapter 7 of AP-42 (dated June 2020). Additionally, the company requested a no-notice amendment to correct several representations for the equipment as built and operated.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Allowable Emission Rated Authorized by Consolidated PBR (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	4.86	-	4.86	0.00
PM ₁₀	4.68	-	4.68	0.00
PM _{2.5}	4.58	-	4.58	0.00
VOC	627.96	15.22	540.83	-102.35
NO _x	18.66	-	18.66	0.00
CO	64.20	-	64.20	0.00
SO ₂	9.42	-	9.42	0.00
Benzene	5.72	0.01	3.90	-1.83
H ₂ S	0.60	-	0.59	-0.01
NH ₃	0.01	-	0.01	0.00
Toluene	0.51	-	0.14	-0.37
Xylene	0.30	-	0.12	-0.18

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:

September 24, 2021

Site rating & classification:

**TRV macro: 0.45* / Satisfactory
BOEXI report: 0.00* / Satisfactory**

Company rating & classification:

**0.45* / Satisfactory
BOEXI report: 0.00* / Satisfactory**

Has the permit changed on the basis of the compliance history or rating?

No

Did the Regional Office have any comments? If so, explain.

No

*Slightly different values are obtained when retrieving the compliance history ratings from the standard TCEQ TRV macro

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compared to the TCEQ's BusinessObjects Enterprise XI (BOEXI) report. Both systems yield "satisfactory" compliance ratings for the site and the company.

Public Notice Information

Requirement	Date	
	Renewal	Amendment
Legislator letters mailed	12/18/2020	N/A
Date 1 st notice published	1/15/2021	N/A
Publication Name: El Paso Times		
Pollutants:	CO, H ₂ S, NO _x , VOC, PM, PM ₁₀ , PM _{2.5} , SO ₂ , and HAPs	N/A
Date 1 st notice Alternate Language published	1/15/2021	N/A
Publication Name (Alternate Language): El Diario De El Paso		
1 st public notice tearsheet(s) received	2/1/2021	N/A
1 st public notice affidavit(s) received	2/1/2021	N/A
1 st public notice certification of sign posting/application availability received	2/9/2021	N/A

Public Interest

Public Interest Information	
Number of comments received	127
Number of meeting requests received	5
Number of hearing requests received	10
Date meeting held	5/24/2022
Date response to comments filed with OCC	9/20/2022
Date of SOAH hearing	N/A

Renewal Requirements

Requirement	
Date of permit expiration:	5/23/2021
Date written notice of review was mailed:	5/22/2020
Was there a condition of air pollution that had to be addressed during this project review?	No
If yes, explain:	
Permit Renewal Fee: \$10,000.00	M106863

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Federal Rules Applicability

Subject to NSPS?	Yes
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Subparts A, Kb, GGG, GGGa & QQQ	
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Subject to NESHAP?	Yes
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Subparts A & FF	
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Subject to NESHAP (MACT) for source categories?	Yes
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Subparts A, CC, EEEE & DDDDD	
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Nonattainment review applicability

WRT is located in El Paso County, which is classified as moderate nonattainment for PM₁₀, marginal nonattainment for ozone (effective December 30, 2021), and attainment or unclassifiable for all other pollutants. WRT is an existing minor source for PM₁₀ and major source for VOC as an ozone-precursor in relation to the New Source Review (NSR) Nonattainment (NA) program. The emissions being added due to the consolidation of the PBRs and SPs underwent a federal applicability analysis at the time of authorization; therefore, a nonattainment review was not triggered.

Additionally, this project involves an amendment that corrected representations on tank designs (see the project scope discussion for Tanks 100 and 139). However, these were representation corrections to the permit and did not result in emission calculation changes. Therefore, there were no project emission changes associated with this representation corrections.

The company represented an hourly increase in the pump rate for Tank TK-509 (EPN TANK509) but no change in the annual pump rate. Therefore, they represented no federal nonattainment applicability. If this were considered a modified source with project emission increases, the maximum annual VOC emissions increase from this tank would be 9.28 tpy conservatively assuming a baseline of zero. Additionally, the company proposed that tanks represented by EPNs T-119 and T-136 are modified due to the addition of benzene emissions. EPNs T-119 and T-136 have allowable VOC emission rates of 2.95 tpy and 3.28 tpy, which results in proposed emission increases of 6.23 tpy from the two tanks combined conservatively assuming zero baseline emissions. The total VOC emission increases from these three tanks would be 16.03 tpy conservatively assuming zero baseline actual emissions, which is less than the VOC netting and significant emission rate threshold of 40 tpy for a marginal ozone nonattainment area. Therefore, nonattainment new source review would not be triggered with this action.

Lastly, none of the amended sources had PM₁₀ emission since they were tanks. Therefore, there were project emission changes and a nonattainment review does not apply.

PSD review applicability

WRT is located in El Paso County, which is classified as moderate nonattainment for PM₁₀, marginal nonattainment for ozone, and attainment or unclassifiable for all other pollutants. WRT is an existing major source in relation to the NSR Prevention of Significant Deterioration (PSD) program. The emissions being added due to the consolidation of the PBRs and SPs underwent a Federal Applicability analysis at the time of authorization; therefore, a PSD review was not triggered.

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Title V Applicability

Requirement

Title V applicability: This site is a major source under Title V of FCAA and operates under federal operating permit numbers O-1348 and O-3929.

Periodic Monitoring (PM) applicability: The site is subject to the requirements of 30 TAC §122. For the sources affected by this permit renewal, the following are periodic monitoring requirements:

- Fugitives: compliance with 28VHP Leak Detection and Repair Program at the frequencies indicated below:
 - SC 7.E (2): Open-ended valve or line monitored daily for leaks above 500 ppmv;
 - SC 7.E (3): Open-ended valve or line shall be monitored once for leaks above background for a plant or unit turnaround lasting up to 45 days with an approved gas analyzer;
 - SC 7.E (3): Open-ended valve or line shall be monitored once at the end of the 72 hour period following the creation of the open ended line and monthly thereafter with an approved gas analyzer;
 - SC 7.F: Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer;
 - SC 7.F (1): A check of the reading of the pressure-sensing device to verify disc integrity shall be performed weekly;
 - SC 7.G: all pump, compressor, and agitator seals shall be monitored with an approved gas analyzer at least quarterly.
- SC 6: Audio, olfactory, and visual (AVO) checks for all components in H₂S service once per shift;
- SC 11.C: For EPN T4064, breakthrough monitoring of carbon canister systems at the highest 1 minute average;
- SC 12.G: Storage tanks monthly recordkeeping and temperature monitoring;
- SC 16.C: Liquid loading monthly recordkeeping;
- SC 18: Annual vapor-tight and leak-tight testing for tank trucks; and
- SC 23: Asphalt Plant daily throughput records; and
- SCs 37 through 52: MSS activity tracking.

Compliance Assurance Monitoring (CAM) applicability: The facility is subject to CAM since a control device is used to achieve compliance with an emission limitation or standard.

- Carbon Adsorber System (CAS): Calibration and weekly sampling with flame ionization detector or equivalent method; recordkeeping;
- Vapor Recovery Unit: Continuous emission monitoring system (CEMS) with an alarm VOC concentration \leq VRU emission rate equivalent to 10 mg/l; recordkeeping; stack sampling;
- Thermal Oxidizer: Calibration and temperature monitoring; recordkeeping; and
- Internal Combustion Engine: Stack testing; oxygen sensor-based air-to-fuel ratio (AFR) controller

Process Description

This site is an integrated petroleum refinery that is owned and operated by both Western Refining Terminals, LLC (WRT) under NSR Permit No. 93546 and Western Refining Company, L.P. (WNR) under NSR Permit No. 18897. The El Paso Refinery is designed to process crude oils (both sweet and sour) to produce a variety of petroleum products, such as liquefied petroleum gas (LPG), butane, gasoline, diesel, kerosene, jet fuel, fuel oil, and other heavy products such as carbon black oil and asphalt. The refinery has three main processing areas that are thoroughly integrated through operations, utilities, and shipping.

Project Scope

WRT is requesting to renew this permit and alter or amend the permit as follows:

- Removal of Tank T-106 (EPN TK-106) from the site since it will be demolished.
- Update the authorizations of the following tanks:

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- Remove Tank 100 (TK-100) from the “External Floating Roof Tank” list and relocate it to the “Fixed Roof Tank” list.
 - Tank 100 was originally authorized as a vertical fixed roof tank via PBR. In TCEQ project No. 242749, Tank 100 was incorrectly identified as an external floating roof tank.
- Remove Tank 139 (TK-139) from the “External Floating Roof Tank” list and relocate it to the “Fixed Roof Tank” list.
 - Tank 139 was originally authorized as a vertical fixed roof tank via PBR. In TCEQ project No. 242749, Tank 100 was correctly identified as a vertical fixed roof tank, but incorrectly placed in the External Floating Roof Tank list.
- Increase hourly emissions for Tank TK-509 (EPN TANK509) due to an increase in the maximum hourly pump rate (note that the annual VOC emission rate for this tank is not increasing).
- Change the service of the Tank TK-4115 (EPN 48) from diesel to Vacuum Gas Oil (VGO), which results in a decrease in VOC allowable emissions of 0.73 tpy.
- Change the service of Tank TK-521 (EPN TANK521) and Tank TK-522 (EPN TANK522) from gasoline to diesel, which results in decreases in VOC allowable emissions of 1.42 tpy and 1.56 tpy, respectively, and elimination of benzene emissions from these two tanks.
- Update hourly and annual tank emission calculations due to AP-42 Chapter 7 equations that were updated in June 2020.
 - This update does not represent a modification for permitting purposes. Any increases as a result of the update will be modeled and impacts will be evaluated.
- Updated floating roof fittings that resulted in emission decreases.
- Address registered and unregistered PBRs and a Standard Permit being consolidated and referenced into the permit.
 - See Permit Incorporation section for a detailed summary.
- Addition of benzene emissions to tanks EPNs T-119 and T-136.

Revised Permit Conditions/MAERT

As a result of the project, the permit special conditions (SCs) and MAERT are being revised as summarized below.

Initial SC No.	New SC No.	Description of Change
-	3.D	Addition of 40 CFR 60 Subpart GGGa applicability due to consolidation of PBRs with sources subject to this New Source Performance Standard (NSPS).
6	-	Removed condition about special conditions and federal rule conflicts since it is redundant with General Condition No. 10 on the permit face.
8.A, 8.F	7.A, 7.F(1)-(3)	Updated Special Conditions numbering and bullet list to reflect consistency with current TCEQ boilerplate language.
8.E, 8.I, 8.J, 13.A-C, 13.D, 31, 36, 37, 38.C, 38.D, 38.D(2), 39.A(2), 39.B(1), 40, 40.B, 41, 41.B, 41.C, 43, 44.D, 45, 49	7E, 7.I, 7.J, 12.A-B, 12.C, 13, 33, 37, 38, 39.C, 39.D, 39.D(2), 40.A(2), 40.B(1), 41, 41.B, 42, 42.B, 42.C, 42.E, 44, 45.D, 46, 50	Updated Special Condition language to reflect current TCEQ boilerplate language consistent with similar facilities.
8.F, 13.I, 24.C	7.F, 13, 28	Updated the formatting of Special Conditions to match formatting of current TCEQ boilerplate. There were no changes to the wording of the Special Conditions.
13.K	13	Updated the approach to calculate tank emissions for compliance from the EPA TANKS program and TCEQ technical guidance to the current version of AP-42 (dated June 2020) and subsequent permit application representations.
34	35	Added “completed” to note that the controls associated with the emission reduction projects noted in this condition has been completed according to

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		the company.
35	36	Reformatted control techniques per unit into a table format
41.E(4)	42.E(4)	For tank planned MSS emissions recordkeeping, updated the reference to AP-42 from November 2006 to the current version of AP-42 (dated June 2020).
-	54	Lists registered and unregistered PBRs and Standard Permits referenced into the permit
Att. D	Att. D	<ul style="list-style-type: none"> • Removal of fixed roof Tank 106 (EPN T-106) from the permit due to unit being demolished at the site • Removing Tank 100 (EPN T-100) from External Floating Roof Tank list and relocating to Fixed Roof Tank list. • Removing Tank 139 (EPN T-139) from External Floating Roof Tank list and relocating to Fixed Roof Tank list.
MAERT		<ul style="list-style-type: none"> • All tank annual and hourly emissions (paper change) based on the AP-42 update. • Removed Tank 106 (EPN T-106) from the permit due to unit being demolished at the site. • Moved TK-136 from bottom of MAERT to be in chronological order. • Addition of benzene emission for tanks represented by EPNs T-119 and T-136. • Consolidated hourly and annual PBR emissions.

Best Available Control Technology

BACT must be evaluated for the consolidated sources and the modified sources, which is summarized in the table below. The modified sources are Tank T-100, Tank T-136, Tank T-139, Tank T-119, and Tank TK-509 while the other sources in the table below are the consolidated sources from PBRs.

Source Name	EPN	Best Available Control Technology Description
Storage Tank (4): Floating roof with TVP <11.0 psia	TANK509, T-202, T-165, T-126, T-117, T-119, 124, 44	<p>VOC: These existing tanks are EFRs that are painted white with a mechanical shoe primary seal and a rim-mounted secondary seal with a maximum true vapor pressure of less than 11 psia. These tanks are not drain dry, which is acceptable under the TCEQ Tier I BACT guidelines for existing tanks.</p> <p>MSS: WRT will continue to comply with the BMPs for storage tanks as specified in SC No. 47. Best management practices for storage tank MSS activities include limiting the uncontrolled standing idle duration to 24 hours, degassing storage tanks that manage high vapor pressure (>0.5 psia at 95°F) materials to control and removing all VOC to the extent practical prior to opening to the atmosphere. Tank roofs may only be landed for changes of tank service or tank inspection/maintenance as identified in the permit application and routed to a control device meeting the requirements of SC 53 for degassing. WRT proposes that the continued compliance with the best management practices and recordkeeping requirements in SC No. 47 is considered BACT.</p>
Storage Tank (4): Floating roof with TVP <11.0 psia	T-210, T-183, T-137, T-136	<p>VOC: These existing tanks are EFRs that are painted white with a mechanical shoe primary seal and a rim-mounted secondary seal that with a maximum true vapor pressure of less than 11 psia. These tanks have slotted guide poles with pole sleeves, and wipers. These design features meet the TCEQ Tier 1 BACT</p>

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Source Name	EPN	Best Available Control Technology Description
		<p>guidelines. These tanks are not drain dry, which is acceptable under the TCEQ Tier I BACT guidelines for existing tanks. Please see below for more information regarding how these tanks meet BACT for planned MSS activities.</p> <p>MSS: WRT will continue to comply with the BMPs for storage tanks as specified in SC No. 47. Best management practices for storage tank MSS activities include limiting the uncontrolled standing idle duration to 24 hours, degassing storage tanks that manage high vapor pressure (>0.5 psia at 95°F) materials to control and removing all VOC to the extent practical prior to opening to the atmosphere. Tank roofs may only be landed for changes of tank service or tank inspection/maintenance as identified in the permit application and routed to a control device meeting the requirements of SC 53 for degassing. WRT proposes that the continued compliance with the best management practices and recordkeeping requirements in SC No. 47 is considered BACT.</p>
Storage Tank (1): Fixed roof with capacity < 25,000 gal or TVP < 0.50 psia	T-139, T-100, 120, 119	VOC: All fixed roof tanks have permanent submerged fill pipes. All tanks are white or aluminum. This meets BACT.
Fugitives: Piping and Equipment Leak	TNK-FUG-T, F-16S-T FUG-T, FUELFUG	<p>VOC: Uncontrolled fugitive VOC emissions from piping, connectors, pumps, agitators, and compressors are greater than 25 tpy, and therefore will use the 28VHP LDAR program that satisfies TCEQ's Tier I BACT guidelines, which is required by Special Condition No. 8. The gas and light liquid valves subject to this LDAR program receive 97% control credit while the pumps and compressors receive 85% control credit in accordance with TCEQ equipment leak fugitives guidance.</p> <p>H₂S: For emissions of approved odorous compounds (chlorine, ammonia, hydrogen sulfide, hydrogen cyanide and mercaptans only): AVO inspection twice per shift. This meets BACT.</p>
Loading: Truck	CA-SK, LRACK-FUG	VOC: Loading emissions are submerged or bottom loading. There is no splash loading. This meets BACT.

Permits Incorporation

Permit by Rule (PBR) / Standard Permit / Permit Nos.	Authorization	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
PBR Registration No. 140939	30 TAC §106.261/§106.262 effective November 1, 2003	Evaluate Dryness of LPG per ASTM D2713 (LPG Freeze Test)	Reference
Standard Permit Registration No. 159720	Non-rule Pollution Control Project (PCP) Standard Permit effective February 9, 2011	Portable combustion system comprised of a Portable Equalizer Tank and Vapor Burner to control emissions from loading and unloading operations (Portable Vapor Combustion Unit)	Reference
PBR Registration No.	30 TAC §106.263 effective	Replacement tank; Replaced T-106	Reference

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Permit by Rule (PBR) / Standard Permit / Permit Nos.	Authorization	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
162737	November 1, 2001 and 30 TAC §106.472 effective September 4, 2000	with Tank T-102b (normal and MSS operations). PBRs §106.472 and §106.263 authorized both routine tank emissions and MSS operations (EPNs T-102b and T-102b-MSS).	
PBR Registration No. 162737	30 TAC 106.261 effective November 1, 2003	Replacement tank; Replaced T-106 with Tank T-102b (normal and MSS operations). PBR §106.261 authorized the fugitive emissions associated with this tank replacement project and is being consolidated (EPN TNK-FUG-T). Only EPN TNK-FUG-T will be consolidated into the permit.	Partial Consolidate
Claimed PBR/Not Registered	30 TAC §106.263, effective November 1, 2001	TK-136 MSS	Reference
Claimed PBR/Not Registered	30 TAC §106.261, effective November 1, 2003	TK-136 Fugitives	Reference
Claimed PBR/Not Registered	30 TAC §106.511, effective September 4, 2000	Wacker Neuson G 100 mobile generator	Reference
PBR Registration No. 138663	30 TAC §106.261, effective November 1, 2003 and §106.263 effective November 1, 2001	PBR authorized the South Alkylation Units Corrosion Identification and Control Project which included authorizations for EPNs 44 (Permit No 93546), Alky-MSS (Permit No. 18897), F-5 (Permit No. 18897), F-20S (Permit No. 18897), T4272 (Permit No. 18897), T4273 (Permit No. 18897), and 122 (Permit No. 18897). Only EPN 44 will be consolidated into the permit	Partial Consolidate
PBR Registration No. 139750	30 TAC §106.261, effective November 1, 2003	PBR authorized the 2015 annual fugitive emission change which included authorizations for EPNs TNK-FUG-T, FUG-T, FUELFUG, F-16S-T.	Partial Consolidate
PBR Registration No. 142938	30 TAC §106.261/262, effective November 1, 2003 and §106.263 effective November 1, 2001	PBR authorized the installation of equipment to route CCTM (Crude Collector Tray Material) and transmix to the FCCU Unit which led to an increase in emissions at the tanks and the associated units which included authorizations for EPNs F-16N (NSR Permit No. 18897), F-11 (NSR Permit No. 18897), 112 (NSR Permit No. 18897), TranCoMSS (NSR Permit No. 18897), T-126 (NSR Permit No. 93546), T-202 (NSR Permit No. 93546), T-117 (NSR Permit No. 93546), T-165 (NSR Permit No. 93546), T-183 (NSR Permit No. 93546), T-136 (NSR Permit No. 93546), 124 (NSR Permit No. 93546), 119 (NSR Permit No. 93546), and 120 (NSR Permit No. 93546). Only EPNs	Partial Consolidate

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Permit by Rule (PBR) / Standard Permit / Permit Nos.	Authorization	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
		T-126, T-202, T-117, T-165, T-183, T-136, 124, 119, and 120 will be consolidated into the permit	
PBR Registration No. 145691	30 TAC §106.261, effective November 1, 2003	PBR authorized the 2016 annual fugitive emission change which included authorizations for EPNs TNK-FUG-T, FUG-T, FUELFUG, F-16S-T.	Partial Consolidate
PBR Registration No. 150238	30 TAC §106.261/262, effective November 1, 2003	PBR authorized the Transmix Unloading which included EPN TNK-FUG-T	Consolidate
PBR Registration No. 151223	30 TAC §106.261, effective November 1, 2003	PBR authorized the 2017 annual fugitive emission change which included authorizations for EPNs TNK-FUG-T, FUG-T, FUELFUG, F-16S-T.	Partial Consolidate
PBR Registration No. 156429	30 TAC §106.261, effective November 1, 2003	PBR authorized the 2018 annual fugitive emission change which included authorizations for EPNs TNK-FUG-T, FUG-T, FUELFUG, F-16S-T.	Partial Consolidate
PBR Registration No. 160826	30 TAC §106.261, effective November 1, 2003	PBR authorized the 2019 annual fugitive emission change which included authorizations for EPNs TNK-FUG-T, FUG-T, FUELFUG, F-16S-T.	Consolidate
PBR Registration No. 159664	30 TAC §106.261, effective November 1, 2003	PBR authorized a marketing terminal throughput increase which included authorizations for EPN CA-SK and LRACK-FUG.	Consolidation

Impacts Evaluation

Was modeling conducted?	Yes	Type of Modeling:	AERMOD version 19191 in refined screening mode and version 21112 for updated runs
Is the site within 3,000 feet of any school?	Yes		
Additional site/land use information: Medium roughness and elevated terrain were used in the modeling analysis.			

The air quality analysis is acceptable for all review types and pollutants. More detailed information regarding the air quality analysis may be found in the ADMT modelling memo, ADMT Project No. 7726, WCC Content ID No. 5972960, dated March 18, 2022. This air quality analysis consisted of a health effects review as specified in the TCEQ's March 2018 Modeling and Effects Review Applicability (MERA) guidance for consolidated PBRs and allowable emission increases of non-criteria pollutants; emission rates for criteria pollutants are not increasing with this project and therefore were not subject to a modeling analysis. In addition to modeling the consolidated PBRs, the modeled impacts were due to following the updated TCEQ guidance and AP-42 guidance for estimating emission rates from storage tanks. A summary of the review for the pollutants with allowable emission increases is included below in Table 1.

Table 1. Health Effects Review - Minor NSR Project-Related Modeling Results

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Regulated Entity No. RN100213016

Pollutant & CAS#	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	ESL ($\mu\text{g}/\text{m}^3$)	Modeling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
Diesel Fuel 68334-30-5	1-hr	98.24 (Production GLCmax since most recent site-wide modeling, no MSS); 98.24 (Production project only GLCmax, no MSS)	1000	Step 4 – Production GLCmax since most recent site wide modeling, no MSS < 25% of ESL, Production project only GLCmax, no MSS < 10% of ESL
	Annual	0.56	100	Step 3 - GLCmax < 10% ESL
Gasoline 8006-61-9	1-hr	510.94 (Production GLCmax since most recent site-wide modeling, no MSS); 318.71 (Production project only GLCmax, no MSS)	3,500	Step 4 – Production GLCmax since most recent site-wide modeling, no MSS < 25% of ESL, Production project only GLCmax, no MSS < 10% of ESL
	Annual	18.15	350	Step 3 - GLCmax < 10% ESL
Refinery Lights - Naphtha, petroleum, light alkylate 64741-66-8	1-hr	197.40	3,500	Step 3 - GLCmax < 10% ESL
	Annual	3.87	350	Step 3 - GLCmax < 10% ESL
Distillates (Petroleum), Crude Oil 68410-00-4	1-hr	94.57	3,500	Step 3 - GLCmax < 10% ESL
	Annual	0.56	350	Step 3 - GLCmax < 10% ESL
Benzene 71-43-2	1-hr	1.74	170	Step 3 - GLCmax < 10% ESL
	Annual	0.01	4.5	Step 3 - GLCmax < 10% ESL
Ethanol 64-17-5	1-hr	5222.58 (sitewide GLCmax and GLCni)	18,880	Step 7 – sitewide modeling deemed acceptable by ADMT
	Annual	1.53	1,880	Step 3 - GLCmax < 10% ESL
Jet fuel	1-hr	77.54 (Production GLCmax since most recent site-wide modeling, no MSS); 77.54 (Production project only GLCmax, no MSS)	1000	Step 3 - GLCmax < 10% ESL
	Annual	0.03	100	Step 4 – Production GLCmax since most recent site-wide modeling, no MSS < 25% of ESL, Production project only GLCmax, no MSS < 10% of ESL

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Regulated Entity No. RN100213016

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Eddie Al-Rayes, consultant who copied Rebecca Ayala on correspondence email
Contacted Via:	Email
Date of contact:	Special conditions – 3/22/2022; MAERT - 3/22/2022
Other permit(s) or permits by rule affected by this action:	See permits incorporation summary table above
List permit and/or PBR number(s) and actions required or taken:	See permits incorporation summary table above

Project Reviewer	Date	Section Manager	Date
Christopher Loughran, P.E.		TBD	



Compliance History Report

Compliance History Report for CN604485763, RN100213016, Rating Year 2022 which includes Compliance History (CH) components from September 1, 2017, through August 31, 2022.

Customer, Respondent, or Owner/Operator:	CN604485763, Western Refining Terminals, LLC	Classification: HIGH	Rating: 0.00
Regulated Entity:	RN100213016, MARATHON EL PASO REFINERY	Classification: HIGH	Rating: 0.00
Complexity Points:	22	Repeat Violator: NO	
CH Group:	02 - Oil and Petroleum Refineries		
Location:	6501 TROWBRIDGE DR EL PASO, TX 79905-3401, EL PASO COUNTY		
TCEQ Region:	REGION 06 - EL PASO		

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER EE0015H
AIR OPERATING PERMITS PERMIT 3929
AIR NEW SOURCE PERMITS PERMIT 18897
AIR NEW SOURCE PERMITS AFS NUM 4814100004
AIR NEW SOURCE PERMITS REGISTRATION 76517
AIR NEW SOURCE PERMITS REGISTRATION 81841
AIR NEW SOURCE PERMITS REGISTRATION 101519
AIR NEW SOURCE PERMITS REGISTRATION 108054
AIR NEW SOURCE PERMITS REGISTRATION 139751
AIR NEW SOURCE PERMITS REGISTRATION 138663
AIR NEW SOURCE PERMITS PERMIT AMOC48
AIR NEW SOURCE PERMITS REGISTRATION 166171
AIR NEW SOURCE PERMITS REGISTRATION 162353
AIR NEW SOURCE PERMITS REGISTRATION 169325
AIR NEW SOURCE PERMITS REGISTRATION 164606
AIR NEW SOURCE PERMITS REGISTRATION 151222
AIR NEW SOURCE PERMITS REGISTRATION 151223
AIR NEW SOURCE PERMITS REGISTRATION 159720
AIR NEW SOURCE PERMITS REGISTRATION 159664
AIR NEW SOURCE PERMITS PERMIT AMOC167
AIR NEW SOURCE PERMITS REGISTRATION 168428
PETROLEUM STORAGE TANK REGISTRATION
 REGISTRATION 7854
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30605
STORMWATER PERMIT TXR05U187
AIR EMISSIONS INVENTORY ACCOUNT NUMBER EE1359L
POLLUTION PREVENTION PLANNING ID NUMBER P06427
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD007399025
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD054256391

AIR OPERATING PERMITS PERMIT 1348
AIR NEW SOURCE PERMITS ACCOUNT NUMBER EE0015H
AIR NEW SOURCE PERMITS REGISTRATION 145691
AIR NEW SOURCE PERMITS REGISTRATION 71353
AIR NEW SOURCE PERMITS REGISTRATION 47597
AIR NEW SOURCE PERMITS PERMIT 93546
AIR NEW SOURCE PERMITS REGISTRATION 103466
AIR NEW SOURCE PERMITS REGISTRATION 139750
AIR NEW SOURCE PERMITS REGISTRATION 140939
AIR NEW SOURCE PERMITS REGISTRATION 127775
AIR NEW SOURCE PERMITS REGISTRATION 150238
AIR NEW SOURCE PERMITS REGISTRATION 162737
AIR NEW SOURCE PERMITS REGISTRATION 162439
AIR NEW SOURCE PERMITS REGISTRATION 164609
AIR NEW SOURCE PERMITS REGISTRATION 145707
AIR NEW SOURCE PERMITS REGISTRATION 142938
AIR NEW SOURCE PERMITS REGISTRATION 156428
AIR NEW SOURCE PERMITS REGISTRATION 160827
AIR NEW SOURCE PERMITS REGISTRATION 160826
AIR NEW SOURCE PERMITS REGISTRATION 156429
AIR NEW SOURCE PERMITS REGISTRATION 168322
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 86385
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 85616
AIR EMISSIONS INVENTORY ACCOUNT NUMBER EE0015H
AIR EMISSIONS INVENTORY ACCOUNT NUMBER EE0082P
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXR000036087
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 36419
INDUSTRIAL AND HAZARDOUS WASTE PERMIT PCO36419

Compliance History Period: September 01, 2017 to August 31, 2022 **Rating Year:** 2022 **Rating Date:** 09/01/2022

Date Compliance History Report Prepared: September 26, 2022

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

Component Period Selected: September 01, 2017 to August 31, 2022

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

Name: Chris Loughran

Phone: (512) 239-0838

Site and Owner/Operator History:

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

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

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

1 Effective Date: 12/19/2017 ADMINORDER 2017-0458-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: NSR Permit No. 18897 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on January 11, 2017, from 11:43 am to 7:22 pm (7 hrs. 39 minutes) TCEQ/STEERS Incident No. 250319. Western Refining released unauthorized emissions that exceeded the values stated on the table attached to NSR Permit No. 18897 and titled "Emission Sources--Maximum Allowable Emission Rates." Emissions that exceed the MAERT rates are not authorized and are a violation of the permit.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	October 06, 2017	(1438146)
Item 4	January 05, 2018	(1448518)
Item 5	March 21, 2018	(1478148)
Item 7	May 03, 2018	(1482232)
Item 8	May 11, 2018	(1483669)
Item 9	June 28, 2018	(1497709)
Item 10	July 31, 2018	(1504035)
Item 11	August 08, 2018	(1496800)
Item 12	October 24, 2018	(1524190)
Item 13	November 16, 2018	(1519776)
Item 14	December 07, 2018	(1524906)
Item 15	March 29, 2019	(1531057)
Item 16	April 22, 2019	(1551607)
Item 17	May 08, 2019	(1552935)
Item 18	May 16, 2019	(1553292)
Item 19	May 30, 2019	(1557928)
Item 20	June 04, 2019	(1570258)
Item 21	June 12, 2019	(1570788)
Item 22	July 09, 2019	(1577793)
Item 23	September 03, 2019	(1589767)
Item 24	September 20, 2019	(1597260)
Item 25	September 23, 2019	(1589716)
Item 26	November 13, 2019	(1606149)
Item 27	December 03, 2019	(1612302)
Item 28	December 12, 2019	(1616630)
Item 29	January 02, 2020	(1610191)
Item 30	January 22, 2020	(1616761)
Item 33	February 18, 2020	(1623604)
Item 34	February 19, 2020	(1622792)
Item 35	February 21, 2020	(1622794)
Item 36	March 03, 2020	(1630282)
Item 37	April 10, 2020	(1640547)
Item 38	April 17, 2020	(1644598)

Item 39	May 06, 2020	(1644681)
Item 40	September 18, 2020	(1672920)
Item 41	February 22, 2021	(1700175)
Item 42	March 04, 2021	(1702274)
Item 43	March 17, 2021	(1702936)
Item 44	April 22, 2021	(1708742)
Item 45	May 10, 2021	(1707574)
Item 46	June 14, 2021	(1735198)
Item 47	July 12, 2021	(1738605)
Item 48	August 27, 2021	(1756029)
Item 49	September 13, 2021	(1760673)
Item 51	December 06, 2021	(1770421)
Item 52	December 20, 2021	(1775946)
Item 53	January 04, 2022	(1782601)
Item 54	January 05, 2022	(1775491)
Item 55	February 24, 2022	(1794488)
Item 56	March 04, 2022	(1795997)
Item 58	March 30, 2022	(1795738)
Item 59	April 20, 2022	(1805152)
Item 61	July 29, 2022	(1833059)
Item 62	August 23, 2022	(1833535)

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.

N/A

F. Environmental audits:

Notice of Intent Date: 10/31/2017 (1454312)

No DOV Associated

Notice of Intent Date: 02/15/2019 (1550840)

Disclosure Date: 04/11/2019

Viol. Classification: Moderate

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

Rqmt Prov: PERMIT GC No. 1 & MAERT

OP SC No. 26

Description: Failure to comply with the annual NOx emissions rate from 2012-2018 for the CPS Vac Column Heater H1601 in NSR Permit No. 18897.

Disclosure Date: 07/26/2019

Viol. Classification: Moderate

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

Rqmt Prov: OP SC No. 10.E.

PERMIT SC No. 3.A.

Description: Failure to pass the CGA audit gas through as much of the sampling probe as is practical for the refinery H2S fuel gas CEMS cylinder gas audits.

Viol. Classification: Moderate

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

Rqmt Prov: OP SC No. 10.E.

PERMIT SC No. 3.A.

Description: Failure to exclude the CEMS held data in the relative accuracy calculations as specified in the Applicability Determination Index Control Number 9700035 (EPNs F-4150/60, F-4170/80, F-1601, F-1602, H-901, H-903, H1601, and H-1101.

Viol. Classification: Minor

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

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(a)(1)(i)(C)(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(b)

Rqmt Prov: OP SC No. 13.G. and 16

PERMIT SC No. 4.B.

PERMIT SC No. 72

Description: Failure to monitor several components in the North API area as required by the BWON regulations.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter B 115.146(2)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.697(b)(1)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(g)

Rqmt Prov: PERMIT SC Nos. 3.H. and 4.B.
OP SC Nos. 5.E., 12.G., and 14.G.

Description: Failure to properly document the drain system inspection results.
Viol. Classification: Moderate

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

Rqmt Prov: OP SC No. 16
PERMIT SC No. 4.B.

Description: Failure to install controls on two junction boxes as required by Benzene Waste NESHAPs regulations.
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)

Rqmt Prov: OP SC No. 13.G. and 15.A.
PERMIT SC No. 4.B.

Description: Failure to conduct required monitoring of roll off boxes containing material subject to 61 Subpart FF.

Notice of Intent Date: 02/06/2020 (1631164)
No DOV Associated

Notice of Intent Date: 09/24/2020 (1686000)
Disclosure Date: 07/29/2021

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 66.B.

Description: Failure to comply with the temperature limit on six instances when calculation errors were corrected.
Viol. Classification: Moderate

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

Description: Failure to comply with the temperature limit on one instance when calculation errors were corrected.
Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 12.B.

Description: Failure to ensure cooling tower drift eliminators are maintained and inspected at least annually.
Disclosure Date: 10/19/2021

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 66.B.

Description: Failure to comply with the temperature limit on six instances when calculation errors were corrected.
Viol. Classification: Moderate

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

Description: Failure to comply with the temperature limit on one instance when calculation errors were corrected.
Viol. Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
Rqmt Prov: PERMIT SC 12.B.

Description: Failure to ensure cooling tower drift eliminators are maintained and inspected at least annually.
Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter W 106.512(1)

Description: Failure to update PBR when several pieces of stationary equipment was replaced.

Notice of Intent Date: 07/13/2021 (1749760)
No DOV Associated

Notice of Intent Date: 07/13/2021 (1749779)
No DOV Associated

Notice of Intent Date: 07/13/2021 (1749782)
No DOV Associated

Notice of Intent Date: 07/16/2021 (1762865)
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