



**BOBBY JINDAL**  
GOVERNOR

**PEGGY M. HATCH**  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

January 3, 2013

CERTIFIED MAIL (7003 2260 0000 5827 0127)  
RETURN RECEIPT REQUESTED

**MARATHON PETROLEUM COMPANY LP**  
c/o C T Corporation System  
Agent for Service of Process  
5615 Corporate Boulevard  
Suite 400B  
Baton Rouge, Louisiana 70808

**RE: CONSOLIDATED COMPLIANCE ORDER  
& NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. AE-CN-11-01307  
AGENCY INTEREST NO. 3165**

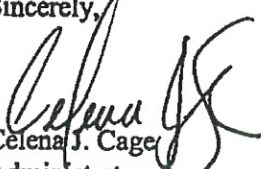
Dear Sir:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **MARATHON PETROLEUM COMPANY LP (RESPONDENT)** for the violation(s) described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violation(s) cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Tonya Landry at (225) 219-3785.

Sincerely,

  
Celena J. Cager  
Administrator  
Enforcement Division



CJC/TBL/tbl  
Alt ID No. 2580-00013  
Attachment

c: Marathon Petroleum Company LP  
c/o Nicole Brien, Environmental Supervisor  
Post Office Box AC  
Garyville, Louisiana 70051

STATE OF LOUISIANA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF

**MARATHON PETROLEUM COMPANY LP**  
**ST. JOHN THE BAPTIST PARISH**  
**ALT ID NO. 2580-00013**

PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT,  
La. R.S. 30:2001, ET SEQ.

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**ENFORCEMENT TRACKING NO.**

**AE-CN-11-01307**

**AGENCY INTEREST NO.**

**3165**

**CONSOLIDATED**

**COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **MARATHON PETROLEUM COMPANY LP (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

**FINDINGS OF FACT**

**I.**

The Respondent owns and/or operates a refinery located at or near 4663 West Airline Highway in Garyville, St. John the Baptist Parish, Louisiana. The Facility operates or has operated under the authority of the following Title V Air Permits:

UNIT	PERMIT	ISSUE DATE	EXPIRATION DATE
Coker Unit and Gasoline Desulfurization Unit	2640-V3	8/25/04	10/21/04
	2640-V4	2/22/06	2/22/11
	2640-V5	12/27/06	2/22/11
	2640-V6	10/12/09	2/22/11
Fugitive & Miscellaneous Equipment	2887-V1	7/12/04	6/15/09

UNIT	PERMIT	ISSUE DATE	EXPIRATION DATE
	2887-V2	12/16/05	6/15/09
	2887-V3	12/27/06	6/15/09
	2887-V4	10/26/07	6/15/09
	2887-V5	4/10/08	6/15/09
	2887-V6	11/26/08	6/15/09
	2887-V7	1/6/09	6/15/09
	Storage Tanks	2891-V1	3/14/05
2891-V2		12/20/05	1/3/10
2891-V3		5/31/06	1/3/10
2891-V4		12/27/06	1/3/10
2891-V5		4/25/08	1/3/10
2891-V6		11/26/08	1/3/10
2891-V7		10/19/09	1/3/10
Combustion Sources	2893-V0	8/10/05	8/10/10
	2893-V1	12/16/05	8/10/10
	2893-V2	9/6/06	8/10/10
	2893-V3	12/27/06	8/10/10
	2893-V4	1/30/07	8/10/10
	2893-V5	7/23/07	8/10/10
	2893-V6	10/19/07	8/10/10
	2893-V7	6/20/08	8/10/10
	2893-V8	10/10/08	8/10/10
	2893-V9	1/6/09	8/10/10
	2893-V10	9/21/09	8/10/10
2893-V11	12/16/09	8/10/10	
Louisiana Refining Division	2580-00013-V0	7/8/10	7/8/15
	2580-00013-V1	1/18/11	7/8/15
	2580-00013-V2	3/16/11	7/8/15
	2580-00013-V3	8/17/11	7/8/15
	2580-00013-V4	12/2/11	7/8/15
Garyville Major Expansion Project	3039-V0	12/27/06	12/27/11

UNIT	PERMIT	ISSUE DATE	EXPIRATION DATE
	3039-V1	8/10/07	12/27/11
	3039-V2	12/20/07	12/27/11
	3039-V3	4/22/08	12/27/11
	3039-V4	10/9/08	12/27/11
	3039-V5	8/3/09	12/27/11
	3039-V6	9/29/09	12/27/11
	3039-V7	7/8/10	12/27/11
	3039-V8	11/29/10	12/27/11
	3039-V9	3/16/11	12/27/11
	3039-V10	12/21/11	12/27/11

## II.

The Respondent submitted its Title V Annual Compliance Certification Reports, which did not include all the information to determine the compliance status of the source as required by LAC 33:III.507.H.5.c as referenced by Part 70 General Condition M.

## III.

On or about February 24, 2010, an investigation of an unauthorized discharge which occurred on or about February 22, 2010, at the facility was performed to determine the degree of compliance with the Act and the Air Quality Regulations. While the Department's investigation is not yet complete, the following violations were noted during the course of the investigation:

The Department received an unauthorized discharge notification report from the Respondent dated February 24, 2010. According to the Respondent the following pollutants were released to the atmosphere during this incident:

Compound	Amount Released (lbs)	Permitted Maximum Pounds Per Hour
Highly Reactive VOC	21.5	0.53
VOC	31.7	
H <sub>2</sub> S	6.8	Not permitted
NO <sub>x</sub>	15.0	1.17
SO <sub>2</sub>	2,547.7	0.91
CO	81.4	1.57

According to this report, on February 22, 2010, water from the offline coke drum overhead line was inadvertently sent to the Main Fractionator; vaporized and over pressured the wet gas compressor suction drum which caused the Pressure Control Valve (205-PC-1511-V2) to open to the North Ground Flare (EQT 0282). The duration of the release was eighteen (18) minutes. The Respondent reported that there were no known offsite impacts associated with this incident. Each exceedance of the maximum pounds per hour permit limit for VOC, NO<sub>x</sub>, SO<sub>2</sub>, and CO is a violation of LAC 33:III.501.C.4, Title V Permit No. 3039-V6, LAC 33:III.905, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Emissions of an unpermitted pollutant is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Additionally, this unauthorized discharge report stated that "All aspects of this incident/upset are currently under investigation. Once the TapRoot ® analysis is completed, all recommendations will be implemented in a timely manner. . . ." The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause. Failure to submit updates is a violation of LAC 33:I.3925.A.3 and La. R.S. 30:2057(A)(2).

#### IV.

On or about January 31, 2012, through February 10, 2012, the Department conducted file reviews to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits from August 25, 2004, through December 21, 2011. While the review is not complete, the Department noted the violations found in paragraphs V-XI of the Findings of Fact portion of this enforcement action.

#### V.

The Respondent reported the following unauthorized releases:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	Unauthorized Discharge Notification for Incident 76286 (1/25/2005)	2887-V1	LRD Unit flange gasket	1/19/05	compressed flammable gas	Not permitted	81	A flange gasket was not replaced after maintenance activities due to operator error.	LAC 33:III.905
B.	Unauthorized Discharge Notification for Incident 76432 (1/25/2005)	2893-V0	South Flare EQT 0160	1/25/05	SO <sub>2</sub>	1.32	16	The control logic for the Unit 47 Lean Amine Pump was tripped due to operator error.	LAC 33:III.905

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
C.	Unauthorized Discharge Notification for Incident 79431 (6/2/2005)	2893-VO	North Flare EQT 0162	5/28/05	Butane	Not permitted	914	Regenerate steam was blocked in due to operator error and caused the liquid feed drier to over pressurize.	LAC 33:III.905
					H <sub>2</sub> S	Not permitted	26		
					SO <sub>2</sub>	1.20	49		
D.	Release Notification for Incident 79912 (6/23/2005)	2893-VO	North Flare EQT 0162	6/17/05	SO <sub>2</sub>	1.20	1**	Hydrocarbon carryover from another unit increased unit pressure and caused the preventable release from the sour water stripper. The Respondent reported that this incident was preventable.	LAC 33:III.905
E.	Unauthorized Discharge Notification for Incident 83347 (10/27/05)	2893-VO	North Flare EQT 0162	10/21/05	SO <sub>2</sub>	1.20	6,623	The Delayed Coker Unit's Drums 1 and 2 overpressured led to the Blowdown System and Wet Gas compressor relieving to the flare. The Respondent did not follow the procedure to reduce the charge rate.	LAC 33:III.905
					H <sub>2</sub> S	Not permitted	18		
					HRVOC	VOC (7.90)	29		
F.	2005 Consolidated Second Quarter General Condition D.C and R.3 Report (9/16/2005)	2893-VO	South Flare EQT 0160	4/1/05	SO <sub>2</sub>	1.32	27.1	The Heavy Gas Oil Hydroheater Unit LP Offgas Compressor overramped and caused the Stripper Receiver to overpressure and relieve to the flare.	LAC 33:III.501.C.4
					VOC	2.29	8.7		
					H <sub>2</sub> S	Not permitted	0.1		
G.	2005 Consolidated Third Quarter General Condition D.C and R.3 Report (12/21/05)	2893-VO	South Flare EQT 0160	7/24/05	VOC	2.92	11.9	High temperature product was temporarily routed to the sphere while building up inventory; the	LAC 33:III.501.C.4
					Olefins	Not permitted	10.1		



	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
								high temperature caused the sphere to overpressure.	
H.	2005 Consolidated Fourth Quarter General Condition IX.C Report (3/15/06)	2893-V0	South Flare EQT 0160	10/10/05	VOC	2.92	90	Excessive hydrogen was put into the fuel gas system that adversely affected the heater operation.	LAC 33:III.501.C.4
I.				11/1/05	VOC	2.92	1,116		
J.	40 CFR 70 General Conditions N and R Report (03/01/2007) And Unauthorized Discharge Notification for T94400 (3/07/07)	2887-V3	Marine/Barge Loading Operations EQT 0054	2/27/07	Benzene	Not permitted	0.06	Piping on the new liquid separation vessel was installed incorrectly. Excess liquid was routed to a sump instead of the ballast water rundown line that eventually goes to the slop oil tank. The duration of this incident was 11 hours.	LAC 33:III.501.C.4 LAC 33:III.905
VOCs HRVOCs					2.46	439.79 3.99			
Compressed, Flammable Gas					Not permitted	2036.4 lbs			
K.	Unauthorized Discharge Notification for T93979 (02/20/2007) And First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V4	North Flare EQT 0162 and GRPO20	2/14/07	SO <sub>2</sub>	1.20	716	The new Distillate Hydrotreating Unit's recycle gas compressor shutdown. The duration of this incident was 11 hours. (*provide root cause)	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
H <sub>2</sub> S					Not permitted	1			
VOC					7.90	35			
H <sub>2</sub> S					160 ppm H <sub>2</sub> S 3 hour average	(*More information required)			
L.	Unauthorized Discharge Notification for T93924 (2/15/07) And First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V4	South Flare EQT 0160	2/12/07	SO <sub>2</sub>	1.32	11	Two of the refinery's steam boilers shutdown unexpectedly. The H <sub>2</sub> S content was 1.47%. The duration of the incident was 60 minutes. (*provide root cause)	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
NO <sub>x</sub>					2.84	<1**			
VOC					2.92	<1**			



	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
M.	Unauthorized Discharge Notification for T94388 (3/8/07) And First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V4A	South Flare EQT 0160	3/6/07	SO <sub>2</sub>	1.32	.02**	One of two compressors in Unit 22 shutdown for maintenance and gas feed to the Unit was significantly decreased. As result of the reduced gas feed, the temperature of the gas feed cooler effluent decreased, in turn increasing the amount of condensed liquid in the interstage knockout drum. The increased liquid volume caused a high level in the drum and control valve was found plugged. The valve to South Flare Knockout Drum was opened intermittently for total of 74 minutes. Reported as preventable.	40 CFR 60.104(a)(1) LAC 33:III.905
					H <sub>2</sub> S	Not permitted	<.01		
N.	Unauthorized Discharge Notification for T95029 (4/4/07)	2893-V4A	South Flare EQT 0160	3/30/07	SO <sub>2</sub>	1.32	5	A sudden loss of pressure was noticed in the Gas Oil Hydrotreating Unit. The emergency "dump" valve had opened. An electrical failure caused the sudden change in valve position. (*specify if the electrical failure was internal or external?)	LAC 33:III.501.C.4
					H <sub>2</sub> S	Not permitted	<.01		
O.	Unauthorized Discharge Notification	2893-V4A	North Flare EQT 0162	4/25/07	SO <sub>2</sub>	1.20	76	After a scheduled Drum swap,	40 CFR 60.104(a)(1) LAC 33:III.501.C.4

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	for T95653 (05/01/2007) And Second Quarter 2007 NSPS Subpart J Report (7/30/07)				H <sub>2</sub> S	Not permitted	<1	Drum No. 1 pressured-up while steam stripping on the Fractinator. The H <sub>2</sub> S content was 14.50%. The duration of the incident was 1 minute. (*provide root cause)	
P.	Unauthorized Discharge Notification for T95665 (5/02/07)	2893-V4A	North Flare EQT 0162	4/26/07	SO <sub>2</sub>	1.20	40	Maintenance was being performed on the shutdown solenoid on the FCCU's upper spent slide valve. While trying to make tie-ins to the Triconex System a fuse was blown causing FCCU to shutdown. A small fire resulted in a set of exchangers and was promptly extinguished. Flaring occurred during shutdown for 35 minutes.	LAC 33:III.501.C.4
				Hydrocarbons	Not permitted	15			
				HRVOC	7.90	9			
Q.	Unauthorized Discharge Notification for T96496 (05/29/2007)	2893-V4A	North Flare EQT 0162	5/23/07	VOC	7.90	82	The relief valve on the HF Alkylation Unit's depropanizer was sticking open. The duration of this incident was 5 minutes. (*provide root cause)	LAC 33:III.501.C.4
R.	Unauthorized Discharge Notification for T98775 (8/23/07)	2893-V5	North Flare EQT 0162	8/18/07	SO <sub>2</sub>	1.20	199	The Crude Overhead Compressor overpressured and relieved to North Flare. The duration of the incident was 25 minutes. (*provide root cause)	LAC 33:III.501.C.4
				NO <sub>x</sub>	3.52	10			
				VOC	7.90	29			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
S.	Unauthorized Discharge Notification for T98913 (8/31/07) And Unauthorized Discharge Notification for T98914 (8/31/07) And Third Quarter 2007 NSPS Subpart J Report (10/30/07)	2893-V5 For EQT 0162 And (*provide Permit No. for valve)	North Flare EQT 0162 and HF Acid Settler relief valve (*provide FUG for valve)	8/24/07	Hydrocarbons from EQT 0162	Not permitted	663.14	This incident was caused by the failure of the Unit 27 Substation PT transformer and the bellows in the Unit 27 Main Fractionator Bottoms relief valve. The H <sub>2</sub> S content was <20 ppm. The duration of this incident was 10 hours. (*provide root cause)	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
					Olefins from EQT 0162 VOC	7.90	1.31**		
					NO <sub>x</sub>	3.52	277.16 from EQT 0162		
					Hydrocarbons from valve	Not permitted	130.96		
					Olefins from valve	Not permitted	17.2		
					HF from valve	Not permitted	.80 from Valve		
T.	Unauthorized Discharge Notification for T99754 (10/02/07)	2893-V5	South Flare EQT 0160	9/26/07	SO <sub>2</sub>	1.32	<1**	The Shell off-gas compressors experienced a problem and had to shutdown. When the compressors go down, gas is put into the fuel gas system which over pressured. Reported as preventable.	LAC 33:III.905
					Olefins VOC	12.36	< 2**		
U.	Unauthorized Discharge Notification for T100086 (10/17/07) And Fourth Quarter 2007 NSPS Subpart J Report (1/30/08)	2893-V5	South Flare EQT 0160	10/10/07	H <sub>2</sub> S	Not permitted	166	The packing in a lean amine bypass control valve blew out. To repair the valve, the unit required depressuring to the refinery's South Flare. The H <sub>2</sub> S content was 6.76%. The duration of the incident was 8 hours. (*provide root cause)	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
					SO <sub>2</sub>	1.32	5,067		
					VOC	12.36	583		
					PM	.21	501		
					NO <sub>x</sub>	5.61	1.3**		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
V.	Unauthorized Discharge Notification for T100369 (10/24/07)	(*Not Reported)	Pump (*need FUG)	10/20/07	Sodium Hypochlorite	Not permitted	6.2	A leak occurred when the pump suction line broke and caused bleach to spill into the small dike area where the pumps are located. Reported as preventable.	LAC 33:III.905
W.	Unauthorized Discharge Notification for T100653 (11/02/07) And Fourth Quarter 2007 NSPS Subpart J Report (1/30/08)	2893-V6A	North Flare, EQT 0162	10/29/07	SO <sub>2</sub>	1.20	1,857	Water from the Coker Overhead line went into the Main Fractionator and vaporized then went into the Fractionator Overhead Receiver. The vapors from the Overhead Receiver went to the 1 <sup>st</sup> Stage Suction Drum of the Coker Wet Gas Compressor raising the drum pressure above 15 psig. The H <sub>2</sub> S content was 7.86%. The duration of this incident was 7 minutes. (*provide root cause)	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
					H <sub>2</sub> S	Not permitted	4.96		
X.	Unauthorized Discharge Notification for T101734 (12/18/07)	2893-V6A	South Flare EQT 0160	12/16/07	VOC	12.36	18	A plantwide power surge caused several pumps and compressors to shutdown. The duration of this incident was one hour. (*specify if power surge was internal or external)	LAC 33:III.501.C.4
Y.	Unauthorized Discharge Notification for T101968 (1/4/08)	2893-V6A	Thermal Oxidizer No. 2 EQT 0161	12/29/07	SO <sub>2</sub> H <sub>2</sub> S	NSPS 40 CFR 60 Subpart J SO <sub>2</sub> limit of 250 ppm; H <sub>2</sub> S limit of 160 ppm	(*not provided)	The Amine Unit 47 shutdown when amine circulation was lost due to control valve failing to close.	40 CFR 60 Subpart J LAC 33:III.501.C.4

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max:lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
								Lost of amine circulation in Unit 47 caused a severe swing in acid gas production which resulted in loss of feed to the Unit 45 Sulfur Recover Unit. The resulting increase in feed to the Units 20 & 34 SRUs caused these units to go off air ratio. Being off ratio caused a spike in SO <sub>2</sub> emissions from the SRUs. The Respondent reported the SO <sub>2</sub> limit of 250 ppm for EQT 161 was exceeded and the H <sub>2</sub> S limit of 160 ppm for the fuel gas system was exceeded. The duration of the incident was 7 hours. (*specify root cause)	
Z.	Unauthorized Discharge Notification for T102655 (2/01/08) And First Quarter 2008 NSPS Subpart J Report (4/30/08)	2893-V6A	North Flare EQT 0152	1/28/08	VOC HRVOC	7.90	256 116	The Coker Unit's Wet Gas Compressor (WGC) shutdown due to high level in the suction drum. The Coker Unit began bringing feed into the unit after being shut down for scheduled maintenance activities. During startup of the unit, the feed into the Unit could not be stopped when the WGC tripped. Also there was an	40 CFR 60.104(a)(1) LAC 33:11.501.C.4
				H <sub>2</sub> S	Not permitted	109			
				NO <sub>x</sub>	3.52	142			
				SO <sub>2</sub>	1.20	40, 782			
				CO	2.92	771			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
								issue with the timing of restarting the WGC. The Duration of this incident was 130 minutes.	
AA.	Unauthorized Discharge Notification for T102655 (2/01/08)	2893-V6A	North Flare EQT 0162	1/28/08	VOC HRVOC	7.90	256 116	The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.	LAC 33:1.3925.A.3
					H <sub>2</sub> S	Not permitted	109		
					NO <sub>x</sub>	3.52	142		
					SO <sub>2</sub>	1.20	40,782		
					CO	2.92	771		
BB.	Unauthorized Discharge Notification for T103090 (2/21/08) And First Quarter 2008 NSPS Subpart J Report (4/30/08)	2893-V6A	North Flare EQT 0162 and South Flare EQT 0160	2/15/08	VOC HRVOC EQT 0162	7.9	(*provide emissions for pollutants listed to the left for each flare, separately; provide amount of H <sub>2</sub> S above the amount specified in 40 CFR 60.104(a)(1) for EQT 0162)	A partial refinery-wide power failure caused several units to shutdown and relieve to the emergency flares (EQT 0162 & 0160) The Respondent report the H <sub>2</sub> S limit as specified in 40 CFR 60.104(a)(1) was exceeded for EQT 0162. The Respondent also reported the opacity limit was exceeded for both flares. (* Respondent failed to submit an update, every sixty (60) days until the	40 CFR 60.104(a)(1) 40 CFR 60.18(c)(1) LAC 33:1.3925.A.3
					Benzene EQT 0162	<0.01			
					H <sub>2</sub> S EQT 0162	Not permitted			
					NO <sub>x</sub> EQT 0162	3.52			
					SO <sub>2</sub> EQT 0162	1.20			
					CO EQT 0162	2.92			
					VOC HRVOC EQT 0160	12.36			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
					Benzene EQT 0160	<0.01		Investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	
					H <sub>2</sub> S EQT 0160	Not permitted			
					NO <sub>x</sub> EQT 0160	5.61			
					SO <sub>2</sub> EQT 0160	1.32			
					CO EQT 0160	15.32			
CC.	Unauthorized Discharge Notification for T103973 (3/20/08)	2893-V6A	North Flare EQT 0162	3/14/08	VOC HRVOC	7.90	119.5 20.5	The Shell off-gas compressors had to be shutdown for emergency maintenance resulting in a buildup of sweet refinery fuel gas which had to be flared. The duration of this incident was 120 minutes.	LAC 33:III.501.C.4
					NO <sub>x</sub>	3.52	46.9		
DD.	Unauthorized Discharge Notification for T103950 (3/20/08) And First Quarter 2008 NSPS Subpart J Report (4/30/08)	2893-V6A	North Flare EQT 0162	3/14/08	SO <sub>2</sub>	1.20	2,206	A plugged drain valve caused the Fractionator in Coker Unit to overpressure. This in turn caused the Unit's compressor suction drum to relieve to flare. The H <sub>2</sub> S content was 0.04%. The duration of the incident was 80 minutes.	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
EE.	Unauthorized Discharge Notification for T103950 (3/20/08)	2893-V6A	North Flare EQT 0162	3/14/08	SO <sub>2</sub>	1.20	2,206	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of	LAC 33:1.3925.A.3



	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or-PERMIT REQUIREMENTS
								the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	
FF.	Unauthorized Discharge Notification for T104869 (4/25/08)	(*Not Reported)	Flange on Asphaltene Pump around Exchanger (*need FUG)	4/18/08	VOC	(*Additional information required)	172	The ROSE Unit had been flushed and was on internal circulation. The change in temperature caused the metal to contract and the exchanger flange to leak. (*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
GG.	Unauthorized Discharge Notification for T105287 (5/08/08)	(*Not Reported)	N/A	5/1/08	Heavy slop oil (*specify pollutants released during fire)	Not permitted	(*specify quantity of pollutants released during fire)	Approximately 30 gallons of H <sub>2</sub> O was released to the Coker Unit's concrete slab prior to the small fire due to a leak of the Delayed Coker Unit's Heavy Slop Oil line.	LAC 33:1.3925.A.3

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
								Two Turner employees sustained minor burns and were treated on-site. (*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	
HH.	Unauthorized Discharge Notification for T107208 (7/18/08)	(*Not Reported)	Tubing on flow orifice plate of the FCCU	7/15/08	HRVOC	Not permitted	1,440.18	Tubing on flow orifice plate sheared off during start-up of the FCC Unit. This tubing was attached to the LPG vaporizer. (*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
				VOC	Not permitted	4,199.70			
				Compressed, flammable gas	Not permitted	4,199.70			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
II.	Unauthorized Discharge Notification for T107688 (8/08/08) And Third Quarter 2008 NSPS Subpart J Report (10/30/08)	2893-V6A	North Flare EQT 0162	8/01/08	VOC HRVOC	7.90	53 lbs 33 lbs during event	The FCCU shutdown due to an unknown failure in the unit's Wet Gas Compressor for 22 minutes. The H <sub>2</sub> S content was <0.1%. The unit was kept circulating to avoid a complete shutdown for 36 hours.	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
					SO <sub>2</sub>	1.20	0.02 lbs during event**		
					VOC	7.90	27 lbs during circulation		
					NO <sub>x</sub>	3.52	746 lbs during circulation		
JJ.	Unauthorized Discharge Notification for T107688 (8/08/08)	2893-V6A	North Flare EQT 0162	8/01/08	VOC HRVOC	7.90	53 lbs 33 lbs during event	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:I.3925.A.3
					SO <sub>2</sub>	1.20	0.02 lbs during event**		
					VOC	7.90	27 lbs during circulation		
					NO <sub>x</sub>	3.52	746 lbs during circulation		
KK.	Unauthorized Discharge Notification for T108044 (8/20/08)	(*Not Reported)	Inlet flange on relief valve in Unit 14 (*need FUG)	8/14/08	VOC	2.2	2.5	An Inlet flange on a relief valve leaked to the atmosphere.	LAC 33:III.501.C.4
LL.	Unauthorized Discharge Notification for T108823 (9/15/08) And Third Quarter 2008 NSPS Subpart J Report (10/30/08)	2893-V6A	North Flare EQT 0162	9/10/08	VOC from hatch HRVOC from hatch	Not permitted	79 0.28	During the loading of an Enterprise Transportation propane tanker, the hatch at the rear was found to be leaking. The majority of the product from the leaking tanker was transferred to another tanker onsite. The H <sub>2</sub> S content was <0.1%. The	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
					VOC HRVOC	7.90	43 0.16		
					CO	2.92	69		
					NO <sub>x</sub>	3.52	13		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
								duration of the incident was 46 minutes. The remaining quantity was sent to the North Flare. (*provide root cause of leaking hatch)	
MM.	Unauthorized Discharge Notification for T110398 (10/31/08)	(*Not Reported)	Butane Storage Tank EQT 0046	10/27/08	VOC	(*Additional information required)	963	During the annual emission monitoring of the RBS tank relief valve it was observed that the relief valve was intermittently relieving to the atmosphere. (*provide root cause)	LAC 33:III.501.C.4
NN.	Unauthorized Discharge Notification for T110717 11/14/08	(*Not Reported)	% bleeder valve atop exchangers in Unit 56 Diesel Hydrotreater (*need FUG)	11/08/08	Hydrocarbons (*provide what was released to atmosphere)	Not permitted	23 gal (*provide amount of what was released to atmosphere)	During startup of Unit 56 Diesel Hydrotreater, the valve was inadvertently left open and light cycle oil was released.	LAC 33:III.905
OO.	Unauthorized Discharge Notification for T110736 (11/14/08)	(*Not Reported)	Unit 56 Diesel Hydrotreater (*need FUG)	11/10/08	Diesel fuel	Not permitted	1 gal was combusted	A diesel pump in Unit 56 Diesel Hydrotreater was being prepared for maintenance by removing the pump's strainer. Upon strainer removal, high temperature diesel began leaking by a motor operated valve causing a small flash fire. This incident was reported as preventable.	LAC 33:III.905
PP.	Unauthorized Discharge Notification	2893-V6A	North Flare EQT 0162	1/28/08	VOC HRVOC	7.90	256 116	The Coker Unit's Wet Gas Compressor	40 CFR 60.104(a)(1) LAC 33:III.501.C.4

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	for T102655 (2/01/08) And First Quarter 2008 NSPS Subpart J Report (4/30/08)				H <sub>2</sub> S	Not permitted	109	(WGC) shutdown due to high level in the suction drum. The Coker Unit began bringing feed into the unit after being shut down for scheduled maintenance activities. During startup of the unit, the feed into the Unit could not be stopped when the WGC tripped. Also there was an issue with the timing of restarting the WGC. The Duration of this incident was 130 minutes.	
QQ.	Unauthorized Discharge Notification Report for T111750 (1/9/09)	2891-V6	Deasphalted Oil Tank EQT 0104	1/4/09	Butane	Not permitted	1,726 lbs	Operator failed to close battery limits block valve during unit shutdown.	LAC 33:III.905 LAC 33:III.501.C.2
RR.	Unauthorized Discharge Notification Report for T112890 (1/30/09)	2893-V9	South Flare Stack EQT 0160	1/23/09	Isobutane	Not permitted	386 lbs	Valve misalignment allowed 18sobutene to be routed to the flare.	LAC 33:III.905 LAC 33:III.501.C.2
SS.	Unauthorized Discharge Notification Report for 115595 (6/17/09)	(*Not Reported)	Hydrocarbon feed exchanger 11- 1301	6/11/09	Benzene	Not permitted	1 lb	While cleaning the exchanger in Unit 11, a piece of tubing blew out.	LAC 33.III.905
TT.	Unauthorized Discharge Notification Report for 7/26/09 incident (7/29/09)	(*Not Reported)	Crude oil pipe located inside 500-9 tank dike.	7/26/09	Crude Oil	Not permitted	26 Gallons	Maintenance was breaking a crude line flange inside the diked area of Tank 500-9 for a GME tie- in, when approximately 26 gallons of oil spilled on the ground outside the drip pan. (*more information)	LAC 33:III.905

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UU.	Unauthorized Discharge Notification Report for T119673 (11/25/09)	(*Not Reported)	Unit 263 Pipe Rack	11/23/09	H <sub>2</sub> S	Not permitted	3.54 lbs	During startup of the Kerosene Hydrotreater Unit (KHT), a bleeder valve on a piperack outside the unit was inadvertently left half open.	LAC 33:III.905
					Compressed Flammable Gas	Not permitted	13.85 lbs		
VV.	Unauthorized Discharge Notification Report for T121405 (2/9/10)	(*Not Reported)	Three Quarter Inch Bleeder Valve	2/9/10	H <sub>2</sub> S	Not permitted	24 lbs	A three-quarter inch bleeder valve had been left cracked open during the steaming out of Unit 32 Stripper.	LAC 33:III.905
WW.	Unauthorized Discharge Notification Report for T122763 (4/20/10)	2893-V11	FCCU Regenerator Vent EQT 0165	4/13/10	CO	15.28 lbs/hr	<5,000 lbs	The FCCU had to reduce rates in conjunction with the Alkylation Unit shutdown. While reducing charge rate, an adequate carbon balance was not maintained; causing elevated CO in the flue gas.	LAC 33:III.905 LAC 33:III.501.C.2
XX.	Unauthorized Discharge Notification for 1/25/11 Incident (1/27/10)	2580-00013-V1	North Flare Stack EQT 0162	1/25/11	HRVOC VOC	21.05	51.25 157.96	The reactor temperature increased after the feed streams to the FCCU was switched, which resulted in an increase in vapor routed to the FCCU Main Fractionator. The FCCU Main Fractionator overhead pressure increased and the pressure control valve opened to the refinery's North Flare (EQT 0162). The duration of this incident was 26 minutes.	LAC 33:III.501.C.4
					H <sub>2</sub> S	0.13	2.24		
					Nox	2.90	13.4		
					SO <sub>2</sub>	13.71	207.03		
					CO	72.29	73.29		

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YY.	Unauthorized Discharge Notification for 1/25/11 incident (1/27/10)	2580-00013-V1	North Flare Stack EQT 0162	1/25/11	HRVOC	21.05	51.25	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
					VOC		157.96		
					H <sub>2</sub> S	0.13	2.24		
					Nox	2.90	13.4		
					SO <sub>2</sub>	13.71	207.03		
					CO	72.29	73.29		
ZZ.	Unauthorized Discharge Notification for T129232 (2/18/11)	2580-00013-V1	block valve in FUG 018	2/12/11	VOC	Not permitted	216.8	The bonnet on a block valve located in the Unit 12 Platformer Debutanizer Overhead Reflux line developed a leak to the atmosphere. This incident lasted 8 hours.	LAC 33:III.905
AAA.	Unauthorized Discharge Notification for T129232 (2/18/11)	2580-00013-V1	block valve in FUG 018	2/12/11	VOC	Not permitted	216.8	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3



	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
BBB.	Unauthorized Discharge Notification for 5/31/11 Incident (6/3/11)	3039-V9	N. Ground Flare EQT 0282	5/31/11	HRVOC	3.81	0.7	Unit 210 Crude Off-gas Suction Knock Out Drum overfilled which caused the Crude Off- gas Compressor to trip and relieve the off- gas to the North Ground Flare (EQT 0282). The Incident lasted for 24 minutes.	LAC 33:III.501.C.4 LAC 33:III.905
					VOC		115.5		
					H <sub>2</sub> S	0.05	14.2		
					NO <sub>x</sub>	11.83	13.9		
					SO <sub>2</sub>	1.51	1,335		
	CO	9.90	11.7						
					PM <sub>10</sub>	0.90	1.1		
CCC.	Unauthorized Discharge Notification for T131650 (6/9/11)	2580-00013- V2	elbow in FUG 0027	6/4/11	VOC	Not permitted	1,314.0	Unit 22, the Saturated Gas Plant Unit Fugitives, feed line developed a leak in an elbow. The leak was originally assumed to be in a weld but later direct inspection revealed there was a 5 inch crack on the elbow. This incident lasted for 185 minutes.	LAC 33:III.905
					H <sub>2</sub> S	Not permitted	12.0		
DDD.	Unauthorized Discharge Notification for T131650 (6/9/11)	2580-00013- V2	elbow in FUG 0027	6/4/11	VOC	Not permitted	1,314.0	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
					H <sub>2</sub> S		12.0		
EEE.	Unauthorized Discharge Notification for 7/16/11 Incident	3039-V9	flange in FUG 0057	7/16/11	VOC	Not permitted	231.0	(*The Respondent failed to submit an update, every sixty (60)	LAC 33:1.3925.A.3

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	(7/22/11)							days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	
FFF.	Unauthorized Discharge Notification for T133637 (9/30/11)	2580-00013-V3	North Flare Stack EQT 0162	9/7/11	HRVOC	VOC (21.05)	608.2	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
GGG.	Unauthorized Discharge Notification for T133637 (9/30/11)	(*Not Reported)	N/A	10/25/11	N/A	Not permitted	N/A	Triad personnel, onsite electrical contractors, were welding brackets on the outside wall of the C-can storage container when inside the container the wood shelving and floor began smoldering, then caught fire. The Respondent listed this incident as preventable	LAC 33:III.905

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								and that an incident investigation would be conducted.	
KHH.	Unauthorized Discharge Notification for T133637 (9/30/11)	(*Not Reported)	N/A	10/25/11	N/A	Not permitted	N/A	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
III.	Unauthorized Discharge Notification for T134819 (10/28/11)	2580-00Q13-V3 3039-V9	South Flare Stack EQT 0160 North Flare Stack EQT 0162 N. Ground Flare EQT 0282	10/22/11	(*Additional information required)	(*Additional information required)	(*Additional information required)	(*The Respondent failed to submit an update, every sixty (60) days until the investigation was complete, of the status of the ongoing investigation of this unauthorized discharge and the results of the investigation that included details of the circumstances including, but not limited to the root cause.)	LAC 33:1.3925.A.3
III.	Unauthorized Discharge Notification for T136157 (1/3/12)	3039-V10	N. Ground Flare EQT 0282	12/27/11	VOC HRVOC	3.81	8.5 1.3	High pressure on Unit 205-Delayed Coker Unit's blowdown setting drum	LAC 33:III.501.C.4
					NOx	11.83	6.4		