STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:	*	Settlement Tracking No. SA-AE-14-0053
SHELL CHEMICAL LP	*	
AI # 26336 and 4384	*	Enforcement Tracking No. AE-CN-10-00569
PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT LA. R.S. 30:2001, ET SEQ.	*	Docket No. 2013-10181-EQ

SETTLEMENT

The following Settlement is hereby agreed to between Shell Chemical LP ("Respondent") and the Department of Environmental Quality ("DEQ" or "the Department"), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. ("the Act").

I

Respondent is a Partnership that owns and/or operates a petrochemical facility located in St. Charles Parish, Louisiana ("the Facility").

II

On May 3, 2012, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. AE-CN-10-00569, which was based upon the following findings of fact:

The Respondent owns and/or operates the Norco Chemical Plant – East Site (the facility) located at 15536 River Road in Norco, St. Charles Parish, Louisiana. The facility currently operates under the following permits:

Permit Number	Issue Date	Expiration Date
2283-V3	May 5, 2010	May 5, 2015
3078-V0	September 1, 2009	September 1, 2014
2520-V3	December 16, 2010	December 16, 2015
3047-V2	December 27, 2011	December 27, 2016

The facility previously operated under the following permits:

Permit Number	Issue Date
2283-V2	January 8, 2009
2283-V1	December 18, 2006
2283-V0	October 28, 2005
2840-V0	May 30, 2003
3047-V0	November 3, 2006
3047-V1	December 5, 2007
2520-V2	October 23, 2001
2520-V1	January 21, 2000
2510-V1	July 21, 2000

On or about June 22, 2011, July 19, 2011, and September 21, 2011, file reviews of the Respondent's facility were conducted to determine the degree of compliance with the Act and the Air Quality Regulations.

While the Department's investigation is not yet complete, the following violations were noted during the course of the file reviews:

A. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and Quarterly Deviation Report dated June 30, 2005, and correspondence dated March 3, 2005, the Respondent reported a secondary seal visual inspection conducted on February 24, 2005, discovered that the accumulated seal gap standard of 21.2 cm^2/m and individual gap standard of 1.27 cm were exceeded on Tank F-483 (EPN 1243-95). This is a violation of 40 CFR 60.113b(b)(4)(ii)(B), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, LAC 33.III.2103.D.2, Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

B. In the Respondent's 2005 Annual Compliance Certification dated March 27, 2006, and Quarterly Deviation Report dated June 30, 2005, and a letter dated July 5, 2005, the Respondent reported a release which occurred at the facility beginning on March 5, 2005, and ending on March 14, 2005. According to the Respondent, the differential pressure at the GO-1 DEA treater tower began to increase resulting in untreated dry gas being flared. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates associated with EPN 1-90 as shown in the following table:

Date/Duration	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
3/5/05 for 5.3 hours	SO_2	0.01	0.05	1,212.6	1,212
	Hexane	0.01	0.01	10.7	11
3/5/05-3/6/05 for 24 hours	SO_2	0.01	0.05	3,507.9	3,507
	Benzene	0.01	0.01	54.8	55
	Hexane	0.01	0.01	40.3	40
3/6/05-3/7/05 for 24 hours	SO_2	0.01	0.05	42.2	41
	Benzene	0.01	0.01	30	30
	Hexane	0.01	0.01	17.6	18
3/7/05-3/8/05 for 24 hours	Benzene	0.01	0.01	3.4	3
	Hexane	0.01	0.01	1.8	2
3/8/05-3/9/05 for 12 hours	Benzene	0.01	0.01	1.4	1
3/11/05-3/12/05 for 8 hours	Benzene	0.01	0.01	4.0	4
3/14/05-3/15/05 for 1 hour	Hexane	0.01	0.01	1.7	2

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Additionally, the flaring incident which occurred during the timeframe of March 5 through March 8, 2005, resulted in an opacity exceedance at the flare (EPN 1-90) in violation of 40 CFR 60.18(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, and LAC 33:III.1105. In the 2005 Annual Compliance Certification dated March 27, 2006, the Respondent reported the duration of the flare smoking was 15 hours and 40 minutes.

C. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and a letter dated July 5, 2005, the Respondent reported a release occurred at the facility beginning on March 17, 2005. According to the Respondent, the differential pressure at the GO-1 DEA treater tower began to increase resulting in untreated dry gas being flared at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

Date	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
3/17/05-3/18/05	0.3	SO_2	0.01	0.05	18,909.0	18,909
		Hexane	0.01	0.01	16.0	16.0
3/19/05-3/20/05	2.6	SO_2	0.01	0.05	1,418.0	1,418.0
		Hexane	0.01	0.01	1.2	1.0
4/2/05-4/3/05	12	SO_2	0.01	0.05	3,352.2	3,352.0
		Hexane	0.01	0.01	4.7	5.0

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

D. In correspondence dated June 21, 2005, the Respondent reported an unauthorized discharge occurred at the facility beginning on May 24, 2005, and ending on May 28, 2005. According to the Respondent's letter, a leak on a isolation valve on the top of the BD-5 Unit Post Frac Column (PV-1926) was discovered on May 24, 2005. According to the Respondent, the following amounts of 1,3 Butadiene were released. According to the Respondent, this release was preventable.

Date	Amount Released (lbs)
May 24, 2005	53
May 25, 2005	53
May 26, 2005	53
May 27, 2005	53
May 28, 2005	30

The Respondent did not have authorization from the Department to release these pollutants. Each incident of unpermitted emissions of 1,3 Butadiene from PV-1926 is a violation LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

E. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and a letter dated August 25, 2005, the Respondent reported a release

occurred at the facility on July 19, 2005. According to the Respondent, it was discovered that the flare pilot was out. According to the Respondent, the duration of the release was 5.75 hours. According to the Respondent's letter, the following pollutants were released and the permitted emission rates for the following pollutants were exceeded as shown in the following table. The following emissions are associated with EPN 3-84. According to the Respondent, this release was preventable.

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
Total VOCs	63.34	107.30	24,407	24,154
Benzene	0.19	0.32	1,269	1,269
Hexane	0.45	9.85	19,647	19,593

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A

F. In the Respondent's 2005 Annual Compliance Certification dated March 27, 2006, and Quarterly Deviation Report dated December 14, 2005, the Respondent reported the pilot outage due to loss of pilot flame on July 6 and July 19, 2005, for 29 minutes and 5.75 hours respectively. Vents from fixed roof tanks, (XC-409 and XC-430) and several waste management unit vents (EPNS PV-540, PV-542, PV-549, PV-587, PV-587, PV-588, PV-2131, and sumps) were vented to the Utilities East flare (EPN 3-84) while the pilot was out. Each incident of the Respondent's failure to control emissions as required is a violation of 40 CFR 60.18(c)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, 40 CFR 63.11(b)(5), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 60.112b(a)(3)(ii), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, 40 CFR 61.343(a)(1)(ii), which language has been adopted as a Louisiana regulation in LAC 33:III.5116, Title V Permit No. 2510-V1, LAC 33:III.501.C.4, LAC 33:III.905.A and La. R.S. 30:2057(A)(2).

G. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and a letter dated August 1, 2005, the Respondent reported a release which occurred at the facility on July 25, 2005. According to the Respondent, OL-5 operations noted that the butanes in the propylene product were higher than normal. An overhead analyzer and differential pressure meter were out of service for maintenance and inspection. Without these two meters operations could not tell if the column was operating properly. The production of off specification product led to flaring. According to the Respondent's correspondence, the

following pollutants exceeded the permitted emission rates as shown in the following table. According to the Respondent, this release was preventable.

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	6	CO	2.1	18.1	257.2	162
		NO_x	3.6	30.8	437.3	275
		PM	0.66	5.7	82.3	52
1-90	6.2	Benzene	0.01	0.01	2.1	2

Each incident of exceeding each permitted emission limit is a violation of Title V Permit Nos. 2520-V2 and/or 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

H. In letters dated October 13, 2005, and November 2, 2005, the Respondent reported a release occurred at the facility on August 26, 2005. According to the Respondent, the process gas compressor located in the OL-5 Process Unit shutdown resulting in flaring at the OL-5 Ground (EPN 7-84) and Elevated Flares (EPN 6-84). According to the Respondent, the duration of the release was 19.3 hours. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table.

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	CO	2.1	18.1	583	274
	NO_x	3.6	30.8	991	466
	PM	0.66	5.7	187	89
	1,3 Butadiene	0.97	6.2	150	58
6-84	CO	2.1	18.1	3,272	2,963
	NO_x	3.6	30.8	5,562	5,037
	PM	0.66	5.7	1,047	949
	Total VOCs	40.0	430.5	16,301	8,764
	1,3 Butadiene	0.97	6.2	250	232
	Benzene	0.98	0.98	2	2

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and

30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105.

I. In a letter dated October 14, 2005, the Respondent reported an unauthorized discharge occurred at the facility on October 7 through October 9, 2005. According to the Respondent, the flow controller that controls the amount of lean DEA in the DEA treater column failed due to a leak in the instrument air tubing. Subsequently, loss of dry gas feed caused OP-1 shutdown and flaring. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table. The following emissions are associated with the GO-1 Elevated Flare (EPN 1-90).

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
October 7, 2005, through October 8, 2005 (24 hours)				
SO_2	0.01	0.05	13,367	13,366
Hexane	0.01	0.01	105	105
Benzene	0.01	0.01	30	30
October 8, 2005, through October 9, 2005 (15 hours)				
SO_2	0.01	0.05	8,192	8,192
Hexane	0.01	0.01	34	34

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105.

J. In correspondence dated October 20, 2005, and the 2005 Annual Compliance Certification dated March 27, 2006, the Respondent reported an unauthorized discharge occurred at the facility on October 12 through October 14, 2005. According to the Respondent, the GO-1 Process Unit experienced a series of pressure excursions in the DEA Treatment System column resulting in untreated dry gas being sent to the fuel gas system and flared at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table.

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
October 12, 2005, through October 13, 2005 (20 hours)				
SO_2	0.01	0.05	9,174	9,173
Hexane	0.01	0.01	8	8
October 13, 2005, through October 14, 2005 (17 hours)				
SO_2	0.01	0.05	7,094	7,093
Hexane	0.01	0.01	6	6

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

K. In correspondence dated September 1, 2005, and March 24, 2006, the Respondent reported excess emissions associated with a release event occurring during the time period of August 28, 2005, through November 11, 2005. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates for the following pollutants as shown in the following table.

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
August 28, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
1-90	Benzene	0.01	0.01	11	11
	SO_2	0.01	0.05	44	43
	Hexane	0.01	0.01	7	7
3-84	CO	1.69	3.91	3,915	3,861
	PM	0.53	1.22	135	119
	SO_2	3.42	97.16	72,931	70,681
August 29, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	Benzene	0.98	0.98	2,056	2,056
	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
August 30, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259
	Benzene	0.98	0.98	2,056	2,056
	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
August 31, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259
	Benzene	0.98	0.98	2,056	2,056
	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
1-90	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
September 1, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259
	Benzene	0.98	0.98	2,056	2,056
	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
September 2, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259
	Benzene	0.98	0.98	2,056	2,056
	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
September 3, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259
	Benzene	0.98	0.98	2,056	2,056

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
September 4, 2005 (24 hours)					
7-84	CO	2.1	18.1	1,323	939
	Benzene	0.98	6.2	21	21
	Toluene	0.38	0.38	2	2
6-84	Total VOC	40.0	430.5	55,482	46,110
	1,3 Butadiene	0.97	6.2	3,385	3,259
	Benzene	0.98	0.98	2,056	2,056
	Ethylbenzene	0.01	0.01	7	7
	Hexane	0.07	0.07	189	189
	Styrene	0.02	0.02	18	18
	Toluene	0.38	0.38	222	222
	Xylene	0.18	0.18	24	24
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
September 5, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
1-90	SO_2	0.01	0.05	44	43
	Benzene	0.01	0.01	11	11
	Hexane	0.01	0.01	7	7
September 6, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
1-90	SO_2	0.01	0.05	15	14
	Benzene	0.01	0.01	4	4
	Hexane	0.01	0.01	2	2

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
September 7, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 8, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 9, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
3-84	CO	1.69	3.91	350	297
September 10, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 11, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 12, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 13, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 14, 2005 (24 hours)					
6-84	CO	2.1	18.1	804	420
	NO_x	3.6	30.8	1,367	714
	PM	0.66	5.7	257	136
September 17, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	38	37
	Benzene	0.01	0.01	4	4
	Hexane	0.01	0.01	3	3

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
September 18, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	80	79
	Benzene	0.01	0.01	8	8
	Hexane	0.01	0.01	5	5
September 19, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	50	49
	Benzene	0.01	0.01	5	5
	Hexane	0.01	0.01	3	3
September 20, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	85	83
	Benzene	0.01	0.01	8	8
	Hexane	0.01	0.01	5	5
3-84	CO	1.69	3.91	4	1
September 21, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	1,318	1,318
	Benzene	0.01	0.01	124	124
	Hexane	0.01	0.01	87	87
September 22, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	2,039	2,038
	Benzene	0.01	0.01	192	192
	Hexane	0.01	0.01	135	135
3-84	CO	1.69	3.91	4	1
September 23, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	789	788
	Benzene	0.01	0.01	74	74
	Hexane	0.01	0.01	52	52
September 24, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	255	255
	Benzene	0.01	0.01	24	24
	Hexane	0.01	0.01	17	17
September 25, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	717	716
	Benzene	0.01	0.01	68	68
	Hexane	0.01	0.01	47	47
September 26, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	1,539	1,538
	Benzene	0.01	0.01	145	145
	Hexane	0.01	0.01	102	102

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
September 27, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	556	555
	Benzene	0.01	0.01	53	53
	Hexane	0.01	0.01	37	37
September 28, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	501	500
	Benzene	0.01	0.01	47	47
	Hexane	0.01	0.01	33	33
September 29, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	69	68
	Benzene	0.01	0.01	7	7
	Hexane	0.01	0.01	5	5
September 30, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	86	85
	Benzene	0.01	0.01	8	8
	Hexane	0.01	0.01	6	6
October 1, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	84	83
	Benzene	0.01	0.01	8	8
	Hexane	0.01	0.01	6	6
October 2, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	72	71
	Benzene	0.01	0.01	7	7
	Hexane	0.01	0.01	5	5
October 6, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	165	164
	Benzene	0.01	0.01	16	16
	Hexane	0.01	0.01	11	11
October 7, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	1,342	1,341
	Benzene	0.01	0.01	127	127
	Hexane	0.01	0.01	89	89
October 8, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	1,444	1,443
	Benzene	0.01	0.01	136	136
	Hexane	0.01	0.01	95	95

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
October 9, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	1,012	1,011
	Benzene	0.01	0.01	96	96
	Hexane	0.01	0.01	67	67
October 10, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	10	9
	Benzene	0.01	0.01	1	1
	Hexane	0.01	0.01	1	1
October 18, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	631	630
	Benzene	0.01	0.01	60	60
	Hexane	0.01	0.01	42	42
October 19, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	1,897	1,896
	Benzene	0.01	0.01	179	179
	Hexane	0.01	0.01	125	125
October 20, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	188	187
	Benzene	0.01	0.01	18	18
	Hexane	0.01	0.01	12	12
October 21, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	224	223
	Benzene	0.01	0.01	21	21
	Hexane	0.01	0.01	15	15
October 22, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	284	283
	Benzene	0.01	0.01	27	27
	Hexane	0.01	0.01	19	19
October 23, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	282	281
	Benzene	0.01	0.01	27	27
	Hexane	0.01	0.01	19	19
October 24, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	300	299
	Benzene	0.01	0.01	28	28
	Hexane	0.01	0.01	20	20

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
October 25, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	281	280
	Benzene	0.01	0.01	27	27
	Hexane	0.01	0.01	19	19
October 26, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	303	302
	Benzene	0.01	0.01	29	29
	Hexane	0.01	0.01	20	20
October 28, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	16	15
	Benzene	0.01	0.01	2	2
	Hexane	0.01	0.01	1	1
November 7, 2005 (24 hours)					
1-90	SO_2	0.01	0.05	14	13
	Benzene	0.01	0.01	1	1
	Hexane	0.01	0.01	1	1

Each incident of exceeding each permitted emission limit is a violation of Title V Permit Nos. 2510-V1 and/or 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in opacity exceedance(s) in violation of LAC 33:III.1105. In correspondence dated March 24, 2006, the Respondent reported the duration of the flare smoking was for 196 hours and 28 minutes at the GO-1 Elevated Flare (EPN 1-90) and 23 hours at the OL-5 Elevated Flare (EPN 6-84).

L. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and Quarterly Deviation Report dated October 18, 2005, the Respondent reported missing records showing the use of certified recovery and recycling equipment. The Respondent failed to certify to the administrative authority that the Respondent has acquired and properly used certified recovery and recycling equipment in violation of 40 CFR 82.162(a), Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

M. In the Respondent's 2005 Annual Compliance Certification dated March 27, 2006, and Quarterly Deviation Reports dated June, 30, 2005, October 18, 2005, and December 14, 2005, the Respondent reported the following components were not monitored during the 2005 calendar year:

Date Reported	Emission Point	Source ID	Components	Missed monitoring Events
June 30, 2005	3001-95	BD-5 Fugitives	1 flange 4 drains	6 events 6 events
	3006-95	GO-1 Fugitives	63 difficult to monitor (DTM) valves	6 events
	3007-95	OL-5 Fugitives	1 accessible valve 4 DTM valves	22 events 6 events
	3005-95	GHT Fugitives	2 DTM valves	6 events
	3006-95	OP-1 Fugitives	1 DTM valve	5 events
October 18, 2005	3001-95	BD-5 Fugitives	8 DTM valves	6 events
	3006-95	GO-1 Fugitives	11 accessible valves 25 DTM valves	23 events 6 events
	3007-95	OL-5 Fugitives	7 accessible valves 34 DTM valves 2 DTM valves	23 events 6 events 6 events
	3006-95	OP-1 Fugitives	2 DTM valves 1 accessible valve	5 events 18 events
December 14, 2005	3006-95	GO-1 Fugitives	1 accessible valve	24 events
	3007-95	OL-5 Fugitives	1 accessible valve 3 DTM valves	24 events 6 events

Each incident of the Respondent's failure to monitor each component as required is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, LAC 33:III.2121, La. R.S. 30:2057(A)(2) and/or 40 CFR 63 Subpart H, which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 60 Subpart VV, which language has been adopted as a Louisiana regulation in LAC 33:III.3003, and/or 40 CFR 61 Subpart V, which language has been adopted as a Louisiana regulation in LAC 33:III.5116.

N. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and Quarterly Deviation Reports dated June 30, 2005, October 18, 2005, December 14, 2005, and March 27, 2006, the Respondent reported the discovery of open-ended lines or valves during the 2005 calendar year as shown in the following table:

Date Reported	Emission Point	Source ID	Number of Open-Ended Lines or Valves
June 30, 2005	3001-95	BD-5 Fugitives	10
	3005-95	GHT Fugitives	4
	3006-95	GO-1 Fugitives	11
	3007-95	OL-5 Fugitives	35
	3006-95	OP-1 Fugitives	2
October 18, 2005	3001-95	BD-5 Fugitives	9
	3006-95	GO-1 Fugitives	5
	3007-95	OL-5 Fugitives	20
	3006-95	OP-1 Fugitives	1
December 14, 2005	3001-95	BD-5 Fugitives	2
	3005-95	GHT Fugitives	1
	3006-95	GO-1 Fugitives	4
	3007-95	OL-5 Fugitives	17
	3006-95	OP-1 Fugitives	1
March 27, 2006	3001-95	BD-5 Fugitives	1
	3005-95	GHT Fugitives	2
	3006-95	GO-1 Fugitives	8
	3007-95	OL-5 Fugitives	17
	3006-95	OP-1 Fugitives	1

Each open-ended line or valve is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, LAC 33:III.2121, La. R.S. 30:2057(A)(2) and/or 40 CFR 63.167(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 60.482-6(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, which language has been adopted as a Louisiana regulation in LAC 33:III.5122, and/or 40 CFR 61.242-6(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116.

O. The Respondent reported the following deviations from fugitive emission requirements:

REPORT (date)	PERMIT NUMBER	EMISSION POINT	Description	REGULATORY or PERMIT REQUIREMENTS
3/27/2006 and 10/18/2005	2510-V1	3003-95	Discovery of 18 open-ended lines or valves	LAC 33:III.2121, 40 CFR 63.167(a)(1), 40 CFR 60.482-6(a)(1), and/or 40 CFR 61.242-6(a)(1)
3/29/2007	2510-V1	3003-95	Discovery of one (1) open-ended valve	40 CFR 63.167(a)(1), 40 CFR 61.242-6(a)(1), LAC 33:III.2121,
3/29/2007	3047-V0	3014-95	Discovery of two (2) open-ended lines	LAC 33:III.2121

Each open-ended line or valve is a violation of Title V Permit Nos. 2510-V1 and/or 3047-V0, LAC 33:III.501.C.4, La. R.S. 30:2057(A)(2), LAC 33:III.2121, and/or 40 CFR 63.167(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 60.482-6(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, which language has been adopted as a Louisiana regulation in LAC 33:III.5122, and/or 40 CFR 61.242-6(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5116.

P. The Respondent reported the following deviations from fugitive emission requirements:

Report (date)	Permit No.	Emission Point No.	Description	Regulatory or Permit Requirement(s)
3/27/2006 and 6/30/2005	2520-V2	3007-95	One (1) valve missed the 15 day repair deadline	LAC 33:III.2121
3/29/2007	2510-V1	3003-95	One (1) connector missed the 15 day repair deadline.	LAC 33:III.2121 and 40 CFR 63 Subpart CC
3/27/2008	2520-V2	3006-95 3007-95	3 flanges missed the repair date of 7/18/2007 1 pump missed repair date of 8/5/2007	LAC 33:III.2121 and 40 CFR 63.1024(a)

Each incident of the Respondent's failure to repair a component by the deadline is a violation of Title V Permit Nos. 2520-V2 and/or 2510-V1, LAC 33:III.501.C.4, LAC 33:III.2121, 40 CFR 63.1024(a), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, and/or 40 CFR 63 Subpart CC, which language has been adopted in Louisiana regulation in LAC 33:III.5122, and La. R.S. 30:2057(A)(2).

Q. The Respondent reported the following opacity exceedances:

Report (date)	Permit No.	Emission Point No.	Incident Date	Description	Regulatory or Permit Requirement(s)
6/30/2005	2510-V1	1-90	2/15/2005	The flare smoked greater than five (5) minutes in any two (2) consecutive hours on February 15, 2005. The duration of the incident was one (1) hour and 29 minutes.	40 CFR 60.18(c)(1)
3/29/2007	2510-V1	1-90	8/18/2006 and 9/14/2006	Visible emissions for greater than five (5) minutes in any consecutive two (2) hours due to flaring of off spec material and a MAP converter trip.	40 CFR 60.18(c)(1)

Report (date)	Permit No.	Emission Point No.	Incident Date	Description	Regulatory or Permit Requirement(s)
3/29/2007	2510-V1	1-90	12/7/2006 – 12/13/2006	The flare smoked greater than six (6) hours in any ten (10) consecutive days during the time period of According to the Respondent maintenance activity led to the flare smoking. Duration was 45 hours and 4 minutes	LAC 33:III.1105
3/29/2007	2510-V1	1-90	12/9/2006-12/12/2006	Unexpected shutdown of boiler #9 resulted in the shutdown of several units which led to the flare (EPN 1-90) smoking greater than six (6) hours in any ten (10) consecutive days. Duration was 11 hours and 30 minutes	LAC 33:III.1105

Each incident is a violation of 40 CFR 60.18(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, and/or LAC 33:III.1105, Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

R. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, and a letter dated March 27, 2006, the Respondent reported the following emissions in excess of permit limits and emissions of unpermitted pollutants during the 2005 calendar year.

Permit No.	EPN	Pollutant	Allowable Emissions (tpy)	2005 Estimated Emissions (tpy)
2510-V1	3-84	CO	7.40	51.15
		1,3 Butadiene	Not permitted	0.66
		Ethylbenzene	Not permitted	0.04
		Naphthalene	Not permitted	0.05
		Xylene	Not permitted	0.05
		Toluene	Not permitted	0.10
		Hydrogen Sulfide	Not permitted	0.12
		Benzene	0.81	1.80
		Hexane	2.0	10.6
	5-84	CO	5.36	7.26
	1-90	SO_2	0.05	0.17
		Toluene	Not permitted	0.02
	3208-95	Total VOCs	Not permitted	60.25
		Xylene	Not permitted	0.75
		Ethylbenzene	Not permitted	0.05
		Toluene	Not permitted	1.10
		Benzene	Not permitted	0.04

Permit No.	EPN	Pollutant	Allowable Emissions (tpy)	2005 Estimated Emissions (tpy)
2510-V1	3014-95	Ammonia	Not permitted	1.38
		1,3 Butadiene	Not permitted	0.02
		Total VOCs	Not permitted	5.36
		Benzene	Not permitted	0.21
		Ethylbenzene	Not permitted	0.01
		Naphthalene	Not permitted	0.16
		Hexane	Not permitted	0.08
		Xylene	Not permitted	0.02
		Hydrogen Sulfide	Not permitted	1.99
		Toluene	Not permitted	0.10
		Styrene	Not permitted	0.02
		Phenol	Not permitted	0.04
		PAHs	Not permitted	0.70
	1261-95	1,3 Butadiene	Not permitted	0.08
		Total VOCs	0.01	0.16
		Benzene	<0.01	0.02
		Hydrogen Sulfide	<0.01	0.02
	1262-95	1,3 Butadiene	Not permitted	0.03
		Total VOCs	0.01	0.06
	1263-95	Total VOCs	0.11	0.18
		Ammonia	<0.01	0.02
		1,3 Butadiene	Not permitted	0.01
		Hexane	Not permitted	0.02
		Hydrogen Sulfide	<0.01	0.08
	1224-95	Ammonia	Not permitted	0.04
		1,3 Butadiene	Not permitted	0.08
		Hydrogen Sulfide	Not permitted	0.12
	1248-95	Ammonia	Not permitted	0.02
		1,3 Butadiene	Not permitted	0.23
		Benzene	0.06	0.07
		Hydrogen Sulfide	Not permitted	0.06
2520-V2	6-84	SO_2	0.01	0.17
	7-84	CO	9.29	118.40
		PM	2.90	4.10
		SO_2	0.01	54.37
		NO_x	15.79	21.76
		Acetonitrile	Not permitted	0.48
		Hexane	0.33	0.60
	3-95	1,3 Butadiene	Not permitted	0.16
	1064-95	PAH's	Not permitted	0.06

Permit No.	EPN	Pollutant	Allowable Emissions (tpy)	2005 Estimated Emissions (tpy)
2520-V2	3001-95	Benzene	<0.01	0.04
		Hexane	0.01	0.03
		Toluene	0.02	0.03
	3005-95	Hexane	<0.01	0.04
	1065-95	PAHs	Not permitted	0.07
	1018-95	Total VOCs	0.05	13.59
		Naphthalene	0.01	2.55
		PAHs	Not permitted	0.04
	1032-95	Total VOCs	<0.01	0.37
		Naphthalene	<0.01	0.08
	1033-95	Total VOCs	0.03	4.07
		Naphthalene	0.01	0.92
	3007-95	Styrene	Not permitted	0.05
		Dimethylformide	Not permitted	0.08
		Diethanolamine	Not permitted	2.51
		Naphthalene	2.50	2.88
		PAHs	Not permitted	0.05
	3006-95	Diethanolamine	Not permitted	0.45
		Trimethylpentane	Not permitted	0.10
		Ethylbenzene	0.16	0.21
		Methanol	1.23	1.67
		PAHs	Not permitted	0.03
		Xylene	0.40	0.62
	1240-95	Total VOCs	6.03	9.88
		1,3 Butadiene	Not permitted	0.07
		Hexane	Not permitted	0.39
		Benzene	0.01	0.21
		Toluene	0.1	0.11
		Xylene	0.01	0.04
	1243-95	Total VOCs	4.62	8.66
		1,3 Butadiene	Not permitted	0.06
		Hexane	Not permitted	0.34
		Benzene	0.01	0.19
		Toluene	0.01	0.09
		Xylene	0.02	0.04
	1244-95	1,3 Butadiene	Not permitted	0.04
		Benzene	0.05	0.12
		Toluene	0.03	0.06
		Xylene	0.02	0.023
	1252-95	1,3 Butadiene	Not permitted	0.27
		Total VOCs	6.00	6.07
		Xylene	Not permitted	0.01

Permit No.	EPN	Pollutant	Allowable Emissions (tpy)	2005 Estimated Emissions (tpy)
2520-V2	1252-95	Benzene	0.83	1.05
		Toluene	<0.01	0.11
	1052-95	Methanol	Not permitted	0.05
	1200-95	Total VOCs	0.22	0.25
		Acetonitrile	0.22	0.25
	1201-95	Total VOCs	0.19	0.25
		Acetonitrile	0.19	0.25
	1003-95	Total VOCs	0.31	0.36
		Acetonitrile	0.31	0.35
	1008-95	Total VOCs	0.03	0.04

Each incident of emissions in excess of a permitted emission limit of each pollutant is violation of LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Each incident of emissions of unpermitted pollutants is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

S. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, the Respondent reported emissions above the 40 CFR 60 Subpart D standard of less than or equal to 0.20 lb/MMBTU in a three (3) hour rolling average. According to the Respondent, the emissions of NO_x were 0.29 during the period between October 29, 2005, and October 30, 2005. This is associated with Boiler 9 (EPN 5-76). This is a violation of 40 CFR 60.44, which language has been adopted as a Louisiana regulation in LAC 33:III.3003, Title V Permit No. 2283-V0, LAC 33:III.501.C4, and La. R.S. 30:2057(A)(2).

T. In the Respondent's 2005 Title V Annual Compliance Certification dated March 27, 2006, the Respondent reported Boiler 9 (EPN 5-76) exceeded the 20 percent opacity limitation for a total of 18 minutes in November 2005 due to control equipment failure. This is a violation of 40 CFR 60.42(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, Title V Permit No. 2283-V0, LAC 33:III.1101, and La. R.S. 30:2057(A)(2).

U. In correspondence dated February 16, 2006, the Respondent reported an unauthorized discharge occurred at the facility on January 19, 2006, and January 24, 2006. According to the Respondent, the GO-1 DEA treater tower had a series of differential pressure excursions resulting in untreated dry gas being flared at the GO-1 Elevated flare (EPN 1-90). According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
January 19, 2006 (8 hours)				
SO_2	0.01	0.05	1,969	1,969
Hexane	0.01	0.01	3	3
January 24, 2006 (7 hours)				
SO_2	0.01	0.05	1,477	1,477
Hexane	0.01	0.01	2	2

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of 40 CFR 60.18(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003.

V. In a letter dated March 24, 2006, the Respondent reported a release occurred at the facility on March 19, 2006. According to the Respondent, the OL-5 Process Unit experienced an increase in the differential pressure of the ethylene splitter column that resulted in flaring at the OL-5 Ground (EPN 7-84) and Elevated (EPN 6-84) Flares. According to the Respondent, the duration of the release was 3.5 hours and the release was preventable. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	CO	2.1	18.1	2,031	1,975
	NO_x	3.6	30.8	373	279
	PM	0.66	5.7	70	53
6-84	CO	2.1	18.1	3,046	2,991
	NO_x	3.6	30.8	560	465
	PM	0.66	5.7	105	88
	Total VOCs	40.0	430.5	21,286	19,927

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

W. In correspondence dated June 14, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on April 17, 2006, and ending on April 18, 2006. According to the Respondent, the GO-1 Process Unit lost electrical feed causing the shutdown of two compressors resulting in flaring of process gases. According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
1-90	19.7	CO	2.61	152.13	7,655	4,710
		SO_2	0.01	0.05	248	248
		Benzene	0.01	0.01	35	25
		Hexane	0.01	0.01	20	20
7-84	1	CO	2.1	18.1	833	817
		NO_x	3.6	30.8	153	126
		PM	0.66	5.7	29	24
		1,3 Butadiene	0.97	6.2	11	6
		Benzene	0.98	0.98	3	3
		Toluene	0.38	0.38	1	1

Each incident of exceeding each permitted emission limit is a violation of Title V Permit Nos. 2510-V1 and/or 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105.

X. In correspondence dated May 25, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on May 10, 2006, and ending on May 14, 2006. According to the Respondent, boiler #8 unexpectantly shutdown resulting in the rapid shutdown of several units. According to the Respondent, the shutdown led to flaring at the OL-5 Ground (EPN 7-84) and Elevated (EPN 6-84) Flares and the relieving of pressure from vessels through pressure relief devices in two (2) of the units that were shutting down. According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
May 10, 2006						
7-84	24	CO	2.1	18.1	4,556	4,172
		NO_x	3.6	30.8	837	185
		PM	0.66	5.7	158	37
		1,3 butadiene	0.97	6.2	190	64
6-84	24	CO	2.1	18.1	73,927	73,543
	24	NO_x	3.6	30.8	13,586	12,933
		PM	0.66	5.7	2,557	2,437
		VOCs	40.0	430.5	49,577	40,205
		1,3 butadiene	0.97	6.2	532	406
		benzene	0.98	0.98	3	3
Pressure Relief Devices	n/a	Toluene (HRVOC)	n/a	n/a	422	n/a
		VOCs	n/a	n/a	49,874*	n/a
		1,3 butadiene	n/a	n/a	956*	n/a
		benzene	n/a	n/a	1,053*	n/a
		HRVOCs (including ethylene and propylene)	n/a	n/a	41,546*	n/a
May 11, 2006						
7-84	24	CO	2.1	18.1	1,993	1,609
6-84	7	CO	2.1	18.1	21,528	21,416
		NO_x	3.6	30.8	3,957	3,766
		PM	0.66	5.7	745	709
		VOCs	40.0	430.5	14,438	11,704
		1,3 butadiene	0.97	6.2	155	118
		benzene	0.98	0.98	1	1

*Emissions include those released from flaring and pressure relief devices to atmosphere

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105. Each incident of unpermitted emissions from a relief device is a violation of LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

Y. In correspondence dated June 22, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on May 17, 2006, and ending on May

18, 2006. According to the Respondent, the OP-1 Process Gas Compressor shutdown due to a failure of the out board seal on the high pressure case. This shutdown led to a process unit upset and flaring at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, the duration of the incident was 12.5 hours. According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
CO	2.61	152.13	4,719	2,850
SO_2	0.01	0.05	1.0	0.4
Benzene	0.002	0.05	38	38

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of 40 CFR 60.18(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, and LAC 33:III.1105.

Z. In correspondence dated May 24, 2006, the Respondent reported an unauthorized discharge occurred at the facility periodically beginning on May 17, 2006, and ending on May 19, 2006. According to the Respondent, the GO-1 DEA treater tower began to have a series of differential pressure excursions resulting in untreated dry gas being flared at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, SO_2 emissions exceeded the permitted emission rates as shown in the following table.

Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
May 17, 2006					
<1	SO_2	0.01	0.05	779	779
May 18, 2006					
<1	SO_2	0.01	0.05	1,081	1,081

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

AA. In correspondence dated June 30, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on June 10, 2006, and ending on June 13, 2006. According to the Respondent, the GO-1 Process Unit experienced the

unexpected shutdown of a process gas compressor that resulted in flaring at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table.

Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
June 10, 2006					
24	CO	2.61	152.13	36,059	32,470
	SO_2	0.01	0.05	589	588
	Benzene	0.01	0.01	261	261
June 11, 2006					
24	CO	2.61	152.13	41,153	37,565
	PM	0.84	48.68	1,424	275
	Benzene	0.01	0.01	64	64
June 12, 2006					
4.3	CO	2.61	152.13	11,350	10,707
	PM	0.84	48.68	393	187

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105.

BB. In correspondence dated July 11, 2006, and the 2006 Annual Compliance Certification dated March 29, 2007, the Respondent reported an unauthorized discharge occurred at the facility beginning on June 25, 2006. According to the Respondent, on June 25, 2006, the GO-1 DEA treater tower began to have a differential pressure excursion resulting in untreated dry gas being flared at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
June 25, 2006					
7.2	SO_2	0.01	0.05	9,300	9,300
	Hexane	0.01	0.01	0.15	0.15
June 27, 2006					
4.3	SO_2	0.01	0.05	6,161	6,160
	Hexane	0.01	0.01	0.10	0.10

Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
June 28, 2006					
9.7	SO_2	0.01	0.05	15,960	15,959
	Hexane	0.01	0.01	0.26	0.26
June 29, 2006					
3.6	SO_2	0.01	0.05	7,969	7,969
	Hexane	0.01	0.01	0.13	0.13

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

CC. In correspondence dated July 26, 2006, and September 5, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on July 19, 2006, and ending on July 21, 2006. According to the Respondent, the GO-1 Process Unit experienced a process upset caused by instrument issues that resulted in flaring at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, the following pollutants were released and the permitted emission rates were exceeded as shown in the following table:

Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
July 19, 2006					
19	CO	2.61	152.13	30,917	28,076
	PM	0.84	48.68	1,070	161
	SO_2	0.01	0.05	9	8
	benzene	0.01	0.01	69	69
July 20, 2006					
16	CO	2.61	152.13	20,626	18,233
	benzene	0.01	0.01	1	1

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105.

DD. In correspondence dated August 25, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on August 18, 2006, and ending on August 19, 2006. According to the Respondent, the OL-5 Process Unit

experienced an upset when a section of tubing failed causing the Process Gas Compressor to shutdown. According to the Respondent, after mitigating this issue, the OL-5 lost lube oil level causing the compressor to shut down again. Both events caused flaring at the OL-5 Ground (EPN 7-84) and Elevated (EPN 6-84) Flares. The duration of the incident was 15 hours. According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	NO_x	3.6	30.8	589	181
	PM	0.66	5.7	111	35
6-84	CO	2.1	18.1	23,027	22,787
	NOx	3.6	30.8	4,232	3,824
	PM	0.66	5.7	796	721
	VOCs	40.0	430.5	12,829	6,971
	1,3 butadiene	0.97	6.2	141	63
	benzene	0.98	0.98	3	3

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105.

EE. In correspondence dated August 25, 2006, and September 21, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on August 20, 2006, and ending on August 31, 2006. According to the Respondent, the GO-1 Process unit discovered a leak in a heat exchanger, and process gases were released to the atmosphere as a result of this leak. According to the Respondent, a unit shutdown was required to repair the leak, and during the shutdown, a pressure relief valve opened releasing process gases to the atmosphere. The Respondent reported materials were released from the exchanger leak via the cooling tower (EPN 2003-95). The Respondent also reported an upset at the GO-1 DEA treatment system required flaring at the GO-1 Elevated Flare (EPN 1-90) of the RCCU untreated dry gas feed. According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
August 20, 2006						
1-90	24	SO_2	0.01	0.05	5,127	5,126
		benzene	0.01	0.01	117	117
		hexane	0.01	0.01	35	35
2003-95		Totals VOCs	1.68	1.68	6,662	6,660
		1,3 butadiene	0.03	0.03	4,429	4,429
		benzene	0.01	0.01	1,370	1,370
		hexane	0.01	0.01	958	958
		toluene	<0.001	<0.001	31	31
August 21, 2006						
Relief Valve	n/a	VOCs (includes HRVOCs)	n/a	n/a	19,990	19,990
1-90	24	benzene	0.01	0.01	7	7
		hexane	0.01	0.01	0.14	0.14
August 22, 2006						
1-90	24	hexane	0.01	0.01	8	8
August 23, 2006						
1-90	24	benzene	0.01	0.01	2	2
		hexane	0.01	0.01	0.03	0.03
August 24, 2006						
1-90	24	benzene	0.01	0.01	9	9
August 25, 2006						
1-90	24	benzene	0.01	0.01	2	2
August 26, 2006						
1-90	24	benzene	0.01	0.01	3	3
August 27, 2006						
1-90	24	SO_2	0.01	0.05	49	48
		benzene	0.01	0.01	30	30
		hexane	0.01	0.01	6	6
August 28, 2006						
1-90	24	SO_2	0.01	0.05	1,520	1,519
		benzene	0.01	0.01	654	654
		hexane	0.01	0.01	175	175
August 29, 2006						
1-90	24	benzene	0.01	0.01	21	21
August 30, 2006						
1-90	24	benzene	0.01	0.01	0.5	0.5

Each incident of exceeding each permitted emission limit is a violation of Title V Permit Nos. 2510-V1 and/or 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105.

FF. In correspondence dated September 27, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on September 5, 2006, and ending on September 16, 2006. According to the Respondent, the OL-5 Process went through a controlled shutdown in order to make repairs to the seals of the process gas compressor resulting in flaring at the OL-5 Ground (EPN 7-84) and Elevated (EPN 6-84) Flares. According to the Respondent, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
September 5, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 6, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 7, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
September 8, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 9, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 10, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 11, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 12, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	24	PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 13, 2006						
7-84	24	CO	2.1	18.1	7,635	7,251
		NO_x	3.6	30.8	1,403	750
		PM	0.66	5.7	264	143
6-84	24	CO	2.1	18.1	7,042	6,658
		NOx	3.6	30.8	1,294	641
		PM	0.66	5.7	244	123
		benzene	0.98	0.98	0.74	0.74
September 14, 2006						
7-84	24	CO	2.1	18.1	553	169
6-84	24	CO	2.1	18.1	1,302	918
September 15, 2006						
6-84	24	CO	2.1	18.1	875	491
September 16, 2006						
7-84	15	CO	2.1	18.1	2,527	2,276
		NO_x	3.6	30.8	464	37
		PM	0.66	5.7	87	8
		benzene	0.98	0.98	0.02	0.02
6-84	15	CO	2.1	18.1	25,661	25,410
		NOx	3.6	30.8	4,716	4,289
		PM	0.66	5.7	888	809
		VOCs	40.0	430.5	14,023	7,893
		benzene	0.98	0.98	0.49	0.49

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105. According to the Respondent's report, the OL-5 Elevated Flare (6-84) was smoking for eight (8) hours and 33 minutes.

GG. In correspondence dated October 26, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on October 16, 2006. According to the Respondent, the OL-5 Process unit experienced an unexpected shutdown of the process gas compressor due to low seal pressure resulting in flaring at the OL-5 Elevated Flare (EPN 6-84) and the opening of a pressure relief device to atmosphere. According to the Respondent's letter, the following

pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
October 16, 2006						
6-84	24	CO	2.1	18.1	39,558	39,174
		NO_x	3.6	30.8	7,270	6,618
		PM	0.66	5.7	1,369	1,248
		VOCs	40.0	430.5	22,628	13,256
		1,3 butadiene	0.97	6.2	361	235
		benzene	0.98	0.98	6	6
Relief Device	n/a	VOCs	n/a	n/a	18,041*	n/a
	n/a	1,3 butadiene	n/a	n/a	261*	n/a
October 17, 2006						
6-84	1	CO	2.1	18.1	467	451
		NO_x	3.6	30.8	86	59
		PM	0.66	5.7	16	11
		benzene	0.98	0.98	0.08	0.08

*Includes emission from flaring and release to atmosphere and from relief device

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105. Each incident of emissions of unpermitted pollutants from the relief valve is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

HH. In correspondence dated December 7, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on November 10, 2006, and ending on November 15, 2006. According to the Respondent, the OL-5 Process Unit discovered a small crack in piping associated with a process gas compressor. According to the Respondent, in order to safely make repairs the compressor had to be shutdown, and the shutdown and subsequent startup resulted in flaring at the OL-5 Elevated Flare (EPN 6-84). According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
November 10, 2006						
6-84	6	CO	2.1	18.1	12,284	12,188
		NO_x	3.6	30.8	2,258	2,094
		PM	0.66	5.7	425	395
		VOCs	40.0	430.5	7,604	5,261
		benzene	0.98	0.98	0.07	0.07
Emissions from Piping Crack	n/a	1,3 butadiene	n/a	n/a	3,528	n/a
November 11, 2006						
6-84	24	CO	2.1	18.1	49,748	49,364
		NO_x	3.6	30.8	9,143	8,490
		PM	0.66	5.7	1,721	1,600
		VOCs	40.0	430.5	30,393	21,021
		benzene	0.98	0.98	0.3	0.3
November 12, 2006						
6-84	24	CO	2.1	18.1	39,512	39,128
		NO_x	3.6	30.8	7,262	6,609
		PM	0.66	5.7	1,367	1,246
		VOCs	40.0	430.5	24,572	15,200
		benzene	0.98	0.98	0.2	0.2
November 13, 2006						
6-84	24	CO	2.1	18.1	613	229
November 14, 2006						
6-84	24	CO	2.1	18.1	613	229
November 15, 2006						
6-84	24	CO	2.1	18.1	613	229

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105. In correspondence dated December 7, 2006, the Respondent reported the OL-5 Elevated Flare (EPN 6-84) was smoking for 83 hours and 30 minutes. Each incident of unpermitted emissions from the piping crack is a violation of LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

II. In the Respondent's Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the following opacity exceedances:

Source ID and EPN	Date and Duration	Description
Boiler 7 (1-72)	February 13, 2006, for 6 minutes	Exceeded 27 percent opacity due to insufficient oxygen at firebox which caused smothering
Boiler 8 (4-76)	April 20, 2006, for 48 minutes	Exceeded 27 percent opacity while lighting gas on boiler
Boiler 9 (5-76)	June 1, 2006, for 6 minutes	Exceeded 27 percent opacity while attempting to bring the soot blower into service
Boiler 9 (5-76)	July 14, 2006, for 6 minutes	An unexpected steam load increase resulted in the boiler exceedance

Each exeedance is a violation of 40 CFR 60.42(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.3003,LAC 33:III.1101, Title V Permit No. 2283-V0, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

JJ. In the Respondent's Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the following exceedances:

Source ID and EPN	Date and Duration	Description
Boiler 7 (1-72)	December 7, 2006, for 1 hour	Exceeded the 86 nanograms per joule heat input derived from gaseous fossil standard
Boiler 9 (5-76)	December 9, 2006, for 5 hours	Exceeded the 86 nanograms per joule heat input derived from gaseous fossil standard

Each exceedance is a violation of 40 CFR 60.44(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, Title V Permit No. 2283-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

KK. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported no flow rate was indicated by the flow meter on K-5756. According to the Respondent, the flow meter was not working properly on February 27, 2006, and March 6, 2006. This is a violation of 40 CFR 60.663, which language has been adopted as a Louisiana regulation in LAC 33:III.3003, and La. R.S. 30:2057(A)(2).

LL. In the Respondent's Quarterly Deviation Report dated June 19, 2006, Semiannual Monitoring Report dated September 21, 2006, and 2006 Title V Annual Compliance Certification dated March 29, 2007, the following components monitoring events were missed during the 2006 calendar year.

Date Reported	Emission Point	Source ID	Component	Missed Monitoring Events
June 19, 2006	3005-95	GHT Fugitives	3accessible valves	26 events
	3007-95	OL-5 Fugitives	2 accessible valves	26 events
September 21, 2006	3007-95	OL-5 Fugitives	1 accessible valve	6 events
	3006-95	GO-1 Fugitives	4 flanges	1 event
March 29, 2007	3007-95	OL-5 Fugitives	1 accessible valve	4 events
	3006-95	OP-1 Fugitives	1 accessible valve	23 events
			2 accessible valves	1 event

Each incident of the Respondent's failure to monitor each component as required is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, LAC 33:III.2121, and La. R.S. 30:2057(A)(2) and/or 40 CFR 60 Subpart VV, which language has been adopted as a Louisiana regulation in LAC 33:III.3003, and 40 CFR 63 Subpart UU, which language has been adopted as a Louisiana regulation in LAC 33:III.5122.

MM. In the Respondent's Quarterly Deviation Report dated June 19, 2006, Semiannual Monitoring Report dated September 21, 2006, and 2006 Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the discovery of open-ended lines or valves during the 2006 calendar year as shown in the following table:

Date Reported	Emission Point	Source ID	Number of Open-Ended Lines or Valves
June 19, 2006	3001-95	BD-5 Fugitives	5
	3006-95	GO-1 Fugitives	6
	3007-95	OL-5 Fugitives	12
	3006-95	OP-1 Fugitives	3
September 21, 2006	3001-95	BD-5 Fugitives	2
	3006-95	GO-1 Fugitives	12
	3007-95	OL-5 Fugitives	14
March 29, 2007	3001-95	BD-5 Fugitives	2
	3006-95	GO-1 Fugitives	5
	3007-95	OL-5 Fugitives	14
	3006-95	OP-1 Fugitives	1
	3001-95	BD-5 Fugitives	1
	3006-95	GO-1 Fugitives	3
	3007-95	OL-5 Fugitives	10

Each open-ended line or valve is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, LAC 33:III.2121, La. R.S. 30:2057(A)(2) and/or 40 CFR 63.167(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 60.482-6(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, and 40 CFR 63.1033(b)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122.

NN. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, and a letter dated August 17, 2006, the Respondent reported a released occurred at the facility on August 6, 2006. According to the Respondent, the GO-1 Process Unit experienced a process upset that led to the increase in pressure of the pyro-fract column that resulted in flaring at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, the duration of the incident was one (1) hour. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
SO_2	0.01	0.05	7	7
Benzene	0.01	0.01	4	4
Hexane	0.01	0.01	1	1

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

OO. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the data extraction program did not continuously record the presence of the flare pilot for the Utilities East Flare (EPN 3-84) on the following dates and times:

Emission Point No.	Date and Time
3-84	From 3/30/2006 at 1015 to 3/31/2006 at 2345
	From 4/1/2006 at 0000 to 4/2/2006 at 2330
	From 4/5/2006 at 0830 to 4/6/2006 at 1615
	From 4/7/2006 at 1915 to 4/10/2006 1745
	From 4/11/2006 at 0915 to 4/17/2006 at 12/30
	From 4/18/2006 at 1200 to 5/8/2006 at 1630
	From 7/2/2006 at 1315 to 7/2/2006 at 1715
6-84	From 7/2/2006 at 1315 to 7/2/2006 at 1715

Each incident of the Respondent's failure to record required information is a violation of 40 CFR 61.356(j), which language has been adopted as a Louisiana regulation in LAC 33:III.5116, 40 CFR 63.644(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, Title V Permit No. 2510-V1 and/or Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

PP. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the infrared eye that detects the continuous presence of the Utilities East Flare (EPN 3-84) was inoperable from August 22, 2006, through August 28, 2006. This is a violation of 40 CFR 61.356(j), which language has been adopted as a Louisiana regulation in LAC 33:III.5116, 40 CFR 63.644(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

QQ. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the data extraction program did not continuously record the presence of the flare pilot on December 12, 2006, for six (6) hours. This is associated with EPN 3-84.This is a violation of 40 CFR 63.644(a)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, Title V Permit No. 3047-V0, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

RR. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, the Respondent reported the quantity of H_2S in the Fuel Gas Blend Drum exceeded the NSPS J concentration limit of 160 ppm based on a three (3) hour rolling average on the following dates:

November 10 and November 23, 2006. This is associated with EQT018. Each incident of exceeding the limit is a violation of 40 CFR 60.104(a)(1), which language has been adopted as a Louisiana Regulation in LAC 33:III.3003, Title V Permit No. 3047-V0, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

SS. The Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, states, "the ICEs operated for 1,357,620 hp-hour per year for 2006." The equipment operational limit is 924,672 hp-hour per year. This is associated with EPN 5037-95. The exceedance of the operational limit is a violation of Title V Permit No. 3047-V0, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(2).

TT. In the Respondent's 2006 Title V Annual Compliance Certification dated March 29, 2007, a letter dated March 29, 2007, and a revised letter dated September 6, 2007, the Respondent reported the following emissions in excess of permit limits and emissions of unpermitted pollutants during the 2006 calendar year and correspondence dated August 24, 2011, for EPN 1240-95 and 3014-95:

Permit No.	EPN	Pollutant	Allowable Emissions (tpy)	2006 Estimated Emissions (tpy)
2520-V2	6-84	SO_2	0.01	9.08
		CO	9.29	25.59
		Acetonitrile	Not permitted	0.08
	7-84	CO	9.29	70.78
		SO_2	0.01	31.13
		Acetonitrile	Not permitted	0.27
	3-95	1,3 Butadiene	Not permitted	0.05
	3001-95	Benzene	<0.01	0.03
		Hexane	0.01	0.03
		Toluene	0.02	0.025
	3005-95	Hexane	<0.01	0.03
	1065-95	PAHs	<0.01	0.05
		Total VOCs	0.24	0.27
		Hydrogen Sulfide	Not permitted	0.02
	1066-95	PAHs	<0.01	0.13
		Total VOCs	0.22	0.72
		Hydrogen Sulfide	Not permitted	0.06
		CO	Not permitted	0.02
		Naphthalene	0.10	0.20
		Phenol	0.005	0.32
	1018-95	Total VOCs	0.05	8.77
		Naphthalene	0.01	0.12
		PAHs	Not permitted	0.01
	1032-95	Total VOCs	<0.01	0.42
		Naphthalene	<0.01	0.10
	1033-95	Total VOCs	0.03	4.20
		Naphthalene	0.01	0.81
	3007-95	Styrene	Not permitted	0.02
		Dimethylformide	Not permitted	0.05
		Diethanolamine	Not permitted	2.13
		PAHs	Not permitted	0.48

Permit No.	EPN	Pollutant	Allowable Emissions (tpy)	2006 Estimated Emissions (tpy)
2520-V2	3006-95	Diethanolmaine	Not permitted	0.59
		Trimethylpentane	Not permitted	0.09
		Methanol	1.23	1.83
		PAHs	Not permitted	0.03
		Glycol Ethers	Not permitted	0.01
	1240-95	1,3 Butadiene	Not permitted	0.07
		Hexane	Not permitted	0.39
		Benzene	0.01	0.21
		Toluene	0.01	0.11
		Xylene	<0.01	0.04
	1243-95	Total VOCs	4.62	5.03
		1,3 Butadiene	Not permitted	0.07
		Hexane	Not permitted	0.30
		Benzene	0.01	0.13
		Toluene	0.01	0.06
	1244-95	1,3 Butadiene	Not permitted	0.04
		Benzene	0.05	0.09
		Toluene	0.03	0.05
	2005-95	Total VOCs	25.75	26.45
		Acetonitrile	1.02	1.05
		1,3 Butadiene	0.80	0.82
		PM	18.24	18.73
	1252-95	1,3 Butadiene	Not permitted	0.27
		Total VOCs	6.00	6.07
	1252-95	Xylene	Not permitted	0.01
		Benzene	0.83	1.05
		Toluene	<0.01	0.11
	1063-95	Naphthalene	0.22	1.19
	1201-95	Total VOCs	0.19	0.20
		Acetonitrile	0.19	0.20
3047-V0	3014-95	Naphthalene	0.087	0.20
		Phenol	0.005	0.32

Each incident of emissions in excess of a permitted emission limit is a violation of LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Each incident of emissions of unpermitted pollutants is a violation of LAC 33:III.501.C.2.

UU. The Respondent reported the following unauthorized releases:

Report (date)	Permit No.	EPN	Incident Date	Pollutants released	Amount released above permitted quantity (lbs)	Duration (hours)	Maximum lb/hr permit limits	Reported Cause
1/27/2005	2510-V1	1-90	1/20/2005	SO_2	209	0.3	0.05	Motiva operations switched DEA treatment systems during a turnaround at Sulfur Plant #2. During this transition, an upset at Sulfur Plant #3 DEA system resulted in flaring at the GO-1 Elevated Flare.
7/5/2005 and 3/27/2006	2510-V1	1-90	3/16/2005	SO_2	16,885	8.4	0.05	The differential pressure at the GO-1 DEA treater tower began to increase resulting in untreated dry gas being flared at the GO-1 Elevated Flare
				Hexane	14		0.01	
7/7/2005	2510-V1	1-90	6/23/2005	SO_2	2,007	2	0.05	GO-1 Process Unit flared untreated dry gas.
				Hexane	2		0.01	
8/11/2005	2510-V1	1-90	8/4/2005 – 8/8/2005	SO_2	4,587	6	0.05	The GO-1 Process Unit flared untreated dry gas
				Hexane	4		0.01	
11/3/2005	2510-V1	1-90	10/27/2005	SO_2	1,830	4.23	0.05	The differential pressure at the GO-1 DEA treater tower began to have a series of excursions resulting in untreated dry gas being sent to the fuel gas system and the remainder flared at the GO-1 Elevated Flare
				Hexane	2		0.01	
12/21/2005	2510-V1	5-84	11/15/2005	SO_2	65	3.5	5.79	Vented gases from Motiva's Alkylation unit bypassed the Vent Tower Vessel and were routed to the Respondent's West Operations Elevated Flare.

Report (date)	Permit No.	EPN	Incident Date	Pollutants released	Amount released above permitted quantity (lbs)	Duration (hours)	Maximum lb/hr permit limits	Reported Cause
12/15/2005	2510-V1	1-90	11/18/2005 – 11/19/2005	SO_2	59	6.5	0.05	Improper turning of an electronic controller closed the hydrogen supply valve which caused hydrogen loss to the acetylene (AC) converters that resulted in flaring.
				Benzene	7	6.5	0.01	
12/20/2005	2510-V1	1-90	12/13/2005	SO_2	1	4.8	0.05	GO-1 Process Unit experienced a large recycle ethane flow which resulted in cold temperatures at the core exchangers. The process controls reacted to the change in process temperatures leading to a unit process upset resulting in a release from a pressure relief device and flaring
2/16/2006	2510-V1	1-90	2/1/2006	SO_2	2,516	10	0.05	GO-1 DEA treater tower began to have a differential pressure excursion resulting in untreated dry gas being flared
				Hexane	4		0.01	
2/17/2006 and 3/29/2007	2510-V1	1-90	2/12/2006	SO_2	1,586	2	0.05	GO-1 DEA treater tower had two (2) differential pressure excursions resulting in untreated dry gas being flared at the GO-1 Elevated Flare.
				Hexane	3		0.01	
3/9/2006	n/a	Relief Valve	3/2/2006	HRVOCs (ethylene and propylene)	319 (316 ethylene and 3 propylene)	3 seconds	n/a	A control valve in the GO-1 Process Unit malfunctioned causing the de-ethanizer column to overpressure and a relief valve released hydrocarbons to the atmosphere
				Ethane/ methane	192		n/a	
3/30/2006	2510-V1	1-90	3/23/2006 – 3/26/2006	SO_2	1,641	2.7	0.05	GO-1 DEA treater tower had a differential pressure excursion resulting in untreated dry gas being flared at the GO-1 Elevated Flare
3/16/2006 and 5/24/2006	2520-V2	6-84	3/9/2006	SO_2	1,253	6.25	0.002	Motiva's Sulfur Plants experienced an unexpected shutdown resulting in flaring of untreated dry gas at the GO-1 Elevated Flare and OL-5 Elevated Flare
	2510-V1	1-90		SO_2	14,607	5.7	0.05	

Report (date)	Permit No.	EPN	Incident Date	Pollutants released	Amount released above permitted quantity (lbs)	Duration (hours)	Maximum lb/hr permit limits	Reported Cause
5/24/2006	2520-V2	6-84	4/17/2006	SO_2	157.6	1	0.002	A failed controller at Motiva's Distillate Hydrotreater resulted in a trip of the vent gas compressor, K-5337, allowing vent gas to be sent to the OL-5 Flare
4/27/2006	2510-V1	1-90	4/23/2006	SO_2	602	1	0.05	GO-1 DEA treater tower began to have a differential pressure excursion resulting in untreated dry gas being flared at the GO-1 Elevated Flare
5/4/2006	2510-V1	1-90	4/27/2006 – 4/28/2006	SO_2	274	1	0.05	GO-1 DEA treater tower began to have a differential pressure excursion which resulted in untreated dry gas being flared at the GO-1 Elevated Flare
5/5/2006	2510-V1	1-90	5/1/2006 – 5/2/2006	SO_2	766	1.3	0.05	GO-1 DEA treater tower began to have a differential pressure excursion which resulted in untreated dry gas being flared at the GO-1 Elevated Flare
5/12/2006	2510-V1	1-90	5/6/2006	SO_2	175	<1	0.05	GO-1 DEA treater tower began to have a differential pressure excursion which resulted in untreated dry gas being flared at the GO-1 Elevated Flare
5/18/2006	2510-V1	1-90	5/14/2006	SO_2	3,665	3.5	0.05	GO-1 DEA treater tower began to have a series of differential pressure excursions resulting in untreated dry gas being flared at the GO-1 Elevated Flare
6/19/2006	2510-V1	1-90	6/12/2006 – 6/13/2006	SO_2	1,860	2.1	0.05	GO-1 DEA treater tower began to have a differential pressure excursion which resulted in untreated dry gas being flared at the GO-1 Elevated Flare
				Hexane	0.2		0.01	
6/1/2006 and 7/27/2006	2510-V1	1-90	5/26/2006	Benzene	92	11.3	0.01	A leak developed during an online abrasive blasting job. In order to relieve pressure on this line, operations reduced rates at the GO-1 Process Unit

Report (date)	Permit No.	EPN	Incident Date	Pollutants released	Amount released above permitted quantity (lbs)	Duration (hours)	Maximum lb/hr permit limits	Reported Cause
6/22/2006	2510-V1	1-90	6/15/2006	SO_2	7,112	4.6	0.05	GO-1 DEA treater tower began to have a differential pressure excursion resulting in untreated dry gas being flared at the GO-1 Elevated Flare
6/27/2006	2510-V1	1-90	6/20/2006	SO_2	7,714	3	0.05	The H_2S concentration in the outlet of the GO-1 DEA treater tower began to increase sharply that resulted in flaring a portion of the untreated dry gas at the GO-1 Elevated Flare
				Hexane	0.13		0.01	
7/11/2006	2510-V1	1-90	6/22/2006 – 6/23/2006	SO_2	39,115	18.2	0.05	GO-1 DEA treater tower began to have a differential pressure excursion and resulted in untreated dry gas being flared at the GO-1 Elevated Flare
				Hexane	0.6		0.01	
7/25/2006 and 6/5/2007	2520-V2	6-84	7/18/2006	SO_2	2.16	4.75	0.002	High vibrations were detected and on 7/18/06 the vibrations increased and the compressor (owned by Motiva) was taken offline.
7/11/2006	2510-V1	1-90	7/4/2006*	CO	361	6.4	152.13	GO-1 Process Unit experienced an unexpected failure of a condensate control loop for the de-ethanizer re-boiler that resulted in flaring at the GO-1 Elevated Flare
				PM	116		48.64	
7/20/2006	2510-V1	1-90	7/15/2006 – 7/17/2006	SO_2	35,177	13	0.05	Untreated dry gas was flared through the GO-1 Elevated Flare (EPN 1-90) to facilitate re-streaming of the GO-1 DEA absorber (PV-1083) as Motiva's RCCU started up
				Hexane	1		0.01	
11/17/2006 and 3/29/2007	2510-V1	5-84	8/23/2006	SO_2	387	18	5.79	Motiva's Sulfur Plant No. 3 shutdown after losing power to the triconex system during a preventative maintenance check resulting in flaring of sulfur dioxide through the West Operations Flare.
11/30/2006	2283-V0	1-72	11/23/2006	SO_2	1.7	1	16.5	Higher than normal hydrogen sulfide concentration in the refinery fuel gas caused the Boiler 7 (EPN 1-72) SO_2 emissions to increase above the limit.

Report (date)	Permit No.	EPN	Incident Date	Pollutants released	Amount released above permitted quantity (lbs)	Duration (hours)	Maximum lb/hr permit limits	Reported Cause
10/18/2006	n/a	n/a	10/3/2006	Ethane	38,850	4	n/a	The furnace (F-126) at the GO-1 Process Unit was lined up to the de-coke pot (F-104) while on ethane feed resulting in ethylene and ethane being sent to the atmosphere
				Ethylene – HRVOC/VOC	72,150		n/a	
10/23/2006	n/a	n/a	10/16/2006	Propylene	127	3	n/a	A small propylene vapor leak was discovered on a level bridle on a column in the GO-1 Process unit
11/3/2006	2510-V1	1-90	10/25/2006 – 10/26/2006	SO_2	115	10	0.05	Off specification dry gas was flared at the GO-1 Elevated Flare
				Hexane	0.2		0.01	
2/15/2007	2510-V1	1-90	12/9/2006 – 12/12/2006	SO_2	17,462	12	0.05	The Utilities unit experienced an unexpected shutdown of boiler #9 which resulted in the rapid shutdown of several units. According to the Respondent, the shutdown led to flaring.
				Hexane	1		0.01	
	2520-V2	6-84		NO_x	3	1	30.8	
				PM	1		5.7	
5/25/2007	3047-V0	5-84	5/20/2007	SO_2	926	1	15.53	North DEA Treater column experienced an unexpected increase in pressure. The dry gas feed to the DEA treater was routed to West Operations Elevated Flare
				Hexane	0.1		0	
8/8/2007	n/a	n/a	8/1/2007	Benzene	354	<1	n/a	During maintenance activities hydrocarbons from the first stage suction drum of the compressor were inadvertently diverted to the dilution steam system. According to the Respondent, the hydrocarbons were routed to the furnaces, and one of the furnaces was in the process of cooling down into the de-coke pot which is routed to the atmosphere
				Total VOCs	676		n/a	

Report (date)	Permit No.	EPN	Incident Date	Pollutants released	Amount released above permitted quantity (lbs)	Duration (hours)	Maximum lb/hr permit limits	Reported Cause
8/22/2007	2520-V2	2005-95	7/30/2007	1,3 Butadiene	4,633	1	0.18	A tube in a condenser ruptured at the BD-5 Process Unit, allowing 1,3 butadiene to enter the cooling water return
3/16/2009	2510-V1	1-90	3/9/2009	SO_2	3,258	2	0.05	DEA treater column experienced an upset resulting in dry gas feed to the DEA treater being routed to the GO-1 Elevated Flare
				Hexane	13.6		0.01	
3/17/2010, 5/5/2010, and 7/8/2010	2520-V2	7-84	3/10/2010	SO_2	477.7	6	0.002	OL-5 Process Unit experienced an upset in the DEA treatment system resulting in flaring.
		6-84		SO_2	250.07		0.002	
3/31/2010, 5/27/2010, and 7/22/2010	2520-V2	6-84	3/28/2010	SO_2	129.15	3	0.002	Motiva's S-2 Sulfur Plant experienced an unexpected shutdown which led to flaring
	3047-V1	5-84		SO_2	1,033.69	1	5.02	
4/8/2010 and 5/27/2010	n/a	n/a	4/2/2010	Benzene	43		n/a	Oil was discovered in the F-482 separator and determined to be originating from a broken line on RV-1972 located inside of the F-501 tank dike area
				VOC	1,196		n/a	

The following incident dates were reported as being preventable: November 18, 2005, July 30, 2007, March 9, 2009, and March 10, 2010. The following incident dates resulted in opacity exceedances: November 18, 2005, December 13, 2005, June 12, 2006, July 4, 2006, and December 9, 2006 (for EPN 1-90). Each incident of an opacity exceedance is a violation of LAC 33:III.1105 and/or 40 CFR 60.18(c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003. Each incident of unpermitted emissions is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Each incident of the Respondent exceeding a permitted emission limit is a violation of LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

VV. In correspondence dated October 18, 2006, the Respondent reported an unauthorized discharge occurred at the facility on beginning October 3, 2006, and ending on October 6, 2006. According to the Respondent, the GO-1 Process Unit experienced a process upset caused by the unexpected shutdown of a propylene refrigerant compressor due to a high-speed trip resulting in flaring of process gases to the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, a

relief valve opened during the process upset venting hydrocarbons to the atmosphere. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table.

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
October 3, 2006						
1-90	24	PM	0.84	48.68	1,190	43
		SO_2	0.01	0.05	1,376	1,375
		benzene	0.01	0.01	229	229
		hexane	0.01	0.01	108	108
Relief Valve	n/a	VOCs	n/a	n/a	235	n/a
October 4, 2006						
1-90	24	SO_2	0.01	0.05	434	433
		benzene	0.01	0.01	189	189
		hexane	0.01	0.01	92	92
October 5, 2006						
1-90	18	benzene	0.01	0.01	35	35
		hexane	0.01	0.01	42	42

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105. The Respondent's correspondence dated October 18, 2006, states the duration of the flare (EPN 1-90) smoking was 50 hours. The unpermitted VOC emissions from the relief valve are a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

WW. In correspondence dated October 25, 2006, the Respondent reported an unauthorized discharge occurred at the facility beginning on October 18, 2006, and ending on October 19, 2006. According to the Respondent, boiler 7 shutdown unexpectantly resulting in several production units having to be shutdown in order to safely stabilize the steam system resulted in flaring at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent, the duration of the incident was 20 hours. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
PM	0.84	48.68	1,395	423
SO_2	0.01	0.05	622	621
1,3 butadiene	3.43	37.20	1,290	605
benzene	0.01	0.01	516	516
hexane	0.01	0.01	330	330

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105.

XX. In correspondence dated February 8, 2007, the Respondent reported an unauthorized discharge occurred at the facility beginning on December 28, 2006, and ending on January 2, 2007. According to the Respondent the GO-1 propylene refrigerant compressor unexpectantly shutdown due to a high vibration alarm resulting in the opening of pressure relief devices and flaring at the GO-1 Elevated Flare (EPN 1-90). According to the Respondent's letter, the following pollutants exceeded permitted emission rates as shown in the following table:

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
December 28, 2006						
1-90	24	PM	0.84	48.68	1,249	101
		SO_2	0.01	0.05	535	534
		1,3 butadiene	3.43	37.20	814	3
		benzene	0.01	0.01	225	225
		hexane	0.01	0.01	80	80
Relief Device	n/a	ethylene	n/a	n/a	22,045	n/a
		propylene	n/a	n/a	1,371	n/a
		VOCs (including HRVOCs)	n/a	n/a	25,044	n/a

EPN	Duration (hours)	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
Relief Device		HRVOCs (including ethylene, propylene, toluene, 1,3 butadiene, butylenes)	n/a	n/a	24,447	n/a
December 29, 2006						
1-90	24	SO_2	0.01	0.05	52	51
		benzene	0.01	0.01	30	30
		hexane	0.01	0.01	0.09	0.09
December 30, 2006						
1-90	24	benzene	0.01	0.01	5	5

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105, and 40 CFR 60.18 (c)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003. The Respondent's correspondence dated February 8, 2007, states the flare (EPN 1-90) was smoking for 24 hours and 45 minutes. Each incident of emissions of each unpermitted pollutant from the relief device is a violation of LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

YY. In a letter dated March 27, 2007, the Respondent reported an unauthorized discharge occurred at the facility on March 20, 2007. According to the Respondent, an operator in the OL-5 Process Unit inadvertently put the process gas compressor into idle mode via a computer set-point resulting in the need to flare. According to the Respondent, the duration of the incident was 2.3 hours for EPN 6-84 and nine (9) hours for EPN 7-84. The following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	CO	2.1	18.1	5,692	5,655
	NO_x	3.6	30.8	1,046	983

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	PM	0.66	5.7	197	185
	Total VOCs	40.0	430.5	3,241	2,343
	1,3 butadiene	0.97	6.2	75	63
	benzene	0.98	0.98	0.1	0.1

According to the Respondent, this release was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

ZZ. In a letter dated June 26, 2007, the Respondent reported an unauthorized discharge occurred at the facility on June 19, 2007. According to the Respondent, the boiler feed water to furnace F-140 was inadvertently shutoff resulting in flaring to the OL-5 Ground Flare (EPN 7-84). The duration of the incident was one (1) hour. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
CO	2.1	18.1	182	166
NO_x	3.6	30.8	33	6
PM	0.66	5.7	6.29	1

According to the Respondent, this release was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

AAA. In a letter dated July 20, 2007, the Respondent reported an unauthorized discharge occurred at the facility on July 13, 2007. According to the Respondent, operations inadvertently closed a furnace outlet valve while the furnace was in service. This resulted in furnace effluent vapors being released to the atmosphere through a small tubing and the de-coke pot to the atmosphere. According to the Respondent's letter, the following pollutants were released:

Pollutant	Amount Released (lbs)
1,3 Butadiene	29
Benzene	30
PAHs	10
Total VOCs	804
HRVOCs	348

According to the Respondent, this release was preventable. Each incident of emissions of each unpermitted pollutant is a violation of LAC 33:III.501.C.2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This is also a violation of LAC 33:III.905.A.

BBB. In a letter dated October 16, 2007, the Respondent reported an unauthorized discharge occurred at the facility beginning on October 9, 2007, and ending on October 10, 2007. According to the Respondent, critical steam tracing was inadvertently closed off resulting in the shutdown of the PGC compressor. The shutdown of the compressor resulted in flaring at the OL-5 Ground (EPN 7-84) and Elevated Flare (EPN 6-84). According to the Respondent's letter, the duration of the incident was 17 hours. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	NO_x	3.6	30.8	938.52	476.1
	PM	0.66	5.7	176.67	91
	1,3 Butadiene	0.97	6.2	132.42	43.5
6-84	NO_x	3.6	30.8	2,537.48	2,075.1
6-84	PM	0.66	5.7	477.65	392
	1,3 Butadiene	0.97	6.2	358.01	269

According to the Respondent, this release was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A. This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105.

CCC. In the Respondent's 2007 Title V Annual Compliance Certification dated March 27, 2008, the Respondent reported the following components monitoring events were missed during the 2007 calendar year:

Emission Point	Source ID	Component	Missed Monitoring Event
3006-95	GO-1	7 DTM valves missed 1 event of monitoring	1 event
3005-95	GHT	1 accessible valve missed 30 events of monitoring	30 events
3006-95	GO-1	2 accessible valves 7 connectors	13 events 2 events
3007-95	OL-5	1 accessible valves 3 DTM valves	24 events 6 events
3001-95	BD-5	1 accessible valve	14 events
3014-95	CUS	2 DTM valves	2 events

Each incident of the Respondent's failure to monitor each component is a violation of Title V Permit Nos. 2520-V2 and/or 3047-V1, LAC 33:III.501.C.4 LAC 33:III.2121, La. R.S. 30:2057(A)(2) and/or 40 CFR 60 Subpart VV, which language has been adopted as a Louisiana regulation in LAC 33:III.3003, 40 CFR 63 Subpart H, which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 63 Subpart UU, which language has been adopted as a Louisiana regulation in LAC 33:III.5122.

DDD. In the Respondent's 2007 Title V Annual Compliance Certification dated March 27, 2008, the Respondent reported the discovery of the following open-ended valves or lines during the 2007 calendar year:

EPN	Source ID	Number of open-ended valves or lines
3001-95	BD-5	25
3005-95	GHT	8
3006-95	GO-1	54
3007-95	OL-5	61
3006-95	OP-1	3
3014-95	CUS	10
5031-01	PA	8

Each incident of an open-ended line or valve is a violation of Title V Permit Nos. 2520-V2 and/or 3047-V0, LAC 33:III.501.C.4, LAC 33:III.2121, La. R.S. 30:2057(A)(2) and/or 40 CFR 63.167(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.5122, 40 CFR 60.482-6(a)(1), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, 40 CFR 63.1033(b), which language has been adopted as a Louisiana regulation in LAC 33:III.5122.

EEE. In correspondence dated March 31, 2008, the Respondent reported permit limit exceedances and emissions of unpermitted pollutants, as listed in the following table during the 2007 calendar year:

Permit No.	EPN	Pollutant	Permit Limit (tpy)	2007 Estimated Emissions (tpy)
2520-V2	1240-95	Cumene	Not permitted	0.005
		Ethylbenzene	0.004	0.006
		Naphthalene	Not permitted	0.0001
		Styrene	Not permitted	0.0001
		Toluene	0.01	0.076
	1243-95	1-Methylnaphthalene	Not permitted	0.0001
		2-Methylnaphthalene	Not permitted	0.0010
		Benzene	0.012	0.1335
		Cumene	Not permitted	0.0005
		Naphthalene	Not permitted	0.0002
		Styrene	Not permitted	0.0001
		Toluene	0.014	0.068
	1244-95	1-Methylnaphthalene	Not permitted	0.0001
		2-Methylnaphthalene	Not permitted	0.0007
		Benzene	0.048	0.089
		Cumene	Not permitted	0.0004
		Naphthalene	Not permitted	0.0001
		Toluene	0.03	0.046
	1252-95	Benzene	0.835	1.052
		Ethylbenzene	Not permitted	0.0037
		Styrene	Not permitted	0.0069
		Toluene	0.003	0.106
		Xylene (mixed isomers)	Not permitted	0.0115
	1033-95	1-Methylnaphthalene	Not permitted	0.0296
		2-Methylnaphthanele	Not permitted	0.0500
		Naphthalene	0.008	0.169
	1055-95	1-Methylnaphthalene	Not permitted	0.0004
		2-Methylnaphthalene	Not permitted	0.0006
		Naphthalene	0.001	0.002
	1063-95	1-Methylnaphthalene	Not permitted	0.0814
		2-Methylnaphthalene	Not permitted	0.1243
		Naphthalene	0.22	0.269
	1065-95	1-Methylnaphthalene	Not permitted	0.0006
		2-Methylnaphthalene	Not permitted	0.0012
	1066-95	1-Methylnaphthalene	Not permitted	0.0033
		2-Methylnaphthalene	Not permitted	0.0059
		Naphthalene	0.000	0.0020
	1084-95	1-Methylnapthalene	Not permitted	0.0001
		2-Methylnaphthalene	Not permitted	0.0002
		Naphthalene	Not permitted	0.0010

Permit No.	EPN	Pollutant	Permit Limit (tpy)	2007 Estimated Emissions (tpy)
2520-V2	1085-95	1-Methylnapthalene	Not permitted	0.0001
		2-Methylnaphthalene	Not permitted	0.0001
		Naphthalene	Not permitted	0.0006
	1093-95	Naphthalene	Not permitted	0.0044
	1240-95	1-Methylnapthalene	Not permitted	0.0001
		2-Methylnaphthalene	Not permitted	0.0011
		Benzene	0.014	0.152
	1-90	Benzene	0.06	1.194
		CO	11.43	30.05
		Ethylbenzene	Not permitted	0.0012
		Methanol	Not permitted	0.0020
		Styrene	Not permitted	0.0018
		SO_2	0.05	1.6183
		Toluene	Not permitted	0.523
		Xylene (mixed isomers)	Not permitted	0.0032
	3006-95	1-Methylnapthalene	Not permitted	0.0312
		2-Methylnaphthalene	Not permitted	0.0441
		Biphenol	Not permitted	0.0020
		Cumene	Not permitted	0.0030
		Diethanolamine	Not permitted	0.4645
		Methanol	1.23	1.617
		MTBE	Not permitted	0.0003
	3007-95	1-Methylnapthalene	Not permitted	0.6906
		2-Methylnaphthalene	Not permitted	0.9810
		Cumene	Not permitted	0.0013
		Diethanolamine	Not permitted	2.0374
		MTBE	Not permitted	0.0002
		Styrene	Not permitted	0.0222
	7-84	Acetonitrile	0.000	0.338
		CO	9.29	108.91
		Methanol	0.000	0.0040
		NO_x	15.79	20.02
		Phenol	0.000	0.003
		PM_{10}	2.90	3.77
		SO_2	0.01	38.52
3047-V1	3014-95	1-Methylnapthalene	0.006	0.018
		2-Methylnaphthalene	0.007	0.025
		Benzene	0.248	1.447
		Naphthalene	0.087	0.159

Permit No.	EPN	Pollutant	Permit Limit (tpy)	2007 Estimated Emissions (tpy)
3047-V1		Phenol	0.005	0.315
		Styrene	0.059	0.076
		Toluene	0.248	0.531
	3-84	Total VOCs	73.14	251.88

Each incident of emissions in excess of a permitted emission limit is a violation of Title V Permit Nos. 2520-V2 and/or 3047-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Each incident of emissions of unpermitted pollutants is a violation of LAC 33:III.501.C.2.

FFF. In a letter dated April 2, 2008, the Respondent reported an unauthorized discharge occurred at the facility on March 28, 2008. According to the Respondent, three (3) kickback valves on the process gas compressor in the OL-5 Process Unit opened causing high pressure in the 1st stage suction drum of the compressor. The pressure caused a valve to open to safely lower the drum pressure and resulted in flaring at the OL-5 Elevated Flare (EPN 6-84) and Ground Flare (EPN 7-84). According to the Respondent's letter, the duration of the incident was one (1) hour. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	CO	2.1	18.1	2,262	2,246
	NO_x	3.6	30.8	416	389
	PM	0.66	5.7	78	73
	1,3 Butadiene	0.97	6.2	22	17
	Benzene	0.98	0.98	21	21
	Ethylbenzene	0.01	0.01	1.94	1.94
	Toluene	0.38	0.38	16	16
	Xylene	0.18	0.18	7.76	7.76
6-84	CO	2.1	18.1	1,778	1,762
	NO_x	3.6	30.8	326	299
	PM	0.66	5.7	61	56
	1,3 Butadiene	0.97	6.2	18	12
	Benzene	0.98	0.98	16.8	16.8
	Ethylbezene	0.01	0.01	1.52	1.52
	Toluene	0.38	0.38	12.7	12.7
	Xylene	0.18	0.18	6.1	6.1

According to the Respondent, this release was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

GGG. In a letter dated December 2, 2008, the Respondent provided written follow-up to a verbal notification made on December 1, 2008, regarding a release at the facility which began on November 24, 2008, and ended on November 26, 2008. According to the Respondent, in the OL-5 Treater area it was discovered that two (2) flanges were leaking on November 26, 2008. The following emissions were associated with this incident:

Pollutant	Amount Released (lbs)	Date
1,3 Butadiene	41	11/24/2008
	41	11/25/2008
HRVOCs – Ethylene and Propylene	378	11/24/2008
	378	11/25/2008

Each incident of emissions of each unpermitted pollutant is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

HHH. In a letter dated December 2, 2008, the Respondent provided written follow-up to a verbal notification made on December 1, 2008, regarding a release at the facility. On November 26, 2008, it was discovered that two (2) flanges were leaking resulting in pollutants being released above the reportable quantity. The Respondent failed to verbally notify within 24 hours as required by LAC 33:I.3917.A. This is a violation of LAC 33:III.927.A, LAC 33:I.3917.A, and La. R.S. 30:2057(A)(2).

III. In letters dated December 18, 2008, and September 3, 2009, the Respondent reported an unauthorized discharge occurred at the facility beginning on December 11, 2008, and ending on December 12, 2008. According to the Respondent, the OL-5 Process Unit experienced a process upset that led to the production of off-specification ethylene venting to the flare system. Vents to the OL-5 flare system go to the ground flare until the ground flare reaches the capacity then automatically routed to the elevated flare. According to the Respondent, it was discovered that the OL-5 Elevated Flare (EPN 6-84) received vents from this incident without the presence of a pilot. According to the Respondent's letter, the duration of the release was two (2) hours and the following pollutants exceeded the permitted emission rates, as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	VOCs	40.0	430.5	232,103	231,322
7-84	CO	2.1	18.1	703	671
	NO_x	3.6	30.8	129	75
	PM	0.66	5.7	24	14

According to the Respondent, this incident was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). The Respondent's failure to operate the flare with a flame present during this incident is a violation of 40 CFR 60.18(c)(2), which language has been adopted as a Louisiana regulation in LAC 33:III.3003, Title V Permit No. 2520-V2, LAC 33:III.501.C.4, LAC 33:III.905, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

JJJ. In letters dated February 12, 2009, and September 4, 2009, the Respondent reported an unauthorized discharge occurred at the facility beginning on February 6, 2009, and ending on February 13, 2009. Emissions during this incident were associated with a GO-1 relief valve and the GO-1 Elevated Flare (EPN 1-90). According to the Respondent's letter, the following pollutants exceeded permitted emission rates as shown in the following table:

EPN	Date/Duration	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
1-90	2/6/09-2/7/09 (24 hrs)	CO	2.61	152.13	11,442	7,853
		SO_2	0.01	0.05	1,379	1,378
		Benzene	0.01	0.01	385	385
		Hexane	0.01	0.01	97	97
	2/7/09-2/8/09 (24 hours)	CO	2.61	152.13	10,531	6,942
		SO_2	0.01	0.05	685	684
		Benzene	0.01	0.01	324	324
		Hexane	0.01	0.01	88	88
	2/8/09-2/9/09 (24 hours)	CO	2.61	152.13	15,541	11,952
		1,3 Butadiene	3.43	37.2	997	186
		Benzene	0.01	0.01	201	201
		Hexane	0.01	0.01	143	143
	2/9/09-2/10/09 (24 hours)	CO	2.61	152.13	3,650	61

EPN	Date/Duration	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
1-90	2/10/09-2/11/09 (24 hours)	CO	2.61	152.13	9,102	5,514
		SO_2	0.01	0.05	6	5
		Benzene	0.01	0.01	14	14
		Hexane	0.01	0.01	36	36
	2/11/09-2/12/09 (24 hours)	CO	2.61	152.13	7,697	4,856
		Benzene	0.01	0.01	22	22
		Hexane	0.01	0.01	110	110
GO-1 Relief Valve	2/6/09	Benzene	n/a	n/a	7,055	n/a
		1,3 Butadiene	n/a	n/a	4,109	n/a
		VOCs	n/a	n/a	76,098	n/a
		HRVOCs (ethylene and propylene)	n/a	n/a	45,334	n/a
		Toluene	n/a	n/a	4,362	n/a
		Hexane	n/a	n/a	1,680	n/a

According to the Respondent, this release was preventable. Each incident of emissions of unpermitted pollutants from the GO-1 relief valve is a violation of LAC 33:III.501.C.2. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2510-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A. This incident resulted in an opacity exceedance at the flare (EPN 1-90) in violation of LAC 33:III.1105. The Respondent's correspondence dated September 4, 2009, states the flare (EPN 1-90) was smoking for 139 hours.

KKK. In a letter dated May 6, 2009, the Respondent reported an unauthorized discharge occurred at the facility on October 21, 2008. According to the Respondent, a short occurred during troubleshooting of the Triconex system which resulted in the shutting down of the AC Converter resulting in flaring to the OL-5 Elevated (EPN 6-84) and Ground (EPN 7-84) Flares. According to the Respondent's letter, the duration of the release was nine (9) hours and the following pollutants exceeded the permitted emission rates as shown below:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	CO	2.1	18.1	2,198	2,054
	NO_x	3.6	30.8	404	159
	PM	0.66	5.7	76	31
	1,3 Butadiene	0.97	6.2	63	16
6-84	CO	2.1	18.1	13,502	13,358
	NO_x	3.6	30.8	2,481	2,237
	PM	0.66	5.7	467	422
	VOCs	40.0	430.5	7,880	4,366
	1,3 Butadiene	0.97	6.2	388	341

According to the Respondent, this release was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A. This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105.

LLL. In a letter dated December 10, 2009, the Respondent reported an unauthorized discharge at the facility beginning on October 6, 2009, and ending on October 7, 2009. According to the Respondent, the OL-5 Process Unit had an unexpected shutdown of three (3) of their major compressors due to a loss of over speed indication. Without over speed indication the Triconex system is programmed to shutdown the compressors. The shutdown of the compressors led to flaring at the OL-5 Ground Flare (EPN 7-84) and OL-5 Elevated Flare (EPN 6-84). According to the Respondent's letter, the duration of the incident was 17 hours. According to the Respondent's letter, the following pollutants exceeded the permitted emission rates as shown in the following table:

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
7-84	CO	2.1	18.1	279	7
	NO_x	3.6	30.8	474	11
	PM	0.66	5.7	89	3
	SO_2	0.002	0.002	19	19
	Benzene	0.98	0.98	32.22	32.22
	Ethylbenzene	0.01	0.01	1.13	1.13
	Toluene	0.38	0.38	12.75	12.75
	Xylene	0.18	0.18	4.56	4.56

EPN	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
6-84	CO	2.1	18.1	2,508	2,236
	NO_x	3.6	30.8	4,263	3,800
	PM	0.66	5.7	802	717
	SO_2	0.002	0.002	167	167
	VOCs	40.0	430.5	11,047	4,408
	1,3 Butadiene	0.97	6.2	544	455
	Benzene	0.98	0.98	290	290
	Ethylbenzene	0.01	0.01	10.14	10.14
	Toluene	0.38	0.38	114.8	114.8
	Xylene	0.18	0.18	41.01	41.01

According to the Respondent, this release was preventable. Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A. This incident resulted in an opacity exceedance at the flare (EPN 6-84) in violation of LAC 33:III.1105.

MMM. In correspondence dated December 14, 2009, the Respondent reported an unauthorized discharge occurred at the facility on October 11, 2009. According to the Respondent, a release of hydrocarbons from a furnace decoke pot occurred due to an incorrect alignment of the F-131 process furnace to the decoke pot while the furnace was on feed. According to the Respondent, the duration of the incident was nine (9) minutes and the following pollutants were released.

Pollutant	Amount Released (lbs)
1,3 Butadiene	107
Benzene	145
HRVOCs	3,027

According to the Respondent, this release was preventable. Each incident of emissions of each unpermitted pollutant is a violation of LAC 33:III.501.C.2 and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). This release is also a violation of LAC 33:III.905.A.

OOO. In correspondence dated October 6, 2010, and December 2, 2010, the Respondent reported an unauthorized discharge occurred at the facility beginning on September 22, 2010, and ending on October 2, 2010. According to the Respondent, Motiva operators at the Diesel Hydrotreator (DHT) discovered the split range pressure controller, PC-2115, was opening to the Shell Chemical OL-5 Elevated Flare (EPN 6-84) in order to control the pressure of the DHT stripper overhead. According to the Respondent's letter, the following pollutants

associated with EPN 6-84 exceeded the permitted emission rates as shown in the following table:

Date/Duration	Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
9/22/10 (15 hours)	SO_2	0.002	0.002	2,017.29	2,017.29
9/23/10 (24 hours)	SO_2	0.002	0.002	3,439.89	3,439.89
9/24/10 (24 hours)	SO_2	0.002	0.002	3,365.36	3,365.36
9/25/10 (24 hours)	SO_2	0.002	0.002	3,357.41	3,357.41
9/26/10 (24 hours)	SO_2	0.002	0.002	3,435.43	3,435.43
9/27/10 (24 hours)	SO_2	0.002	0.002	3,441.05	3,441.05
9/28/10 (24 hours)	SO_2	0.002	0.002	3,486.09	3,486.08
9/29/10 (24 hours)	SO_2	0.002	0.002	3,474.30	3,474.30
9/30/10 (24 hours)	SO_2	0.002	0.002	3,199.12	3,199.12
10/1/10 (24 hours)	SO_2	0.002	0.002	3,156.54	3,156.54
10/2/10 (15.6 hours)	SO_2	0.002	0.002	2,141.96	2,141.96

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 2520-V2, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

PPP. In correspondence dated October 14, 2010, and December 8, 2010, the Respondent reported an unauthorized discharge occurred at the facility beginning on October 9, 2010, and ending on October 10, 2010. According to the Respondent, the flare knock out drum, PV-191, filled with crude butadiene resulting in flaring at the West Ops Elevated Flare (EPN 5-84). PV-191 filled as a result of the crude butadiene import drum, PV-2170, overfilling while importing crude butadiene at the facility's wharf which is owned and operated by Motiva Enterprises LLC. According to the Respondent's letter, the following pollutants associated with EPN 5-84 exceeded the permitted emission rates as shown in the following table:

Pollutant	Permit Limit Average (lb/hr)	Permit Limit Maximum (lb/hr)	Total Quantity Released by Event (lbs)	Amount Released Above Permitted Quantity (lbs)
NO_x	3.08	139.36	373.44	14.57
PM	0.58	26.23	70.30	2.75
1,3 Butadiene	0.48	85.45	593.55	369.79

Each incident of exceeding each permitted emission limit is a violation of Title V Permit No. 3047-V1, LAC 33:III.501.C.4, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

The issues listed below are not the subject matter of an enforcement action issued by the Department, but are included as part of this Settlement:

East Site (AI No. 26336)

A. Air Quality

1. Reports.

a. Deviations reported in the 2007 1st Semiannual Monitoring Report for Permits Nos. 2283-V1, 2510-V1, 2520-V2, 2840-V0, and 3047-V1.

b. Deviations reported in the 2007 2nd Semiannual Monitoring Report and 2007 Annual Compliance Certification for Permit Nos. 2283-V1, 2510-V1, 2520-V2, 2840-V0, and 3047-V1.

c. Deviations reported in the 2008 1st Semiannual Monitoring Report for Permit Nos. 2283-V1, 2510-V1, 2520-V2, 2840-V0, and 3047-V1.

d. Deviations reported in the 2008 2nd Semiannual Monitoring Report and 2008 Annual Compliance Certification for Permit Nos. 2283-V1, 2510-V1, 2520-V2, 2840-V0, and 3047-V1.

e. Deviations reported in the 2009 1st Semiannual Monitoring Report for Permit Nos. 2283-V2, 2510-V1, 2520-V2, 2840-V0, and 3047-V1.

f. Deviations reported in the 2009 2nd Semiannual Monitoring Report and 2009 Annual Compliance Certification for Permit Nos. 2283-V1, 2283-V2, 2510-V1, 2520-V2, 2840-V0, 3047-V1, and 3078-V0.

g. Deviations reported in the 2010 1st Semiannual Monitoring Report for Permit Nos. 2283-V2, 2510-V1, 2520-V2, 2840-V0, 3047-V1, and 3078-V0.

h. Deviations reported in the 2010 2nd Semiannual Monitoring Report and 2010 Annual Compliance Certification for Permit Nos. 2520-V2, 2520-V3, 2283-V2, 2510-V1, 3047-V1, and 3078-V0.

i. Deviations reported in the 2011 1st Semiannual Monitoring Report for Permit Nos. 2283-V3, 2510-V1, 2520-V3, 3047-V1, and 3078-V0.

j. Deviations reported in the 2011 2nd Semiannual Monitoring Report and 2011 Annual Compliance Certification for Permit Nos. 2283-V3, 2510-V1, 2520-V3, 3047-V1, 3047-V2, and 3078-V0.

k. Deviations reported in the 2012 1st Semiannual Monitoring Report for Permit Nos. 2283-V3, 2520-V3, 3047-V2, and 3078-V0.

l. Deviations reported in the 2012 2nd Semiannual Monitoring Report and 2012 Annual Compliance Certification for Permit Nos. 2283-V3, 2520-V3, 3047-V2, and 3078-V0.

m. General Condition XI Notification letter dated September 24, 2012.

n. General Condition XI Notification letter dated March 31, 2010.

2. Releases

a. In correspondence dated March 19, 2008, Respondent reported on March 12, 2008, a leak on the propylene refrigerant system in the OL-5 Process Unit developed as a result of localized corrosion on a nipple. This resulted in propylene being released to the atmosphere.

b. In a follow-up notification report dated November 20, 2009, Respondent reported on September 27, 2009, OL-5 operator discovered a small leak on a twenty-four inch flange on the outlet of the mercury absorber in the OL-5 Process Unit.

c. In a follow-up notification report dated March 3, 2010, Respondent reported on February 24, 2010, a pinhole leak was discovered in the OP-1 Process Unit on the discharge piping of the process gas compressor.

d. In a follow-up report notification dated May 27, 2010, Respondent reported on April 2, 2010, oil was discovered in the F-482 separator and determined to be originating from a broken line on RV-1972 located inside of the F-501 tank dike area.

e. In a follow-up notification report dated August 11, 2010, Respondent reported on July 30, 2010, GO-1 process operators discovered a crack in the weld on a relief valve discharge line at its junction with the GO-1 flare header. A nitrogen purge was introduced into the piping to minimize the amount of hydrocarbon released.

f. In a follow-up notification report dated October 13, 2011, Respondent reported on September 17, 2011 contractors in Shell Chemical's OL-5 Process Unit were attempting to re-seal a leaking temporary enclosure on a flange located on the discharge piping of a process pump. In the process of making the attempt, the leak rate increased.

g. In a follow-up notification report dated October 12, 2011, Respondent reported on October 5, 2011, OL-5 Process Unit operators suspected that a relief valve was leaking. Operations began investigating the relief valve and found that one of the pilots on the valve was leaking to the atmosphere.

h. In a follow-up notification report dated February 29, 2012, Respondent reported while making an inspection round on January 12, 2012, OL-5 operators found that a relief valve was leaking from the vent connection.

i. In a follow-up release report dated July 3, 2012, Respondent reported on May 9, 2012, the OL-5 Process Unit experienced a small fire during restart of a furnace. After feed to the furnace was established as part of the furnace startup, a gasket on the 42" feed line failed. Hydrocarbon vapors from the leaking gasket were ignited.

j. In a follow-up release report dated September 17, 2012, Respondent reported on July 19, 2012, in the GHT Process Unit a pressure relief device opened up releasing hydrocarbons to the atmosphere.

3. Other Issues

a. Respondent's verbal notification for an incident occurring on December 18, 2012, was late.

West Site (AI No. 4384)

A. Air Quality

a. The biosolids incinerator has not been operational for more than 8000 hours during the year following the initial performance test which was conducted in May 2006. Mechanical problems and equipment failure was the cause for the delay (e.g. the feed conveyor belt and ash handling system were not fully functional). In spite of the efforts of the Respondent's personnel and the equipment vendor, the unit was not fully operational by the required annual test date of May 31, 2007.

b. From January 1, 2008, through March 31, 2008, one open-ended valve or line was found.

c. Due to an oversight, the Benzene Waste Operations NESHAP quarterly report was not submitted by the 60th day following the end of the 2nd quarter 2008; however, all required inspections and monitoring were completed.

d. Per §61.357(d)(7)(iii) quarterly reporting is required for each period in which the flow weighted annual average concentration of benzene entering the wastewater treatment system is equal to or greater than 10 ppmw. During the second quarter of 2009, the flow weighted annual average benzene concentration entering the Norco - West Site biotreater was 10.025 ppm. This is due to a single sample with an elevated benzene concentration collected during the May 2009 sampling event.

e. From July 1, 2010, through December 31, 2010, 1 pump P-6006C missed 15 day repair date of 7/6/2010.

B. Water Quality

a. On January 1, 2011, Respondent did cause or allow the unauthorized discharge of a pollutant from a location not authorized in LPDES permit LA0005762. Specifically, a spill of approximately 5 gallons of a resin material from an R Unit sump overflowed during a heavy rainfall event to a nearby storm water ditch. The R Unit sump, which is owned by Momentive Specialty Chemicals Inc. located on the West Site, is normally routed to the Shell Chemical wastewater treatment facility. T Unit operations noticed the yellow sheen on the water surface at the discharge point of Outfall 005 to the offsite ditch system

b. Respondent did cause or allow the unauthorized discharge of inadequately treated wastewater. Specifically, on February 6, 2011, an elevated sulfide was recorded. at outfall 001 which discharge into the Mississippi River. Specifically, the outfall 001 sample for that day revealed a sulfide loading of 22.0 lbs/day which is above the permitted Daily Maximum of 21.0 lbs/day.

III

In response to the Consolidated Compliance Order & Notice of Potential Penalty, Respondent made a timely request for a hearing.

IV

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

V

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of NINETY EIGHT THOUSAND THREE HUNDRED SIXTY AND NO/100 DOLLARS ($98,360.00) of which Seventeen Thousand Five Hundred Ninety-Nine and 74/100 Dollars ($17,599.74) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement.

VI

Respondent, in addition to the penalty amount specified in Paragraph V above and as part of this Settlement, agrees to expend the amount of $347,400.00 to implement and/or perform the following beneficial environmental projects:

A. Respondent will perform upgrades to their existing ambient air monitoring network in Norco, St. Charles Parish, Louisiana. The meteorological, methane/non-methane, and particulate matter data will be posted online for the public to access freely. Respondent and/or its ambient air monitoring contractor will develop and provide a stand-alone website dedicated to storing and providing viewing capabilities of the monitoring data. Free access to the website and/or data will be made available to the public and the Department shall be able to provide a link and other relevant information on their website. The estimated cost of this project is at least $300,000.00 for the equipment and associated installation labor. The sites will be upgraded as follows:

1. The American Legion site upgrade will include a new Thermo Scientific Model 55i direct methane and non-methane hydrocarbon analyzer linked to the exiting Summa canister collection equipment, a new Thermo Scientific particulate matter sampler utilizing tapered element oscillating microbalance (TEOM) technology, addition of a precipitation gauge with data historian, and upgrades to data acquisition systems and communications hardware/software to facilitate transfer to a server in order to allow data posting for the public to access freely.

2. The Bethune Park monitoring location will be upgraded to install a new shelter (a climate controlled building), add a Thermo Scientific Model 55i direct methane and non-methane hydrocarbon analyzer along with Summa canister collection

equipment, add a Thermo Scientific particulate matter sampler utilizing tapered oscillating microbalance (TEOM) technology, and upgrades to data acquisition systems and communications hardware/software to facilitate transfer to a server in order to allow data posting for the public to access freely.

3. The current Airline Highway site will be upgraded with the installation of a new shelter building, a new Thermo Scientific Model 55i direct methane and non-methane hydrocarbon analyzer with Summa canister collect, and upgrades to data acquisition systems and communications hardware/software to facilitate transfer to a server in order to allow data posting for the public to access freely.

B. Respondent shall submit monthly progress reports to the Administrator of the Enforcement Division regarding its progress on the project. The first shall be due on the 5th of the month following the effective date of this settlement. Monthly reports shall be submitted on the 5th of every month thereafter until the project is completed. Each monthly report shall include a description of the project, tasks completed, tasks remaining, and money expended through the date of the report. Upon completion of this project Respondent shall submit a final report which includes a summary of all information previously submitted and a total amount spent. It shall also contain a certification that the project was completed.

C. If Respondent does not spend the amount of $300,000.00, then it shall, in its final report propose additional projects for the Department's approval or pay to the Department, an amount equal to the difference between the amount of money agree to be spent and the amount of money actually spent.

D. Respondent shall operate the monitoring sites and data posting until such a time that the Department and Respondent agree the data is no longer needed.

E. Respondent will donate a total of $47,400.00 to the Wetlands Watchers. $3,500 will be used to purchase a cargo outreach material trailer. This trailer would play an important role in transporting equipment, materials and larger animals to outreach opportunities. $8,000 will be used to purchase educational interpretive signage/kiosks. This amount includes the design, printing and installation of trail signs, 2 large sheltered information kiosks, 3 groups of sign panels that will be mounted in the marsh overlook and 2 interactive learning pad locations. $17,900 will be used for landscaping with indigenous plantings. This is for educational and aesthetic reasons, as well as extending the habitat for many animals in the area. $18,000 will be used for the construction of a 10 foot marsh overlook pier. Respondent shall submit a report to the Administrator of the Enforcement Division within thirty (30) days after the act of donation or in the first monthly report after the donation is made. If Respondent does not spend the amount of $47,400.00, then it shall, in its report propose additional projects for the Department's approval or pay to the Department, an amount equal to the difference between the amount of money agreed to be spent and the amount of money actually spent.

VII

Respondent further agrees that the Department may consider the inspection report(s), the and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent and in any such action Respondent shall be estopped from objecting to the above-referenced documents being

considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VIII

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

IX

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act and the rules relating to beneficial environmental projects set forth in LAC 33:I.Chapter 25.

X

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in St Charles Parish, Louisiana. The advertisement, in form, wording, and size approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

XI

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XII

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XIII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

SHELL CHEMICAL LP

BY: _____
(Signature)

BRETT D WOLTJEN
ATTORNEY IN FACT
(Printed)

TITLE: ATTORNEY IN FACT

THUS DONE AND SIGNED in duplicate original before me this 29th day of February, 20 16, at Baton Rouge, Louisiana.

_____
NOTARY PUBLIC (ID # 31719 LA Bar)

Rachelle Champagne Fahey, Notary Public
(stamped or printed)
Lifetime Commission

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Chuck Carr Brown, Ph.D., Secretary

BY: _____
Lourdes Iturralde, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 18th day of March, 20 16, at Baton Rouge, Louisiana.

_____
NOTARY PUBLIC (ID # 19181)

Perry Theriot
(stamped or printed)

Approved: _____
, Assistant Secretary