



BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

November 14, 2014

CERTIFIED MAIL (7007 2680 0000 8190 2695)
RETURN RECEIPT REQUESTED

CHALMETTE REFINING, L.L.C.
c/o Corporation Service Company
Agent for Service of Process
320 Somerulos Street
Baton Rouge, Louisiana 70802-6129

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-11-00838
AGENCY INTEREST NO. 1376**

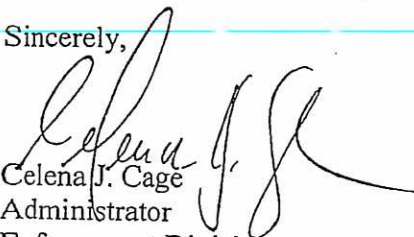
Dear Sir:

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 **CHALMETTE REFINING, L.L.C. (RESPONDENT)** for the violations described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violations 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 Deonne Bodin at (225) 219-3760.

Sincerely,


Celena J. Cage
Administrator
Enforcement Division

CJC/DMB/dmb
Alt ID No. 2500-00005
Attachment

c: Jenny Briones
Air Permitting and Compliance Section Supervisor
Chalmette Refining, L.L.C.
Post Office Box 1007
Chalmette, Louisiana 70044

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE**

IN THE MATTER OF

**CHALMETTE REFINING, L.L.C.
ST. BERNARD PARISH
ALT ID NO. 2500-00005**

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

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* **ENFORCEMENT TRACKING NO.**
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* **AE-CN-11-00838**
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* **AGENCY INTEREST NO.**
*
* **1376**
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**CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **CHALMETTE REFINING, L.L.C. (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 the Chalmette Refinery (the facility) located at or near 500 West St. Bernard Highway in Chalmette, St. Bernard Parish, Louisiana. The facility operates or has operated under multiple air permits, including the following Title V permits:

Unit	Permit	Effective Date	Effective End Date or Expiration Date
Wastewater Treatment Plant	2822-V1	December 15, 2008	July 22, 2013
No. 2 Crude/Coker Units	2933-V1	July 23, 2008	September 16, 2009
	2933-V1 A.A.	September 17, 2009	November 18, 2009
	2933-V2	November 19, 2009	February 28, 2010
	2933-V3	March 1, 2010	June 16, 2011
Utilities Plant	2500-00005-V1	October 29, 2007	May 27, 2008
	2500-00005-V1 A.A.	May 28, 2008	September 14, 2009
	2500-00005-V2	September 15, 2009	December 1, 2010

Unit	Permit	Effective Date	Effective End Date or Expiration Date
Cat Feed Hydrotreater Unit, Pretreater No. 1 and Reformer No. 1, and Gasoline Hydrotreater	3011-V1	August 8, 2008	September 14, 2009
	3011-V1 A.A.	September 15, 2009	February 2, 2012
No. 1 Crude/Coker Units	3018-V1	October 8, 2008	November 18, 2009
	3018-V2	November 19, 2009	September 13, 2011
Oil Movements & Loading	3004-V0	January 30, 2007	May 11, 2009
	3004-V1	May 12, 2009	October 4, 2010
	3004-V2	October 5, 2010	March 25, 2012
No. 1 and 2 Flares	3016-V1	September 25, 2008	February 27, 2012
	3022-V2	July 30, 2008	January 8, 2009
Fluidized Catalytic Cracking Unit and Alkylation Unit	3022-V3	January 9, 2009	December 14, 2009
	3022-V4	December 15, 2009	January 11, 2010
	3022-V4 A.A.	January 12, 2010	June 4, 2012
Sulfur Recovery Unit, Hydrodesulfurization Unit, Amine Treating Unit, Sour Water Stripper, Waste Gas System, Benzene Recovery Unit, and Liquefied Petroleum Gas Recovery	3023-V1	September 25, 2008	February 4, 2009
	3023-V2	February 5, 2009	April 19, 2010
	3023-V3	April 20, 2010	August 9, 2010
	3023-V4	August 10, 2010	July 31, 2011
Aromatics	3017-V1	August 18, 2008	September 14, 2009
	3017-V2	September 15, 2009	December 6, 2009
	3017-V3	December 7, 2009	September 14, 2010
Hydrocracker Unit, Pretreater No. 3 and Reformer No. 3, and Light Ends Plant	3015-V1	July 21, 2008	October 24, 2011

The facility also operates under Consent Decree 05-4662 entered into the United States District Court for the Eastern District of Louisiana on or about April 26, 2006.

II.

On or about August 19, 2010, September 7, 2010, and January 13, 2011, the Department conducted inspections of the facility to determine the Respondent's degree of compliance with the Act and the Air Quality Regulations. Subsequent file reviews were conducted on or about December 21, 2011, and May 9, 2014, for the time period including January 1, 2009 through December 31, 2010. While the review is not complete, the Department noted the violations found in paragraphs III-X of the Findings of Fact portion of this enforcement action.

III.

The Respondent reported the following unauthorized releases which were caused by a failure to maintain control equipment in proper working order:

	REPORT (date)	INCIDENT DATE (duration)	POLLUTANT	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A	Unauthorized Discharge Notification T113358 (3/19/2009)	3/12/2009 (8 minutes)	Slop Oil	1,545 lbs	Tank 1406 was overfilled during multiple tank movements. CRLLC modified the level alarm to include audible alarms and improved the oil movements procedures in order to prevent a recurrence.	LAC 33:III.905
B	Unauthorized Discharge Notification T114985 (5/21/2009)	5/14/2009 (13 minutes)	SO ₂	2,138 lbs	The Cat Feed Hydrotreater high level indicator failed due to insufficient antifreeze. CRLLC instituted a procedure to verify that the seal legs are filled with antifreeze and calibrated.	LAC 33:III.905
C	Unauthorized Discharge Notification T116426 (7/17/2009)	7/12/2009 (8 seconds)	Benzene	28 lbs	During a gasoline transfer to Tank 6309, the level gauge failed. In order to prevent a recurrence, CRLLC instituted a tank return to service checklist to ensure the appropriate testing and calibration of tank operating equipment.	LAC 33:III.905
			Gasoline	985 lbs		
			Xylene	229 lbs		
D	Unauthorized Discharge Notification T116434 (7/17/2009)	7/12/2009 (50 minutes)	SO ₂	3,569 lbs	The coker fines lane pump discharge check valve failed due to accumulated coke fines. Oil from the coker cutting water tank backflowed into the fines lane resulting in a fire. To prevent a recurrence, CRLLC installed a secondary check valve and instituted a procedure to require the coker operator to close the block valve on the pump discharge line when the fines lane pumps are not in use.	LAC 33:III.905
E	Unauthorized Discharge Notification T116460 (7/20/2009)	7/13/2009 (13 minutes)	Sweet crude oil	296 lbs	During unloading of a crude ship, the nipple on the crude line failed due to internal corrosion.	LAC 33:III.905
F	Unauthorized Discharge Notification T116493 (7/21/2009)	7/14/2009- 7/15/2009	HF	3,257 lbs	The gradual loosening of plugs caused a leak in the HF Alky heat exchanger.	LAC 33:III.905
G	Unauthorized Discharge Notification T117083 (8/13/2009)	8/6/2009 (5 hours and 20 minutes)	SO ₂	1,136 lbs	SRU2 was shutdown, increasing the acid gas load to SRU1. A subsequent loss of hydrogen supplied by Air Products caused the shutdown of the hydrotreaters, resulting in the shutdown of SRU1. A contributing factor to this event was lack of coordination between CRLLC and Air Products.	LAC 33:III.905

	REPORT (date)	INCIDENT DATE (duration)	POLLUTANT	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS
H	Unauthorized Discharge Notification T117481 (9/1/2009)	8/25/2009 (10 minutes)	Sweet crude oil	1,499 lbs	During tank cleaning by a 3 rd party contractor, a supply line coupling failed on the tank's roof. The oil spill resulted from insufficient QA/QC by the contractor during the installation of the tank cleaning system. New procedures were implemented to prevent a reoccurrence.	LAC 33:III.905
			Benzene	15 lbs		
I	Unauthorized Discharge Notification T118324 (10/8/2009)	10/1/2009 (10 minutes)	Benzene	23.88 lbs	A 3 rd party contractor was assisting with the emptying of Tank 1203. Suction was impeded when a plastic bag became lodged in the hose, resulting in overfill of the drain pan. This incident occurred due to operator error.	LAC 33:III.905
J	Unauthorized Discharge Notification T118804 (10/23/2009)	10/17/2009 (2 hours)	SO ₂	1,172 lbs	Insufficient glycerin caused a level indicator malfunction in the Light Ends Plant (LEP) overhead drum. CRLLC implemented a monthly validation of the LEP drum level indicator using the drum's sight glass.	LAC 33:III.905
K.	Unauthorized Discharge Notification T120078 (12/21/2009)	12/14/2009	Benzene	57 lbs	Weld imperfections on the minimum flow line to Tank 1.	LAC 33:III.905
L	Unauthorized Discharge Notification T120629 (1/15/2010)	1/8/2010 (6.5 hours)	SO ₂	1,956 lbs	The FCC SO _x scrubber circulating water pumps developed catalyst pluggage which decreased the water flow rate. CRLLC increased the grid wash and decreased the FCC charge rate in order to prevent a reoccurrence.	LAC 33:III.905
M	Unauthorized Discharge Notification T123040 (5/4/2010)	4/27/2010 (25 minutes)	SO ₂	1,359 lbs	A compressor tripped during the Emergency Block Valve Preventative Maintenance Program. Root cause not submitted.	LAC 33:III.905
N	Unauthorized Discharge Notification T123156 (5/7/2010)	4/30/2010 (1 hour)	SO ₂	705 lbs	Compressor K402 was shutdown for maintenance, increasing the load on K406. A subsequent loss of hydrogen supplied by Air Products caused K406 to trip. A contributing factor to this event was lack of coordination between CRLLC and Air Products. In order to prevent a reoccurrence, CRLLC modified its contract with Air Products to have access to its entire production facility to ensure a supply of hydrogen.	LAC 33:III.905
O	Unauthorized Discharge Notification T123894 (6/8/2010)	6/1/2010 (3 hours)	SO ₂	11,726 lbs	Water caused an electrical short in the solenoid valve of the FCC. CRLLC replaced and sealed the solenoid valve to prevent water from entering the valve.	LAC 33:III.905
			VOC	1,600 lbs		

	REPORT DATE	INCIDENT DATE (duration)	POLLUTANT	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
P	Unauthorized Discharge Notification T125557 (8/17/2010)	8/10/2010 (8 hours and 5 minutes)	SO ₂	2,171 lbs	A loss of power due to dirty insulation and high humidity allowed high voltage to track across an insulator, causing the fault to ground. Root cause not submitted.	LAC 33:III.905
Q	Unauthorized Discharge Notification T126093 (8/26/2010)	8/19/2010 (1.2 hours)	VOC	2,996 lbs	Operators failed to follow written protocols resulting in an uncalibrated level controller. This allowed vapor to enter Tank 6344 during the transfer of liquid material to the tank.	LAC 33:III.905
R	Unauthorized Discharge Notification T126170 (9/14/2010)	9/7/2010 (2 hours 43 minutes)	H ₂ S	383 lbs	The presence of unsealed air gas between the bus bar and glastic support at the power station caused a single phase short to ground. During the power interruption, a leak developed due to thermal cycles on the fin fans. This caused a tube failure on the inlet side of an exchanger at the Hydrodesulfurization Unit, releasing gas to the atmosphere. CRLLC installed sealant between the bus bars and supports in order to prevent a reoccurrence.	LAC 33:III.905
			VOC	2,714 lbs		
S	Unauthorized Discharge Notification T126868 (10/11/2010)	10/4/2010 (84 hours)	H ₂ S	732 lbs	The saturated gas line to the amine contactor developed a sour gas leak from a clamp over an existing leak. Root cause not submitted.	LAC 33:III.905
			Compressed flammable gas	4,263 lbs		
T	Unauthorized Discharge Notification T126929 (12/10/2010)	10/7/2010 (10 hours)	SO ₂	584 lbs	Following the mitigation of T126868, a leak developed due to a partially open valve in the #3 dephentanizer. CRLLC tightened the valve to achieve full closure and stop the leak.	LAC 33:III.905
U	Unauthorized Discharge Notification T126946 (10/15/2010)	10/8/2010 (81 hours)	SO ₂	78,395 lbs	Refinery operations were adjusted to isolate a line to mitigate Incident T126868. Available flare gas recovery capacity was used, resulting in the flaring event.	LAC 33:III.905

Each unauthorized release of emissions is a violation of LAC 33:III.501.C.2, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

IV.

The Respondent reported the following violations from permitted operating parameters:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/SOURCE	INCIDENT DATE	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A	2009 1st Quarter Permit Deviations Report (6/24/2009)	3023-V1 3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	2009 Calendar Year	Prepare and implement an operation, maintenance, and monitoring plan (OMMP) for each control system. Submit any changes to permitting authority for review and approval and comply with the plan until the change is approved.	Operated under revised OMMP for SRU Train 1/2 Thermal Oxidizer prior to receiving approval.	Specific Requirements 26 & 28, 40 CFR 63.1574(f)(1)
	2009 1 st Semiannual Monitoring Report (9/15/2009)						
	2009 3rd Quarter Permit Deviations Report (12/15/2009) & 2009 2 nd Semiannual Monitoring Report (3/24/2010)						
B	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	2/26/2009 (1 hour)	Route the Sulfur Pit emissions to the SRU Thermal Oxidizer	Eductor for SRU1 shutdown due to low flow causing sulfur pit vent valve to open.	Specific Requirement 24, 40 CFR 60.104(a)(2)
C	2009 1st Quarter Permit Deviations Report (6/24/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	3/2/2009 (1 hour)	Route the Sulfur Pit emissions to the SRU Thermal Oxidizer	SRU2 second stage tripped due to low flow; a steam tracing problem caused the sulfur pit vent valve to open.	Specific Requirement 24, 40 CFR 60.104(a)(2)
D	2009 1st Semiannual Monitoring Report (9/15/2009)	3016-V1	EQT 0255 No. 2 Flare	6/12/2009 (Not reported)	When air pollution facilities have been installed, they shall be used and diligently maintained in proper working order	After extended downtime due to a plant cooling water failure, K2201 was restarted. Compressor discharge pressure was running higher than normal and the operator was attempting to make corrections when the PSV lifted and did not rescat. No.2 Flare observed smoking.	Specific Requirement 118, LAC 33:III.905.A
E	2009 3rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	8/6/2009 (1 hour)	Route the Sulfur Pit emissions to the SRU Thermal Oxidizer.	Steam excursion caused SRU2 to shutdown from low boiler water level. The load was transferred to SRU1 to mitigate emissions, which caused the sulfur pit vent valve to open.	Specific Requirement 24, 40 CFR 60.104(a)(2)
F	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3018-V1	EQT 0067 No.1 Crude Atmospheric Heater	9/24/2009 (1 hour)	Max. Operating Rate = 175 MM BTU/hr	176 MMBTU/hr (1 hour)	Specific Requirement 132

	REPORT (date)	PERMIT NUMBER	EMISSION POINT/ SOURCE	INCIDENT DATE	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
G	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3016-V1	EQT 0255 No.2 Flare	10/5/2009 (7 minutes)	Opacity \leq 20%; except emissions may have an average opacity in excess of 20% for not more than one 6 minute period in any 60 consecutive minutes.	Louis Dreyfus shutdown resulted in the overpressure of the fuel gas system to flare.	Specific Requirement 39
H	2010 Annual Compliance Certification (3/24/2011)	3022-V4	EQT 0184 FCC Regenerator Flue Gas Scrubber Vent	1/8/2010	Scrubber liquid to gas ratio \geq 0.0175 gpm/dscfm (3 hour average) Scrubber Delta Pressure > 1.24 psig (3 hour average)	Catalyst pluggage in the FCC SO _x scrubber circulating water pumps caused the loss of water recirculation in the SO _x scrubber	Specific Requirement 25
I	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EPN 28 No.1 Flare	3/1/2010	Pilot shall be lit at all times	Pilot light failed. The pilot was relit following the outage.	Specific Requirement 13, 40 CFR 60.18(c)(2)

Each violation from permitted operating parameters is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

V.

The Respondent reported the following violations from monitoring and/or recordkeeping requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	MONITORING PARAMETER /RECORDKEEPING REQUIREMENT	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	2933-V1	FUG0003 FE-CRCK2	7/19/2009	Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.	One group of weekly visual inspections for Coker No.2 was not completed.	Specific Requirement 89, 40 CFR 60.482-2(d)(4), Specific Requirement 93, 40 CFR 63.163(b)(3)
B	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Monitoring Report (3/24/2010)	3023-V2	EQT 0197 No.4 Waste Gas Compressor	Not reported	Demonstrate continuous compliance with each emission limitation and operating limitation.	Documentation of catalyst drop was not recorded due to a failure of the pressure drop instrument.	Specific Requirements 62,73,74 and 75. 40 CFR 63.6640(a)
C	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3004-V1	UNF 0004 Oil Movements and Loading	12/8/2009	Maintain records of all CEMS calibration checks.	Daily validation did not occur due to analyzer malfunction.	Specific Requirement 1772, 40 CFR 63 Subpart A
D	2009 2 nd Semiannual Monitoring Report (3/24/2010)	Refinery Wide	116 Valves	2009 4th Quarter	If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months.	Failed to perform 2 nd successive monthly monitoring for 116 valves. Monitoring completed in the subsequent month.	40 CFR 63.640(p)

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	MONITORING PARAMETER RECORDKEEPING REQUIREMENT	REPORTED CAUSE	REGULATORY of PERMIT REQUIREMENTS
E	2010 Annual Compliance Certification (3/24/2011)	2500-00005-V2 2933-V2/V3 2822-V1 3017-V3 3022-V4 3018-V2 3015-V1 3023-V2 3011-V1 3016-V1 3004-V1	N/A	Discovered in 1 st Semiannual Reporting Period of 2010	The Risk Management Plan (RMP) shall contain a registration form which includes the permit number if the stationary source has a Clean Air Act (CAA) Title V operating permit.	The RMP submitted on October 3, 2008, states the facility is not covered by CAA Title V permits.	LAC 33:III.5901 which incorporates by reference 40 CFR 68.160(b)(12)
F	2010 Annual Compliance Certification (3/24/2011)	2500-00005-V2	EQT 0022 Boiler No.10	Discovery in the 1 st Semiannual Reporting Period of 2010	All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.	The NSPS CEMS report dated January 27, 2010, may not have fully accounted for downtime based on out of control periods. Downtimes have been reassessed and will be corrected in the July 2010 report.	Specific Requirement 96, 40 CFR 60.7(d)
G	2010 Annual Compliance Certification (3/24/2011)	3017-V3	UNF 0010 ARO Aromatics	Discovery in April of 2010	Secure the bypass line valve in the non-diverting position with a car-seal or a lock- and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the non-diverting position and the gas stream is not diverted through the bypass line.	A bypass line on the para- ortho-process vent line to the carbon absorption system was not secured in the non-diverting position with a car-seal or lock-and- key type configuration. The car-seal was replaced in April 2010.	LAC 33:III.5122 which incorporates by reference 40 CFR 63.114(d)(2) and 40 CFR 63.644(c), LAC 33:III.501.C.4, La. R.S. 30:2057(A)(2)
H	2010 Annual Compliance Certification (3/24/2011)	3004-V1	EQT 0082 Barge/Ship Loading	Corrected on 4/27/2010	The owner or operator of an affected facility shall update the documentation file required under §61.302 (d) and (e) for each tank truck, railcar, or marine vessel at least once per year to reflect current test results as determined by the appropriate method. The owner or operator shall include the name, signature, and affiliation of the witnessing inspector.	Vapor tightness documentation for one barge did not contain the name, signature and affiliation of the witnessing inspector. Documentation updated on April 27, 2010.	Specific Requirement 50, 40 CFR 61.305(h)(7)
I	2010 Annual Compliance Certification (3/24/2011)	3004-V2	EQT 0149 Tank 301	8/24/2010	Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Notify the administrative authority within seven days of noncompliance.	Administrative authority was not notified within seven days of repair. Notification was submitted 9/9/2010.	Specific Requirement 843, LAC 33:III.2103.D.2(e)
J	3/24/2011 (Quarterly, Semiannual, and Annual)	2933-V3	FE-CRCK2 - No. 2 Crude/Coker Fugitives FUG 0003	11/12/2010	VOC leak and open-ended reporting form due by the 5 th day from evidence of leak.	The VOC leak and open- ended reporting form was turned in after the 5 th day from evidence of leak.	Specific Requirement 88 and 95, 40 CFR 60.482-8(a), 40 CFR 63.169(a)

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	MONITORING PARAMETER/REGORDKEEPING REQUIREMENT	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
K	2010 Annual Compliance Certification (3/24/2011)	2500-0005-V3 3017-V4 3022-V4 3023-V4 3011-V1 3016-V1	UNF 001	12/31/2010	11 RMP equipment inspections and a small number of process hazard analysis action items were due in 2010	Failed to complete inspections. According to the 2011 Annual Compliance Certification, two items remain outstanding.	LAC 33:III.5901.A which incorporates by reference 40 CFR 68

Each failure to monitor as required is a violation of any applicable permit and associated requirement(s) listed above, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(1), and La. R.S. 30:2057(A)(2).

VI.

The Respondent reported the following emission limit exceedances:

	REPORT (date)	PERMIT NUMBER or OTHER AUTHORIZATION	EMISSION POINT	INCIDENT DATE	POLLUTANT RELEASED (Permit/Authorization Limit)	QUANTITY REPORTED (duration)	REPORTED CAUSE/NATURE OF VIOLATION	REGULATORY or PERMIT REQUIREMENTS
A	2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009)	3016-V1	EQT 0255 No. 2 Flare	1/7/2009 through 1/8/2009	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	163-1157 ppmv (6 hours)	Depropanizer overhead pressure control valve 50PC064 was operating improperly	Specific Requirement 21, 40 CFR 60.104(a)(1)
B	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3015-V1	EQT 0244 No. 3 Pretreater Heater	1/12/2009	CO (2.55 lb/hr)	3.53 lb/hr (1 hour)	Heater over firing	LAC 33:III.501.C.4
C	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3016-V1	EQT 0254 No. 1 Flare	1/24/2009	NO _x (1.27 lb/hr) CO (6.90 lb/hr) SO ₂ (0.02 lb/hr) PM ₁₀ (0.38 lb/hr) VOC (0.04 lb/hr)	Not reported	The LPG compressor suction valve relieved to the Flare Gas Recovery System	LAC 33:III.501.C.4
D	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3023-V1	EQT 0193 SRU Train 1/2 Thermal Oxidizer	1/26/2009	SO ₂ (35.02 lb/hr)	90.47 lb/hr (1 hour)	Unit startup	LAC 33:III.501.C.4
E	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3023-V1	EQT 0193 SRU Train 1/2 Thermal Oxidizer	2/4/2009	SO ₂ (35.02 lb/hr)	71.87 lb/hr (1 hour)	Exceeded limit during sulfiding operation	LAC 33:III.501.C.4
F	2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009)	3016-V1	EQT 0255 No. 2 Flare	2/9/2009	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	165-271 ppmv (9 hours)	Ref Frac tower vented to WGS but an improperly seated valve routed in gases to the flare	LAC 33:III.905.A, Specific Requirement 21, 40 CFR 60.104(a)(1)
G	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	2/26/2009 through 2/27/2009	SO ₂ (35.02 lb/hr) SO ₂ (250 ppmv)	109.28 lb/hr (4 hours) Not reported (5 hours)	Switching SRU1 to O ₂ mode of operation	Specific Requirement 23, 40 CFR 60.104(a)(2)(i)