Executive Summary – Enforcement Matter – Case No. 68866
Houston Refining LP
RN100218130
Docket No. 2025-1868-AIR-E

Order Type:
1660
Findings Order Justification:
N/A
Media:
AIR
Small Business:
No
Location(s) Where Violation(s) Occurred:
Houston Refining, 12000 Lawndale Street, Houston, Harris County
Type of Operation:
Petroleum refinery
Other Significant Matters:
Additional Pending Enforcement Actions: No
Past-Due Penalties: No
Past-Due Fees: No
Other: N/A
Interested Third-Parties: None
Texas Register Publication Date: May 22, 2026
Comments Received: No

Penalty Information

Total Penalty Assessed: $19,050
Amount Deferred for Expedited Settlement: $3,810
Total Paid to General Revenue: $15,240
Total Due to General Revenue: $0
Payment Plan: N/A
Compliance History Classifications:
Person/CN - Satisfactory
Site/RN - Satisfactory
Major Source: Yes
Statutory Limit Adjustment: N/A
Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: September 4, 2025 through November 10, 2025
Date(s) of NOE(s): December 5, 2025

Executive Summary – Enforcement Matter – Case No. 68866
Houston Refining LP
RN100218130
Docket No. 2025-1868-AIR-E

Violation Information

Failed to comply with the hydrogen sulfide ("H2S") concentration limit of fuel gas. Specifically, the Respondent exceeded the H2S concentration limit of 162 parts per million by volume ("ppmv") determined hourly on a 3-hour rolling average basis by a range from 31 ppmv through 14,379 ppmv for a total of 25 hours on ten days from September 6, 2024 through October 26, 2024 for the No. 1 Plant Flare, Emissions Point Number ("EPN") 338K0001 [30 TEX. ADMIN. CODE §§ 101.20(3), 116.715(a) and 122.143(4), 40 CODE OF FEDERAL REGULATIONS § 60.103a(h), Flexible Permit Nos. 2167 and PSDTX985, Special Conditions No. 25, Federal Operating Permit O1372, General Terms and Conditions and Special Terms and Conditions Nos. 1.A and 32, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By October 14, 2024, the Respondent utilized thermal scanning and potential source isolation to locate the emission source and updated instructions and corresponding training to regulate the speed the valve is opened when lining out of service equipment to the in-service operating equipment in order to comply with the H2S concentration limit for the No. 1 Plant Flare, EPN 338K0001.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Johnnie Wu, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-2524; Michael Parrish, Enforcement Division, MC R-12, (512) 239-2548
Respondent: Lambert Titzman, Site Manager, Houston Refining LP, 12000 Lawndale Street, Houston, Texas 77017
Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021) — *PCW Revision February 11, 2021*

DATES						
	Assigned	10-Dec-2025				
	PCW	1-Apr-2026	**Screening**	10-Dec-2025	**EPA Due**	

RESPONDENT/FACILITY INFORMATION

Respondent	Houston Refining LP		
Reg. Ent. Ref. No.	RN100218130		
Facility/Site Region	12-Houston	**Major/Minor Source**	Major

CASE INFORMATION

Enf./Case ID No.	68866	**No. of Violations**	1
Docket No.	2025-1868-AIR-E	**Order Type**	1660
Media Program(s)	Air	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Johnnie Wu
		EC's Team	Enforcement Team 2

Admin. Penalty $ Limit Minimum $0 Maximum $25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — *Subtotal 1* **$15,000**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History **52.0%** Adjustment — *Subtotals 2, 3, & 7* **$7,800**

Notes: Enhancement for one NOV with same/similar violations, one order containing a denial of liability, and one final judgement containing a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

Culpability No **0.0%** Enhancement — *Subtotal 4* **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — *Subtotal 5* **-$3,750**

Economic Benefit **0.0%** Enhancement* — *Subtotal 6* **$0**

Total EB Amounts $26
Estimated Cost of Compliance $5,000

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — *Final Subtotal* **$19,050**

OTHER FACTORS AS JUSTICE MAY REQUIRE **0.0%** — *Adjustment* **$0**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount **$19,050**

STATUTORY LIMIT ADJUSTMENT — *Final Assessed Penalty* **$19,050**

DEFERRAL **20.0%** Reduction — *Adjustment* **-$3,810**

Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY **$15,240**

Screening Date	10-Dec-2025	**Docket No.** 2025-1868-AIR-E	**PCW**
Respondent	Houston Refining LP		*Policy Revision 5 (January 28, 2021)*
Case ID No.	68866		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN100218130		
Media	Air		
Enf. Coordinator	Johnnie Wu		

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	1	5%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgments or consent decrees meeting criteria*)	1	30%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	1	-1%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	1	-2%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 52%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with same/similar violations, one order containing a denial of liability, and one final judgement containing a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 52%

>> Final Compliance History Adjustment

Final Adjustment Percentage ****capped at 100%*** 52%

Screening Date	10-Dec-2025	**Docket No.** 2025-1868-AIR-E	**PCW**
Respondent	Houston Refining LP		*Policy Revision 5 (January 28, 2021)*
Case ID No.	68866		*PCW Revision February 11, 2021*
Reg. Ent. Reference No.	RN100218130		
Media	Air		
Enf. Coordinator	Johnnie Wu		

Violation Number 1

Rule Cite(s): 30 Tex. Admin. Code §§ 101.20(3), 116.715(a) and 122.143(4), 40 Code of Federal Regulations § 60.103a(h), Flexible Permit Nos. 2167 and PSDTX985, Special Conditions No. 25, Federal Operating Permit O1372, General Terms and Conditions and Special Terms and Conditions Nos. 1.A and 32, and Tex. Health & Safety Code § 382.085(b)

Violation Description: Failed to comply with the hydrogen sulfide ("H2S") concentration limit of the fuel gas. Specifically, the Respondent exceeded the H2S concentration limit of 162 parts per million by volume ("ppmv") determined hourly on a 3-hour rolling average basis by a range from 31 ppmv through 14,379 ppmv for a total of 25 hours on ten days from September 6, 2024 through October 26, 2024 for the No. 1 Plant Flare, Emissions Point Number ("EPN") 338K0001.

Base Penalty $25,000

>> Environmental, Property and Human Health Matrix

	Harm		
Release	Major	Moderate	Minor
Actual			x
Potential			

OR

Percent 30.0%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

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

Adjustment $17,500

$7,500

Violation Events

Number of Violation Events: 2 — 50 Number of violation days

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty $15,000

Two monthly events are recommended, for the period of non-compliance from September 6, 2024 through October 26, 2024.

Good Faith Efforts to Comply

25.0% Reduction $3,750

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

Notes: The Respondent completed the corrective measures by October 14, 2024, prior to the Notice of Enforcement dated December 5, 2025.

Violation Subtotal $11,250

Economic Benefit (EB) for this violation

Estimated EB Amount $26

Statutory Limit Test

Violation Final Penalty Total $19,050

This violation Final Assessed Penalty (adjusted for limits) $19,050

Economic Benefit Worksheet

Respondent Houston Refining LP
Case ID No. 68866
Reg. Ent. Reference No. RN100218130
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Delayed Costs							
Equipment				0.00	$0	$0	$0
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/Construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling				0.00	$0	n/a	$0
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$5,000	6-Sep-2024	14-Oct-2024	0.10	$26	n/a	$26
Notes for DELAYED costs	Estimated costs to utilize thermal scanning and potential source isolation to locate the emission source and update instructions and corresponding training to regulate the speed the valve is opened when lining out of service equipment to the in-service operating equipment in order to comply with the H2S concentration limit for the No. 1 Plant Flare, EPN 338K0001. The Date Required is the first date of non-compliance and the Final Date is the date of compliance.						
Avoided Costs	**ANNUALIZE avoided costs before entering item (except for one-time avoided costs)**						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/Equipment				0.00	$0	$0	$0
Financial Assurance				0.00	$0	$0	$0
ONE-TIME avoided costs				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance $5,000

TOTAL $26

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

Compliance History Report

Compliance History Report for CN601313083, RN100218130, Rating Year 2025 which includes Compliance History (CH) components from September 1, 2020, through August 31, 2025.

Customer, Respondent, or Owner/Operator: CN601313083, Houston Refining LP **Classification:** SATISFACTORY **Rating:** 40.69

Regulated Entity: RN100218130, HOUSTON REFINING **Classification:** SATISFACTORY **Rating:** 40.69

Complexity Points: 37 **Repeat Violator:** NO

CH Group: 02 - Oil and Petroleum Refineries

Location: 12000 LAWNDALE ST, HOUSTON, HARRIS COUNTY, TX

TCEQ Region: REGION 12 - HOUSTON

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER HG0048L
AIR OPERATING PERMITS PERMIT 1372
AIR QUALITY NON PERMITTED ID NUMBER R12100218130
PUBLIC WATER SYSTEM/SUPPLY REGISTRATION 1011570
AIR NEW SOURCE PERMITS PERMIT 2167
AIR NEW SOURCE PERMITS ACCOUNT NUMBER HG0048L
AIR NEW SOURCE PERMITS REGISTRATION 55719
AIR NEW SOURCE PERMITS AFS NUM 4820100040
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX985
AIR NEW SOURCE PERMITS REGISTRATION 43445
AIR NEW SOURCE PERMITS REGISTRATION 46595
AIR NEW SOURCE PERMITS REGISTRATION 87937
AIR NEW SOURCE PERMITS REGISTRATION 92373
AIR NEW SOURCE PERMITS REGISTRATION 95583
AIR NEW SOURCE PERMITS REGISTRATION 101633
AIR NEW SOURCE PERMITS REGISTRATION 102445
AIR NEW SOURCE PERMITS REGISTRATION 102528
AIR NEW SOURCE PERMITS REGISTRATION 102539
AIR NEW SOURCE PERMITS REGISTRATION 101897
AIR NEW SOURCE PERMITS REGISTRATION 102500
AIR NEW SOURCE PERMITS REGISTRATION 102525
AIR NEW SOURCE PERMITS REGISTRATION 102533
AIR NEW SOURCE PERMITS REGISTRATION 102524
AIR NEW SOURCE PERMITS REGISTRATION 102526
AIR NEW SOURCE PERMITS REGISTRATION 102538
AIR NEW SOURCE PERMITS REGISTRATION 102448
AIR NEW SOURCE PERMITS REGISTRATION 102537
AIR NEW SOURCE PERMITS REGISTRATION 102523
AIR NEW SOURCE PERMITS REGISTRATION 102446
AIR NEW SOURCE PERMITS REGISTRATION 102540
AIR NEW SOURCE PERMITS REGISTRATION 102521
AIR NEW SOURCE PERMITS REGISTRATION 102531
AIR NEW SOURCE PERMITS REGISTRATION 102522
AIR NEW SOURCE PERMITS REGISTRATION 102511
AIR NEW SOURCE PERMITS REGISTRATION 102512
AIR NEW SOURCE PERMITS REGISTRATION 109351
AIR NEW SOURCE PERMITS REGISTRATION 112762
AIR NEW SOURCE PERMITS REGISTRATION 141096
AIR NEW SOURCE PERMITS REGISTRATION 131635
AIR NEW SOURCE PERMITS REGISTRATION 123232
AIR NEW SOURCE PERMITS REGISTRATION 139906
AIR NEW SOURCE PERMITS REGISTRATION 118761
AIR NEW SOURCE PERMITS REGISTRATION 151230
AIR NEW SOURCE PERMITS REGISTRATION 166263
AIR NEW SOURCE PERMITS REGISTRATION 168547
AIR NEW SOURCE PERMITS REGISTRATION 142711
AIR NEW SOURCE PERMITS REGISTRATION 146126
AIR NEW SOURCE PERMITS PERMIT AMOC51
AIR NEW SOURCE PERMITS REGISTRATION 156246
AIR NEW SOURCE PERMITS REGISTRATION 161353
AIR NEW SOURCE PERMITS REGISTRATION 160669
AIR NEW SOURCE PERMITS REGISTRATION 156839
AIR NEW SOURCE PERMITS REGISTRATION 172306
AIR NEW SOURCE PERMITS REGISTRATION 175854
AIR NEW SOURCE PERMITS REGISTRATION 179688
AIR NEW SOURCE PERMITS REGISTRATION 177063
AIR NEW SOURCE PERMITS REGISTRATION 180265
PETROLEUM STORAGE TANK REGISTRATION REGISTRATION 78219
IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # (SWR) 30092
WASTEWATER PERMIT WQ0000392000
WASTEWATER EPA ID TX0003247
AIR EMISSIONS INVENTORY ACCOUNT NUMBER HG0048L
POLLUTION PREVENTION PLANNING ID NUMBER P00404
INDUSTRIAL AND HAZARDOUS WASTE PERMIT 50106
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXD082688979
INDUSTRIAL AND HAZARDOUS WASTE SOLID WASTE REGISTRATION # (SWR) 30092

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

Date Compliance History Report Prepared: April 01, 2026

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: April 01, 2021 to April 01, 2026

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

Name: Johnnie Wu **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: 09/20/2023 COURTORDER (Final Judgement-Agreed Order With Denial)

Classification: Major
Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition, 1 PERMIT
Description: On December 11, 2016, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate
Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: NSR #2167, Special Condition 1 PERMIT
Description: On December 8, 2017, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate
Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Description: On January 24, 2018, HLRP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate
Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: Special Condition 1 PERMIT
Description: On at least August 8, 2018, HLRP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate
Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
30 TAC Chapter 115, SubChapter B 115.114(a)(4)
30 TAC Chapter 115, SubChapter B 115.144(2)(C)
30 TAC Chapter 115, SubChapter D 115.352(1)
30 TAC Chapter 115, SubChapter D 115.352(4)
30 TAC Chapter 115, SubChapter H 115.725(d)(3)
30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 115, SubChapter H 115.764(a)(3)
30 TAC Chapter 115, SubChapter H 115.764(a)(6)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 117, SubChapter B 117.310(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.103(a)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.105(b)(3)(iii)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(c)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UUU 63.1568(a)(4)(iii)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: GTC OP
SCs 14H, 14E, 25, 31, 36, 56D, 59 PERMIT
SCs 43B and 64B.ii.b and GCs 11 and 15 PERMIT
STC 1.A OP
STC 23 OP
STC No. 26 OP

Description: On July 30, 2018, HRLP submitted to the TCEQ a deviation report. The deviation report documented the following violations at the Refinery for the compliance period of July 1,
2017, through June 30, 2018: HRLP failed to prevent the exceedance of the three-hour rolling average H2S concentration limit of 162 ppmv for the 736 Coker Flare at the Refinery. There was a total of 54 exceedances during 13 separate events for a total of 746 hours from December 23, 2017, through December 30, 2017, and Janua
Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 115, SubChapter B 115.112(d)(2)(H)
30 TAC Chapter 115, SubChapter D 115.352(2)
30 TAC Chapter 115, SubChapter D 115.354(11)
30 TAC Chapter 115, SubChapter H 115.764(a)(6)
30 TAC Chapter 115, SubChapter H 115.782(b)(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 117, SubChapter B 117.310(c)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(2)(i)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.119(c)(3)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT
Special Condition 14E PERMIT
Special Condition 14H PERMIT
Special Condition 25 PERMIT
Special Condition 31 PERMIT
Special Condition 40E PERMIT
Special Condition 43B PERMIT
Special Conditions 4 and 19E PERMIT
Special Term & Condition 26 OP
Special Term and Condition 1.A OP
Special Terms and Conditions 1.F OP

Description: On January 29, 2019, and July 30, 2019, HRLP submitted to the TCEQ deviation reports. The deviation reports documented the following violations at the Refinery for the
compliance period of July 1, 2018, through June 30, 2019: HRLP failed to prevent the exceedance of the three-hour rolling average H2S concentration limit of 162 ppmv for the 736 Coker Flare at the Refinery. The limit was exceeded intermittently for a total of 209 hours, ranging from 163 ppmv to 1,775 ppmv from November 11, 2018
Classification: Major

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC No. 1 PERMIT

Description: On September 3, 2019, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.
Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
Classification: Moderate

30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: SPECIAL CONDITION 1 PERMIT

Description: On March 25, 2018, HLRP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Major

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 101, SubChapter F 101.223(a)(2)
5C THSC Chapter 382 382.085(b)

Description: HRLP has failed to obtain TCEQ approval of a CAP related to the excessive emissions event. Accordingly, HRLP failed to obtain TCEQ approval of a CAP within 120 days after the TCEQ received the first CAP submission. On December 18, 2019, the TCEQ requested a Corrective Action Plan ("CAP") relating to the September 3, 2019 excessive emissions event at HRLP's Refinery. HRLP was required to obtain approval of a CAP by May 6, 2020, or 120 days from its first CAP submittal.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: SPECIAL CONDITION 1 PERMIT

Description: On August 6, 2020, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On April 12, 2020, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On September 26, 2018, HLRP caused, suffered, allowed, and/or permitted two separate unauthorized emissions.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On at least October 23, 2018, HLRP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Specific Condition 1 PERMIT

Description: On April 13, 2019, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On at least April 4, 2019, HLRP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Major

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Pemit 2167 Special Conditions 1 PERMIT

Description: From July 15, 2019, through July 16, 2019, HRLP caused, suffered, allowed, and/or permitted an

unauthorized emissions event.

Classification: Major

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On August 4, 2019, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Conditions 1 PERMIT

Description: From July 14, 2021, through at least July 16, 2021, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event. On September 2, 2021, the TCEQ performed an on-site investigation of the incident. the TCEQ investigators were escorted to an external floating roof tank identified as 137TK0420 ("EFR Tank") located in the 137 Tank Farm at the Refinery. The TCEQ observed the roof condition of the EFR Tank and noted large visible holes all across the roof and severe corrosion.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On February 17, 2022, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Major

Citation: 2A TWC Chapter 7, SubChapter D 7.101
30 TAC Chapter 116, SubChapter G 116.715(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 1 PERMIT

Description: On March 30, 2022, HRLP caused, suffered, allowed, and/or permitted an unauthorized emissions event.

Classification: Moderate

Citation: 2A TWC Chapter 7, SubChapter A 7.101
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.102a(f)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Condition 2 PERMIT
Special Conditions 31 PERMIT
Special Term and Condition 1A OP
Special Term and Condition 32 OP

Description: In deviation reports dated January 28, 2022 and July 28, 2022, HRLP documented the following violations at the Refinery: HRLP failed to prevent an exceedance of the permitted three-hour rolling average H2S concentration limit of 162 ppmv for Flare No. 1. Between July 10, 2021 and February 19, 2022, HRLP exceeded its three-hour rolling average H2S limit 98 times with H2S concentrations ranging from 164 ppmv to 46,591 ppmv. HRLP failed to prevent an exceedance of the permitted 12-hour rolling aver

2 Effective Date: 10/16/2024 ADMINORDER 2023-1786-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

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

Rqmt Prov: FOP Special Term and Condition 32 OP
NSR Special Condition 25 PERMIT

Description: Failed to comply with the H2S concentration limit of the fuel gas. Specifically, the Respondent exceeded the H2S concentration limit of approximately 160 parts per million by volume ("ppmv") on a three-hour rolling average basis by a range of 12 ppmvd to 20,692 ppmv for a total of 80 hours on eight days from December 24, 2022 to May 20, 2023 for the No. 2 Plant Flare, Emissions Point Number ("EPN") 338K0002. (Category A12i(6)).

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	April 14, 2021	(1725365)
Item 2	April 30, 2021	(1711006)
Item 3	May 11, 2021	(1739995)
Item 4	May 27, 2021	(1710706)
Item 5	June 11, 2021	(1739996)
Item 6	June 18, 2021	(1725042)
Item 7	July 09, 2021	(1751655)
Item 8	August 11, 2021	(1757121)
Item 9	September 01, 2021	(1708486)
Item 10	September 13, 2021	(1766140)
Item 11	September 15, 2021	(1678816)
Item 12	October 12, 2021	(1776601)
Item 13	November 04, 2021	(1783571)
Item 14	November 18, 2021	(1747493)
Item 15	December 08, 2021	(1790593)
Item 16	January 18, 2022	(1798389)
Item 17	January 28, 2022	(1771892)
Item 18	February 07, 2022	(1806265)
Item 19	March 10, 2022	(1813328)
Item 20	March 24, 2022	(1760549)
Item 21	April 06, 2022	(1819901)
Item 22	April 11, 2022	(1775083)
Item 23	May 10, 2022	(1828743)
Item 24	June 17, 2022	(1835029)
Item 25	June 28, 2022	(1722793)
Item 26	July 20, 2022	(1842237)
Item 27	August 04, 2022	(1724650)
Item 28	August 12, 2022	(1848372)
Item 29	September 08, 2022	(1856166)
Item 30	October 03, 2022	(1862525)
Item 31	November 14, 2022	(1869441)
Item 32	November 22, 2022	(1852241)
Item 33	November 30, 2022	(1841145)
Item 34	December 15, 2022	(1875286)
Item 35	December 19, 2022	(1834741)
Item 36	January 09, 2023	(1882109)
Item 37	February 14, 2023	(1889926)
Item 38	March 20, 2023	(1898483)
Item 39	April 19, 2023	(1905272)
Item 40	May 08, 2023	(1912457)
Item 41	June 08, 2023	(1919057)
Item 42	June 19, 2023	(1904804)
Item 43	June 22, 2023	(1869172)
Item 44	July 06, 2023	(1926022)
Item 45	August 10, 2023	(1782571)
Item 46	August 16, 2023	(1932987)
Item 47	August 29, 2023	(1918866)
Item 48	September 08, 2023	(1939121)
Item 49	September 27, 2023	(1930440)
Item 50	October 06, 2023	(1945973)
Item 51	November 08, 2023	(1951665)
Item 52	November 17, 2023	(1925503)
Item 53	December 06, 2023	(1961427)
Item 54	January 02, 2024	(1945903)
Item 55	January 05, 2024	(1968023)
Item 56	February 12, 2024	(1873214)

Item 57	March 08, 2024	(1983651)
Item 58	April 10, 2024	(1990181)
Item 59	May 09, 2024	(1996637)
Item 60	June 07, 2024	(1931560)
Item 61	June 25, 2024	(1994945)
Item 62	June 27, 2024	(1995345)
Item 63	July 15, 2024	(2011142)
Item 64	August 07, 2024	(2002385)
Item 65	September 11, 2024	(2023763)
Item 66	September 12, 2024	(2007947)
Item 67	October 08, 2024	(2029887)
Item 68	November 14, 2024	(2009496)
Item 69	November 15, 2024	(2036208)
Item 70	December 11, 2024	(2042319)
Item 71	December 19, 2024	(2027436)
Item 72	January 02, 2025	(2003470)
Item 73	January 13, 2025	(2049146)
Item 74	March 04, 2025	(2042766)
Item 75	March 19, 2025	(2065280)
Item 76	April 04, 2025	(2072085)
Item 77	May 06, 2025	(2078484)
Item 78	May 15, 2025	(2055699)
Item 79	May 29, 2025	(1951025)
Item 80	June 09, 2025	(2085576)
Item 81	July 10, 2025	(2092686)
Item 82	August 12, 2025	(2099266)
Item 83	September 18, 2025	(2108408)
Item 84	October 06, 2025	(2108409)
Item 85	November 03, 2025	(2078160)
Item 86	November 04, 2025	(2091368)
Item 87	November 10, 2025	(2117895)
Item 88	November 24, 2025	(2104551)
Item 89	December 02, 2025	(2090177)
Item 90	December 10, 2025	(2124756)
Item 91	January 06, 2026	(2131367)
Item 92	February 06, 2026	(1995915)
Item 93	February 24, 2026	(2105945)

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: 12/04/2025 (2090178)

Self Report? NO Classification: Moderate

Citation: 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)
Special Term and Condition 1A OP

Description: Failure to prevent exceedance of hourly average carbon monoxide (CO) concentration limit for Wet Gas Scrubber (EPN: 732D0063). (Category B13)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
Special Condition 28(A) PERMIT
Special Term and Condition 1A OP

Special Term and Condition 33 OP

Description: Failure to maintain minimum net heating value (NHV) for No. 1 Plant Flare (EPN: 338K0001). (Category B18g.1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)

Special Condition 28(A) PERMIT
Special Term and Condition 1A OP
Special Term and Condition 33 OP

Description: Failure to maintain minimum net heating value (NHV) for No. 3 Plant Flare (EPN: 338K0007). (Category B18g.1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
Special Condition 28(A) PERMIT
Special Term and Condition 1A OP
Special Term and Condition 33 OP

Description: Failure to maintain minimum net heating value (NHV) for the 736 Coker Flare (EPN: 736K0101A). (Category B18g.1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 43A (2) PERMIT
Special Term and Condition 33 OP

Description: Failure to maintain minimum liquid to gas ratio for FCCU Wet Gas Scrubber (EPN: 732D0063). (Category B18g.1)

Self Report? NO Classification: Moderate

Citation: 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)
Special Term and Condition 1A OP

Description: Failure to prevent exceedance of 3-hour rolling average H2S concentration limit for No. 2 Plant Flare (EPN: 338K0002). (Category B13)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.102a(f)(1)
5C THSC Chapter 382 382.085(b)
Special Condition 36 PERMIT
Special Term and Condition 1A OP
Special Term and Condition 33 OP

Description: Failure to prevent exceedance of 12-hour flow weighted average sodium dioxide (SO2) concentration limit for 435 Thermal Oxidizer and 440 Thermal Oxidizer (EPNs: 435F1402 and 440F2002). (Category B13)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Condition 31 PERMIT
Special Term and Condition 33 OP

Description: Failure to prevent exceedance of hourly carbon monoxide (CO) concentration limit for 435 Thermal Oxidizer (EPN: 435F1402). (Category B13)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP

Description: Failure to conduct highly reactive volatile organic compound (HRVOC) sampling during analyzer downtime for No. 1 Plant Flare (EPN: 338K0001). (Category B1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP

Description: Failure to collect a valid highly reactive volatile organic compound (HRVOC) sample during analyzer downtime for No. 2 Plant Flare (EPN: 338K0002). (Category B1)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 115, SubChapter H 115.725(d)(4)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP

Description: Failure to collect a valid HRVOC sample during analyzer downtime for 736 Coker Flare (EPN: 736K0101A). (Category B1)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.104(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Ja 60.103a(h)
5C THSC Chapter 382 382.085(b)
Special Condition 25 PERMIT
Special Term and Condition 1A OP
Special Term and Condition 33 OP
Description: Failure to prevent exceedance of 3-hour rolling average H2S concentration limit for Mixing Pot (EPN: 338D0408). (Category B13)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(d)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP
Description: Failure to conduct weekly carbon canister monitoring required on Lift Station #5 (EPN: 137TK0005). (Category B1)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT CC 63.670(e)
5C THSC Chapter 382 382.085(b)
Special Condition 28(A) PERMIT
Special Term and Condition 1A OP
Special Term and Condition 33 OP
Description: Failure to maintain minimum net heating value (NHV) for No. 2 Plant Flare (EPN: 338K0002). (Category B18g.1)

Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.357(d)(7)(iv)(A)
5C THSC Chapter 382 382.085(b)
Special Term and Condition 1A OP
Description: Failure to maintain the minimum 3-hour average temperature for Solid Sludge Processing Unit (SSPU) (EPN: 313TO0001). (Category B18g1)

F. Environmental audits:

Notice of Intent Date: 02/20/2023 (1881005)
Disclosure Date: 08/18/2023
Viol. Classification: Minor
Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT A 262.17(a)(1)(vi)(B)
Description: Failed to have a visible "No Smoking" sign per 40 CFR 262.17(a)(1)(vi)(B) at an ignitable waste accumulation area (the Wash Pad/Hydroblast Area).

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN	**§**	**BEFORE THE**
ENFORCEMENT ACTION	**§**	
CONCERNING	**§**	**TEXAS COMMISSION ON**
HOUSTON REFINING LP	**§**	
RN100218130	**§**	**ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2025-1868-AIR-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Houston Refining LP (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a petroleum refinery located at 12000 Lawndale Street in Houston, Harris County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).

2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.

3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

4. An administrative penalty in the amount of $19,050 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid $15,240 of the penalty and $3,810 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.

7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.

8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

9. The Executive Director recognizes that by October 14, 2024, the Respondent utilized thermal scanning and potential source isolation to locate the emission source and updated instructions and corresponding training to regulate the speed the valve is opened when lining out of service equipment to the in-service operating equipment in order to comply with the hydrogen sulfide ("H2S") concentration limit for the No. 1 Plant Flare, Emissions Point Number ("EPN") 338K0001.

II. ALLEGATIONS

During a record review for the Plant conducted from September 4, 2025 through November 10, 2025, an investigator documented that the Respondent failed to comply with the H2S concentration limit of fuel gas, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.715(a) and 122.143(4), 40 CODE OF FEDERAL REGULATIONS § 60.103a(h), Flexible Permit Nos. 2167 and PSDTX985, Special Conditions No. 25, Federal Operating Permit O1372, General Terms and Conditions and Special Terms and Conditions Nos. 1.A and 32, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent exceeded the H2S concentration limit of 162 parts per million by volume ("ppmv") determined hourly on a 3-hour rolling average basis by a range from 31 ppmv through 14,379 ppmv for a total of 25 hours on ten days from September 6, 2024 through October 26, 2024 for the No. 1 Plant Flare, EPN 338K0001.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Houston Refining LP, Docket No. 2025-1868-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. All relief not expressly granted in this Order is denied.

3. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.

4. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

5. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

6. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

_____	_____
For the Commission	Date
Kristin Mello-Jurack	06/28/2026
For the Executive Director	Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

_____	4/8/2026
Signature	Date
Lambert (Clint) Titzman	Site Manager
_____	_____
Name (Printed or typed) Authorized Representative of Houston Refining LP	Title

☐ *If mailing address has changed, please check this box and provide the new address below:*

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.