

	REPORT (date)	PERMIT NUMBER or OTHER AUTHORIZAT ION	EMISSION POINT	INCIDENT DATE	POLLUTANT RELEASED (Permit/Authoriz ation Limit)	QUANTITY REPORTED (duration)	REPORTED CAUSE/NATURE OF VIOLATION	REGULATORY or PERMIT REQUIREMENTS
H	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3016-V1	EQT 0254 No. 1 Flare	3/4/2009	SO ₂ (0.02 lb/hr) VOC (0.04 lb/hr)	Not reported	The pretreater relieved to the Flare Gas Recovery System	LAC 33:III.501.C.4
I	2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009)	3016-V1	EQT 0255 No. 2 Flare	3/23/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	173-485 ppmv (8 hours)	Unknown Cause	Specific Requirement 21, 40 CFR 60.104(a)(1)
J	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3017-V1	EQT 0208 No. 2 Hot Oil Heater	3/27/2009	CO (14.26 lb/hr)	19.32 lb/hr (1 hour)	High fuel gas flow	LAC 33:III.501.C.4
K	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	3/30/2009	SO ₂ (35.02 lb/hr) SO ₂ (250 ppmv)	79.07 lb/hr (3 hours) Not reported (4 hours)	Startup of SRU1	Specific Requirement 23, 40 CFR 60.104(a)(2)(f)
L	2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009)	3016-V1	EQT 0255 No. 2 Flare	3/30/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	222-225 ppmv (3 hours)	Unknown Cause	Specific Requirement 21, 40 CFR 60.104(a)(1)
M	2009 1 st Quarter Permit Deviations Report (6/24/2009)	3017-V1	EQT 0208 No. 2 Hot Oil Heater	3/30/2009	CO (14.26 lb/hr)	15.93 lb/hr (1 hour)	High fuel gas flow	LAC 33:III.501.C.4
N	2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009) and 2009 1 st Semiannual Monitoring Report (9/15/2009)	3016-V1	EQT 0255 No. 2 Flare	4/8/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	184-186 ppmv (2 hours)	Pump seal misalignment caused a release to flare	LAC 33:III.905.A, Specific Requirement 21, 40 CFR 60.104(a)(1)
O	2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009) and 2009 1 st Semiannual Monitoring Report (9/15/2009)	3016-V1	EQT 0255 No. 2 Flare	4/16/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	293-296 ppmv (3 hours)	Inadequate procedure led to the PSV lifting during startup of K400.	LAC 33:III.905.A, Specific Requirement 21, 40 CFR 60.104(a)(1)

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P 2009 1 st Semiannual Monitoring Report (9/15/2009)	3016-V1	EQT 0254 No. 1 Flare	5/14/2009	NO _x (1.27 lb/hr)	Not reported (1 hour)	Nonworking level indicator resulted in the total loss of liquid in the hot separator. High pressure vapor from the hot separator was fed to the fractionator. This resulted in increased gas rates to the fractionator overhead; excess gas exceeded the capacity of the waste gas and flare gas recovery systems.	Specific Requirement 3
				CO (5.90 lb/hr)			
				SO ₂ (0.02 lb/hr)			
				PM ₁₀ (0.38 lb/hr)			
				VOC (0.04 lb/hr)			
				n-Hexane (0.07 lb/hr)			
				H ₂ S (0.28 lb/hr)			
				Benzene (0.02 lb/hr)			
				Ethyl Benzene (0.002 lb/hr)			
				Toluene (0.01 lb/hr)			
				Xylene (0.01 lb/hr)			
				Naphthalene (0.07 lb/hr)			
				Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	Not Reported (3 hours)		
Q 2009 1 st Semiannual Continuous Emissions Monitoring Report (7/29/2009) and 2009 1 st Semiannual Monitoring Report (9/15/2009)	3016-V1	EQT 0255 No. 2 Flare	5/19/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	194-201 ppmv (3 hours)	Failure to follow procedures resulted in venting gas to the No.2 Flare during startup.	LAC 33:III.905.A, Specific Requirement 21, 40 CFR 60.104(a)(1)
R 2009 1 st Semiannual Monitoring Report (9/15/2009)	3017-V1	EQT 0208 No. 2 Hot Oil Heater	6/1/2009	CO (14.26 lb/hr)	33.9 lb/hr (1 hour)	In an effort to reduce excess oxygen to the heater, the dampers were closed and oxygen levels dropped resulting in the exceedance.	Specific Requirement 42, LAC 33:III.905
S 2009 1 st Semiannual Monitoring Report (9/15/2009)	3016-V1	EQT 0254 No. 1 Flare	6/7/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf (three hour rolling average)	Not Reported (4 hours)	D9006/7 relieved to the Flare Gas Recovery System	Specific Requirement 3
				SO ₂ (0.02 lb/hr)	Not reported (2 hours)		
				VOC (0.04 lb/hr)			
				NO _x (1.27 lb/hr)	Not reported (1 hour)		
				CO (5.90 lb/hr)			
				PM ₁₀ (0.38 lb/hr)			
H ₂ S (0.28 lb/hr)							

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T	2009 1 st Semiannual Monitoring Report (9/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	6/25/2009	SO ₂ (35.02 lb/hr)	58.12 lb/hr (1 hour)	Foaming at the MDEA contactor caused high levels in the contactor outlet	LAC 33:III.501.C.4
U	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No.2 Flare	7/2/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	191-206 ppmv (2 hours)	Reduced flow rates resulted in the failure of the G-2415 seal which relieved to the No.2 Flare	Specific Requirement 21, 40 CFR 60.104(a)(1)
V	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No.2 Flare	7/11/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	178-482 ppmv (8 hours)	Flaring resulted from depressurizing the east caustic treater too quickly	Specific Requirement 21, 40 CFR 60.104(a)(1), LAC 33:III.905
W	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	7/11/2009	SO ₂ (35.02 lb/hr)	77.4 lb/hr (4 hours)	Foaming event	LAC 33:III.501.C.4
X	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	7/14/2009	SO ₂ (35.02 lb/hr)	36.6 lb/hr (1 hour)	Misaligned cooling water valves	LAC 33:III.905
Y	2009 3 rd Quarter Permit Deviations Report (12/15/09) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No. 2 Flare	7/23/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	164 ppmv (1 hour)	Residual gas in flare header from pump seal leak	Specific Requirement 21, 40 CFR 60.104(a)(1)
Z	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	7/24/2009 through 7/25/2009	SO ₂ (35.02 lb/hr) SO ₂ (250 ppmv)	326.4 lb/hr (3 hours) Not reported (11 hours)	Not reported	Specific Requirement 23, 40 CFR 60.104(a)(2)(i)
AA	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3022-V3	EQT 0184 FCCU Regenerator Flue Gas Scrubber Vent	7/27/2009 through 7/28/2009	CO (500 ppmv)	Not reported (15 hours)	Excess CO emissions at the FCCU occurred during startup	Specific Requirement 14, 40 CFR 60.103(a)
BB	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No. 2 Flare	7/29/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	236-827 ppmv (3 hours)	Wet gas scrubber diverted to the flare due to compressor issues. Residual gas in the flare header was pushed to the flare.	Specific Requirement 21, 40 CFR 60.104(a)(1)
CC	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	8/5/2009	SO ₂ (35.02 lb/hr) SO ₂ (250 ppmv)	100.0 lb/hr (4 hours) Not reported (4 hours)	Shutdown	LAC 33:III.501.C.4

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DD	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	8/6/2009	SO ₂ (35.02 lb/hr) SO ₂ (250 ppmv)	Not reported (9 hours) Not reported (5 hours)	Steam excursion caused SRU2 to shutdown from low boiler water level	Specific Requirement 23
EE	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No.2 Flare	8/6/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	169-364 ppmv (17 hours)	Source not confirmed	Specific Requirement 21, 40 CFR 60.104(a)(1)
FF	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3022-V3	EQT 0186 FCC Alky Isotripper Reboiler	8/6/2009	CO (11.04 lb/hr)	19.8 lb/hr (1 hour)	Loss of steam	LAC 33:III.501.C.4
GG	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	8/8/2009	SO ₂ (35.02 lb/hr)	74.8 lb/hr (1 hour)	Sudden spike in gas flow caused the air demand analyzer to be off ratio	LAC 33:III.501.C.4
HH	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3022-V3	EQT 0184 FCCU Regenerator Flue Gas Scrubber Vent	8/27/2009 through 8/28/2009	CO (500 ppmv)	Not reported (23 hours)	Startup	Specific Requirement 14, 40 CFR 60.103(a)
II	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No.2 Flare	9/4/2009	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	447-1063 ppmv (4 hours)	Source not confirmed	Specific Requirement 21, 40 CFR 60.104(a)(1)
JJ	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	9/6/2009	SO ₂ (35.02 lb/hr)	38.4 lb/hr (1 hour)	SRU1 regeneration condensate pot level controller failed.	LAC 33:III.501.C.4
KK	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3022-V3	EQT 0184 FCCU Regenerator Flue Gas Scrubber Vent	9/18/2009	CO (500 ppmv)	Not reported (10 hours)	Startup	Specific Requirement 14, 40 CFR 60.103(a)
LL	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3022-V3	EQT 0184 FCCU Regenerator Flue Gas Scrubber Vent	9/18/2009	SO ₂ (68.14 lb/hr)	71.9 lb/hr (1 hour)	The FCC shutdown on ES1 causing F-7801 to trip.	LAC 33:III.501.C.4
		3022-V2	EQT 0183 FCC Heater		CO (5.77 lb/hr)	14.96 lb/hr (1 hour)		
MM	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3015-V1	EQT 0247 Hydrocracker 1 st /2 nd Stage Preheater (East)	9/18/2009	CO (3.79 lb/hr)	33.1 lb/hr (2 hours)	Loss of feed forced the heater to fire harder	LAC 33:III.501.C.4

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NN	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No. 2 Flare	9/20/2009 through 9/21/2009	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	186-508 ppmv (25 hours)	Source was not confirmed	Specific Requirement 21, 40 CFR 60.104(a)(1)
OO	2009 3 rd Quarter Permit Deviations Report (12/15/2009) and 2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010)	3016-V1	EQT 0255 No. 2 Flare	9/24/2009	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	171-4737 ppmv (5 hours)	During the startup of the No.1 Coker, undetected condensation in a line caused a compressor to trip.	Specific Requirement 21, 40 CFR 60.104(a)(1), LAC 33:III.905
PP	2009 3 rd Quarter Permit Deviations Report (12/15/2009)	3022-V3	EQT 0184 FCCU Regenerator Flue Gas Scrubber Vent	9/25/2009	SO ₂ (68.14 lb/hr)	75.7 lb/hr (1 hour)	The SO ₂ on the SO _x Scrubber was increasing when the analyzer went into calibration mode. When the analyzer was returned to operation, SO ₂ was above the alarm set point and the permit limit.	LAC 33:III.501.C.4
QQ	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	10/7/2009 through 10/8/2009	SO ₂ (35.02 lb/hr)	49.0 lb/hr (3 hours)	SRU2 tripped on low combustion air signal	LAC 33:III.501.C.4
RR	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	10/9/2009	SO ₂ (35.02 lb/hr)	40.4 lb/hr (1 hour)	Combustion air control valve malfunction	LAC 33:III.501.C.4
SS	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3016-V1	EQT 0254 No. 1 Flare	10/9/2009	SO ₂ (0.02 lb/hr)	Not reported (1 hour)	A failure of the lubrication line to the chain tensioner caused K406 to trip. The waste gas system was rerouted to the No.1 Flare which exceeded the compression capacity.	LAC 33:III.501.C.4
					VOC (0.04 lb/hr)	Not reported (1 hour)		
TT	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3016-V1	EQT 0255 No. 2 Flare	10/17/2009	SO ₂ (0.02 lb/hr)	Not reported (2 hours)	The LEP level indicator failed, resulting in the overflow of liquid from the drum to the off gas header. The back pressure increased and released gas to the flare.	LAC 33:III.501.C.4
					H ₂ S (0.28 lb/hr)	Not reported (3 hours)		
UU	2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010) and 2009 2 nd Semiannual Monitoring Report (3/24/10)	3016-V1	EQT 0255 No. 2 Flare	10/18/2009 through 10/19/2009	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	172-649 ppmv (29 hours)	Source not confirmed	Specific Requirement 21, 40 CFR 60.104(a)(1)

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VV	2009 2 nd Semiannual Continuous Emissions Monitoring Report (1/27/2010) and 2009 2 nd Semiannual Monitoring Report (3/24/2010)	3016-V1	EQT 0255 No. 2 Flare	12/14/2009	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	235-4898 ppmv (8 hour period)	Crude #2 stabilizer overpressured and vented to the No.2 Flare due to a delayed response to the high pressure alarm	Specific Requirement 21, 40 CFR 60.104(a)(1), LAC 33:III.905
W W	2009 2 nd Semiannual Monitoring Report (3/24/2010)	3015-V1	EQT 0245 No.3 Pretreater Reboiler	12/18/2009	CO (3.38 lb/hr)	4.8 lb/hr (1 hour)	While troubleshooting moisture issues on the heater, the increased reflux conditions caused an increased firing rate.	LAC 33:III.905
XX	2010 Annual Compliance Certification (3/24/2011)	3022-V4	EQT 0184 FCC Regenerator Flue Gas Scrubber Vent	1/8/2010	SO ₂ (68.14 lb/hr)	Not reported (5 hours)	Catalyst pluggage in the circulating water pumps caused a loss of water recirculation.	Specific Requirements 25 and 31
YY	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	1/10/2010	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	2094 ppmv (9 hours)	Unknown source of flaring	Specific Requirement 21, 40 CFR 60.104(a)(1)
ZZ	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	1/10/2010	SO ₂ (153.18 lb/hr) H ₂ S (0.41 lb/hr)	Not reported Not reported (1 hour)	Unknown source of flaring	LAC 33:III.501.C.4
AA A	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	1/13/2010	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	244 ppmv (3 hours)	Unknown source of flaring	Specific Requirement 21, 40 CFR 60.104(a)(1)
BB B	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	1/26/2010	Fuel Gas: Hydrogen sulfide ≤ 0.1 gr/dscf or less than 162 ppm (three hour rolling average)	168 ppmv (1 hour)	Unknown source of flaring	Specific Requirement 21, 40 CFR 60.104(a)(1)
CC C	2010 Annual Compliance Certification (3/24/2011)	3023-V2	EQT 0191 HDS Heater	2/12/2010	CO (6.84 lb/hr)	Not Reported (1 hour)	Vacuum Gauge Transmitter 55PC852 started swinging, causing louvers to open and close on heater F3300. The closed louvers caused the O ₂ to drop to zero.	LAC 33:III.501.C.4
DD D	2010 Annual Compliance Certification (3/24/2011)	3022-V4	EQT 0184 FCCU Regenerator Flue Gas Scrubber Vent	3/20/2010-3/21/2010	CO (500 ppm)	Not reported (12 hours)	Shutdown due to high vibrations.	Specific Requirement 14
EE E	2010 Annual Compliance Certification (3/24/2011)	3023-V2	EQT 0193 SRU Train 1/2 Thermal Oxidizer	3/23/2010 through 3/24/2010	SO ₂ (35.02 lb/hr) SO ₂ (250 ppm)	Not Reported (2 hours) Not Reported (6 hours)	The SRU tripped due to low combustion air pressure as a result of 80PC004 malfunction.	LAC 33:III.501.C.4

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FF F	2010 Annual Compliance Certification (3/24/2011) and & Consent Decree Report (8/29/2011)	3016-V1	EQT 0254 No. 1 Flare	4/3/2010	H ₂ S (162 ppm 3 hour rolling average)	Not reported (4 hours)	Contractor truck discharged to Tank 9001 with the flare valve open.	Specific Requirement 2 40 CFR 60.104(a)(1), paragraph 55 of the Consent Decree, LAC 33:III.905
					SO ₂ (0.02 lb/hr)	Not reported (2 hours)		
					VOC (0.04 lb/hr)	Not reported (1 hour)		
GG G	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	4/8/2010	Fuel Gas: Hydrogen sulfide ≤0.1gr/dscf or less than 162 ppm (three hour rolling average)	162 ppmv (3 hours)	Shortly after a closed liquid drain was inadvertently routed to the No.2 Flare, an alarm for high H ₂ S was noted and the closed liquid drain line was isolated.	Specific Requirement 21, 40 CFR 60.104(a)(1), LAC 33:III.905
HH H	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0254 No.1 Flare	4/27/2010	SO ₂ (0.02 lb/hr)	Not reported (1 hour)	While testing the emergency valves on the Process Gas Compressor, the logic did not operate properly. This caused the compressor to trip, routing material to the flare.	Specific Requirements 2 and 8
					NO _x (1.27 lb/hr)	Not reported (1 hour)		
					CO (6.90 lb/hr)	Not reported (1 hour)		
					PM (0.38 lb/hr)	Not reported (1 hour)		
					VOC (0.04 lb/hr)	Not reported (1 hour)		
					n-hexane (0.07 lb/hr)	Not reported (1 hour)		
					Benzene (0.02 lb/hr)	Not reported (1 hour)		
					Ethyl benzene (0.02 lb/hr)	Not reported (1 hour)		
					Toluene (0.01 lb/hr)	Not reported (1 hour)		
					Xylenes (0.11 lb/hr)	Not reported (1 hour)		
					Napthalene (0.004 lb/hr)	Not reported (1 hour)		
Opacity (not > 20% for more than 6 minute average)	Not reported (30 minutes)							
III	2010 Annual Compliance Certification (3/24/2011) and Consent Decree Report (8/11/2010)	3016-V1	EQT 0254 No.1 Flare	4/30/2010	H ₂ S (162 ppmvd 3 hour rolling average)	Not reported (4 hours)	An increased load to the K406 compressor caused the compressor to over speed, routing the gas stream to the flare gas recovery system. The increased flow to the flare, in conjunction with the increased average molecular weight due to an Air Products outage, caused the No.1 Flare to stage.	Specific Requirement 3, 40 CFR 60.104(a)(1), LAC 33:III.905, Paragraph 55 of the Consent Decree, La. R.S. 30:2025(E)(2)

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JJJ	2010 Annual Compliance Certification (3/24/2011)	3023-V3	EQT 0193 SRU Train 1/2 Thermal Oxidizer	5/12/2010 and 5/27/2010	Sulfur pit emissions shall be routed to the SRU	Not reported (< 1 hour)	The SRU system shutdown on low process gas flow due to the misalignment of steam to the educator. However, following the second pit vent opening on 5/27/10, the root cause was determined to be misalignment of instrument air.	Specific Requirement No. 24, LAC 33:III.905
KKK	2010 Annual Compliance Certification (3/24/2011)	3023-V3	EQT 0193 SRU Train 1/2 Thermal Oxidizer	5/28/2010	SO ₂ (250 ppm 12 hour rolling average)	Not reported (9 hours)	A lack of hydrogenation catalyst activity during startup of SRU2.	Specific Requirements 23 and 40, CFR 60.104(a)(2)(i), LAC 33:III.905
LLL	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0254 No. 1 Flare	6/1/2010	H ₂ S (162 ppmvd 3 hr rolling average) SO ₂ (0.02 lb/hr) CO (6.90 lb/hr) NO _x (1.27 lb/hr) PM (0.38 lb/hr) VOC (0.04 lb/hr) n-hexane (0.07 lb/hr) Benzene (0.02 lb/hr) Ethyl benzene (0.02 lb/hr) Toluene (0.01 lb/hr) Xylenes (0.11 lb/hr) Naphthalene (0.004 lb/hr)	Not reported (7 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours) Not reported (5 hours)	The FCC Process Gas Compressor unexpectedly lost power due to an electrical short in the solenoid valve. This caused a fuse to blow that took out power to the Emergency Shutdown circuit in the shutdown control system of the FCC Process Gas Compressor. Shutdown of the compressor was initiated, causing the No.1 Flare control valve to relieve. The solenoid valve was repaired and the equipment restarted.	Specific Requirement 2
MMM	2010 Annual Compliance Certification (3/24/2011)	3022-V4	EQT 0184 FCC Regenerator Flue Gas Scrubber Vent	6/1/2010	CO (300.24 lb/hr) CO (500 ppm)	Not reported (13 hours) Not reported (17 hours)	A loss of power due to an electrical short in the solenoid valve caused a fuse to blow. This resulted in a power loss to the Emergency Shutdown circuit which initiated a shutdown of the compressor.	Specific Requirements 14 and 31, 40 CFR 60.103(a), 40 CFR 63.1565(a)(1)
NNN	2010 Annual Compliance Certification (3/24/2011)	3023-V3	EQT 0193 SRU Train 1/2 Thermal Oxidizer	6/8/2010 and 6/10/2010	SO ₂ (250 ppm 12 hour rolling average)	Not reported (38 hours)	During a transition of SRU2 to O ₂ mode and SRU1 to combustion air mode to test recent repairs to SRU2, SO ₂ increased due to lack of hydrogenation reactor catalyst activity.	Specific Requirement 23, CFR 60.104(a)(2)(i), LAC 33:III.905
OOO	2010 Annual Compliance Certification (3/24/2011)	3023-V3	EQT 0193 SRU Train 1/2 Thermal Oxidizer	6/18/2010, 6/22/2010, 6/27/2010	SO ₂ (250 ppm 12 hour rolling average)	Not reported (73 hours)	During the planned Claus Unit switch to the Tail Gas Treating Unit (TGTU), the SRU rich filters became plugged.	Specific Requirement 23, 40 CFR 60.104(a)(2)(i), LAC 33:III.905

	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
PP P	2010 Annual Compliance Certification (3/24/2011)	3004-V2	EQT 080 No.3 Flare	7/28/2010	H ₂ S (160 ppm 3hour rolling average)	Not reported (3 hours)	During loading of the sour naphtha barge TK61, the dreager H ₂ S sample read > 2000 ppm.	40 CFR 60.104(a)(1)
QQ Q	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	10/7/2010	H ₂ S (162 ppmvd 3 hour rolling average)	Not reported (3 hours)	While routing the Refrac and TDU sweet streams to the flare, orders were misunderstood and the Prefract Tower (sour) was also routed to the flare.	Specific Requirements 20, 21, and 40, LAC 33:III.905
RR R	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No. 2 Flare	10/13/2010	H ₂ S (162 ppmvd 3 hour rolling average)	Not reported (3 hours)	Gas streams were inadvertently routed to the waste gas system resulting in high H ₂ S in the flare.	Specific Requirements 20, 21, and 40, LAC 33:III.905
SS S	2010 Annual Compliance Certification (3/24/2011)	3023-V4	EQT 0193 SRU Train 1/2 Thermal Oxidizer	11/7/2010	SO ₂ (250 ppmv)	Not reported (12 hours)	Shutdown/startup associated with routine maintenance. The MDEA filters became plugged and the pump became vapor locked until suction was established.	Specific Requirement 23
					SO ₂ (95 lb/hr)	Not reported (2 hours)		LAC 33:III.501.C.4
TT T	2010 Annual Compliance Certification (3/24/2011)	3016-V1	EQT 0255 No.2 Flare	12/15/2010	H ₂ S (162 ppmvd 3 hour rolling average)	Not reported (32 hours)	During a repair of the high pressure line of the Waste Gas System, the Hot Oil Drum Off Gas line was inadvertently routed to the flare.	Specific Requirements 20, 21, and 40, LAC 33:III.905
					SO ₂ (153.185 lb/hr)	Not reported (1 hour)		
					H ₂ S (0.41 lb/hr)	Not reported (1 hour)		
UU U	2010 Annual Compliance Certification (3/24/2011)	3022-V4	EQT 0184 FCC Regenerator Flue Gas Scrubber Vent	12/16/2010	CO (500 ppm)	Not reported (11 hours)	Planned startup.	Specific Requirements 14 and 31
VV V	2010 Annual Compliance Certification (3/24/2011)	3022-V4	EQT 0184 FCC Regenerator Flue Gas Scrubber Vent	12/31/2010	SO ₂ (53.79 tpy)	Approximately 5 tpy exceedance	Not submitted	LAC 33:III.501.C.4

Each emission exceedance 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).

VII.

The Respondent failed to meet the following reporting requirements:

	REPORT	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
A	Not reported	3004-V0	Submit report of the number of breakthroughs for EQT 081 Tank C-8901	3/31/2009	Failed to submit.	Specific Requirement 45
B	Not reported	3004-V0	Submit report of the number of breakthroughs for EQT 085 Tank C-8902	3/31/2009	Failed to submit.	Specific Requirement 85

	REPORT	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
C	Not reported	3004-V0	Submit report of the number of breakthroughs for EQT 103 Tank D-913	3/31/2009	Failed to submit.	Specific Requirement 132
D	Not reported	3004-V0	Submit report of the number of breakthroughs for EQT 108 Tank 1024	3/31/2009	Failed to submit.	Specific Requirement 158
E	Not reported	3004-V0	Submit report of the number of breakthroughs for EQT 109 Tank 5509	3/31/2009	Failed to submit.	Specific Requirement 179
F	Not reported	3004-V0	Submit report of the number of breakthroughs for EQT 110 Tank 6306	3/31/2009	Failed to submit.	Specific Requirement 198
G	Not reported	3017-V1/V2/V3	Submit report of the number of breakthroughs for EQT 233 Storage Tank M1	3/15/2009, 9/15/2009 3/15/2010, 9/15/2010	Failed to submit.	Specific Requirements 181/167/190
H	Not reported	3017-V1/V2/V3	Submit report of the number of breakthroughs for EQT 234 Storage Tank M2	3/15/2009, 9/15/2009 3/15/2010, 9/15/2010	Failed to submit.	Specific Requirements 191/179/203
I	Not reported	3017-V1/V2/V3	Submit report of the number of breakthroughs for EQT 240 Storage Tank M3	3/15/2009, 9/15/2009 3/15/2010, 9/15/2010	Failed to submit.	Specific Requirements 255/224/251
J	Not reported	3017-V1/V2/V3	Submit report of overall calculated VOC emissions for EQT 0216 TKMAINT-ARO, Aromatics Tank Maintenance and Service Changes	3/31/2009	Failed to submit.	Specific Requirements 134/121/121
K	Not reported	3017-V1	Submit report of overall calculated VOC emissions for GRP035 Group B Tanks Emission Cap	3/31/2009	Failed to submit.	Specific Requirement 404
L	Unauthorized Discharge Notification Report T116426 Update	N/A	Updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	9/15/2009	10/23/2009	LAC 33:1.3925.A.3
M	Unauthorized Discharge Notification Report T116434 Update	N/A	Updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	9/15/2009	9/30/2009	LAC 33:1.3925.A.3
N	Unauthorized Discharge Notification Report T116460 Update	N/A	Updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	9/18/2009	9/23/2009	LAC 33:1.3925.A.3

	REPORT	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
O	Unauthorized Discharge Notification Report T117083 Update	N/A	Updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	10/12/2009	10/26/2009	LAC 33:1.3925.A.3
P	Unauthorized Discharge Notification Report T117481 Update	N/A	Updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	10/31/2009	11/16/2009	LAC 33:1.3925.A.3
Q	3Q2009 NESHAP Subpart FF (BWON) Uncontrolled Benzene Evaluation Report (2/23/2010)	Consent Decree	Submit Corrective Measures Plan no later than 60 days after the end of the calendar quarter.	11/29/2009	2/23/2010	Paragraph 92(b) of Consent Decree, La. R.S. 30:2025(E)(2)
R	Not reported	2500-00005-V1/V2	Submit report of heat input of individual boilers and total calculated emissions for GRP0022 Boilers CAP	3/31/2010	Failed to submit.	Specific Requirements 91/95
S	Not reported	3004-V0/V1	Submit report of overall calculated VOC emissions for GRP029 Group A	3/31/2010	Failed to submit.	Specific Requirements 1853/1758
T	Not reported	3004-V0/V1	Submit report of overall calculated VOC emissions for EQT 182 SD-OM, Sphere Drain Emissions	3/31/2010	Failed to submit.	Specific Requirements 1601/1612
U	Not reported	3004-V0/V1	Submit report of overall calculated VOC emissions for GRP030 Group B	3/31/2010	Failed to submit.	Specific Requirements 1854/1759
V	Not reported	3004-V0/V1	Submit report of overall calculated VOC emissions for GRP036 Loading Cap	3/31/2010	Failed to submit.	Specific Requirements 1855/1760
W	Not reported	3004-V0/V1	Submit report of overall calculated VOC emissions for GRP039 Tank Maintenance	3/31/2010	Failed to submit.	Specific Requirements 1856/1761
X	Not reported	3016-V1	Submit report of emissions calculated based on number of Startup/Shutdown of Flare No.2 for EQT 0270	3/31/2010	Failed to submit.	Specific Requirement 47
Y	Not reported	3017-V1/V2/V3	Submit report of overall calculated VOC emissions for GRP034 Group A Tanks Emission Cap	3/31/2010	Failed to submit.	Specific Requirements 403/362/386
Z	Unauthorized Discharge Notification Report T120078 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	2/19/2010	3/24/2010	LAC 33:1.3925.A.3

	REPORT	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITAL DATE	REGULATORY OF PERMIT REQUIREMENTS
A A	Unauthorized Discharge Notification Report T123040 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	7/3/2010	Failed to submit.	LAC 33:1.3925.A.3
BB	Unauthorized Discharge Notification Report T123156 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	7/6/2010	8/17/2010	LAC 33:1.3925.A.3
CC	March 24, 2011 (Quarterly, Semiannual, & Annual)	3004-V2	Conditions not up to the standards described in LAC 33:III.2103.D.2 shall be recorded along with the date(s) that the standards are not met and the administrative authority shall be notified within seven days.	8/24/2010	9/9/2010	LAC 33:III.2103.D.2.e
D D	Unauthorized Discharge Notification Report T125557 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	10/16/2010	Failed to submit.	LAC 33:1.3925.A.3
EE	Unauthorized Discharge Notification Report T126093 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	10/25/2010	12/16/2010	LAC 33:1.3925.A.3
FF	Unauthorized Discharge Notification Report T126170 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	11/13/2010	12/14/2010	LAC 33:1.3925.A.3
G G	Unauthorized Discharge Notification Report T126868 Update	N/A	Updates on the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	2/8/2011	Failed to submit.	LAC 33:1.3925.A.3
H H	Unauthorized Discharge Notification Report T126929 Update	N/A	Written reports for any unauthorized discharge shall be submitted within 7 calendar days.	10/14/2010	12/10/2010	LAC 33:1.3925.A

Each noncompliance of the reporting requirements is a violation of 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).