Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO: Office of Chief Clerk **Date:** September 16, 2025

FROM: Katelyn Ding
Staff Attorney
Environmental Law Division

SUBJECT: Backup Documents Filed for Consideration of Hearing Requests at Agenda

Applicant: Valero Refining-Texas LP
Permit No.: 106965
Program: Air
Docket No.: 2025-1293-AIR

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

- The final draft permit, including any special conditions or provisions;
- Maximum Allowable Emission Rate Table (MAERT);
- The summary of the technical review of the permit application;
- The compliance summary of the Applicant;

SPECIAL CONDTIONS

Permit Number 106965

Emission Limitations

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the special conditions.

Federal Applicability

2. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) on Standards of Performance for New Stationary Sources promulgated for:

   A. Subpart A, General Provisions;

   B. Subpart Ja, Petroleum Refineries;

   C. Subpart Kb, Volatile Organic Liquid Storage Vessels;

   D. Subpart GGGa, Equipment Leaks of Volatile Organic Compounds (VOC) in Petroleum Refineries; and

3. These facilities shall comply with all applicable requirements of the EPA regulations in 40 CFR Part 61 on National Emission Standards for Hazardous Air Pollutants (NESHAPS) promulgated for:

   A. Subpart A, General Provisions; and

   B. Subpart FF, Benzene Waste Operations.

4. These facilities shall comply with all applicable requirements of EPA regulations in 40 CFR Part 63 on NESHAPS for Source Categories for:

   A. Subpart A, General Provisions;

   B. Subpart CC, Petroleum Refineries; and

   C. Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters

Fugitives

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

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

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

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

      (1) piping and instrumentation diagram (PID);

      (2) a written or electronic database or electronic file;

      (3) color coding;

      (4) a form of weatherproof identification; or

      (5) 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 subparagraph A above. If an unsafe to monitor component is not considered safe to monitor within a calendar year, then it shall be monitored as soon as possible during safe to monitor times. A difficult to monitor component for which quarterly monitoring is specified may instead be monitored annually.

   E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer within 15 days of the components being returned

to service. Adjustments shall be made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.

(1) 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;

(2) a cap, blind flange, plug, or second valve must be installed on the line or valve; 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 within 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 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.

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. If a relief valve is equipped with rupture disc, 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 at least quarterly 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 40 CFR part 60, appendix A. The gas analyzer shall be calibrated with methane. In addition, the response factor of the instrument for a specific VOC of interest shall be determined and meet the requirements of Section 8 of Method 21. If a mixture of VOCs is 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 than 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), the TCEQ Regional Manager and any local programs shall be notified and may require early unit shutdown or other appropriate action based on the number and severity of tagged leaks awaiting shutdown. This notification shall be made within 15 days of making this determination.

J. Records of repairs shall include date of repairs, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of instrument monitoring shall indicate dates and times, test methods, and instrument readings. The instrument monitoring record shall include the time that monitoring took place for no less than 95% of the instrument readings recorded. 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.

28CNTQ (Connectors Inspected Quarterly)

6. In addition to the weekly physical inspection required by Item E of Special Condition No. 5, all accessible connectors in gas/vapor and light liquid service shall be monitored quarterly with an approved gas analyzer in accordance with Items F thru J of Special Condition No. 5.

A. Allowance for reduced monitoring frequencies.

(1) The frequency of monitoring may be reduced from quarterly to semiannually if the percent of connectors leaking for two consecutive quarterly monitoring periods is less than 0.5 percent.

(2) The frequency of monitoring may be reduced from semiannually to annually if the percent of connectors leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of connectors leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

B. The percent of connectors leaking used in paragraph A shall be determined using the following formula:

$$(Cl + Cs) \times 100/Ct = Cp$$

Where:

Cl = the number of connectors found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.

Cs = the number of connectors for which repair has been delayed and are listed on the facility shutdown log.

Ct = the total number of connectors in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor connectors.

Cp = the percentage of leaking connectors for the monitoring period.

Piping, Valves, Pumps, and Compressors in contact with H_2S or NH_3 – 28AVO

7. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:

A. Audio, olfactory, and visual checks for leaks within the operating area shall be made every four hours.

B. Immediately, but no later than one hour upon detection of a leak, plant personnel shall take at least one of 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.

Storage of VOCs

8. Storage tanks are limited to the following services:

Tank Number	Service(s)
73-TK-168	Naphtha

9. Storage tanks are subject to the following requirements: The control requirements specified in paragraphs A-D of this condition shall not apply (1) where the VOC has an aggregate partial pressure of less than 0.50 psia at the maximum feed temperature or 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.

A. An internal floating deck or “roof” or equivalent control shall be installed in all tanks. 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.

B. An open-top tank containing a floating roof (external floating roof tank) which uses double seal or secondary seal technology shall be an approved control alternative to an internal floating roof tank 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.

C. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and seal gap measurements as 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 seals were inspected and seal gap measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies noted.

D. 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.

E. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum. Storage tanks must be equipped with permanent submerged fill pipes.

F. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12 month period. 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 receive liquids that are at or below ambient temperatures. Emissions for tanks shall be calculated using: AP-42, Fifth Edition, Volume I Chapter 7.1 Organic Liquid Storage Tanks (dated June 2020) and the TCEQ APDG 6419 document titled “Short-term Emissions from Floating Roof Storage Tanks”

Combustion Units

10. Process Heater (EPN: 900) shall be fired with natural gas and/or refinery fuel gas. No visible emissions are allowed from the heater. Refinery fuel gas shall contain a maximum sulfur content of 162 parts per million by volume (ppmv), hourly basis, and an annual average sulfur content of 60 ppmv.

11. The refinery fuel gas shall be sampled every 6 months to determine total sulfur and net heating value. Test results from the fuel supplier may be used to satisfy this requirement.

12. The permittee shall operate a continuous hydrogen sulfide (H_2S) monitoring instrument in the fuel feed line header for all fired units with a firing rate greater than 40 MMBtu/hr to continuously monitor a representative sample of fuel gas for H_2S content. The instrument shall be installed and operated according to the specifications set out in 40 CFR § 60.105. These gases shall have a maximum H_2S concentration of 0.10 grain per dry standard cubic foot (dscf) on an hourly average.

13. Emissions from Process Heater (EPN: 900) shall not exceed the following:

    A. 0.04 lb NO_x/MMBtu on an hourly average

    B. 0.01 lb NOx/MMBtu on an annual average

    C. 100 ppmvd CO corrected to 3 percent oxygen on an hourly average

    D. 50 ppmvd CO corrected to 3 percent oxygen on an annual average

    E. 10 ppmv NH_3 corrected to 3 percent oxygen on an hourly average

14. The NH_3 concentration in the Process Heater (EPN: 900) exhaust stack shall be tested or calculated according to one of the methods listed below and shall be tested or calculated

according to frequency listed below. Testing for NH_3 slip is only required on days when the SCR unit is in operation.

A. The holder of this permit may install, calibrate, maintain, and operate a CEMS to measure and record the concentrations of NH_3. The NH_3 concentrations shall be corrected and reported in accordance with Special Condition No. 13.

B. As an approved alternative, the NH_3 slip may be measured using a sorbent or stain tube device specific for NH_3 measurement in the 5 to 10 parts per million (ppm) range. The frequency of sorbent/stain tube testing shall be daily for the first 60 days of operation, after which the frequency may be reduced to weekly testing if operating procedures have been developed to prevent excess amounts of NH_3 from being introduced in the SCR unit and when operation of the SCR unit has been proven successful with regard to controlling NH_3 slip. Daily sorbent or stain tube testing shall resume when the catalyst is within 30 days of its useful life expectancy. These results shall be recorded and used to determine compliance with Special Condition No. 13.

C. As an approved alternative to sorbent or stain tube testing or an NH_3 CEMS, the permit holder may install and operate a second NO_X CEMS probe located between the firebox and the SCR, upstream of the stack NO_X CEMS, which may be used in association with the SCR efficiency and NH_3 injection rate to estimate NH_3 slip. This condition shall not be construed to set a minimum NO_X reduction efficiency on the SCR unit. These results shall be recorded and used to determine compliance with Special Condition No. 13.

D. If the sorbent or stain tube testing indicates an NH_3 slip concentration which exceeds 5 ppm at any time, the permit holder shall begin NH_3 testing by either the Phenol Nitroprusside Method, the Indophenol Method, or the EPA Conditional Test Method (CTM) 27 on a quarterly basis, in addition to the weekly sorbent or stain tube testing. The quarterly testing shall continue until such time as the SCR unit catalyst is replaced; or if the quarterly testing indicates NH_3 slip is 4 ppm or less, the Phenol Nitroprusside/Indophenol/CTM 27 tests may be suspended until sorbent or stain tube testing again indicate 5 ppm NH_3 slip or greater. These results shall be recorded and used to determine compliance with Special Condition No. 13.

E. As an approved alternative to sorbent or stain tube testing, NH_3 CEMS, or a second NO_X CEMS, the permit holder may install and operate a dual stream system of NO_X CEMS at the exit of the SCR. One of the exhaust streams would be routed, in an unconverted state, to one NO_X CEMS and the other exhaust stream would be routed through a NH_3 converter to convert NH_3 to NO_X and then to a second NO_X CEMS. The NH_3 slip concentration shall be calculated from the delta between the two NO_X CEMS readings (converted and unconverted). These results shall be recorded and used to determine compliance with Special Condition No. 13.

F. Any other method used for measuring NH_3 slip shall require prior approval from the TCEQ Regional Director.

Continuous Emissions Monitoring

15. The permit holder shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of CO, NO_x, and O_2 from Process Heater (EPN: 900).

A. 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 the applicable Performance Specification Nos. 1 through 9, Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60), Appendix B. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Air, Air Permits Division for requirements to be met.

B. Section 1 below applies to sources subject to the quality-assurance requirements of 40 CFR Part 60, Appendix F; section 2 applies to all other sources:

(1) The permit holder shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, § 5.2.3 and any CEMS downtime shall be reported to the appropriate TCEQ Regional Manager, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Manager.

(2) The system shall be zeroed and spanned daily, and corrective action taken when the 24-hour span drift exceeds two times the amounts specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or as specified by the TCEQ if not specified in Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

Each monitor shall be quality-assured at least quarterly using Cylinder Gas Audits (CGA) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2, with the following exception: a relative accuracy test audit (RATA) is not required once every four quarters (i.e., four successive quarterly CGA may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive quarterly audits shall occur no closer than two months.

All CGA exceedances of +15 percent accuracy indicate that the CEMS is out of control.

C. The permit holder shall install and operate a fuel flow meter to measure the gas fuel usage for Process Heater (EPN: 900). The monitored data shall be reduced to an hourly average flow rate at least once every day, using a minimum of four equally-spaced data points from each one-hour period. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 5 percent. In lieu of monitoring fuel flow, the permit holder may monitor stack exhaust flow using the flow monitoring specifications of 40 Code of Federal Regulations (CFR) Part 60, Appendix B, Performance Specification 6 or 40 CFR Part 75, Appendix A.

D. The monitoring data shall be reduced to hourly average concentrations at least once everyday, using a minimum of four equally spaced data points from each one hour period. The individual average concentrations shall be reduced to units of the permit allowable emission rate in lbs/hr and lb/MMBtu at least once everyday and cumulative TPY on a 12 month rolling average at least once every month. At least 23 hourly averages shall be generated per day. The technique used to convert ppmv to mass

emission rates lb/MMBtu shall be Method 19. Conversion from lb/MMBtu to lb/hr shall be based on each furnaces measured firing rate and the corresponding Btu content of the fuel. All monitoring data and quality-assurance data shall be maintained by the source. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.

E. The appropriate TCEQ Regional Office shall be notified at least 30 days prior to any required RATA in order to provide them the opportunity to observe the testing.

F. Quality-assured (or valid) data must be generated when the Process Heater (EPN: 900) is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the Process Heater (EPN: 900) operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded. Options to increase system reliability to an acceptable value, including a redundant CEMS, may be required by the TCEQ Regional Manager.

Stack Testing

16. 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 Process Heater (EPN: 900) to demonstrate compliance with the MAERT and lb/MMBtu limits of Special Condition No. 13. The permit holder is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling shall be conducted in accordance with the appropriate procedures of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual and the U.S. Environmental Protection Agency (EPA) Reference Methods.

A. 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.

B. The appropriate TCEQ Regional Office shall be notified not less than 30 days prior to sampling. The notice shall include:

(1) Proposed date for pretest meeting.

(2) Date sampling will occur.

(3) Name of firm conducting sampling.

(4) Type of sampling equipment to be used.

(5) Method or procedure to be used in sampling.

(6) Description of any proposed deviation from the sampling procedures specified in this permit or TCEQ/EPA sampling procedures.

(7) Procedure/parameters to be used to determine worst case emissions during the sampling period.

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

C. Air contaminants emitted from the Process Heater (EPN: 900) to be tested for include CO, NO_x, O_2 and NH_3.

D. Sampling shall occur within 60 days after achieving the maximum operating rate, but no later than 180 days after initial start-up of the facilities and at such other times as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the appropriate regional office.

E. The facility being sampled shall operate at the maximum firing rate during stack emission testing. These conditions/parameters and any other primary operating parameters that affect the emission rate shall be monitored and recorded during the stack test. Any additional parameters shall be determined at the pretest meeting and shall be stated in the sampling report. Permit conditions and parameter limits may be waived during stack testing performed under this condition if the proposed condition/parameter range is identified in the test notice specified in paragraph A and accepted by the TCEQ Regional Office. Permit allowable emissions and emission control requirements are not waived and still apply during stack testing periods. During the initial stack test, the permit holder may be allowed to fire the heater at levels up to 15 percent above the firing rate limits represented in the initial permit application.

(1) During subsequent operations, if the maximum firing rate is greater than that recorded during the test period, stack sampling shall be performed at the new operating conditions within 120 days. This sampling may be waived by the TCEQ Air Section Manager for the region.

F. 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:

(a) One copy to the appropriate TCEQ Regional Office.

(b) One copy to each local air pollution control program.

17. Sampling ports and platform(s) shall be incorporated into the design of Process Heater (EPN: 900) according to the specifications set forth in the attachment entitled “Chapter 2, Stack Sampling Facilities” of the Texas Commission on Environmental Quality (TCEQ) Sampling Procedures Manual. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.

Cooling Towers

18. The cooling towers shall comply with the following requirements:

A. The cooling tower water shall be monitored monthly for VOC leakage from heat exchangers in accordance with the requirements of the TCEQ Sampling Procedures Manual, Appendix P (dated January 2003 or a later edition) or another air stripping method approved by the TCEQ Executive Director.

B. Cooling water VOC concentrations above 0.08 ppmw indicate faulty equipment. Equipment shall be maintained so as to minimize VOC emissions into the cooling water. Faulty equipment shall be repaired at the earliest opportunity but no later than the next scheduled shutdown of the process unit in which the leak occurs.

C. Emissions from the cooling tower are not authorized if the VOC concentration of the water returning to the cooling tower exceeds 0.80 ppmw. The VOC concentrations above 0.80 ppmw are not subject to extensions for delay of repair under this permit condition. The results of the monitoring and maintenance efforts shall be recorded.

D. The cooling towers (EPN 901) shall be operated and monitored in accordance with the following:

(1) Each cooling tower shall be equipped with drift eliminators having manufacturer's design assurance of 0.001% drift or less. Drifts eliminators shall be maintained and inspected at least annually. The permit holder shall maintain records of all inspections and repairs.

(2) Total dissolved solids (TDS) shall not exceed 5,000 parts per million by weight (ppmw). Dissolved solids in the cooling water drift are considered to be emitted as PM, PM10, and PM2.5 as represented in the permit application calculations.

(3) Cooling water shall be sampled at least once per week for TDS.

(4) Cooling water sampling shall be representative of the cooling tower feed water and shall be conducted using approved methods.

(a) The analysis method for TDS shall be EPA Method 160.1, ASTM D5907, and SM 2540 C [SM - 19th edition of Standard Methods for Examination of Water]. Water samples should be capped upon collection, and transferred to a laboratory area for analysis.

(b) Alternate sampling and analysis methods may be used to comply with D(1) with written approval from the TCEQ Regional Director.

(c) Records of all instrument calibrations and test results and process measurements used for the emission calculations shall be retained.

E. Emission rates of PM, PM10 and PM2.5 shall be calculated using the measured TDS, the design drift rate and the daily maximum and average actual cooling water circulation rate for the short term and annual average rates. Alternately, the design maximum circulation rate may be used for all calculations. Emission records shall be updated monthly.

Carbon Adsorption System

19. Merox Unit and Jet Fuel Merox Unit process vents (EPNs 911 and 912) shall vent through a carbon adsorption system (CAS) consisting of at least two activated carbon canisters that are connected in series.

A. The CAS shall be sampled once every day to determine breakthrough of volatile organic compounds (VOC). The sampling point shall be at the outlet of the initial canister but before the inlet to the second or final polishing canister. Sampling shall be done while process emissions are being vented. The sampling frequency may be extended using the following method:

(1) Sampling frequency may be extended 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 VOC sampling and analysis shall be performed using an instrument with a flame ionization detector (FID), or a TCEQ-approved alternative detector. The instrument/FID must meet all requirements specified in Section 8.1 of EPA Method 21 (40 CFR 60, Appendix A). Sampling and analysis for VOC breakthrough shall be performed as follows:

(1) Immediately prior to performing sampling, the instrument/FID shall be calibrated with zero and span calibration gas mixtures. Zero gas shall be certified to contain less than 0.1 ppmv total hydrocarbons. Span calibration gas shall be methane a concentration within ± 10 percent of 100 ppmv, and certified by the manufacturer to be ± 2 percent accurate. Calibration error for the zero and span calibration gas checks must be less than ± 5 percent of the span calibration gas value before sampling may be conducted.

(2) The sampling point shall be at the outlet of the initial canister but before the inlet to the second or final polishing canister. Sample ports or connections must be designed such that air leakage into the sample port does not occur during sampling.

(3) During sampling, data recording shall not begin until after two times the instrument response time. The VOC concentration shall be monitored for at least 5 minutes, recording 1-minute averages, during process venting.

C. Breakthrough shall be defined as the highest 1 minute average measured VOC concentration at or exceeding 100 ppmv. 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 24 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.

D. Records of the CAS monitoring maintained at the plant site, shall include (but are not limited to) the following:

(1) Sample time and date.

(2) Monitoring results (ppmv).

(3) Corrective action taken including the time and date of that action.

(4) Process operations occurring at the time of sampling.

E. Alternate monitoring or sampling requirements that are equivalent or better may be approved by the TCEQ Regional Manager. Alternate requirements must be approved in writing before they can be used for compliance purposes.

20. Visual inspection for carbon build up around the stack shall occur once a week. If carbon build up is noticed, it shall be recorded, the CAS shall be shut down, and corrective action shall be taken in accordance with the system maintenance manual.

Maintenance, Startup and Shutdown

21. Permit No. 38754 authorizes the emissions from the facilities identified below for the planned maintenance, startup, and shutdown (MSS) activities summarized in the MSS Activity Summary (Attachments 1, 2, 3, and 4) attached to Permit No. 38754.

A. Process Heater 17-H-1 (EPN:900)

B. Cooling Tower 05-CT-109 (EPN: 901)

C. Storage Tank 73-TK-168 (EPN: 902)

D. Fugitive components 17-FUG (EPNs: 903)

E. Flares (EPNs: 126 and 127)

Recordkeeping

22. All the following records shall be maintained electronically or in hard copy format for at least five years and shall be used to demonstrate compliance with the Special Conditions and the limits specified in the MAERT. All records required in this permit shall be made available at the request of personnel from the TCEQ or any air pollution control agency with jurisdiction.

A. Fugitives

(1) Records of all inspections, repairs and replacements made due to leaks and of all leaks that cannot be repaired until the next scheduled shutdown in accordance with Special Condition No. 5.

B. Storage Tanks

(1) For purposes of assuring compliance with VOC emission limitations, the holder of this permit shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12 month period. 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 receive liquids that are at or below ambient temperatures.

(2) For any tank equipped with a floating roof, records of the dates seals were inspected, seal integrity, and corrective actions taken.

C. Heater and SCR

(1) Permit application dated August 2015, and subsequent representations submitted to the TCEQ.

(2) A complete copy of the testing reports and records of the initial performance testing completed pursuant to Special Condition No. 16 to demonstrate initial compliance.

(3) Stack sampling results or other air emissions testing that may be conducted on units authorized under this permit after the date of issuance of this permit.

(4) Records of all NO_x, CO and NH_3 monitoring data and quality-assurance data as required by Special Condition Nos. 13 through 15.

D. CEMS

(1) Records of all monitoring data and quality-assurance data as required by Special Condition No. 15. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.

E. Maintenance, Startup and Shutdown

(1) The facility records for this permit shall include records of MSS activities and emissions as specified in Special Conditions No. 13 and 22. All records shall be kept on site in a current and complete condition, and shall be made available upon request to representatives of the TCEQ.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 106965

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)	FIN	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
				lbs/hour	TPY (4)
900	17-H-1	Process Heater	NO_x	12.03	12.48
			CO	21.36	44.31
			VOC	1.62	6.73
			SO_2	8.62	13.25
			PM	2.21	9.18
			PM_{10}	2.21	9.18
			$PM_{2.5}$	2.21	9.18
			NH_3	1.48	6.13
901	05-CT-109	Cooling Tower	VOC (5)	0.19	0.83
			PM	0.11	0.49
			PM_{10}	0.07	0.32
			$PM_{2.5}$	0.03	0.12
902	73-TK-168	Naphtha Tank	VOC	3.24	5.71
903	17-FUG	Crude Unit Fugitives (5)	VOC	6.28	27.50
			NH_3	0.01	0.02
			H_2S	<0.01	0.02
911	17-MEROX	Merox Unit	VOC	<0.01	0.02
			H_2S	<0.01	<0.01
912	JMEROX	Jet Fuel Merox Vent	VOC	<0.01	0.01
			H_2S	<0.01	<0.01

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	FIN	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
				lbs/hour	TPY (4)
			Dimethyl Disulfide	<0.01	<0.01

(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
NH_3 - ammonia
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - 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
H_2S - 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.

Date: TBD

Permit Renewal & Amendment
Source Analysis & Technical Review

Company	**Valero Refining-Texas, L.P.**	Permit Number	**106965**
City	**Corpus Christi**	Project Numbers	**362031**
County	**Nueces**	Regulated Entity Number	**RN100214386**
Project Types	**Renewal and Amendment**	Customer Reference Number	**CN600127468**
Project Reviewer	**Maryam Rasti**	Received Date	**August 18, 2023**
Site Name	**Domestic Crude Unit**		

Project Overview

This project renews and amends Permit 106965 with two as-built updates, consolidation of PBR 140196, and several administrative changes. The as-built updates are an increase to the annual average firing rate of the charge heater (EPN 900) and revised fugitive component counts (EPN 903). The administrative changes include AP-42 Chapter 7 calculations for the naphtha storage tank (EPN 902), combining BWS fugitives (EPN 904) under fugitive EPN 903, renaming an EPN, and correcting an error in Special Condition 12.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Allowable Emission Rates Authorized by Consolidated PBRs and SPs (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	7.94	-	9.67	+1.73
PM_{10}	9.50	-	7.77	+1.73
$PM_{2.5}$	7.57	-	9.30	+1.73
VOC	38.04	4.00	40.80	-1.24
NO_X	10.13	-	12.48	+2.35
CO	35.98	-	44.31	+8.33
SO_2	10.76	-	13.25	+2.49
H_2S	0.09	0.01	0.04	-0.06
NH_3	5.07	-	6.15	+1.08
Dimethyl Disulfide	0.00	<0.01	<0.01	+0.01

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	**March 20, 2025**
Site rating & classification:	**6.56 / Satisfactory**
Company rating & classification:	**3.30 / 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**

Public Notice Information

Requirement	Date	
	Renewal	Amendment
Legislator letters mailed	8/28/2023	8/28/2023
Date 1st notice published	9/15/2023	9/15/2023
Publication Name: **Corpus Christi Caller Times**		

Requirement	Date	
	Renewal	Amendment
Pollutants: CO, H_2S, NOx, VOCs, PM including PM_{10} and $PM_{2.5}$, and SO_2		
Date 1st notice Alternate Language published	9/15/2023	9/15/2023
Publication Name (Alternate Language): **Tejano Y Grupero News**		
1st public notice tearsheet(s) received	9/29/2023	9/29/2023
1st public notice affidavit(s) received	9/29/2023	9/29/2023
1st public notice certification of sign posting/application availability received	10/19/2023	10/19/2023

*Second public notice is not required, because the scope of the amendment project changed during the course of the technical review such that the emission increases no longer trigger public notice thresholds.

Public Interest

Public Interest Information	
Number of comments received	2
Number of meeting requests received	2
Number of hearing requests received	1
Date meeting held	n/a
Date response to comments filed with OCC	n/a
Date of SOAH hearing	n/a

Renewal Requirements

Requirement	
Date of permit expiration:	**8/20/2023**
Date written notice of review was mailed:	**7/18/2022**
Was there a condition of air pollution that had to be addressed during this project review?	**No**
If yes, explain: n/a	
Permit Renewal Fee: $4,883.84	

Federal Rules Applicability

Requirement	
Subject to NSPS?	**Yes**
Subparts A, Ja, Kb & GGGa	
Subject to NESHAP?	**No**
Subject to NESHAP (MACT) for source categories?	**Yes**
Subparts A, CC, & DDDDD	

Requirement

Nonattainment review applicability: Nueces County is in attainment or unclassified for all criteria pollutants. Therefore, nonattainment review is not applicable.

PSD review applicability: This site is an existing named Major Source under the PSD program. There are two retrospective updates with this project which affect previous federal applicability determinations (i.e. increased heater firing rate and as-built fugitive component representations). Since the initial authorization of the crude unit, there have been two as-built amendments (Project Nos 234897 and 249595). Project increases associated with the firing rate increase and fugitives will be added to the previous Project Emission Increases (PEI).

Pollutant	Previous PEI (tpy)	Revised PEI (tpy)	PSD Major Mod Threshold (tpy)	PSD Major Mod Triggered?	Net Emissions Increase (tpy)
NOx	12.62	14.97	40	No	-
CO	41.35	49.68	100	No	-
SO_2	12.22	14.71	40	No	-
PM	8.61	10.34	25	No	-
PM_{10}	8.44	10.17	15	No	-
$PM_{2.5}$	8.24	9.97	10	No	-
VOC	73.33	79.55*	40	Yes	-32.93**

*The revised VOC Project Emission Increase is calculated by updating the proposed emissions for EPNs 900 and 903 in the Table 2F submitted during the last as-built amendment (Project No. 249595) on page 131 of WCC Content ID 1675642.
**The revised VOC Net Emissions Increase is calculated by updating the project emissions from 73.33 tpy to 79.55 tpy in the Table 3F submitted during the last as-built amendment (Project No. 249595) on pages 133-134 of WCC Content ID 1675642.

Title V Applicability

Requirement

Title V applicability: This site is a Title V major source under 30 TAC Chapter 122 and operates under Federal Permit Nos. 2601 and 1458.

Periodic Monitoring (PM) applicability: This site is a major source and is subject to PM under 30 TAC Chapter 122. The permit requires PM as follows:

Sources/EPNs	SC No.	PM Condition Summary
Fugitives (903)	5, 6, and 7	28VHP Leak Detection and Repair Program for VOCs, 28CNTQ quarterly inspections for connectors, and 28AVO for H_2S and NH_3
Storage Tank (902)	9	Visual inspections and seal gas measurements to verify fitting and seal integrity; recordkeeping of tank calculation operating parameters
Process Heater (900)	11, 12, 14, and 15	Refinery fuel gas sampling for sulfur and heating value; continuous H_2S monitoring instrument in the fuel feed line header; testing for NH_3 slip when SCR is operating; CEMS measuring in-stack concentration of CO, NOx, and O_2
Cooling Tower (901)	18	Monthly monitoring for VOC leakage from heat exchangers; drift eliminators inspected annually; cooling water sampled weekly for total dissolved solids
Merox Vents (911 and 912)	19 and 20	Carbon Adsorption System (CAS) sampled once per day to determine breakthrough of VOC; visual inspection for carbon build up around the stack once per week.

Compliance Assurance Monitoring (CAM) applicability: There are no units authorized by this permit that have an individual pre-control potential to emit (PTE) greater than the Title V major source threshold. Therefore, CAM is not applicable.

Process Description

This permit authorizes the Domestic Crude Unit at the West Plant of the Bill Greehey Refineries. The Domestic Crude Unit consists of the initial process equipment that is used to refine crude oil. The crude oil is separated into six streams: atmospheric tower overheads, side cut naphtha, jet kerosene, diesel, atmospheric gas oil (AGO), and the atmospheric tower resid stream. These streams are further refined in other units within the West Plant or shipped off-site via pipeline, ships, or barges.

Project Scope

Valero Refining – Texas, L.P. is requesting the following changes:

- Increase firing rate of Charge Heater (EPN 900):
  - The annual average firing rate of the charge heater is being revised from 231 MMBtu/hr to 285 MMBtu/hr. The charge heater can fire 100% refinery fuel gas (primary scenario), 100% natural gas (back-up scenario), or a mixture of natural gas and refinery fuel gas (back-up scenario). Calculations are based on the primary scenario of firing exclusively refinery fuel gas. The firing rate increase results in an increase of annual emissions, but there are no proposed short-term increases from the charge heater. The applicant represents this as a retrospective change to the original project that authorized the crude unit.
  - The scope of this project originally included a request to increase the NOx concentration factor from 0.01 lb/MMBtu to 0.015 lb/MMBtu. However, sufficient BACT justification was not provided, and the applicant represents that the SCR system on the heater has been optimized since the submission of the application and this safety factor is no longer necessary. Thus, the NOx concentration factor remains 0.01 lb/MMBtu.
- Update Naphtha Tank (EPN 902) emission calculations
  - The emission calculations are being updated using the latest equations and emission factors in AP-42, Fifth Edition, Volume I Chapter 7.1: Organic Liquid Storage Tanks (dated June 2020). Short-term emission calculations are based on TCEQ guidance document *APDG 6250 Estimating Short-Term Emission Rates from Fixed Roof Tanks*. This update results in decreases for both the short- and long-term emission rates.
- Update Crude Unit Fugitives (EPN 903) emission calculations
  - The fugitive emissions calculations are being updated to reflect as-built component counts. With this update, the applicant represents project increases of VOCs for two speciated materials (crude oil, <1% benzene and n-butane) and decreases of VOCs for the following speciated materials: naphtha, petroleum, heavy alkylate; kerosene; diesel fuel (vapor); gas oils (petroleum), straight-run; residues (petroleum) atmospheric tower; methyl diethanolamine; and benzene. This is a retrospective change.
  - This update also includes combining the fugitives from the Benzene Waste Stripper (BWS) (EPN 904) with other fugitives on the MAERT. The BWS currently has separate emissions on the MAERT, but these will be combined under EPN 903, because the components are in the same area of the plant
  - Additionally, Jet Fuel Merox Unit Fugitives (EPN 911) are being consolidated from PBR No. 140196 and brought under EPN 903, because the components are in the same area of the plant.
- Remove BWS Fugitives (EPN 904) from MAERT
  - Emissions will now be included under EPN 903 as noted above.
- Incorporate by consolidation PBR No. 140196
  - The Jet Fuel Merox Unit (EPN 912) is used to sweeten jet fuel that is already in production at the refinery. It is a closed loop system that takes product from tanks authorized in this Permit 106965, reduces mercaptan in the product from 250 ppm to 30 ppm, and returns the product to storage tanks. EPN 912 is added to the MAERT.
  - Jet Fuel Merox Unit Fugitives (EPN 911), which are additional piping fugitive components associated with EPN 912 will be incorporated into EPN 903 as noted above.
- Change the EPN for the existing Merox unit from EPN 905 to EPN 911
- Correct SO_2 from 0.054 limit to 0.1 in the Special Conditions
  - This change is a correction, not a modification, because the applicant previously represented a maximum hourly sulfur content of 162 ppmv as part of an application update dated February 2, 2013 in Project No. 185480. The Special Condition specifying the fuel content was inadvertently not updated. Project records confirmed that calculations used the 162 ppmv value, so there is no increase to the emissions from this correction.

Changes to Special Conditions

Old SC	New SC	Description of Change
2.D	2.D	Revised "GGG" to "GGGa" as requested by applicant.
2.E	-	Deleted subpart QQQ because applicant represents that this subpart is no longer applicable to the site.
-	-	Revised "Operational Limits" subheading above fugitives conditions to "Fugitives".
-	6	Added 28CNTQ fugitive monitoring program for connectors inspected quarterly as represented in application.
-	7	Added 28AVO fugitive monitoring for components in hydrogen sulfide and ammonia service as represented in application.
7.F	9.F	Updated the storage tank emission calculation guidance to AP-42 Chapter 7 and APDF 6419.
8	10	Added the sulfur content requirement for refinery fuel gas as represented in the emission calculations in the application.
-	11	Added boilerplate 6-month sampling requirement for total sulfur and net heating value in refinery fuel gas.
9	12	Correction H_2S content of refinery fuel gas from 0.054 grain per dry standard cubic foot (dscf) (87 ppmv) to 0.10 grain per dscf (162 ppmv) as represented in the emission calculations in the application.
16	19	Added the Jet Fuel Merox Unit (EPN 912) incorporated from PBR 140196 to this condition, because it is also controlled by a Carbon Adsorption System. Also changed EPN 905 to 911.
-	20	Added boilerplate visual inspection for carbon build up requirement for carbon adsorption systems.

Best Available Control Technology

Source Name	EPN	Best Available Control Technology Description
Process Heater	900	VOC: Firing refinery fuel gas and natural gas or a mixture of both. This meets Tier I BACT. NOx: Selective catalytic reduction (SCR) system to achieve an annual average NOx emission rate of 0.01 lb/MMBtu. The heater has an annual firing rate of 285 MMBtu/hr and is equipped with a continuous emissions monitoring system (CEMS). This meets Tier I BACT. SO_2: Refinery fuel gas is limited to a maximum of 162 ppmv – 10 grains of total sulfur per 100 dry standard cubic feet (dscf) on an hourly basis, and a maximum of 60 ppmv – 3.5 grains of total sulfur per 100 dscf on an annual basis per SC 10. TCEQ's Tier I BACT for SO_2 for process heaters is a maximum of 5 grains (85 ppmv) of total sulfur for firing pipeline quality natural gas. A concentration limit is not specified for heaters firing refinery fuel gas. However, TCEQ published Tier I BACT for Boilers > 40 MMBtu/hr specifies a concentration limit of 10 grains of total sulfur per 100 dscf. This limit is deemed acceptable as meeting BACT for the heater. CO: 100 ppmv corrected to 3% oxygen on an hourly average. 50 ppmv corrected to 3% oxygen on an annual average. This meets Tier I BACT. $PM/PM_{2.5}/PM_{10}$: Maximum 5% opacity. Per SC 10, no visible emissions are allowed from the heater. This meets Tier I BACT. NH_3: Ammonia slip is limited to 10 ppmv at 3% oxygen and is monitored using CEMS or specified alternatives per SC 14A. There is currently no TCEQ published Tier I BACT for this pollutant activity with this unit. Ammonia slip is an unavoidable collateral emission that occurs with an SCR system used to

Source Name	EPN	Best Available Control Technology Description
		control NOx emissions. The applicant proposed to retain a NH3 limit of 10 ppmv at 3% oxygen on an hourly average, achieved by controlling the NH_3 injection system to minimize NH_3 slip, which is consistent with Tier I BACT for Boilers > 40 MMBtu/hr This limit is deemed acceptable as meeting Tier I BACT for the heater.
Crude Unit Fugitives	903	VOC: 28VHP and 28CNTQ leak detection and repair program for uncontrolled VOC emissions >25 tpy per SC 5 and 6. This meets Tier I BACT. NH_3: Audio, Visual and Olfactory (AVO) inspection every four hours per SC 7. This meets Tier I BACT. H_2S: Audio, Visual and Olfactory (AVO) inspection every four hours per SC 7. This meets Tier I BACT.
Jet Fuel Merox Vent	912	VOC: Process vent through a carbon adsorption system (CAS) with a control efficiency of 100 ppm. This meets Tier I BACT. H_2S: There is currently no TCEQ published Tier I BACT for this pollutant. The applicant stated that only trace amounts are present, so no control is deemed acceptable. $C_2H_6S_2$: There is currently no TCEQ published Tier I BACT for this pollutant. The applicant stated that only trace amounts are present, so no control is deemed acceptable.

Permits Incorporation

Permit by Rule (PBR) / Standard Permit / Permit Nos.	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
140196	Authorized construction of additional MEROX unit (JMEROX, EPN 912) and associated fugitives (JMEROX-FUG, EPN 911) used to reduce mercaptan in product from 250 ppm to 30 ppm.	Consolidate & Void

Impacts Evaluation

Was modeling conducted? **Yes** Type of Modeling: **SCREEN3**

Is the site within 3,000 feet of any school? **No**

Additional site/land use information: located along industrial ship channel; residences located east and west of the site

The air quality analysis is acceptable for all review types and pollutants. The applicant performed generic modeling using SCREEN3 to obtain Unit Impact Multiplier (UIM) values representing the maximum 1-hour ground-level concentration (GLCmax) for the charge heater, fugitive sources, and jet fuel merox vent (EPNs 900, 903, and 912). EPNs 900 and 912 were characterized as point sources and EPN 903 was characterized as a volume source. The 1-hr UIMs are multiplied by the appropriate conversion factors to obtain UIMs for the 3-hr, 8-hr, 24-hr, and annual averaging periods as shown in Table 1 below.

Table 1. Generic Modeling Unit Impact Multipliers

EPN	1-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	3-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	8-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	24-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	Annual GLC_{max} ($\mu g/m^3$ per lb/hr)
900	0.747	0.673	0.523	0.299	0.060

EPN	1-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	3-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	8-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	24-hr GLC_{max} ($\mu g/m^3$ per lb/hr)	Annual GLC_{max} ($\mu g/m^3$ per lb/hr)
903	204.61	184.149	143.227	81.844	16.369
912	35.68	32.112	24.976	14.272	2.854

NAAQS

A minor National Ambient Air Quality Standards (NAAQS) analysis is required to evaluate the annual increases of criteria pollutants from the charge heater (EPN 900). As a conservative measure, the full proposed annual emission rate (rather than project increases alone) for every criteria pollutant is divided by 8,760 hours to obtain a representative hourly emission rate. The representative hourly emission rates are multiplied by the UIMs above to obtain GLC_{max} values. NO_2 and $PM_{2.5}$ are the only pollutants emitted from the charge heater that have an annual NAAQS. For the other criteria pollutants emitted from the charge heater, GLCmax values are also calculated using the appropriate UIMs for comparison to the 24-hr PM_{10}, 8-hr CO, and 3-hr SO_2 NAAQS. Results are less than de minimis values for all pollutants as shown in Table 2 below and no further analysis is required.

Table 2. Modeling Results for NSR De Minimis Analysis in Micrograms Per Cubic Meter ($\mu g/m^3$)

Pollutant	Averaging Time	GLC_{max} ($\mu g/m^3$)	De Minimis ($\mu g/m^3$)
NO_2	Annual	0.170	1
$PM_{2.5}$	Annual	0.126	0.2
PM_{10}	24-hr	0.627	5
CO	8-hr	5.291	500
SO_2	3-hr	2.035	25

Health Effects

A health effects analysis is required to evaluate the emission increases of VOCs and ammonia from the charge heater (EPN 900), fugitives (EPN 903), and jet fuel merox vent (EPN 912). For the charge heater (EPN 900), the constituent of refinery fuel gas with the lowest ESL (ethylene) is used to evaluate the proposed annual allowable VOC emission rate of 6.73 tpy. For crude unit fugitives (EPN 903), the hourly and annual project increases of crude oil, <1% benzene (1.54 lb/hr and 6.77 tpy) and the hourly and annual project increases of n-butane (1.41 lb/hr and 6.18 tpy) are evaluated. For the jet fuel merox vent (EPN 912), the constituent with the lowest ESL (isobutane) is used to evaluate the proposed allowable VOC emission rates of <0.01 lb/hr and 0.015 tpy. The proposed allowable emission rates of dimethyl disulfide from the merox unit (<0.01 lb/hr and <0.01 tpy), ammonia from the charge heater (6.13 tpy), and ammonia from crude unit fugitives (0.01 lb/hr and 0.02 tpy) are also evaluated. All pollutants fall out of the MERA between Steps 0-3 as shown in Table 3 below and no further analysis is required.

Table 3. Modeling Results for Health Effects Analysis Using MERA Guidance

Pollutant & CAS#	Averaging Time	GLCmax ($\mu g/m^3$)	ESL ($\mu g/m^3$)	Modeling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
Ethylene 74-85-1	1-hr	-	1,400	Step 0 – No increase in short-term emissions.
	Annual	0.092	34	Step 3 – $GLC_{max} \leq 0.1 * ESL$

Pollutant & CAS#	Averaging Time	GLCmax (µg/m^3)	ESL (µg/m^3)	Modeling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
Crude oil, <1% Benzene	1-hr	316.102	3,500	Step 3 – $GLC_{max} \leq 0.1$ * ESL
	Annual	25.589	350	Step 3 – $GLC_{max} \leq 0.1$ * ESL
n-butane 106-97-8	1-hr	288.827	66,000	Step 3 – $GLC_{max} \leq 0.1$ * ESL
	Annual	23.107	7,100	Step 3 – $GLC_{max} \leq 0.1$ * ESL
Isobutane 75-28-5	1-hr	-	23,000	Step 2 – Long-term ESL ≥ 10% of short-term ESL and short-term project increase is less than 0.04 lb/hr
	Annual	-	7,100	Step 0 – Long-term evaluation not necessary because long-term ESL ≥ 10% of short-term ESL
Dimethyl Disulfide 624-92-0	1-hr		20	Step 2 – Long-term ESL ≥ 10% of short-term ESL and short-term project increase is less than 0.04 lb/hr
	Annual		2	Step 0 – Long-term evaluation not necessary because long-term ESL ≥ 10% of short-term ESL
Ammonia 7664-41-7	1-hr	-	180	Step 2 – Long-term ESL ≥ 10% of short-term ESL and short-term project increase is less than 0.04 lb/hr
	Annual	0.158	92	Step 3 – $GLC_{max} \leq 0.1$ * ESL

State Propery Line

A State Property Line (SPL) analysis is required for the H_2S emissions from the jet fuel merox vent (EPN 912). The H_2S emissions which were previously associated with the benzene waste stripper unit (EPN 904) will now be under EPN 903. Therefore, the proposed H_2S emission rate for EPN 903 is not an increase. For conservatism, the combined H_2S emissions from both the jet fuel merox vent (<0.01 lb/hr) and fugitives (0.005 lb/hr) are still evaluated. Although the hourly allowable emission rate of SO_2 from the charge heater (EPN 900) is not increasing, the annual increase of SO_2 from this unit is converted to an hourly emission rate and evaluated for conservatism. Results are below the de minimis values for both pollutants and no further analysis is required.

Table 4. Modeling Results for State Property Line Analysis

Pollutant	Averaging Time	GLC_{max} (µg/m^3)	De Minimis (µg/m^3)
SO_2	1-hr	0.425	20.42
H_2S	1-hr	1.380	2.16

Maryam Rasti 11/8/2024

Project Reviewer Maryam Rasti — Date — Team Leader Matthew Ray — Date

The TCEQ is committed to accessibility.
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Compliance History Report

Compliance History Report for CN600127468, RN100214386, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN600127468, Valero Refining-Texas, L.P. **Classification:** SATISFACTORY **Rating:** 5.57

Regulated Entity: RN100214386, VALERO CORPUS CHRISTI REFINERY WEST PLANT **Classification:** SATISFACTORY **Rating:** 8.33

Complexity Points: 38 **Repeat Violator:** NO

CH Group: 02 - Oil and Petroleum Refineries

Location: 5900 UP RIVER RD NUECES, TX, NUECES COUNTY

TCEQ Region: REGION 14 - CORPUS CHRISTI

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER NE0112G
AIR OPERATING PERMITS PERMIT 1458
AIR OPERATING PERMITS PERMIT 2601
AIR NEW SOURCE PERMITS PERMIT 38754
AIR NEW SOURCE PERMITS ACCOUNT NUMBER NE0112G
AIR NEW SOURCE PERMITS PERMIT 20740
AIR NEW SOURCE PERMITS PERMIT 20992
AIR NEW SOURCE PERMITS REGISTRATION 39505
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M9
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M10
AIR NEW SOURCE PERMITS AFS NUM 4835500050
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M11
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M8
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M12
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M13
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M14
AIR NEW SOURCE PERMITS REGISTRATION 103920
AIR NEW SOURCE PERMITS REGISTRATION 103918
AIR NEW SOURCE PERMITS REGISTRATION 103932
AIR NEW SOURCE PERMITS REGISTRATION 103930
AIR NEW SOURCE PERMITS REGISTRATION 103936
AIR NEW SOURCE PERMITS REGISTRATION 103934
AIR NEW SOURCE PERMITS REGISTRATION 103937
AIR NEW SOURCE PERMITS REGISTRATION 103938
AIR NEW SOURCE PERMITS REGISTRATION 103922
AIR NEW SOURCE PERMITS REGISTRATION 103921
AIR NEW SOURCE PERMITS REGISTRATION 103919
AIR NEW SOURCE PERMITS REGISTRATION 140196
AIR NEW SOURCE PERMITS PERMIT 106965
AIR NEW SOURCE PERMITS PERMIT AMOC39
AIR NEW SOURCE PERMITS REGISTRATION 168339
AIR NEW SOURCE PERMITS REGISTRATION 165131
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX324M15
AIR NEW SOURCE PERMITS REGISTRATION 168565
AIR NEW SOURCE PERMITS REGISTRATION 164619
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX211
AIR NEW SOURCE PERMITS REGISTRATION 151262
AIR NEW SOURCE PERMITS REGISTRATION 155846
AIR NEW SOURCE PERMITS PERMIT AMOC131
AIR NEW SOURCE PERMITS REGISTRATION 156307
AIR NEW SOURCE PERMITS REGISTRATION 174792
AIR NEW SOURCE PERMITS REGISTRATION 172299
AIR NEW SOURCE PERMITS REGISTRATION 175930
AIR NEW SOURCE PERMITS REGISTRATION 179147
AIR NEW SOURCE PERMITS REGISTRATION 179668
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30478
STORMWATER PERMIT TXR05FS92
WASTEWATER PERMIT WQ0001909000
WASTEWATER EPA ID TX0063355
AIR EMISSIONS INVENTORY ACCOUNT NUMBER NE0112G
POLLUTION PREVENTION PLANNING ID NUMBER P00757
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30478
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD074604166
TAX RELIEF ID NUMBER 16116

Compliance History Period: September 01, 2020 to August 31, 2025 **Rating Year:** 2025 **Rating Date:** 09/01/2025

Date Compliance History Report Prepared: September 15, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: September 01, 2018 to August 31, 2025

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

Name: TCEQ Staff Member **Phone:** (512) 239-1000

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: 06/30/2020 ADMINORDER 2019-1594-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

Rqmt Prov: GTC and STC No. 2.F OP

Description: Failure to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 309030 was due by May 22, 2019 at 9:45 a.m., but was not submitted until May 22, 2019 at 2:03 p.m.

Classification: Moderate

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

Rqmt Prov: GTC and STC No. 22 OP
SC 1 PA

Description: Failure to prevent unauthorized emissions. Specifically, the Respondent released 225.88 pounds ("lbs") of nitrogen oxides and 897.05 lbs of sulfur dioxide from the Main Flare, Emissions Point Number 126, during an emissions event (Incident No. 309030) that began on May 21, 2019 and lasted 16 hours and 40 minutes. The emissions event occurred due to a process upset that caused Propane Tank 35 to vent to the Main Flare, resulting in flaring. Since the Respondent did not comply with the emission

Classification: Minor

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

Rqmt Prov: GTC and STC No. 2.F. OP

Description: Failure to identify all required information on the final record for a reportable emissions event. Specifically, the Respondent did not identify the time of the discovery of the emissions event and the best known cause of the emissions event on the final record for Incident No. 309030.

2 Effective Date: 12/21/2021 ADMINORDER 2020-1256-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Major

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

Rqmt Prov: FOP O1458 OP
SC 1 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that occurred on July 22, 2019; TCEQ/STEERS Incident No. 316652.

Classification: Moderate

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

Rqmt Prov: FOP O1458 OP

Description: Failure to submit a copy of the final record to the TCEQ Region 14 office no later than two weeks after the end of the emissions event.

Classification: Moderate

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

5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-01458, Special Term & Condition 22 OP
FOP O1458 OP
NSR 106965, Special Condition 1 PERMIT

Description: Failure to comply with the annual tons per year (TPY) emissions limit.

Classification: Moderate

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

Rqmt Prov: Special Term & Condition 2.F OP

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

Classification: Moderate

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

Rqmt Prov: [PSDTX324M14] Special Condition 1 PERMIT
Special Term & Condition 24 OP

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on December 9, 2018, TCEQ/STEERS Incident No. 298636.

3 Effective Date: 03/13/2023 ADMINORDER 2021-1206-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

Rqmt Prov: FOP O-1458, ST&C 22 OP
NSR 38754/PSDTX324M14, SC 1 PERMIT

Description: Failure to comply with the Maximum Allowable Emission Rate. Specifically, the Respondent exceeded the nitrogen oxides MAER of 17.34 tons per year based on a 12-month rolling period for the 12-month periods ending on February 2019, March 2019, and April 2019 for the Heater-Desalter Heater (11-H-1), EPN 114, resulting in 2.93 tons of unauthorized emissions.

Classification: Moderate

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

Rqmt Prov: FOP O-1458, ST&C 22 OP
NSR 38754/PSDTX324M14, SC 1 PERMIT

Description: Failure to comply with hourly emissions limitations listed on the Maximum Allowable Emissions Rate Table (MAERT).

Classification: Moderate

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

Rqmt Prov: FOP O-1458, ST&C 22 ORDER
NSR 38754/PSDTX324M14, SC 1 PERMIT

Description: Failure to comply with hourly emissions limitations listed on the Maximum Allowable Emissions Rate Table (MAERT).

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 10, 2018	(1518007)
Item 2	October 12, 2018	(1513088)
Item 3	November 18, 2018	(1513740)
Item 4	November 20, 2018	(1542227)
Item 5	November 30, 2018	(1525120)
Item 6	December 20, 2018	(1489947)
Item 7	January 18, 2019	(1562018)
Item 8	February 05, 2019	(1425021)
Item 9	March 20, 2019	(1562017)
Item 10	April 18, 2019	(1572593)
Item 11	June 13, 2019	(1558946)
Item 12	June 20, 2019	(1531493)
Item 13	July 19, 2019	(1593939)
Item 14	August 20, 2019	(1600264)
Item 15	September 20, 2019	(1607158)
Item 16	October 04, 2019	(1597591)
Item 17	October 20, 2019	(1614009)
Item 18	November 20, 2019	(1619821)
Item 19	November 25, 2019	(1589763)
Item 20	January 20, 2020	(1634819)
Item 21	March 20, 2020	(1647940)
Item 22	April 22, 2020	(1640192)
Item 23	May 18, 2020	(1605207)
Item 24	May 20, 2020	(1660859)
Item 25	May 22, 2020	(1644286)
Item 26	June 23, 2020	(1657457)
Item 27	June 25, 2020	(1657246)
Item 28	July 06, 2020	(1652651)
Item 29	July 20, 2020	(1674342)
Item 30	August 03, 2020	(1665629)
Item 31	August 20, 2020	(1681116)
Item 33	September 11, 2020	(1672899)
Item 34	September 21, 2020	(1687686)
Item 35	October 20, 2020	(1694028)
Item 36	October 29, 2020	(1679550)
Item 37	November 02, 2020	(1684592)
Item 38	December 04, 2020	(1692495)
Item 39	January 12, 2021	(1690469)
Item 40	January 13, 2021	(1693082)
Item 41	January 20, 2021	(1714754)
Item 42	February 10, 2021	(1697386)
Item 43	February 19, 2021	(1727817)
Item 44	April 19, 2021	(1727819)
Item 45	May 20, 2021	(1741205)
Item 46	May 21, 2021	(1706396)
Item 47	June 18, 2021	(1747985)
Item 48	July 20, 2021	(1752466)
Item 49	August 20, 2021	(1757895)
Item 50	September 01, 2021	(1760438)
Item 51	September 20, 2021	(1767120)
Item 52	September 21, 2021	(1751345)
Item 53	October 20, 2021	(1777594)
Item 54	December 20, 2021	(1791423)
Item 55	January 20, 2022	(1799205)

Compliance History Report for CN600127468, RN100214386, Rating Year 2025 which includes Compliance History (CH) components from September 01, 2018, through August 31, 2025. Ratings are pending Mass Classification.

Item 56	February 17, 2022	(1794960)
Item 57	March 17, 2022	(1814147)
Item 58	April 18, 2022	(1820721)
Item 59	May 18, 2022	(1843051)
Item 60	July 19, 2022	(1843052)
Item 61	August 19, 2022	(1834045)
Item 62	August 20, 2022	(1849221)
Item 63	October 11, 2022	(1847555)
Item 64	December 19, 2022	(1846419)
Item 65	January 18, 2023	(1846428)
Item 66	February 10, 2023	(1874159)
Item 68	April 04, 2023	(1888689)
Item 69	April 20, 2023	(1906103)
Item 70	May 20, 2023	(1913258)
Item 71	June 27, 2023	(1904302)
Item 72	August 18, 2023	(1933791)
Item 73	August 21, 2023	(1869109)
Item 74	August 24, 2023	(1923844)
Item 75	September 20, 2023	(1939935)
Item 76	October 06, 2023	(1930622)
Item 77	October 18, 2023	(1946777)
Item 78	November 17, 2023	(1925091)
Item 79	December 20, 2023	(1962238)
Item 80	January 19, 2024	(1968829)
Item 81	February 20, 2024	(1977891)
Item 82	March 20, 2024	(1984467)
Item 83	April 22, 2024	(1960467)
Item 84	May 20, 2024	(1997444)
Item 85	June 11, 2024	(1987486)
Item 86	June 19, 2024	(1989703)
Item 87	June 20, 2024	(2004397)
Item 88	August 02, 2024	(1923589)
Item 89	August 20, 2024	(1932118)
Item 90	August 30, 2024	(1910063)
Item 91	September 20, 2024	(2024575)
Item 92	October 15, 2024	(2030691)
Item 93	November 18, 2024	(2037015)
Item 94	December 13, 2024	(2043393)
Item 95	January 09, 2025	(2049952)
Item 96	February 07, 2025	(1938208)
Item 97	March 19, 2025	(2066080)
Item 98	April 02, 2025	(1974338)
Item 99	April 17, 2025	(2072893)
Item 100	May 19, 2025	(2079282)
Item 101	May 21, 2025	(1932019)
Item 103	August 28, 2025	(2084816)

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

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

1 Date: 01/31/2025 (2057517)

Self Report? YES Classification: Moderate

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

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

2 Date: 05/31/2025 (2086380)

Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)

Compliance History Report for CN600127468, RN100214386, Rating Year 2025 which includes Compliance History (CH) components from September 01, 2018, through August 31, 2025. Ratings are pending Mass Classification.

30 TAC Chapter 305, SubChapter F 305.125(1)
Description: Failure to meet the limit for one or more permit parameter

3 Date: 07/22/2025 (2076804)

Self Report? NO Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)
30 TAC Chapter 305, SubChapter F 305.125(1)
Permit Conditions No. 2g, Pg. 8 PERMIT

Description: Failed to prevent an unauthorized discharge of wastewater or any other waste.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 319, SubChapter A 319.7(a)
30 TAC Chapter 319, SubChapter A 319.7(c)
Monitoring Requirements No. 3.c., Pg. 5 PERMIT

Description: Failed to maintain records of the monitoring activities required by the permit.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Monitoring Requirements 2.a., Pg. 5 PERMIT

Description: Failed to accurately calculate and report information on the Discharge Monitoring Reports (DMRs).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Reporting Requirements No. 7.a., Pg. 6 PERMIT

Description: Failed to report orally or by facsimile transmission (FAX) to the regional office within 24 hours of becoming aware of any noncompliance that may endanger human health or safety, or the environment and provide a written submission of an unauthorized discharge to the regional office and the Enforcement Division (MC 224) within five working days of becoming aware of the noncompliance.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Other Requirements No. 2, Pg. 14 PERMIT

Description: Failed to provide all monitoring results in the calculation of reported values on the discharge monitoring reports (DMRs) for free cyanide.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Reporting Requirements No. 4, Pg. 5 PERMIT

Description: Failed to include all results in the calculation and reporting of the pH values submitted on the approved self-report form and indicate increased frequency of sampling on the self-report form.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Reporting Requirement No. 7.c., Pg. 6 PERMIT

Description: Failed to report any effluent violation which deviates from the permitted effluent limitation by more than 40% in writing to the Regional Office and the Enforcement Division (MC 224) within 5 working days of becoming aware of the noncompliance.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
30 TAC Chapter 305, SubChapter F 305.125(5)
Effluent Limitations No. 3, Pg. 2b PERMIT
Operational Requirements No. 1, Pg. 10 PERMIT

Description: Failed to prevent discharge of floating solids and ensure that the facility and all of its systems of collection, treatment, and disposal are properly operated and maintained.

4 Date: 07/24/2025 (2083575)

Self Report? NO Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)
30 TAC Chapter 305, SubChapter F 305.125(1)
Permit Conditions; No. 2g, Pg. 8 PERMIT

Description: Failed to prevent an unauthorized discharge of wastewater or any other waste.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Monitoring Requirements; No.1, Pg. 2a PERMIT
Monitoring Requirements; No.3, Pg. 2a PERMIT

Description: Failed to discharge only stormwater runoff, steam condensate, fire monitor water, uncontaminated utility wastewater, and hydrostatic test water.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
Effluent Limitations, No. 1, Pg. 2a PERMIT

Description: Failed to maintain compliance with the single grab permitted effluent limit for COD and O&G.

5 Date: 08/08/2025 (2035713)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to comply with permitted pounds per million British thermal units (lbs/MMBtu) emissions limit for nitrogen oxides (NOx) from the 30-B-04 Boiler (EPN 30-B-04).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 OP

Description: Failure to comply with the permitted tons per year (TPY) limits for volatile organic compounds (VOC) and particular matter (PM) for the 30-B-04 Boiler (EPN 30-B-04).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(4)
5C THSC Chapter 382 382.085(b)
SC 75(D) OP
STC 24 OP

Description: Failure to make necessary repairs or empty Tank No. 162 (EPN 83-TK-162) within 45 days of identification in any inspection for seals not meeting the requirements of 40 CFR 60.113b(b)(4)(i-ii).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
SC 41 OP
STC 24 OP

Description: Failure to maintain the carbon monoxide (CO) concentration at or below 500 parts per million (ppm) for the HOC Belco Scrubber (EPN 121).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to maintain the permitted hourly average nitrogen oxide (NOx) pounds per million British thermal units (lbs/MMBtu) emissions limit of 0.06 for the SMR Heater (EPN 118).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to maintain the permitted hourly average nitrogen oxide (NOx) pounds per million British thermal units (lbs/MMBtu) emissions limit of 0.07 for the CRU Heater (EPN 152).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 38 OP
STC 24 OP

Description: Failure to maintain the daily average minimum mixed liquor total suspended solids (MLSS) at or above 2000 milligrams per liter (mg/L) in the aeration basin and outlet for the Bio Oxidation Tank (EPN 83-TK-27).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.102a(g)(1)(ii)
5C THSC Chapter 382 382.085(b)
SC 47 OP
STC 24 OP

Description: Failure to prevent the burning of fuel gas in the BUP Flare (EPN 127) that contains hydrogen sulfide (H2S) more than 162 parts per million by volume (ppmv) determined hourly on a 3-hour rolling average basis.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
5C THSC Chapter 382 382.085(b)
SC 12(B) OP
STC 24 OP

Description: Failure to operate the Main Flare (EPN 126) with its pilot flame present at all times vent gas may be directed to it.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 27 OP
STC 24 OP

Description: Failure to maintain the Naptha CCR Unit's caustic absorber (EPN 155) at the required circulation rate of 368 gallons per minute (gpm) or more.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 46 OP
STC 24 OP

Description: Failure to operate the SMR Stripper Vent (EPN 118) within the permitted hourly temperature limit of 121 degrees Fahrenheit (°F).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to comply with the emissions specifications outlined in Special Condition 16 of NSR 38754 for Boiler 30-B-04 (EPN 30-B-04).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.102(a)(1)
5C THSC Chapter 382 382.085(b)
STC 22 OP

Description: Failure to comply with the compliance assurance monitoring (CAM) requirements specified in FOP 1458 for Control Devices ID Nos. 24-ST-02 and 24-ST-01

Self Report? YES Classification: Moderate

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

SC 16 OP
STC 24 OP

Description: Failure to comply with the emissions specifications outlined in Special Condition 16 of NSR 38754 for the Alky Fract Reboiler (EPN 117).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to comply with the emissions specifications outlined in Special Condition 16 of NSR 38754 for the Hydrogen Reformer Heater (EPN 118).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(d)
5C THSC Chapter 382 382.085(b)
SC12(A) OP
STC 24 OP

Description: Failure to comply with the maximum flare tip velocity limit at all times that emissions may be directed to the ground flare (EPN 158) for more than 15 minutes.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 51(D)(1) OP
STC 24 OP

Description: Failure to prevent the venting of gases containing a concentration of volatile organic compounds (VOC) at or above 10 percent (%) lower-explosive-limit (LEL) when performing maintenance, start-up, and shutdown (MSS) activities.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
5C THSC Chapter 382 382.085(b)
SC 47 OP
STC 24 OP

Description: Failure to prevent the burning of fuel gas in the ground flare (EPN 158) that contains hydrogen sulfide (H2S) more than 162 parts per million by volume (ppmv) determined hourly on a 3-hour rolling average basis.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(d)
5C THSC Chapter 382 382.085(b)
SC 12(A) OP
STC 24 OP

Description: Failure to comply with the maximum flare tip velocity limit at all times that emissions may be directed to the main flare (EPN 126) for more than 15 minutes.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(b)(1)
5C THSC Chapter 382 382.085(b)
SC 41 OP
STC 24 OP

Description: Failure to maintain at or below the permitted concentration limit of 50 parts per million by volume (ppmv) sulfur dioxide (SO2) for the HOC Belco Scrubber (EPN 121).

Self Report? YES Classification: Moderate

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

30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
SC 12(A) OP
STC 24 OP

Description: Failure to maintain the net heating value in the combustion zone (NHVcz) for the BUP Flare (EPN 127) of 270 British thermal unit per standard cubic foot (Btu/SCF).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)
5C THSC Chapter 382 382.085(b)
SC 60(B)(1) OP
STC 24 OP

Description: Failure to maintain an hourly average carbon monoxide (CO) concentration of 1200 parts per million by volume (ppmv) or less during start-up and shutdown activities from the HOC Belco Scrubber (EPN 121).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
SC 12(A) OP
STC 24 OP

Description: Failure to maintain the net heating value in the combustion zone (NHVcz) for the Main Flare (EPN 126) of 270 British thermal unit per standard cubic foot (Btu/SCF).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 OP
STC 24 OP

Description: Failure to comply with the Maximum Allowable Emissions Rate Table (MAERT) limit for carbon monoxide (CO) associated to the Maintenance, Start-up, and Shut-down (MSS) Cap (EPN MSS Caps).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to maintain the permitted pounds per million British thermal unit (lbs/MMBTU) limit for nitrogen oxides (NOx) for the Crude Heater (EPN 1).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 15 OP
STC 24 OP

Description: Failure to combust off-gas having an hourly average hydrogen sulfide (H2S) concentration of 0.10 grains per dry standard cubic feet (grains/dscf) or less in the Vacuum Unit Heater (EPN 74) and 0.054 grains/dscf for the fuel feed line header of all fired units with a firing rate greater than 40 million British thermal units per hour (MMBtu/hr).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 16 OP
STC 24 OP

Description: Failure to comply with the emissions specifications outlined in Special Condition 16 of NSR Permit No. 38754 for the Alky Fract Reboiler (EPN 117).

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 21 OP
STC 24 OP

Description: Failure to maintain the pH of the HOC Belco Scrubber (EPN 121) circulating caustic solution between 6.0 and 9.0.

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 1 OP
STC 24 OP

Description: Failure to comply with Maximum Allowable Emissions Rate Table (MAERT) limits for the Main Flare (EPN 126).

F. Environmental audits:

Notice of Intent Date: 05/16/2018 (1486351)

Disclosure Date: 09/06/2018

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(g)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(h)

Description: Failure to ensure consistent verification of applicable requirements for BWON containers during BWON quarterly visual inspections and records for vacuum trucks.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(B)
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(a)(3)

Description: Failure to ensure timely repair of a carbon canister system with integrity deficiencies and failure to ensure that a gauge hatch at the top of vessel V-53 is maintained secured.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)

Rqmt Prov: PERMIT Special Condition No. 12.D.

Description: Failure to maintain readily available record that indicate that the flare analyzers are being operated at least 95% of the time through regular calculation on a 12month rolling average basis.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter D 115.311(b)(1)
30 TAC Chapter 115, SubChapter D 115.312(b)(2)
30 TAC Chapter 115, SubChapter D 115.317

Description: Failure to document an exemption from control for the outlets of the steam eductors that are routed to the atmosphere (Unit 36, 38, and 47).

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.654(f)

Description: Failure to report a Title V deviation for the heat exchanger leak in the Alky Cooling Tower that was not repaired within 30 days.

Viol. Classification: Moderate

Citation: 4F TWC Chapter 60, SubChapter A 60.104(b)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(d)

Description: Failure to maintain complete documentation to show that the FCCU SO2 CEMS meets the applicable 30-day rolling average for 22 valid days of data.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2(a)(2)

Description: Failure to maintain complete documentation to verify that water seals were present in all NSPS Subpart QQQ drains (an alternative monitoring request remains pending with EPA).

Disclosure Date: 04/16/2019

Viol. Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.128(a)
30 TAC Chapter 305, SubChapter F 305.128(c)
30 TAC Chapter 305, SubChapter C 305.44(a)

Rqmt Prov: PERMIT Section 5.9 & 6.1

Description: Failure to maintain documentation of storm water pollution prevention plan training, documentation of non-storm water discharge certification, and complete and accurate quarterly outfall inspection forms.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.16(a)
40 CFR Chapter 265, SubChapter I, PT 265, SubPT B 265.16(c)

Description: Failure to maintain current and consistent training records for representatives performing RCRA-related tasks.

Notice of Intent Date: 01/24/2019 (1548746)

Disclosure Date: 04/08/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(c)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(1)(i)(A)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(a)(2)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.346(b)(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.349(f)

Description: Failure to ensure that benzene waste management units and other equipment subject to the benzene waste NESHAP rule requirements are all being properly monitored and/or inspected.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)

Description: Failure to ensure that cover and opening of tanks subject to the benzene waste NESHAP control requirements are consistently maintained in a closed sealed position.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.347(a)(1)

Description: Failure to ensure that covers and openings of equipment associated with the oil-water separators are consistently maintained in a closed sealed position.

Viol. Classification: Moderate

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

Description: Failure to ensure that individual drain systems subject to alternative control requirements under the benzene waste NESHAP for drains, junction boxes, and sewer lines are consistently maintained in a sealed position.

Viol. Classification: Moderate

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

Description: Failure to ensure that individual drain systems subject to alternative control requirements under the benzene waste NESHAP for drains, junction boxes, and sewer lines are consistently maintained to ensure compliance with alternative requirements.

Disclosure Date: 09/04/2019

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2(b)(4)

Rqmt Prov: OP SC 9.B.
PERMIT SC Nos. 36 & 36

Description: Failure to ensure a timely first attempt at repair is made after a broken seal or gap was identified on individual drain systems subject to VOC emission rule requirements.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-2(a)(5)

Rqmt Prov: PERMIT SC No. 35 & 36
OP SC No. 9.B

Description: Failure to ensure that individual drain systems subject to VOC emissions control do not have low water levels or missing/improperly installed caps/plugs and ensure they receive a timely first effort at repair.

Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.692-3(a)(2)
Rqmt Prov: OP App. Requirement Summary
PERMIT SC No. 29
Description: Failure to prevent non-fugitive emissions from pressure relief valves from the API separators, based on AVO and IR camera inspections.
Disclosure Date: 03/06/2020
Viol. Classification: Moderate
Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.658(h)
Rqmt Prov: OP ST&Cs
Description: Failure to timely report fenceline reporting requirements in the corrective action plan.

Notice of Intent Date: 07/20/2020 (1670817)
Disclosure Date: 03/05/2021
Viol. Classification: Moderate
Citation: 30 TAC Chapter 115, SubChapter B 115.112(b)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(b)
Description: Failure to meet the vapor pressure control requirements for Tank 73TK168 for the month of September.
Viol. Classification: Moderate
Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(a)(4)
Description: Failure to conduct the 10 year internal inspections for listed tanks.

Notice of Intent Date: 09/09/2022 (1847117)
No DOV Associated

Notice of Intent Date: 12/19/2022 (1869155)
No DOV Associated

Notice of Intent Date: 05/30/2024 (1994382)
No DOV Associated

Notice of Intent Date: 04/21/2025 (2063725)
No DOV Associated

Notice of Intent Date: 04/30/2025 (2089619)
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