

JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

April 10, 2018

CERTIFIED MAIL (7003 2260 0000 5823 4952)
RETURN RECEIPT REQUESTED

EQUILON ENTERPRISES LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Drive
Baton Rouge, LA 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-16-01017
AGENCY INTEREST NO. 2719**

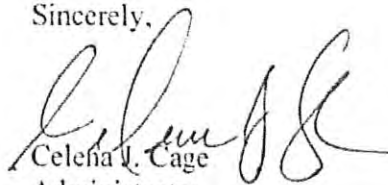
Dear Sir:

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 **EQUILON ENTERPRISES LLC (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 Antoinette Cobb at (225) 219-3072 or via email at antoinette.cobb@la.gov.

Sincerely,



Celesta L. Cage
Administrator
Enforcement Division

CJC/AFC/afc
Ali ID No. 2560-00001
Attachment



c: Equilon Enterprises LLC
c/o Mr. Oliver Boyd, Environmental Manager
P.O. Box 37
Convent. LA 70723

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

IN THE MATTER OF

EQUILON ENTERPRISES LLC
ST. JAMES PARISH
ALT ID NO. 2560-00001

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-16-01017
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* AGENCY INTEREST NO.
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* 2719
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**CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **EQUILON ENTERPRISES LLC (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 Convent Refinery (the Facility), a petroleum refinery, located at 10700 Louisiana Highway 44 in Convent, St. James Parish, Louisiana. The Facility operates or has operated under the authority of the following Title V Air Permits:

PERMIT NO.	ISSUE DATE	EXPIRATION DATE
2560-00001-V16	07/08/2016	11/05/2019
2560-00001-V15	03/09/2016	11/05/2019
2560-00001-V14	07/22/2015	11/05/2019
2560-00001-V13	12/22/2014	11/05/2019
2560-00001-V12	11/05/2014	11/05/2019
2560-00001-V11	01/18/2013	09/30/2013

PERMIT NO.	ISSUE DATE	EXPIRATION DATE
2560-00001-V10	09/27/2012	09/30/2013
2560-00001-V9	03/16/2011	09/30/2013

The facility also operates under Consent Decree, Civil Action Number H-01-0978 entered into the United States District Court for the Southern District of Texas on or about March 21, 2001.

On or about June 7, 2017, the Department received a Notification of Change (NOC-1) Form for the facility. According to the NOC-1, the facility name, ownership, and operational control changed, and permits transferred effective May 1, 2017, from Motiva Enterprises LLC to Equilon Enterprises LLC dba Shell Oil Products US. Equilon Enterprises LLC dba Shell Oil Products US assumed responsibility for all violations existing prior to the transfer of the permits. The Department effectively transferred the permits and updated records to reflect the changes on June 22, 2017.

II.

On or about April 27, 2011 through May 31, 2011, a Partial Compliance Evaluation (PCE) Inspection was conducted at the facility to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits. During the course of the inspection, the inspector noted areas of concerns related to the following unauthorized discharges:

Incident Date	Department Incident No.	Written Notification Report(s) Postmark Date(s)
04/05/2011	T130425	04/12/2011
04/11/2011	T130553	04/15/2011,05/10/2011
04/15/2011	T130936	04/19/2011
04/17/2011	T130690	04/21/2011

III.

On or about March 4, 2013, March 13-15, 2013, and June 10, 2013, a Partial Compliance Evaluation (PCE) Inspection was conducted at the facility to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits. While the Department's investigation is not complete, the following violations were noted during the course of the inspection:

- A. In the Unauthorized Discharge Notification Report for Incident No. T139889 and postmarked May 24, 2012, the Respondent reported an unauthorized release that

occurred on May 18, 2012, at the facility. The HTU-2 Unit was in the process of starting up when H₂S containing hydrocarbons entered the unit's low pressure fuel gas drum. The H₂S containing hydrocarbons were then combusted in the West Side Refinery Fuel Gas combustion devices resulting in the 500 SO₂ reportable quantity being exceeded. In the 60-Day Follow-up Report dated March 19, 2013, the Respondent reported the root cause of the release was human error and therefore the release was preventable. According to the report, a lineup was made on the 14F-323 off gas absorber that resulted in routing sour gas into the west side fuel gas drum. The release lasted for approximately one (1) hour and resulted in the following exceedances:

Source	Pollutant	Permitted Limit (max lb/hr)	Amount Reported Over Permit Limit (in lbs)
EQT 0029 1F-201 VPS-1 Atmospheric Heater	SO ₂	4.30	72.92
EQT 0030 1F-202 VPS-1 Atmospheric Heater	SO ₂	4.60	71.99
EQT 0031 1F-251 VPS-1 Vacuum Heater	SO ₂	1.80	32.80
EQT 0060 7F-1 Gas Oil Heater	SO ₂	3.60	54.03
EQT 0069 2F-301 FCCU Feed Heater	SO ₂	17.45	18.39
EQT 0070 2F-302 FCCU Recycle Heater	SO ₂	2.28	16.32
EQT 0038 3F-401 HTU HSR Charge Heater	SO ₂	1.60	22.49
EQT 0039 3F-402 HTU-1 Kerosene Charge Heater	SO ₂	1.30	15.70
EQT 0040 3F-403 HTU-1 HSR Reboiler	SO ₂	2.10	24.86
EQT 0041 3F-404 HTU-1 Kerosene Reboiler	SO ₂	2.00	34.70
EQT 0042 4F-501 CRU Charge Heater	SO ₂	3.50	11.26
EQT 0043 4F-502 CRU Inter Heater No. 1	SO ₂	3.60	8.08
EQT 0044 4F-503 CRU Inter Heater No. 3	SO ₂	1.40	3.05
EQT 0045 4F-504 CRU Inter Heater No. 2	SO ₂	1.50	5.36
EQT 0033 31F-801 Boiler No. 1	SO ₂	9.07	145.95

Source	Pollutant	Permitted Limit (lb/day/yr)	Amount Exceeded Over Permitted Limit (lb/day)
EQT 0034 31F-802 Boiler No. 2	SO ₂	9.07	134.47
EQT 0035 31F-803 Boiler No. 3	SO ₂	9.07	128.09
EQT 0037 31F-810 Boiler No. 4	SO ₂	7.55	186.55

The failure to operate according to procedure is a violation of LAC 33:III.905, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Each exceedance of a permitted limit is a violation of Title V Permit No. 2560-00001-V9, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). In the 7-Day Follow-up Report dated and postmarked May 24, 2012, the Respondent stated the cause of the emission event was being investigated. The Respondent is required to submit updates of the status of the ongoing investigation of the unauthorized discharge every 60 days until the investigation has been completed and the results of the investigation have been submitted. The Final 60-Day Follow-up Report was postmarked March 20, 2013. Each failure to submit an update every 60 days until completion of the investigation is a violation of Specific Requirement 3342 of Title V Permit No. 2560-00001-V9, LAC 33:1.3925A.3, LAC 33:III.927, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- B. During the course of the inspection, the inspector reviewed the March 20, 2012 Visual Inspection and Secondary Seal Gas Measurement record for External Floating Roof Tank 20D-40 (EQT 0142) and noted the automatic bleeder vent (vacuum breakers) was open. This is a violation of 40 CFR 60.112b(a)(2)(ii), Specific Requirement 1816 of Title V Permit No. 2560-00001-V9, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. During the course of the inspection, the inspector reviewed the March 20, 2012 Internal Floating Roof Tank visual inspection record for Tank 37T-301 (EQT 0201) and noted the access hatch was not bolted, the gauge float well was not bolted, the sample well was not at least 90% covered, and the cover was not over the ladder well. Each deficiency is a violation of 40 CFR 60.112b(a)(1)(iv), Specific Requirement 2860 of Title V Permit No. 2560-00001-V9, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- D. During the course of the inspection, the inspector reviewed the March 20, 2012 Internal Floating Roof Tank Visual Inspection Record for Tank 37T-301 (EQT 0201) and noted the access hatch was marked as N/A in regards to a gasket being in place but a gasket was needed for the lid to the access hatch. This is a violation 40 CFR 60.112b(a)(1), Specific Requirement 2860 of Title V Permit No. 2560-00001-V9, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

- E. During the course of the inspection, the inspector reviewed the March 23, 2011 Tank 37T-315 (EQT 0204) inspection, the secondary seal fabric had holes and tears, but the repairs were made on May 27, 2011, which is more than 45 days after it was identified in the inspection. This is a violation of 40 CFR 60.113b(b)(4), Specific Requirement 2936 of Title V Permit No. 2560-00001-V9, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

IV.

On or about April 22-24, 2014, and April 29-30, 2014, the Department conducted a compliance audit to determine the Respondent's degree of compliance with the Chemical Accident Prevention Provisions set forth in 40 CFR Part 68. While the Department's investigation is not yet complete, the following violations were discovered during the course of the audit:

- A. The Respondent failed to implement procedures for inspection, testing, and maintenance for the Emergency Response section. Specifically, the 2012 annual deluge, 2012 annual sprinkler, and 2012 annual foam tests were not performed. The Fire Alarm policy states it is being tested quarterly but the facility is only testing the fire alarm annually. Each failure to test according to the Emergency Response procedure is a violation of 40 CFR 68.95(a)(2), which language has been incorporated by reference as Louisiana Regulation LAC 33:III.5901.A, Specific Requirement 3197 of Title V Permit No. 2560-00001-V11, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- B. The Respondent failed to maintain records supporting the implementation of training, contractors, and emergency response for five (5) years. Specifically, the inspector noted the following during the audit:
- i. The Respondent verbally consults with the operators on the frequency of refresher training but there is no documentation of this consultation.
 - ii. There was no documentation of the Respondent periodically evaluating the contractors to ensure the jobs are being performed safely. The Respondent did have contractor safety audits but the audits only addressed the work site, permit, and equipment being used.
 - iii. There were no inspection and testing records for Annual Deluge, Annual Foam, or Annual Sprinkler tests prior to 2012.

Each failure to maintain records supporting the implementation of training, contractors, and emergency response is a violation of 40 CFR 68.200, which language has been incorporated by reference as Louisiana Regulation LAC 33:III.5901.A, Specific Requirement 3197 of Title V Permit No. 2560-00001-V11, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

V.

On or about March 26, 2015, March 30-31, 2015, and April 7-8, 2015, the Department conducted a Full Compliance Evaluation (FCE) Inspection to determine the Respondent's degree of

compliance with the Act, the Air Quality Regulations, and all applicable permits. While the Department's investigation is not complete, the following violations were noted during the course of the inspection:

- A. During the course of the inspection, the inspector reviewed visual tank inspection reports for Tanks 20D-34, 20D-47, 20T-303, 37T-301, 20AT-904, and 20AT-907. The inspector noted inadequate visual inspections were conducted for the tanks. Each failure to conduct an adequate inspection is a violation of 40 CFR 63.120(a), LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- B. During the course of the inspection, the inspector noted Wharf No. 2 Firewater Diesel Engine (EQT 0088) and Wharf No.1 Firewater Diesel Engine (EQT 0089) operated for more than 100 hours in a calendar year. Wharf No. 2 Firewater Diesel Engine was operated for 985 hours in 2013 and 733 hours in 2014. Wharf No. 1 Firewater Engine was operated for 193 hours in 2013 and 853 hours in 2014. Each failure to comply with the operational hours limit is a violation 40 CFR 63.6640(f)(a), Specific Requirements 720 and 724 of Title V Permit No. 2560-00001-V11, Specific Requirements 793 and 801 of Title V Permit No. 2560-00001-V12, Specific Requirements 805 and 814 of Title V Permit No. 2560-00001-V13, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).
- C. In the Unauthorized Discharge Notification Report for Incident No. T154126 dated March 3, 2014, and the Final Unauthorized Discharge Report dated April 7, 2014, the Respondent reported a release that occurred at the facility on February 24, 2014. According to the reports, a scaffolding crew was dismantling a scaffold by Train-100 heater passes on HTU-2. A scaffold builder was hammering a scaffold coupling when the hammer bounced back unexpectedly and struck ½" diameter process tube located overhead. The tubing separated from a fitting, resulting in a release of hydrogen, diesel range hydrocarbons, and a subsequent, localized fire. The incident lasted for approximately 57 minutes. The release could have been prevented had the tubing/ferrule assembly been properly seated at the time it was inadvertently struck by the scaffold worker.

Initial Gas Release to Air from Tubing Leak:

Pollutant	Release Quantity (lbs)	Reportable Quantity (lbs)
H ₂ S	83	100
VOCs	143	5,000

Diesel Released to Unit Slab:

Amount	Unit	Fate
27.6	bbls	Released to Unit Slab

Amount	Unit	Fate
8,126	lbs	Released to Unit Slab
7,558	lbs	Amount combusted (assuming 93% combustion)
569	lbs	Amount combusted (assuming 93% combustion)

Emissions to Air from Combustion of Diesel during the Fire:

Pollutant	Release Quantity (lbs)	Reportable Quantity (lbs)
CO	1,542	5,000
NO _x	23	1,000
PM	1,474	NA
SO ₂	45	500

The unauthorized release is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

VI.

In the Unauthorized Discharge Report for Incident No. 167124 dated November 6, 2015, and the Final Unauthorized Discharge Report dated December 7, 2015, the Respondent reported a release that occurred at the facility on November 3, 2015. According to the December 7, 2015 report, HTU-2 was in start-up mode following a turnaround. During the reactor heat-up, carbon dioxide was released from a coating on newly installed catalyst. A valve line-up on the HTU-2 sour water stripper was open for longer than required and resulted in the carbon dioxide entering the facility's Flare Gas Recovery System. The Flare Gas Recovery scrubber was overwhelmed by the carbon dioxide. Hydrogen sulfide in off-gas being routed to the flare header was carried over into the refinery's fuel gas system. Flaring began on November 3, 2015 and ended on November 5, 2015. An investigation determined the root cause of the incident was the incorrect line-up of the sour water stripper skim line and a malfunctioning level transmitter on the HTU-2 unit flare drum. The incident was preventable. Approximately 44,639 lbs of sulfur dioxide and 259 lbs of hydrogen sulfide were released from various flares, boilers, and process heaters. The Respondent reported the following permit exceedances:

EMISSION POINT	POLLUTANTS RELEASED	PERMITTED LIMITS (max lb/hr)	AMOUNT REPORTED IN EXCESS OF PERMIT LIMIT (lbs)	DURATION (hrs)
EQT 0029 VPS-1 Atmospheric Heater	SO ₂	4.26	15.94	3

EMISSION POINT	POLLUTANTS RELEASED	PERMITTED LIMITS (max lb/hr)	AMOUNT REPORTED IN EXCESS OF PERMIT LIMIT (lbs)	DURATION (hrs)
EQT 0030 VPS-1 Atmospheric Heater	SO ₂	4.51	15.37	3
EQT 0031 VPS-1 Atmospheric Heater	SO ₂	1.78	4.1	3
EQT 0060 Gas Oil Heater	SO ₂	3.56	15.74	3
EQT 0070 FCCU Recycle Heater	SO ₂	2.28	0.71	2
EQT 0038 HTU-1 HSR Charge Heater	SO ₂	1.60	4.63	3
EQT 0039 Kerosene Charge Heater	SO ₂	1.29	3.51	3
EQT 0040 HSR Reboiler	SO ₂	2.05	1.24	2
EQT 0041 Kerosene Reboiler	SO ₂	1.93	8.00	3
EQT 0042 CRU Charge Heater	SO ₂	3.39	2.19	2
EQT 0043 CRU Inter Heater No.1	SO ₂	3.56	3.55	2
EQT 0045 CRU Inter Heater No. 2	SO ₂	1.52	4.92	3
EQT 0033 Boiler No. 1	SO ₂	8.93	17.06	3
EQT 0034 Boiler No. 2	SO ₂	8.93	15.87	3
EQT 0035 Boiler No. 3	SO ₂	8.93	18.04	3
EQT 0036 Boiler No. 4	SO ₂	7.82	4.43	2
EQT 0037 Boiler	SO ₂	7.43	46.53	3
EQT 0072 Refinery Flare No. 2	SO ₂	671.47	44,457	39
EQT 0073 Refinery Flare No. 1				
EQT 0074 Refinery Flare No. 3				
EQT 0075 Refinery Flare No. 4				

EMISSION POINT	POLLUTANTS RELEASED	PERMITTED LIMITS (max lb/hr)	AMOUNT REPORTED IN EXCESS OF PERMIT LIMIT (lbs)	DURATION (hrs)
EQT 0072 Refinery Flare No. 2	H ₂ S	3.36	259	39
EQT 0073 Refinery Flare No. 1				
EQT 0074 Refinery Flare No. 3				
EQT 0075 Refinery Flare No. 4				

Each emission exceedance is a violation of Title V Permit No. 2560-00001-V14, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). The Respondent also reported the refinery fuel gas hydrogen sulfide concentration at the West-side fuel gas drum exceeded the 162 ppmv concentration standard for four (4) hours. This is a violation of 40 CFR 60.104, Title V Permit No. 2560-00001-V14, and La. R.S. 30:2057(A)(2).

VII.

In the Unauthorized Discharge Report for Incident No. 171240 dated June 23, 2016, and the Written Follow-Up Report dated July 14, 2016, the Respondent reported a release that occurred at the facility on June 18, 2016. According to the reports, on June 18, 2016, while conducting repairs to a redundant Distributed Control System (DCS) communication cable, several units unexpectedly experienced a loss of screen view on the refinery's control consoles. The loss of the DCS screen view occurred because cables were inadvertently cross-connected during the repair. The inability to make control adjustments in H-Oil Unit resulted in an activation of the reactor outback system which led to elevated flaring from Flare 3 (EQT 0074). The incident started at 1:40 PM and ended at 3:00 PM. The incident was reported as preventable. The following permitted limits for Flare No. 3 were also exceeded during the incident: approximately 3,455.27 lb of SO₂ was released, 1,408.41 lbs above the permit limit of 671.47 max. lb/hr.; and 11.48 lbs of H₂S was released, 8.12 lbs was above the permit limit of 3.36 max. lb/hr. This is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(2). Each exceedance of a permit limit is a violation of Title V Permit No. 2560-00001-V15, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

VIII.

In the Unauthorized Discharge Report for Incident No. 172554 dated August 30, 2016, and the Follow-Up Report dated September 21, 2016, the Respondent reported a release that occurred at the facility on August 23, 2016. According to the reports, on August 23, 2016, SRU-4 tripped on low dP for the combustion air to its thermal reactors. The decision was made to leave SRU-4 down to investigate the trip and transition its feed to SRU-5. During the transition, an input error occurred that allowed SO₂ breakthrough to the TGTU-5 incinerator stack (EQT 0061). The incident started at 11:35 AM and ended at 12:40 PM. The incident was reported as preventable. The incident resulted in the release of 1303 lbs of SO₂, 1268 lbs above the permit limit, 35.00 lb/hr. This is a violation of LAC 33:III.905 and La. R.S. 30:2057(A)(2). Exceeding SO₂ permit limit is a violation of Specific Requirement 499 of Title V Permit No. 2560-00001-V16, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

IX.

In the Unauthorized Discharge Report for Incident No. 174611 dated December 20, 2016, the Respondent reported a release that occurred at the facility on December 15, 2016. According to the report, on December 20, 2016, the console operators noticed a loss of level indication on the F-103 flash drum. Gas was sent to F-107 causing Pressure Safety Valve (PSV) 880 to lift, relieving to Flare No. 3. During troubleshooting, the console operators noticed the flow controller 70FC-156, HP purge valve to IP loop was closed. Flow controller 70FC-156 opened and closed twice, causing a pressure swing. The pressure swing affected the H2 heater passes, caused gas blow by on F-103, started pressuring up F-107 and F-108 as well as F-116 and F-111; eventually leading to a flaring event during which PSVs off of F-107 lifted and the front end of the PSA pressured up and relieved to the flare. The incident lasted for approximately one (1) hour and resulted in the release of approximately 1322 lbs of SO₂. The incident was reported as preventable; during the last outage, heat tracing was not installed and winterization of the transmitter did not occur. This is a violation of LAC 33:III.905 and La. R.S. 30:2057(A)(2). Exceeding the SO₂ permit limit of 671 max lb/hr for Flare No. 3 (EQT 0074) is a violation of Title V Permit No. 2560-00001-V16, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

X.

On or about April 17-21, 2017, and December 20, 2017, the Department conducted file reviews to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits. While the review is not complete, the Department noted the violations found in paragraphs XI-XVIII of the Findings of Fact portion of this enforcement action.

XI.

The Respondent reported the following deviations from permitted operating parameters:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0173 Tank 20T-206	07/26/2012	Bolt covers on each access hatch and automatic gauge float well except when they are in use	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 60.112(a)(2). Specific Requirement 2476
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
B.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0148 Tank 20D-47	08/21/2012	Bolt covers on each access hatch and automatic gauge float well except when they are in use	Access hatch cover found to be in the closed position but unbolted	40 CFR 60.112b(a)(1). Specific Requirement 1872
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
C.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0168 Tank 20T-201	08/21/2012	Equip each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains with a cover or lid and maintain in a closed position at all times except when the device is in actual use	Rim vents discovered in the open position	40 CFR 60.112(a)(2), Specific Requirement 2345
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
D.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0098 Tank 18D-1	09/24/2012	Equip the cover or lid with a gasket. Bolt covers on each access hatch and automatic gauge float well except when they are in use.	Place a gasket on the access hatch cover and bolt the cover closed*	40 CFR 60.112b(a)(1) Specific Requirement 752
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
E.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0098 Tank 18D-1	09/24/2012	The sample well shall have a slit fabric cover that covers at least 90% of the opening	Sample well was not covered at least 90%	40 CFR 60.112b(a)(1), Specific Requirement 752
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
F.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0098 Tank 18D-1	09/24/2012	Equip each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains with a cover or lid and maintain in a closed position at all times except when the device is in actual use.	Ladder well found to be without a gasketed cover while tank was in service	40 CFR 60.112b(a)(1), Specific Requirement 752
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
G.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0138 Tank 20D-36	09/24/2012	Equip the cover or lid with a gasket. Bolt covers on each access hatch and automatic gauge float well except when they are in use.	Place a gasket on the access hatch cover and bolt the cover closed*	40 CFR 60.112b(a)(1). Specific Requirement 1750
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
H.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0138 Tank 20D-36	09/24/2012	The sample well shall have a slit fabric cover that covers at least 90% of the opening	Sample well was not covered at least 90%	40 CFR 60.112b(a)(1). Specific Requirement 1750
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
I.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0138 Tank 20D-36	09/24/2012	Equip each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains with a cover or lid and maintain in a closed position at all times except when the device is in actual use.	Ladder well found to be without a gasketed cover while tank was in service	40 CFR 60.112b(a)(1). Specific Requirement 1750
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
J.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0176 Tank 20T-210	09/24/2012	Equip the cover or lid with a gasket. Bolt covers on each access hatch and automatic gauge float well except when they are in use.	Place a gasket on the access hatch cover and bolt the cover closed*	40 CFR 60.112a(a)(2). Specific Requirement 2534
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
K.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0176 Tank 20T-210	09/24/2012	The sample well shall have a slit fabric cover that covers at least 90% of the opening	Sample well was not covered at least 90%	40 CFR 60.112a(a)(2). Specific Requirement 2534
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
L.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0176 Tank 20T-210	09/24/2012	Equip each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains with a cover or lid and maintain in a closed position at all times except when the device is in actual use.	Ladder well found to be without a gasketed cover while tank was in service	40 CFR 60.112a(a)(2), Specific Requirement 2534
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
M.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0183 Tank 20T-217	07/26/2012	External floating roof: Ensure that each external floating roof meets the specifications listed in 40 CFR 31.119(c)(2)(i) through (c)(2)(xii)	Gaps visible around the guide pole	40 CFR 63.119(c)(2), Specific Requirement 2606
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
N.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0184 Tank 20T-218	07/26/2012	External floating roof: Ensure that each external floating roof meets the specifications listed in 40 CFR 31.119(c)(2)(i) through (c)(2)(xii)	Gaps visible around the guide pole	40 CFR 63.119(c)(2), Specific Requirement 2651
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
O.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0141 Tank 20D-4	08/21/2012	Spills of volatile organic compounds shall be avoided and cleanup of such spills shall employ procedures that reduce or eliminate the emission of volatile organic compounds	Light residue discovered on floating roof	IAC 33.III 2113.A, Specific Requirement 3389
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
P.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V9	EQT 0126 Tank 20D-25	08/21/2012	If a cover or lid is installed on an opening on a floating roof, keep the cover lid closed except when it must be opened for access	Place vacuum breaker vent in the closed position*	40 CFR 63.646(f)(1), Specific Requirement 1439
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Q.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/14/2013)	2560- 00001-V10	EQT 0111 Tank 20D-10	10/23/2012	Spills of volatile organic compounds shall be avoided and clean up such spills shall employee procedures that reduce or eliminate the emission of volatile organic compounds	Dried product residue on roof	LAC 33:III.2113, Specific Requirement 3292
	2012 2 nd Semiannual Monitoring Report (04/17/2013)						
R.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560- 00001-V10	EQT 0075 Refinery Flare No. 4	11/09/2012 (3.6 hours)	Operate at all times when emissions may be vented to the flare	Refinery Flare No 4 was isolated as part of HTU-3 Unit start-up. During the flaring event associated with the unit start-up, the flare started to stop As operations introduced more steam, the flare pilot was inadvertently snuffed out.	40 CFR 63.116(b)(5), Specific Requirement 651
S.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560- 00001-V10	EQT 0073 Refinery Flare No. 1	11/28/2012 (0.1 hour)	Operate at all times when emissions may be vented to the flare	Snuffed out flame with steam addition	40 CFR 63.11(b)(3), Specific Requirement 577
T.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560- 00001-V10	EQT 0062 VPS-2 Atmospheric Tower Feed Heater	12/18/2012 (1 hour)	Use of Flue Gas Oxygen Monitors as BACT for combustion controls	A swing in the operational conditions caused the heaters to trip to natural draft mode, causing both their F/D and I/D fans to shutdown	LAC 33:III.501.C.4
U.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0109 Tank 20AT- 907	03/23/2013	Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 60.112b(a)(7), Specific Requirement 263
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)						
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						
V.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0189 Tank 20T-303	03/23/2013	Bolt covers on each access hatch and automatic gauge well except when they are in use	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 60.112b(a)(1). Specific Requirement 2709
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
W.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0189 Tank 20T-303	03/23/2013	The sample well shall have a slit fabric cover that covers at least 90 percent of the opening	Sample well was not covered by at least 90%	40 CFR 60.112b(a)(1). Specific Requirement 2709
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
X.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0201 Tank 37T-301	03/23/2013	Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 60.112b(a)(1). Specific Requirement 2758
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
Y.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0201 Tank 37T-301	03/23/2013	The cover or lid shall be equipped with a gasket	Sample and ladder wells found to be without a gasketed cover while tank was in service	40 CFR 60.112b(a)(1). Specific Requirement 2758
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
Z.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0107 Tank 20AT- 904	03/23/2013	Covers on each access hatch and each gauge float well shall be bolted or fastened so as to be air-tight when they are closed	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 63.119(b)(6). Specific Requirement 1067
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
A2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0136 Tank 20D-34	03/23/2013	Covers on each access hatch and each gauge float well shall be bolted or fastened so as to	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 63.119(b)(6). Specific Requirement 1684

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	2013 1 st Semiannual Monitoring Report (09/27/2013)				be air-tight when they are closed		
	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)						
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						
B2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/13/2013)	2560- 00001-V11	EQT 0111 Tank 20D-10	04/30/2013	If a cover or lid is installed on an opening on a floating roof, keep the cover or lid closed except when it must be open to access	Sample hatch discovered open as a result of not being closed after use	40 CFR 63.646(f)(1). Specific Requirement 1047
	2013 1 st Semiannual Monitoring Report (09/27/2013)						
C2.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560- 00001-V11	EQT 0074 Refinery Flare No. 3	04/02/2013 (0.4 hour)	Design and operation for no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours	Elevated flow to flare system during H-Oil unit start up. H-Oil Unit start-up involves the flaring of light ends from the Fractionation System. When H- Oil Reactor Section temperature reached 300 degrees, Naphtha from the Recovery Section was routed to the flare. This changed the composition of the gas being flared and required additional steam injection to prevent any visible emissions. The steam flow to the flare stack was increased to stop the visible emissions event.	40 CFR 63.11(b)(4). Specific Requirement 607

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
D2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/12/2014)	2560- 00001-V11	EQT 0169 Tank 20T-202	08/09/2013	Gauge float well must be bolted	Not reported	40 CFR 60.112b(a)(1). Specific Requirement 2303
	2013 Annual Compliance Certification (03/31/2014)						
E2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/12/2014)	2560- 00001-V11	EQT 0166 Tank 20D-8	08/20/2013	Automatic bleeder vents and rim space vents are to be gasketed	Not reported	40 CFR 63.119(c)(2). Specific Requirement 2233
	2013 Annual Compliance Certification (03/31/2014)						
F2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/12/2014)	2560- 00001-V11	EQT 0166 Tank 20D-8	08/20/2013	Each unslotted guide pole well shall have a gasketed sliding cover or a flexible fabric sleeve seal	Not reported	40 CFR 63.119(c)(2). Specific Requirement 2233
	2013 Annual Compliance Certification (03/31/2014)						
G2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0189 Tank 20T-303	03/13/2014	Bolt covers on each access hatch and automatic gauge well except when they are in use	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 60.112b(a)(1). Specific Requirement 2709
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
112.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0189 Tank 20T-303	03/13/2014	The sample well shall have a slit fabric cover that covers at least 90 percent of the opening	Sample well was not covered by at least 90%	40 CFR 60.112b(a)(1). Specific Requirement 2709
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						
12.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0201 Tank 37T-301	03/13/2014	Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use The cover or lid shall be equipped with a gasket	Access hatch and automatic gauge float well covers found to be in the closed position but unbolted	40 CFR 60.112b(a)(1). Specific Requirement 2758
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						
J2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0201 Tank 37T-301	03/13/2014	Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use	Sample well was not covered by at least 90%	40 CFR 60.112b(a)(1). Specific Requirement 2758
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
K2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0201 Tank 37T-301	03/13/2014	Equip the cover or lid with a gasket	40 Sample and ladder wells found to be without a gasketed cover while tank was in service	40 CFR 60.112b(a)(1). Specific Requirement 2758
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)						
	2014 Annual Compliance Certification (03/31/2015)						
L2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0105 Tank 20AT- 902	02/04/2014	External floating Roof: Ensure that each external floating rood meets the specification listed in 40 CFR 63.119(c)(2)(i) through (c)(2)(xii)	Float well cover found to be heavily corroded, Gauge hatch tension cable needs to be adjusted to allow cover to close easily	40 CFR 63.119(c)(2). Specific Requirement 849
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
M2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0105 Tank 20AT- 902	02/04/2014	External floating Roof: Ensure that each external floating rood meets the specification listed in 40 CFR 63.119(c)(2)(i) through (c)(2)(xii)	Guidepole gasket found to be worn with a visible gap	40 CFR 63.119(c)(2). Specific Requirement 849
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
N2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0106 Tank 20AT- 903	02/04/2014	Spills of volatile organic compounds shall be avoided and clean-up of such spills shall employ procedures that reduce or eliminate the	Small leak/product on roof near the manway	LAC 33:III.2113.A. Specific Requirement 3178
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
O2.	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560- 00001-V11	EQT 0106 Tank 20AT- 903	02/04/2014	External floating Roof: Ensure that each external floating rood meets the specification listed in 40 CFR 63.119(c)(2)(i) through (c)(2)(xii)	Gauge hatch tension cable needs to be adjusted to allow cover to close easily	40 CFR 63.119(c)(2). Specific Requirement 893
	2014 1 st Semiannual Monitoring Report (09/30/2014)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
P2	40 CFR 63. Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (09/11/2014)	2560-00001-V11	EQT 0142 Tank 20D-40	03/31/2014	Equip automatic bleeder vents and rim space vents with gaskets	Automatic bleeder vent (vacuum breaker) was either not closed or missing gasket/cover)	40 CFR 60.112b(a)(2)(ii). Specific Requirement 1768
	2014 1 st Semiannual Monitoring Report (09/30/2014)						
Q2	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0027 TGTU No. 1 Incinerator Stack	01/15/2014 (0.2 hour)	Opacity \leq 20% except emissions may have an average opacity in excess of 20% for not more than one six-minute period in any 60 consecutive minutes	Unknown process upset conditions. While performing offline Instrument Protective Function (IPF) testing on Sulfur Recovery Unit 2 (SRU-2) the corresponding incinerator stack (TGTU-1) smoked for approximately 12 minutes. The unit was down and there was no charge in the unit at the time. When the control board operator opened the air valve to stimulate air flow to the thermal reactor, the stack began smoking and flames were seen coming from the top of the stack.	LAC 33-III.1311.C. Specific Requirement 12
R2	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0027 TGTU No. 1 Incinerator Stack	02/17/2014-02/18/2014 (8 hours)	Sulfur dioxide \leq 250 ppmv @ 0% excess air	An unintended stop to instrument air to the SRU 2 acid gas valve during maintenance work caused loss of the acid gas to flow	40 CFR 60.104(a)(2) (i). Specific Requirement 1
S2	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0079 HTU-2 Stripper Reboiler	03/18/2014-03/19/2014 (4 hours)	Fuel gas: Hydrogen sulfide \leq 0.1 gr/dscf (230 mg/dsem (3 hr rolling average)	CO ₂ released from the new HTU-3 catalyst during the H ₂ purge process saturated the FGR Amine Absorber System resulting in a contamination of the WSFG system	40 CFR 60.104(a)(1). Specific Requirements 233, 241, 249 257, 265, 389, 401, 428, 435, 675, & 682
			EQT 0049 H-Oil Train 100 Feed Heater				
			EQT 0050 H-Oil Train 100 Hydrogen Heater				
			EQT 0051 H-Oil Train 200 Feed Heater				
			EQT 0052 H-Oil Train 200 Hydrogen Heater				

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
			EQT 0053 H-Oil Vacuum Tower Heater				
			EQT 0062 VPS-2 Atmospheric Tower Feed Heater				
			EQT 0063 VPS-2 Vacuum Heater				
			EQT 0065 ISOM Reactor Feed Furnace				
			EQT 0080 HTU-3 Reactor Feed Heater				
			EQT0066 HDS-1 Heater				
Y2.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560- 00001-V11	EQT 0061 TGTU No. 5 Incinerator Stack	05/31/2014 (12 hours)	Sulfur dioxide ≤ 250 ppmv @ 0% excess air	During start-up of SRU-5, operations introduced feed but experienced upset conditions when they were unable to optimize the ratio of air to gas. An open valve was discovered.	40 CFR 60.104(a)(2)(i). Specific Requirement 370
U2.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560- 00001-V11	EQT 0056 TGTU No. 3 Incinerator Stack	05/30/2014 (0.2 hour)	Opacity ≤ 20% except emissions may have an average opacity in excess of 20% for not more than one six-minute period in any 60 consecutive minutes	Transitioning to hot sweep, operations was in the process of removing feed from SRU-3 when they observed a visible plume from the corresponding incinerator stack (TGTU-3)	LAC 33.III.1311 C. Specific Requirement 315
V2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)	2560- 00001-V11	EQT 0183 Tank 20T-217	07/10/2014	Each unslotted guide pole well shall have a gasketed sliding cover or a flexible fabric sleeve seal	Not reported	40 CFR 63.119(c)(2). Specific Requirement 2521
	2014 Annual Compliance Certification (03/31/2015)						
W2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)	2560- 00001-V11	EQT 0184 Tank 20T-218	07/10/2014	Each unslotted guide pole well shall have a gasketed sliding cover or a flexible fabric sleeve seal	Not reported	40 CFR 63.119(c)(2). Specific Requirement 2565
	2014 Annual Compliance Certification (03/31/2015)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
X2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)	2560- 00001-V11	EQT 0131 Tank 20D-3	09/04/2014	Automatic bleeder vents and rim space vents are to be gasketed	Not reported	40 CFR 63.119(c)(2), Specific Requirement 1595
	2014 Annual Compliance Certification (03/31/2015)						
Y2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)	2560- 00001-V11	EQT 0131 Tank 20D-3	09/04/2014	Each unslotted guide pole well shall have a gasketed sliding cover or a flexible fabric sleeve seal	Not reported	40 CFR 63.119(c)(2), Specific Requirement 1595
	2014 Annual Compliance Certification (03/31/2015)						
Z2.	40 CFR 63, Subpart CC-Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015)	2560- 00001- V11/V12	Refinery Flares [EQT 0072 Refinery Flare No. 2, EQT 0073 Refinery Flare No. 1, EQT 0074 Refinery Flare No. 3, EQT 0075 Refinery Flare No. 4]	07/12/2014 07/20/2014 07/24/2014 07/25/2014 07/31/2014 08/05- 08/2014 08/11- 19/2014 10/15/2014 10/17/2014 10/29/2014 11/10/2014 11/23/2014 11/24/2014 12/02/2014 12/04/2014 12/06/2014 12/22/2014 12/28/2014 12/29/2014	Operate with a flame present at all times	The presence of a pilot on one or more of the refinery flares was indicated to be out via the infrared camera	40 CFR 63.11 (b)(5), Specific Requirements 533, 571, 608, & 646
	2014 Annual Compliance Certification (03/31/2015)						
A3.	2014 2 nd Semianual Monitoring Report (03/31/2015)	2560- 00001-V11	EQT 0057 TGTU No. 4 Incinerator Stack	07/07/2014- 07/09/2014 (39.5 hours)	Sulfur dioxide ≤ 250 ppmv @ 0% excess air	Due to an upset on the H-Oil Unit, the Amine Recovery Units received feed that had entrained hydrocarbons. This limited the operational capability of the Sulfur Recovery Unit	40 CFR 60.104(a)(2)(i), Specific Requirement 321
	2014 Annual Compliance Certification (03/31/2015)						
B3.	2014 2 nd Semianual Monitoring Report (03/31/2015)	2560- 00001-V12	EQT 0027 TGTU No. 1 Incinerator Stack	12/17/2014 (0.85 hour)	Opacity ≤ 20% except emissions may have an average opacity in excess of 20% for not more than	Elevated liquid levels in 17AF- 101B	LAC 33:III.1311.C, Specific Requirement 12

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	2014 Annual Compliance Certification (03/31/2015)				one six-minute period in any 60 consecutive minutes		
C3.	2014 2 nd Semiannual Monitoring Report (03/31/2015)	2560- 00001-V13	EQT 0062 VPS-2 Atmospheric Tower Feed Heater	12/26/2014 (1 hour)	Use of Flue Gas Oxygen Monitors as BACT for Combustion Controls. The permittee shall install a continuous oxygen monitor in the flue of the permitted combustion device.	Operational swing occurred as draw from the Preflash Tower was decreased for unit optimization this increased the flow of lighter hydrocarbons to VPS-2 83H-101 increasing heater firing. This resulted in the operation of VPS-2 A-Tower Heater 83H-101 outside of the specified BACT Box Oxygen Limits.	LAC 33:III.501.C.4
	2014 Annual Compliance Certification (03/31/2015)						
D3.	2015 1 st Semiannual Monitoring Report (9/30/2015)	2560- 00001-V13	EQT 0055 TGTU No. 2 Incinerator Stack and Sulfur Pit	01/12/2015- 01/13/2015 (17.5 hours)	Use and diligently maintain air pollution control facilities in proper working order	Normal wear of seal over time	LAC 33:III.905.A. Specific Requirement 3469
E3.	2015 1 st Semiannual Monitoring Report (9/30/2015)	2560- 00001-V13	UNF 0001 MEC-Convent Refinery	06/18/2015- 06/26/2015 (5 days)	An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board of Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity	Not following procedure	LAC 33:III.5151.F.1.7. Specific Requirement 3458
F3.	2015 1 st Semiannual Monitoring Report (9/30/2015)	2560- 00001-V13	EQT 0129 Storage Tank	04/02/2015- 05/07/2015 (35 days)	Use and diligently maintain air pollution control facilities in proper working order	A small hole was discovered on the roof of Tank 20D- 28 caused by normal wear of roof over time	LAC 33:III.905.A. Specific Requirement 3469

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
G3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	EQT 0057 TGTU No. 4 Incinerator Stack	10/31/2015- 11/01/2015 (12 hours)	Sulfur dioxide ≤ 250 ppmv @ 0% excess air	Operator error during ARU-4 SU which resulted in hydrocarbon carryover to the SRU. 12 periods	40 CFR 60.104(a)(2)(i). Specific Requirement: 450
	2015 Annual Compliance Certification (03/31/2016)						
H3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V13	West side heaters and west side fuel gas drum	07/05/2015- 07/07/2015 (41 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm)	Lack of H ₂ S absorption in 2AF- 102	40 CFR 60.104(a)(1)
	2015 Annual Compliance Certification (03/31/2016)						
I3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	EQT 0072 Refinery Flare No. 2	07/28/2015 (1 hour)	Opacity ≤ 20% except for a combined total of six hours in any 10 consecutive day period for burning in connection with pressure valve releases for control over process upsets	Instrument air to steam control valve blocked in for Flare CEMs Project work	LAC 33:III.1105: Specific Requirement 648
	2015 Annual Compliance Certification (03/31/2016)						
J3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	GRP 0005 Flare Cap	12/02/2015	Shall not burn any fuel gas that contains hydrogen sulfide in excess of 162 ppmv determined hourly on a 3-hour rolling average basis	Flaring during IPF Trip Test	40 CFR 60.103a(h)
	2015 Annual Compliance Certification (03/31/2016)						
K3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	EQT 0074 Refinery Flare No. 3	12/10/2015- 12/12/2015	Shall not burn any fuel gas that contains hydrogen sulfide in excess of 162 ppmv determined hourly on a 3-hour rolling average basis	Hydrocarbon entrainment to Flare No. 3 KO Drum	40 CFR 60.103a(h). Specific Requirement 674
	2015 Annual Compliance Certification (03/31/2016)						
L3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V13	EQT 0057 TGTU No. 4 Incinerator Stack	07/14/2015 (1 hour)	Sulfur dioxide ≤ 250 ppmv @ 0% excess air	Sulfur Recovery Unit 4 experienced hydrocarbon carryover from H- Oil Unit (70F118) resulting in	40 CFR 60.104(a)(2)(i). Specific Requirement 450

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	OPERATING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	2015 Annual Compliance Certification (03/31/2016)					inadequate air to acid gas ratio in the thermal reactor and subsequent high sulfur dioxide (SO ₂) in the TGTU-4 Incinerator Stack	
M3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	EQT 0057 TGTU No. 4 Incinerator Stack	07/29/2015- 07/30/2015 (6 hours)	Sulfur dioxide ≤ 250 ppmv @ 0% excess air	Fault in Substation Switch Cabinet due to dust and moisture contamination	40 CFR 60.104(a)(2)(i). Specific Requirement 450
	2015 Annual Compliance Certification (03/31/2016)		EQT 0061 TGTU No. 5 Incinerator Stack				
N3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	EQT 0057 TGTU No. 4 Incinerator Stack	12/03/2015- 12/04/2015 (13 hours)	Sulfur dioxide ≤ 250 ppmv @ 0% excess air	Unit upset due to an incinerator air blower shutdown due to installation of incorrect under- voltage ride- through device which caused SRU/TGTU5 Thermal Reaction, inline heater and incinerator burners to trip	40 CFR 60.104(a)(2)(i). Specific Requirement 450
	2015 Annual Compliance Certification (03/31/2016)						
O3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	FUG 0002 General Plant Fugitive Emissions	10/20/2015- 10/27/2015 (7 days)	Use and/or diligently maintain air pollution control facilities in proper working order	New carbon canister was replaced; however, the carbon canister was inadvertently not placed into service	LAC 33:III.905.A Specific Requirement 3483
	2015 Annual Compliance Certification (03/31/2016)						
P3	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560- 00001-V14	EQT 0071 FCCU WGS	11/29/2015- 12/10/2015 (11 days)	Alternative Monitoring Plan (AMP): 3 hour average liquid- to-gas ratio of gallons Mscf must be greater than 86.86	Exceeded the 3-hr rolling average L/G ratio limit of >86.86 gal/MMscf. Spare Wet Gas Scrubber pump was not available	LAC 33:III.501.C.4
	2015 Annual Compliance Certification (03/31/2016)						

* Note: Reported corrective action.

Each failure to operate according to permitted requirements 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).

XII.

In the Unauthorized Discharge Report for Incident No. 164635 dated July 2, 2015, and the Written Follow-Up Report dated July 23, 2015, the Respondent reported a release that occurred at the facility on June 26, 2015. The release was also included in the 2015 1st Semiannual Monitoring Report

dated September 30, 2015. According to the reports, on June 26, 2015, an electrical switch failure caused a power dip across the facility resulting in an upset of operating units. As a result of the power dip, many pumps, blowers, and compressors in the East area of the facility as well as the facility's Sulfur Recovery Units (SRUs) and Tail Gas Treatment Units (TGTUs) shutdown. Acid gas could not be process and refinery-wide production was slowed to minimum rates to compensate for the SRUs and TGTUs shutdowns. During the investigation, the Respondent discovered the internal heater within the cabinet was disconnected. It was determined the initiating event for the upset was most likely the result of exposure to dust, moisture, or other contamination within the electrical switch cabinet that created a conductive path between two electrical circuits resulting in the electrical fault. Additional issues within the electrical protection systems of the pumps and blowers of the SRUs were discovered during the investigation that could have potentially prevented or mitigated the incident. The Respondent proposed the following actions to prevent recurrence of the incident: 1) clean the switch cabinet and ensure all internal equipment is working properly, and repair all damaged components; 2) perform an evaluation of the preventative maintenance (PM) schedule for the switch cabinet and other similar electrical equipment; 3) install high frequency current transformers on 15 kV switches to aid in monitoring of the switch condition; 4) correct the Instrumented Protective Function (IPF) logic for certain medium voltage motors within the TGTUs; 5) install under-voltage ride-through protection on the SRU Combustion Blower motors; and 6) install under-voltage ride-through protection for critical 480V motors in the SRU. The tables below list the emission sources, the pollutants involved in the incident, and the durations for the incident.

Combustion Devices			
Emission Point	SO ₂ Permitted Limit (max lb./hr.)	Emissions in Excess of Permit Limit (lbs.)	No. of hours in excess of permit limit
EQT 0077 HTU-2 Train 1 Charger Heater	0.97	150.75	1
EQT 0078 HTU-2 Train 2 Charge Heater	1.15	125.74	2
EQT 0079 HTU-2 Stripper Reboiler	1.74	177.64	2
EQT 0049 H-Oil Train 100 Feed Heater	1.71	297.70	2
EQT 0050 H-Oil Train 100 Hydrogen Heater	0.92	211.65	2
EQT 0051 H-Oil Train 200 Feed Heater	1.71	342.21	2

Combustion Devices			
Emission Point	SO ₂ Permitted Limit (max lb./hr.)	Emissions in Excess of Permit Limit (lbs.)	No. of hours in excess of permit limit
EQT 0052 H-Oil Train 200 Hydrogen Heater	0.84	199.97	2
EQT 0053 H-Oil Vacuum Tower Heater	1.46	227.19	1
EQT 0062 VPS-2 Atmospheric Tower Feed Heater	7.37	1,425.27	2
EQT 0063 VPS-2 Vacuum Heater	3.15	589.69	2
EQT 0065 ISOM Reactor Feed Furnace	0.82	152.50	1
EQT 0081 HTU-3 Stripper Reboiler Heater	1.85	502.96	2
EQT 0066 HDS-1 Heater	3.28	955.28	2
EQT 0029 VPS-1 Atmospheric Heater	4.26	395.76	2
EQT 0030 VPS-1 Atmospheric Heater	4.51	376.65	2
EQT 0031 VPS-1 Vacuum Heater	1.78	154.47	2
EQT 0060 Gas Oil Heater	3.56	338.19	2
EQT 0069 FCCU Feed Heater	17.45	144.20	1
EQT 0070 FCCU Recycle Heater	2.24	159.82	2
EQT 0038 HTU-1 HSR Charge Heater	1.60	148.91	2
EQT 0039 HTU-1 Kerosene Charge Heater	1.29	92.01	2
EQT 0040 HTU-1 HSR Reboiler	2.05	112.34	2
EQT 0041 HTU-1 Kerosene Reboiler	1.93	169.16	2
EQT 0042 CRU Charge Heater	3.39	187.18	2
EQT 0043 CRU Inter Heater No. 1	3.56	216.06	2
EQT 0044 CRU Inter Heater No. 2	1.35	45.18	2
EQT 0045 CRU Inter Heater No. 2	1.52	132.85	2

Combustion Devices			
Emission Point	SO ₂ Permitted Limit (max lb./hr.)	Emissions in Excess of Permit Limit (lbs.)	No. of hours in excess of permit limit
EQT 0033 Boiler No. 1	8.93	743.55	2
EQT 0034 Boiler No. 2	8.93	778.59	2
EQT 0035 Boiler No. 3	8.93	804.63	2
EQT 0036 Boiler No. 4	7.82	136.59	2
EQT 0037 Boiler	7.43	995.47	2

Tail Gas Treating Units (TGTUs)					
Emission Point	Total SO ₂ Emissions (lbs.)	Emissions in excess of 35 lb/hr (12-hr rolling avg) Permit Limit (lbs.)	No. of Periods of excess of 12-hr rolling avg (35 lb/hr)	No. of periods in excess of 12-hr rolling avg (250 ppmv)	No. of periods in excess of consent decree 24-hr rolling avg (250 ppmv)
EQT 0057 TGTU No. 4 Incinerator Stack	1170	715	13	15	34
EQT 0027 TGTU No. 1 Incinerator Stack	NA	0	0	13	0
EQT 0056 TGTU No. 4 Incinerator Stack	NA	0	0	16	0
EQT 0061 TGTU No. 5 Incinerator Stack	NA	0	0	13	0

Refinery Flare System				
Emission Point	Pollutants	Permitted Limit (max lb./hr.)	Emissions in excess of permit limit (lbs.)	No. of hours in excess of permit limit
GRP 0005 EQT 0072-0075 Flare No. 1-4 Cap	SO ₂	671.47	111.711	4
	H ₂ S	3.36	1.201	3

BACT Box				
Emission Point	Parametric Variables	Max Parametric Variable	Values in excess of BACT Box Limit	No. of hours in excess of max lb/hr limit

BACT Box				
Emission Point	Parametric Variables	Max Parametric Variable	Values in excess of BACT Box Limit	No. of hours in excess of max lb/hr limit
EQT 0062 VPS-2 Atmospheric Tower Feed Heater	MM Btu/hr	143-249 MMBtu/hr	120 & 171	2
	% O ₂	2.3-7.16%	7.7 & 9.6	2

H ₂ S Analyzers		
Equipment Name	H ₂ S Concentration in RFG	No. of period of excess of 3-hr rolling avg H ₂ S concentration (ppmv)
East-side Fuel Gas Drum	162 ppmv	4
West-side Fuel Gas Drum	162 ppmv	4
VPS-2 Vacuum Tower Offgas	162 ppmv	5
VPS-2 Disulfide Offgass	162 ppmv	0
VPS-1 A-Tower Waste Gas	162 ppmv	0

Total SO₂ emissions for the incident=123,917 lbs

Total H₂S emissions for the incident=1,201 lbs

- A. Failure to use and/or diligently maintain a control device in proper working order as required is a violation of Specific Requirement 3469 of Title V Permit No. 2560-00001-V13, LAC 33:III.905.A, and La. R.S. 30:2057(A)(2).
- B. Each exceedance of a permitted emission limit is a violation of Title V Permit No. 2560-00001-V13, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).
- C. Exceeding the 35 lb/hr (12-hr rolling avg) permit limit is a violation of Specific Requirement 463 of Title V Permit No. 2560-00001-V13, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).
- D. Each exceedance of the SO₂ 250 ppmv (12-hr rolling avg) is a violation of 40 CFR 60.104(a)(2)(i). Specific Requirements I, 432, 450, and 484 of Title V Permit No. 2560-00001-V13, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

E. Each exceedance of the H₂S 162 ppmv (3-hr rolling avg) standard is a violation of 40 CFR 60.104(a)(1) and La. R.S. 30:2057(A)(2).

XIII.

The Respondent reported the following emission exceedances:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V10	EQT 0075 Refinery Flare No. 4	11/09/2012 (3.6 hours)	H ₂ S (3.30 max lb/hr)	88 lbs (in excess)	Refinery Flare No. 4 was isolated as part of HTU-3 Unit start-up. During the flaring event associated with the unit start-up, the flare started to stop. As operations introduced more steam, the flare pilot was inadvertently snuffed out.	Emission's Rate for TAP/HAP & Other Pollutants
B.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V10	EQT 0073 Refinery Flare No. 1	11/28/2012 (0.9 hour)	VOC (405.30 max lb/hr)	Not reported	Snuffed out flame with steam addition	Emission Rates for Criteria Pollutants
C.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001-V11	EQT 0078 HTU-2 Train 2 Charge Heater EQT 0079 HTU-2 Stripper Reboiler EQT 0062 VPS-2 Atmospheric Tower Feed Heater EQT 0063 VPS-2 Vacuum Heater EQT 0065 ISOM Reactor Feed Furnace EQT 0066 HDS-1 Heater EQT 0080 HTU-3 Reactor Feed Heater EQT 0081 HTU-3 Stripper Reboiler Heater	03/22/2013 (1 hour)	SO ₂ (1.17 max lb/hr) SO ₂ (1.77 max lb/hr) SO ₂ (7.50 max lb/hr) SO ₂ (3.20 max lb/hr) SO ₂ (0.84 max lb/hr) SO ₂ (3.30 max lb/hr) SO ₂ (1.40 max lb/hr) SO ₂ (1.89 max lb/hr)	20 lbs (in excess)	Elevated H ₂ S in the east-side fuel gas drum while sulfiding HTU-2 Train 100 Catalyst	Emission Rates for Criteria Pollutants

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
D.	2013 Annual Compliance Certification (03/31/2014)	2560-00001-V11	EQT 0094 Sulfur Truck Loading	08/06/2013 (1 hour)	H ₂ S (3.50 max lb/hr)	Not reported	Not operating equipment properly	Emission Rates for Criteria Pollutants
E.	2013 Annual Compliance Certification (03/31/2014)	2560-00001-V11	EQT 0029 VPS-1 Atmospheric Heater	12/06/2013 (1 hour)	SO ₂ (4.30 max lb/hr)	22 lbs (in excess)	Abrupt adjustment of cooling water on both the Intercoolers and after cooler exchangers	Emission Rates for Criteria Pollutants
			EQT 0030 VPS-1 Atmospheric Heater		SO ₂ (4.50 max lb/hr)			
			EQT 0031 VPS-1 Vacuum Heater		SO ₂ (1.80 max lb/hr)			
			EQT 0060 Gas Oil Heater		SO ₂ (3.62 max lb/hr)			
			EQT 0040 HTU-1 HSR Reboiler		SO ₂ (2.10 max lb/hr)			
			EQT 0041 HTU-1 Kerosene Reboiler		SO ₂ (2.00 max lb/hr)			
			EQT 0042 CRU Charge Heater		SO ₂ (3.50 max lb/hr)			
			EQT 0043 CRU Inter Heater No. 1		SO ₂ (3.60 max lb/hr)			
			EQT 0045 CRU Inter Heater No. 2		SO ₂ (1.50 max lb/hr)			
			EQT 0033 Boiler No. 1		SO ₂ (9.07 max lb/hr)			
			EQT 0034 Boiler No. 2		SO ₂ (9.07 max lb/hr)			
			EQT 0036 Boiler No. 4		SO ₂ (7.95 max lb/hr)			
			F.		2013 Annual Compliance Certification (03/31/2014)			
EQT 0037 Boiler	SO ₂ (7.55 max lb/hr)							
G.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0079 HTU-2 Stripper Reboiler	03/18/2014-03/19/2014 (3 hours)	SO ₂ (1.77 max lb/hr)	74 lbs (in excess)	CO ₂ released from the new HTU-3 catalyst during the H ₂ purge process saturated the FGR Amine Absorber System resulting in a contamination of the WSFG system	Emission Rates for Criteria Pollutants
			EQT 0049 H-Oil Train 100 Feed Heater		SO ₂ (1.23 max lb/hr)			
			EQT 0050 H-Oil Train 100 Hydrogen Heater		SO ₂ (0.94 max lb/hr)			

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
			EQT 0051 H-Oil Train 200 Feed Heater		SO ₂ (1.70 max lb/hr)			
			EQT 0052 H-Oil Train 206 Hydrogen Heater		SO ₂ (0.85 max lb/hr)			
			EQT 0053 H-Oil Vacuum Tower Heater		SO ₂ (1.50 max lb/hr)			
			EQT 0062 VPS-2 Atmospheric Tower Feed Heater		SO ₂ (7.50 max lb/hr)			
			EQT 0063 VPS-2 Vacuum Heater		SO ₂ (3.20 max lb/hr)			
			EQT 0065 ISOM Reactor Feed Furnace		SO ₂ (0.84 max lb/hr)			
			EQT 0080 HTU-3 Reactor Feed Heater		SO ₂ (1.40 max lb/hr)			
			EQT0066 HDS-1 Heater		SO ₂ (3.30 max lb/hr)			
H.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001- VII	EQT 0072 Refinery Flare No. 2	02/24/2014 (1 hour)	SO ₂ (663.20 max lb/hr)	262 lbs (in excess)	A scaffolding crew was dismantling a scaffold by Train 100 heater passes on HTU-2. A scaffold builder was hammering a scaffold coupling when the hammer bounced back unexpectedly and struck ½ inch diameter process tubing located overhead. The tubing separated from a fitting, resulting in a release of hydrogen, diesel range hydrocarbons, and a subsequent, localized fire.	Emission Fates for Criteria Pollutants

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
I.	2014 2 nd Semiannual Monitoring Report (03/31/2015)	2560-00001-V11	EQT 0057 TGTU No. 4 Incinerator Stack	07/07/2014-07/09/2014 (39.5 hours)	Sulfur Dioxide ≤ 35.00 lb/hr (12 hr rolling average)	Not Reported	Due to an upset on the H-Oil Unit, the Amine Recovery Units received feed that had entrained hydrocarbons. This limited the operational capability of the Sulfur Recovery Unit	Specific Requirement 335
	2014 Annual Compliance Certification (03/31/2015)							
J.	2014 2 nd Semiannual Monitoring Report (03/31/2015)	2560-00001-V11	EQT 0074 Refinery Flare No. 1	09/18/2014 (3 hours)	SO ₂ (663.20 max lb/hr)	4,315 lbs (in excess)	1. Eroded pump housing and impeller due to catalyst entrained oil; and 2. Buildup of asphaltic material on the reactor grid tailpipes	Emission Rates for Criteria Pollutants Emissions Rate for TAP/HAP & Other Pollutants
	2014 Annual Compliance Certification (03/31/2015)				H ₂ S (3.30 max lb/hr)	7 lbs (in excess)		
K.	2014 2 nd Semiannual Monitoring Report (03/31/2015)	2560-00001-V13	EQT 0062 VPS-2 Atmospheric Tower Feed Heater	12/26/2014 (1 hour)	NOx (30.55 max lb/hr)	Not reported	Operational swing as draw from the Prellash Tower was decreased for unit optimization this increased the flow of lighter hydrocarbons to VPS-2 83H-101 increasing heater firing. This resulted in the operation of VPS-2 A-Tower Heater 83H-101 outside of the specified BACT Box Oxygen Limits.	Emission Rates for Criteria Pollutants
	2014 Annual Compliance Certification (03/31/2015)							
L.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V13	West side heaters and west side fuel gas drum	07/05/2015-07/07/2015 (4) hours)	SO ₂ (multiple sources)	7,400 lbs	Lack of H ₂ S absorption in 2AF-102	Emission Rates for Criteria Pollutants
	2015 Annual Compliance Certification (03/31/2016)							
M.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V14	EQT 0072 Refinery Flare No. 2	10/29/2015 (1 hour)	SO ₂ (671 max lb/hr)	Not reported	Unknown	Emission Rates for Criteria Pollutants Emissions Rate for TAP/HAP & Other Pollutants
	2015 Annual Compliance Certification (03/31/2016)			10/29/2015 (2 hours)	H ₂ S (3.3 max lb/hr)	Not reported		

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
N.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V14	EQT 0072 Refinery Flare No. 2	10/13/2015 (2 hours)	SO ₂ (671 max lb/hr)	Not reported	Unknown	Emission Rates for Criteria Pollutants
	2015 Annual Compliance Certification (03/31/2016)			10/13/2015 (1 hour)	H ₂ S (3.3 max lb/hr)	Not reported		Emissions Rate for TAP/HAP & Other Pollutants
O.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V14	EQT 0057 TGTU No. 4 Incinerator Stack	12/03/2015-12/04/2015 (13 hours)	Sulfur Dioxide ≤ 35.00 lb/hours (12 hr rolling average)	311 lbs (in excess)	Reported as a unit upset due to an incinerator air blower shutdown due to installation of incorrect under-voltage ride-through device which caused SRU/TGTU5 Thermal Reaction, inline heater and incinerator burners to trip	Specific Requirement 4C3
	2015 Annual Compliance Certification (03/31/2016)							

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

XIV.

The Respondent reported the following deviations from monitoring requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	DEVIATION	REGULATORY or PERMIT REQUIREMENTS
A.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V9	FUG 0002 General Plant Fugitive Emissions	04/30/2012-06/30/2012	Valves in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly	Missed quarterly monitoring for four (4) PRVs	LAC 33:III.5109.A, Specific Requirement 3214
B.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V9	FUG 0002 General Plant Fugitive Emissions	04/30/2012-06/30/2012	Valves in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly	Fugitive components not monitored within thirty (30) days of being put into service	LAC 33:III.5109.A, Specific Requirement 3214
C.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V9/V10	FUG 0002 General Plant Fugitive Emissions	07/01/2012-12/31/2012	Valves in gas/vapor service and in light liquid service (percent leaking valve ≤2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually	Missed annual monitoring for twenty (20) 2" block valves	40 CFR 60.592(a), LAC 33:III.5109.A, Specific Requirement 3197, 3113, and 320
D.	2H14 Streamlined Equipment Leaks Monitoring Program Report (02/11/2015)	2560-00001-V13	FUG 0002 General Plant Fugitive Emissions	12/31/2014	Valves in gas/vapor service and in light liquid service (percent leaking valve ≥4): VOC, Total monitored by the regulation's specified method(s) monthly	Missed a total of twelve (12) quarterly monitoring events: LDAR personnel miscoded a valve resulting in missed monitoring	LAC 33:III.5109.A Specific Requirement 3379
	2014 2 nd Semiannual Monitoring Report (03/31/2015)						
	2014 Annual Compliance Certification (03/31/2015)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	DEVIATION	REGULATORY or PERMIT REQUIREMENTS
E.	1H15 Semiannual Streamlined Equipment Leaks Monitoring Program Report (08/13/2015)	2560-00001- V13	FUG 0002 General Plant Fugitive Emissions	01/01/2015- 06/30/2015	Valves in gas/vapor service and in light liquid service (percent leaking valve ≤ 2 for two consecutive semiannual leak detection periods); VOC. Total monitored by the regulation's specified method(s) annually	Missed annual monitoring for one (1) component	LAC 33:III.5109 A. Specific Requirement 3378
F.	2015 1 st Semiannual Monitoring Report (09/30/2015)	2560-00001- V13	FUG 0002 General Plant Fugitive Emissions	02/24/2015	Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection 1.3 and 1.4 of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994).	Field operators unaware of the need for immediate isolation as part of Delay- of-Repair	LAC 33:III.5901.A. Specific Requirement 3384
G.	2015 1 st Semiannual Monitoring Report (09/30/2015)	2560-00001- V13	FUG 0002 General Plant Fugitive Emissions	01/20/2015	Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection 1.3 and 1.4 of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994).	Field operators unaware of the need for immediate isolation as part of Delay- of-Repair	LAC 33:III.5901.A. Specific Requirement 3384

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

XV.

The Respondent became subject to NSPS 40 CFR 60 Subpart J (Subpart J) under Cor.sent Decree, Civil Action Number H-01-0978 entered into on or about March 21, 2001. In correspondence dated April 12, 2017, the Respondent reported a Flare Gas Recovery System (FGR) was installed to demonstrate compliance with Subpart J requirements. Installation of the FGR was completed in the fourth quarter of 2003. If the flare is used for periods other than process upset gas, i.e. gas generated as a result of start-up, shut-down, upset, or malfunction, as defined in Subpart J, the Respondent is out of compliance because the vent gases being combusted in the flare are not being monitored. The Respondent reported the following deviations from H₂S monitoring requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
A.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V9	EQT 0073 Refinery Flare No. 1	07/25/2012 (0.8 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Depressuring rates could not be contained by Fuel Gas Recovery (FGR)	40 CFR 60.105(a)(4). Specific Requirement 563
B.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V9	EQT 0073 Refinery Flare No. 1	09/14/2012 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Operating conditions of manual valve makes its correct operation difficult	40 CFR 60.105(a)(4). Specific Requirement 563
C.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0072 Refinery Flare No. 2	10/02/2012 (3.8 hours)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	During VPS-2 fire, operations isolated Flare 2 rather than Flare 1	40 CFR 60.105(a)(4). Specific Requirements 526 and 563
			EQT 0073 Refinery Flare No. 1				
D.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0072 Refinery Flare No. 2	10/01/2012- 10/02/2012 (11.2 hours)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Valve not closed completely; during start-up of HTU-2 Train 200, the bypass valve on the Recycle Compressor was inadvertently left open after purging of the compressor case was completed	40 CFR 60.105(a)(4). Specific Requirements 526 and 563
			EQT 0073 Refinery Flare No. 1				
E.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0073 Refinery Flare No. 1	10/20/2012 (4.2 hours)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Operational upset; flows were elevated due to excess flow to the FGR system. The source was unknown.	40 CFR 60.105(a)(4). Specific Requirements 562 and 600
			EQT 0074 Refinery Flare No. 4				
F.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0072 Refinery Flare No. 2	10/24/2012 (0.3 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Foaming in the 70F-116 Absorber	40 CFR 60.105(a)(4). Specific Requirements 526 and 563
			EQT 0073 Refinery Flare No. 1				
G.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0073 Refinery Flare No. 1	11/05/2012 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Bleeder on the HTU-2 recycle compressor left open to prevent a trip	40 CFR 60.105(a)(4). Specific Requirement 563

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
H.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0072 Refinery Flare No. 2	11/27/2012 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Valve not completely closed	40 CFR 60.105(a)(4). Specific Requirements 526 and 563
			EQT 0073 Refinery Flare No. 1				
I.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001- V10	EQT 0072 Refinery Flare No. 2	12/25/2012 (0.8 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Overloaded FGR as a result of moving catalyst concurrently with relieving of PSV on 70C-403	40 CFR 60.105(a)(4). Specific Requirements 526, 563, and 600
			EQT 0073 Refinery Flare No. 1				
			EQT 0074 Refinery Flare No. 3				
J.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- V10	EQT 0074 Refinery Flare No. 3	01/01/2013 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	While depressing the H-Oil Hydrogen Make-up Compressor during shutdown depressing rates could not be contained by the FGR system	40 CFR 60.105(a)(4). Specific Requirement 600
K.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- V11	EQT 0073 Refinery Flare No. 1	01/23/2013 (0.3 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Flaring due normal operation due to elevated fuel gas recovery rate which could not be contained in FGR	40 CFR 60.105(a)(4). Specific Requirement 554
L.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- V11	EQT 0073 Refinery Flare No. 1	03/21/2013 (0.05 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	While blowing down level transmitter on a high pressure absorber, rates could not be contained in FGR due to non-immediate communication between the console and outside operators	40 CFR 60.105(a)(4). Specific Requirement 554
M.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- V11	EQT 0073 Refinery Flare No. 1	04/29/2013 (0.05 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Flaring for 3 minutes as a result of a level transmitter that drifted off calibration	40 CFR 60.105(a)(4). Specific Requirement 554
N.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- V11	EQT 0074 Refinery Flare No. 3	05/10/2013 (0.05 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Flaring resulted from an error that occurred when operations were implementing a catalyst addition	40 CFR 60.105(a)(4). Specific Requirement 592

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
O.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- VII	EQT 0073 Refinery Flare No. 1	05/14/2013 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Flaring during normal operation due to elevated fuel gas recovery rate which could not be contained in FGR	40 CFR 60.105(a)(4), Specific Requirement 554
P.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0073 Refinery Flare No. 1	07/26/2013 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Insufficient communication between railcar loading technician and the utilities console operator	40 CFR 60.105(a)(4), Specific Requirement 554
Q.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0073 Refinery Flare No. 1	10/04/2013 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4), Specific Requirement 554
R.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0073 Refinery Flare No. 1 EQT 0072 Refinery Flare No. 2	10/14/2013 (0.45 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4), Specific Requirements 554 and 516
S.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0073 Refinery Flare No. 1	08/27/2013 (1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Increased demand on flare gas recovery concurrently with loading	40 CFR 60.105(a)(4), Specific Requirement 554
T.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0073 Refinery Flare No. 1 EQT 0072 Refinery Flare No. 2	10/27/2013 (0.2 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Fuel gas system imbalance	40 CFR 60.105(a)(4), Specific Requirements 554 and 516
U.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0074 Refinery Flare No. 3	08/07/2013 (2.22 hours)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4), Specific Requirement 592
V.	2013 Annual Compliance Certification (03/31/2014)	2560-00001- VII	EQT 0073 Refinery Flare No. 1	08/07/2013 (0.3 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Repairs to 831.C-268 level controller caused rupture of Butanes Product Cooler	40 CFR 60.105(a)(4), Specific Requirement 554

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
W.	2013 Annual Compliance Certification (03/31/2014)	2560-00001-V11	EQT 0074 Refinery Flare No. 3	08/06/2013 (0.72 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4). Specific Requirement 592
X.	2013 Annual Compliance Certification (03/31/2014)	2560-00001-V11	EQT 0074 Refinery Flare No. 3	08/01/2013 (0.38 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4). Specific Requirement 592
Y.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0073 Refinery Flare No. 1	03/05/2014 (0.3 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4). Specific Requirement 554
Z.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0073 Refinery Flare No. 1	03/07/2014 (0.1 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Manual blowdown of boot on propane sphere	40 CFR 60.105(a)(4). Specific Requirement 554
A2.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0073 Refinery Flare No. 1	04/15/2014 (0.07 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Unknown	40 CFR 60.105(a)(4). Specific Requirement 554
B2.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560-00001-V11	EQT 0073 Refinery Flare No. 1	06/23/2014 (0.2 hour)	Hydrogen sulfide monitored by continuous emission monitor (CEM) continuously. Monitor the H ₂ S in fuel gases before being burned in any fuel gas combustion device.	Board operator opened wrong valve	40 CFR 60.105(a)(4). Specific Requirement 554
C2.	2014 2 nd Semiannual Monitoring Report (03/31/2015)	2560-00001-V12	EQT 0073 Refinery Flare No. 1	12/02/2014 (0.75 hour)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Flaring due to flow from railcar loading	40 CFR 60.107(a). Specific Requirement 654
	2014 Annual Compliance Certification (03/31/2015)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
D2.	2014 2 nd Semiannual Monitoring Report (03/31/2015)	2560-00601- V12	EQT 0073 Refinery Flare No. 1	12/04/2014 (10.5 hours)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Valve settings not returned to normal after performing work	40 CFR 60.107a(a). Specific Requirement 654
	2014 Annual Compliance Certification (03/31/2015)						
E2.	2015 1 st Semiannual Monitoring Report (9/30/2015)	2560-00001- V13	EQT 0072 Refinery Flare No. 2	06/15/2015 (2.5 hours)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Unknown	40 CFR 60.107a(a). Specific Requirement 634
F2.	2015 1 st Semiannual Monitoring Report (9/30/2015)	2560-00001- V13	EQT 0074 Refinery Flare No. 3	03/02/2015- 03/03/2015 (7.3 hours)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Full capacity of FGR suction capacity was not utilized	40 CFR 60.107a(a). Specific Requirement 675

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
G2.	2015 1 st Semiannual Monitoring Report (9/30/2015)	2560-00001-V13	EQT 0074 Refinery Flare No. 3	01/30/2015 (0.25 hour)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Full capacity of FGR suction capacity was not utilized	40 CFR 60.107a(a). Specific Requirement 675
H2.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V14	EQT 0073 Refinery Flare No. 1	07/28/2015 (1 hour)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Pressure transmitter inadvertently blocked in	40 CFR 60.107a(a). Specific Requirement 655
	2015 Annual Compliance Certification (03/31/2016)						
I2.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V14	EQT 0073 Refinery Flare No. 1	08/01/2015 (1 hour)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(c) and quality assurance procedures in Appendix F.	Excess H ₂ S in vent gas	40 CFR 60.107a(a). Specific Requirement 655
	2015 Annual Compliance Certification (03/31/2016)						

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE (duration)	MONITORING PARAMETER	REPORTED CAUSE OF FLARING	REGULATORY or PERMIT REQUIREMENTS
12.	2015 2 nd Semiannual Monitoring Report (03/31/2016)	2560-00001-V14	EQT 0074 Refinery Flare No. 3	10/12/2015 (1 hour)	Shall comply with all the applicable requirements of monitoring for assessing root cause analysis of emissions and operations of flares. Continuous emission monitoring system (CEMS) shall be operated per manufacturers specifications and shall comply with all the applicable requirements of NSPS, 40 CFR 60, Subpart B, Specification 8 as per the requirements of 40 CFR 60.13(e) and quality assurance procedures in Appendix F.	Flaring occurred while installing blind to isolate leaking valve	40 CFR 60.107a(a). Specific Requirement 675
	2015 Annual Compliance Certification (03/31/2016)						

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

XVI.

The Respondent reported the following deviations from fugitive emission requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	DURATION	DEVIATION	REGULATORY or PERMIT REQUIREMENTS
A.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V9/V10	FUG 0002 General Plant Fugitive Emissions	07/01/2012-12/31/2012	Twelve (12) open-ended lines and/or lines with missing caps/plugs	LAC 33:III.5109.A. Specific Requirement 3180
B.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001-V10/V11	FUG 0002 General Plant Fugitive Emissions	01/01/2013-06/30/2013	Forty-one (41) open-ended lines and/or lines with missing caps/plugs	LAC 33:III.5109.A. Specific Requirements 3192 and 3081
C.	2013 Annual Compliance Certification (03/31/2014)	2560-00001-V11	FUG 0002 General Plant Fugitive Emissions	07/01/2013-12/31/2013	Sixty-seven (67) open-ended lines and/or lines with missing caps/plugs	LAC 33:III.5109.A. Specific Requirement 3081
D.	1H14 Streamlined Equipment Leaks Monitoring Program Report (08/11/2014)	2560-00001-V11	FUG 0002 General Plant Fugitive Emissions	04/02/2014	Thirty-eight (38) pumps went unmonitored as a result of an administrative error	LAC 33:III.5109.A. Specific Requirement 3093
	2014 1 st Semiannual Monitoring Report (09/30/2014)					
E.	1H14 Streamlined Equipment Leaks Monitoring Program Report (08/11/2014)	2560-00001-V11	FUG 0002 General Plant Fugitive Emissions	04/03/2014	Control valve was not isolated properly within the 15 day requirement	LAC 33:III.5109.A. Specific Requirement 3115
	2014 1 st Semiannual Monitoring Report (09/30/2014)					

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	DURATION	DEVIATION	REGULATORY or PERMIT REQUIREMENTS
F.	2H14 Semiannual Streamlined Equipment Leaks Monitoring Program Report (02/11/2015)	2560-00001-V11/12/13	FUG 0002 General Plant Fugitive Emissions	07/01/2014- 12/31/2014	Eleven (11) open-ended lines and/or lines with missing caps/plugs	LAC 33:III.5109.A, Specific Requirements 3081, 3290, and 3350
	2014 2 nd Semiannual Monitoring Report (03/31/2015)					
	2014 Annual Compliance Certification (03/31/2015)					
G.	2015 1 st Semiannual Monitoring Report (09/30/2015)	2560-00001-V13	FUG 0002 General Plant Fugitive Emissions	01/01/2015- 06/30/2015	Nineteen (19) open-ended lines and/or lines with missing caps/plugs	LAC 33:III.5109.A, Specific Requirement 3350
H.	1H15 Semiannual Streamlined Equipment Leaks Monitoring Program Report (08/13/2015)	2560-00001-V13	FUG 0002 General Plant Fugitive Emissions	01/01/2015- 06/30/2015	Repair for two(2) components not completed within 15 days	LAC 33:III.5109.A
I.	2H15 Semiannual Streamlined Equipment Leaks Monitoring Program Report (02/15/2016)	2560-00001-V14	FUG 0002 General Plant Fugitive Emissions	07/31/2015- 12/31/2015	Discovered eight (8) open-ended lines	LAC 33:III.5109.A, Specific Requirement 3365
	2015 2 nd Semiannual Monitoring Report (03/31/2016)					
	2015 Annual Compliance Certification (03/31/2016)					
J.	2H15 Semiannual Streamlined Equipment Leaks Monitoring Program Report (02/15/2016)	2560-00001-V14	FUG 0002 General Plant Fugitive Emissions	10/08/2015	FE Tag #015083 was put on DOR requiring shutdown. Valve repaired on 10/08/2015 with no outage	LAC 33:III.5109.A, Specific Requirement

Each failure to meet fugitive emission requirements is a violation of the applicable permit(s) and associated requirement(s) listed above, LAC 33:III.501.C.4, LAC 33:III.2122.C.3, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

XVII.

The Respondent failed to meet the following reporting requirements:

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
A.	2012 2 nd Semiannual Monitoring Report (04/17/2013)	2560-00001-V10	Report due semiannually by March 31 st or September 30 th	03/31/2013	04/17/2013	LAC 33:III.535, Specific Requirement 3330

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
B.	2013 1 st Semiannual Monitoring Report (09/27/2013)	2560-00001- VII	Notify the administrative authority within seven (7) days of noncompliance with LAC 33:III.2103D.2	05/24/2013	06/25/2013	LAC 33:III.2103.D.2 e. Specific Requirement
C.	2H2014 Streamlined Equipment Leaks Monitoring Report (02/27/2015)	2560-00001- VI3	Report due semiannually by August 15 th and February 15 th	02/15/2015	02/27/2015	LAC 33:III.5109 A
D.	1H15 40 CFR 63, Subpart CC [FMACT] Report	2560-00001- VI5	Due no later than 60 days after the end of each 6- month period when any of the compliance exceptions specified in 40 CFR 63.655(g)(1) through (g)(6) occur.	09/15/2015	Not submitted	40 CFR 63.655(g). Specific Requirement 3-60

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

XVIII.

The Respondent reported the following recordkeeping violations:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	RECORD REQUIREMENT	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	40 CFR 63, Subpart CC- Petroleum Refinery NESHAP Period and SSM Periodic Report (03/12/2014)	2560- 00001- VII	EQT 0074 Refinery Flare No. 3	07/08/2013	Flares shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.	Missing record of visual confirmation of the presence of a pilot.	40 CFR 63.11(b)(5). 40 CFR 63.644(a)(2). Specific Requirement 613
	2013 Annual Compliance Certification (03/31/2014)						
B.	2014 1 st Semiannual Monitoring Report (09/30/2014)	2560- 00001- VII	FUG 0002 General Plant Fugitive Emissions	05/29/2014	Keeps records of information as specified in Subsections Q.1 through Q.13 as applicable, as specified in section Q of the Louisiana MACT Determination for Refinery Equipment Leaks	LDAR personnel did not record data	LAC 33:III.5105.A. Specific Requirement 3076

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	RECORD REQUIREMENT	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
C.	40 CFR 63, Subpart CC- Petroleum Refinery NESHAP Period and SSM Periodic Report (03/11/2015) 2014 Annual Compliance Certification (03/31/2015)	2560-00001-V11	EQT 0074 Refinery Flare No 3	07/11/2014, 07/31/2014	Flares shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.	Missing record of visual confirmation of the presence of a pilot.	40 CFR 63.11(b)(5) 40 CFR 63.634(a)(2), Specific Requirement 613
D.	2014 Semiannual Streamlined Equipment Leaks Monitoring Program Report (02/11/2015)	2560-00001-V11	FUG 0002 General Plant Fugitive Emissions	07/01/2014	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994)	Missing nine (9) records of method-of-repair. Identified in 2014 CD L.DAR Audit	LAC 33:III.5109.A. Specific Requirement 3076
E.	2015 1 st Semiannual Monitoring Report (09/30/2015)	2560-00001-V13	FUG 0002 General Plant Fugitive Emissions	04/17/2015	Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994)	Misplaced record	LAC 33:III.5109.A. Specific Requirement 3345

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

COMPLIANCE ORDER

Based on the foregoing, the Respondent is hereby ordered:

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Act, the Air Quality Regulations, and all applicable permits.

II.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, additional information, specifically the causes, for the violations cited in Paragraph XI.D2-F2, V2-Y2, and E3 of the **FINDINGS OF FACT** portion of this action.

III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report identifying the emission source(s), the quantities for the emission exceedances, and/or the cause(s) for the violations cited in Paragraph XIII. B, D, I, and K-N of the **FINDINGS OF FACT** portion of this action.

IV.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the number of fugitive components not monitored within thirty (30) days after being put into service as cited in Paragraph XVI.B of the **FINDINGS OF FACT** portion of this action.

V.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the 40 CFR 63 Subpart CC-Petroleum Refinery NESHAP Periodic Report and Startup, Shutdown, and Malfunction (SSM) Periodic Report for the January 1, 2015 through July 15, 2015 Reporting Period.

VI.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Antoinette Cobb
Re: Enforcement Tracking No. AE-CN-16-01017
Agency Interest No. 2719

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. AE-CN-16-01017
Agency Interest No. 2719

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from

contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Antoinette Cobb at (225) 219-3072 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross

revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

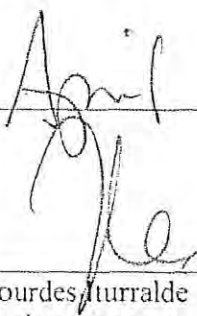
IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 16th day of April, 2018.



Lourdes Murralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Antoinette Cobb



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL COMPLIANCE
 ENFORCEMENT DIVISION CONSOLIDATED COMPLIANCE ORDER &
 POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY
 BATON ROUGE, LOUISIANA 70821-4312 REQUEST TO CLOSE

Enforcement Tracking No.	AE-CN-16-01017	Contact Name	Antoinette Cobb
Agency Interest (AI) No.	2719	Contact Phone No.	(225) 219-3072
Alternate ID No.	2560-00001		
Respondent:	Equilon Enterprises LLC	Facility Name:	Convent Refinery
	c/o C T Corporation System	Physical Location:	Highways 44 & 70
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Convent, LA 70723
	Baton Rouge, LA 70816	Parish:	St. James

STATEMENT OF COMPLIANCE

STATEMENT OF COMPLIANCE	Date Completed	Copy Attached?
A written report was submitted in accordance with Paragraph VI of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) II-V of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 45 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) ? of the "Order" portion of the COMPLIANCE ORDER.		
All necessary documents were submitted to the Department within 90 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) ? of the "Order" portion of the COMPLIANCE ORDER.		
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:		

SETTLEMENT OFFER (OPTIONAL)

(check the applicable option)

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart1.Chapter7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-16-01017), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-16-01017), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> • Monetary component = \$ _____ • Beneficial Environmental Project (BEP) component (optional)= \$ _____ • DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-16-01017) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

CERTIFICATION STATEMENT

I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date

MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Louisiana Department of Environmental Quality
 Office of Environmental Compliance
 Enforcement Division
 P.O. Box 4312
 Baton Rouge, LA 70821
 Attn: Antoinette Cobb

JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
December 28, 2018

CERTIFIED MAIL (7017 1070 0000 2657 8236)
RETURN RECEIPT REQUESTED

EQUILON ENTERPRISES LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Drive
Baton Rouge, LA 70816

**RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. MM-CN-18-00423
AGENCY INTEREST NO. 2719**

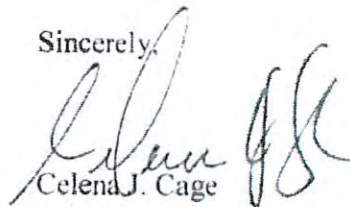
Dear Sir/Madam:

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 **EQUILON ENTERPRISES LLC (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 Cynthia Arrison at (225) 219-3796 or Cynthia.Arrison@la.gov.

Sincerely,


Celena J. Cage
Administrator
Enforcement Division

CJC/CLA
Alt ID No. LAD065485146
Attachment



c: Equilon Enterprises LLC dba Shell Oil US
c/o William Paul
P.O. Box 47
Convent, LA 70723

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF

EQUILON ENTERPRISES LLC
ST. JAMES PARISH
ALT ID NO. LAD065485146

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

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ENFORCEMENT TRACKING NO.

MM-CN-18-00423

AGENCY INTEREST NO.

2719

CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **EQUILON ENTERPRISES LLC (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 Equilon Enterprises LLC dba Shell Oil US, an oil refinery located at Louisiana Highway 44 and Louisiana Highway 70 in Convent, St. James Parish, Louisiana. The facility operates under Hazardous Waste Operating Permit LAD065485146-PC-RN-2, which was approved on May 11, 2017 and will expire on May 11, 2027. The Respondent notified as a large quantity generator of hazardous waste and has been assigned EPA Identification No. LAD065485146.

II.

On or about March 13, 2018, March 14, 2018, and March 29, 2018, the Department conducted an inspection at the above referenced facility to determine the degree of compliance with the Act and the supporting Regulations. While the investigation by the Department is not yet complete, the following violations were noted during the course of the inspection:

- A. The Respondent failed to mark satellite accumulation containers of hazardous waste with the words "Hazardous Waste," in violation of LAC 33:V.1109.E.4. Specifically, one (1) half-full 55-gallon drum, located in the Paint Shop's paint locker, contained hazardous waste paint (D001) and was not labeled. During the inspection, a Respondent employee placed a hazardous waste label on the drum.
- B. The Respondent failed to mark a full satellite accumulation container holding hazardous waste with the date the excess amounts began accumulating in accordance with LAC 33:V.1109.E.4, in violation of LAC 33:V.1109.E.6. Specifically, the inspection revealed one (1) full 55-gallon drum and one (1) half-full 55-gallon drum of hazardous waste located in the Paint Shop. The full drum was not marked with an accumulation date to indicate the date excess amounts began accumulating.
- C. The Respondent failed to store solid waste in a container that keeps out water and prevents leakage, in violation of LAC 33:VII.503.A.2. Specifically, two (2) solid waste containers located on the Old Pad were open and not covered to prevent the entry of rainwater, and the containers' doors were kept open to allow liquids to drain out.
- D. The Respondent failed to perform hazardous waste determinations for waste materials at the facility, in violation of LAC 33:V.1103.B. Specifically, the Respondent failed to determine whether five (5) 1-gallon containers that were half-full of glue air-drying in the Carpentry Shop were hazardous wastes. During the inspection, a Respondent employee stated sawdust was mixed with the glue to solidify the material so it could be disposed as solid waste.
- E. The Respondent failed to provide inspection records of permitted units, in violation of Permit LAD065485146-PC-RN-2, Section III.O.3 and LAC 33:V.309.A. Specifically, inspection records from 2015 through 2018 were reviewed. The Respondent failed to provide weekly inspection reports of each permitted unit (Land Treatment Unit 1, Land Treatment Unit 2, Equalization Basin, and South Surge Pond) for the following time periods: January 1, 2016 to June 1, 2016; June 23, 2016 to August 25, 2016; August 31, 2016 to September 29, 2016; and November 3, 2016 to November 17, 2016. During the inspection, a representative of the Respondent stated that inspections were conducted, and the paperwork was lost.
- F. The Respondent failed to include arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to

coordinate emergency services in the contingency plan as required by LAC 33:V.1513.B.3, in violation of LAC 33:V.1109.E.1.e.

- G. The Respondent failed to list names of all persons qualified to act as emergency coordinator in the contingency plan as required by LAC 33:V.1513.B.4, in violation of LAC 33:V.1109.E.1.e. Specifically, the facility's Emergency Response Action Plan listed Shane Stuntz, who left the facility in January 2018, as the Emergency Coordinator.
- H. The Respondent failed to list the emergency equipment at the facility, such as fire extinguishing system, spill control equipment, communications, and alarm systems (internal and external), and decontamination equipment and the location and a physical description of each item on the list in the contingency plan as required by LAC 33:V.1513.B.5, in violation of LAC 33:V.1109.E.1.e. Specifically, the facility's Emergency Response Action Plan did not include a location of spill kits or decontamination equipment onsite.
- I. The Respondent failed to ensure facility personnel take part in an annual review of the initial training required in LAC 33:V.1515.A, as specified in LAC 33:V.1515.C, in violation of LAC 33:V.1109.E.1.e. Specifically, training records for three (3) employees (William "Bill" Paul, Craig Perque, and Terry Beckendorf) were reviewed. Mr. Perque did not complete an annual refresher in calendar year 2017.

COMPLIANCE ORDER

Based on the foregoing, the Respondent is **hereby ordered**:

I.

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Hazardous Waste Regulations.

II.

To label or mark clearly, within thirty (30) days upon receipt of this **COMPLIANCE ORDER**, all satellite containers of hazardous waste with the words "Hazardous Waste," in accordance with LAC 33:V.1109.E.6.

III.

To label or mark clearly, within thirty (30) days upon receipt of this **COMPLIANCE ORDER**, all satellite containers in which hazardous waste is stored with the date the container began accumulating hazardous waste, in accordance with LAC 33:V.1109.E.1.c.

IV.

To cease, immediately upon receipt of this **COMPLIANCE ORDER**, storing solid waste in containers that do not keep out water and prevent leakage, in accordance with LAC 33:VII.503.A.2.

V.

To institute procedures, immediately upon receipt of this **COMPLIANCE ORDER**, to ensure waste determinations are made on all waste generated at the facility.

VI.

To amend, immediately upon receipt of this **COMPLIANCE ORDER**, the contingency plan to reflect accurate and current facility information in accordance with LAC 33:V.4345.A. The facility contingency plan must meet the content requirements specified in LAC 33:V.1513.B. The Respondent shall include arrangements with local authorities in the contingency plan in accordance with LAC 33:V.1513.B.3. The Respondent shall submit a copy of the amended contingency plan to the Enforcement Division within thirty (30) days of receipt of this **COMPLIANCE ORDER**.

VII.

To institute procedures, immediate upon receipt of this **COMPLIANCE ORDER**, to ensure that all employees responsible for managing hazardous waste have received or will receive initial and annual hazardous waste training meeting the requirements specified in LAC 33:V.1515.

VIII.

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order Portion of this **COMPLIANCE ORDER**. This report and all other reports or information required to be submitted to the Enforcement Division by this **COMPLIANCE ORDER** shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Cynthia Arrison
Re: Enforcement Tracking No. MM-CN-18-00423
Agency Interest No. 2719

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this **COMPLIANCE ORDER**. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this **COMPLIANCE ORDER**.

II.

The request for an adjudicatory hearing shall specify the provisions of the **COMPLIANCE ORDER** on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality
Office of the Secretary
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302
Attn: Hearings Clerk, Legal Division
Re: Enforcement Tracking No. MM-CN-18-00423
Agency Interest No. 2719

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this **COMPLIANCE ORDER** may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Division of Administrative Law (DAL) Procedural Rules. The Department may amend or supplement this **COMPLIANCE ORDER** prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This **COMPLIANCE ORDER** shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this **COMPLIANCE ORDER** shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although

the Respondent is estopped from objecting to this **COMPLIANCE ORDER** becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars (\$27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this **COMPLIANCE ORDER** and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Cynthia Arrison at (225) 219-3796 within ten (10) days of receipt of this **NOTICE OF POTENTIAL PENALTY**.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this **NOTICE OF POTENTIAL**

PENALTY. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

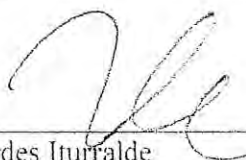
IV.

The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer. **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

This **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is effective upon receipt.

Baton Rouge, Louisiana, this 27th day of December, 2018.



Lourdes Iturralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Cynthia Arrison

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION POST OFFICE BOX 4312 BATON ROUGE, LOUISIANA 70821-4312		CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE			
Enforcement Tracking No.	MM-CN-18-00423	Contact Name	Cynthia Arrison		
Agency Interest (AI) No.	2719	Contact Phone No.	(225) 219-3796		
Alternate ID No.	LAD065485146				
Respondent:	EQUILON ENTERPRISES LLC	Facility Name:	Equilon Enterprises LLC dba Shell Oil US		
	c/o C T Corporation System Agent for Service of Process	Physical Location:	Louisiana Highway 44 and Louisiana Highway 70		
	3867 Plaza Tower Drive	City, State, Zip:	Convent, Louisiana 70723		
	Baton Rouge, LA 70816	Parish:	St. James Parish		
STATEMENT OF COMPLIANCE					
STATEMENT OF COMPLIANCE			Date Completed	Copy Attached?	
A written report was submitted in accordance with Paragraph VIII of the "Order" portion of the COMPLIANCE ORDER.					
All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph VI of the "Order" portion of the COMPLIANCE ORDER.					
All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:					
SETTLEMENT OFFER (OPTIONAL)					
<i>(check the applicable option)</i>					
<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:I.Subpart1.Chapter7.				
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (MM-CN-18-00423), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.				
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (MM-CN-18-00423), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance.				
	<ul style="list-style-type: none"> • Monetary component = \$ _____ • Beneficial Environmental Project (BEP) component (optional)= \$ _____ • DO NOT SUBMIT PAYMENT C.F THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted. 				
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (MM-CN-18-00423) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.				

CERTIFICATION STATEMENT

I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.

Respondent's Signature	Respondent's Printed Name	Respondent's Title
Respondent's Physical Address	Respondent's Phone #	Date

MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Louisiana Department of Environmental Quality
 Office of Environmental Compliance
 Enforcement Division
 P.O. Box 4312
 Baton Rouge, LA 70821
 Attn: Cynthia Arrison



JOHN BEL EDWARDS
GOVERNOR

CHUCK CARR BROWN, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

October 31, 2017

Equilon Enterprises LLC
P.O. Box 37
Convent, LA 70723

**RE: Convent Refinery
WARNING LETTER
ENFORCEMENT TRACKING NO. AE-L-17-01026
AGENCY INTEREST NO. 2719
AGENCY INCIDENT NO. 177910**

Dear Sir:

On or about May 21, 2017, an investigation of an unauthorized air discharge occurring on May 21, 2017, at the above referenced facility was conducted to determine compliance with the Louisiana Environmental Quality Act and supporting regulations. The discharge was reported to the Department in a letter dated May 26, 2017. The investigation report, noting areas of concern, has been forwarded to the Enforcement Division. All violations at your facility will be taken into consideration in determining what further actions this office will take.

We strongly encourage you to review the findings of our most recent investigation and immediately take any and all steps to ensure compliance with all environmental regulations at your facility. We request that you review the area(s) of concern noted and submit a written response within **30 days** of receipt of this letter to Antoinette Cobb at the address below. In your response, please include any action(s) you have taken to correct the area(s) of concern at your facility.

If you have any questions regarding this potential civil enforcement matter, please contact Antoinette Cobb at (225) 219-3072.

Sincerely,

Michelle M. McCarthy
Air Enforcement Manager

MMM/AFC/afc
Alt. ID No. 2560-00001

