	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max lbs/br)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS										
					SO <sub>2</sub>	1.51	591.0	caused a relief valve to open to the flare system. This											
					со	9.90	6.8	incident lasted for 20 minutes. This report states that this											
					PM₁o	0.90	0.6	Incident is being investigated. (*Provide results of the investigation/ root cause.)											
			Thermal Oxidizer Unit	1/14-	\$O <sub>2</sub>	56.86	385.27	Hydrocarbons carryover from											
			45 (EQT 0174)	15/12	Opadty	<=20	(*need more Information)	the Unit 19 Sour Water Stripper caused											
			Thermal Oxidizer Unit 220 (EQT 0204)	1/14- 15/12	\$O <sub>1</sub>	61.67	0.6**	Unit 220 and Unit 45 to trip. As a result, a SO <sub>2</sub> plume was											
													Thermal Oxidizer Unit 234 (EQT 0205)	1/14- 15/12	501	61.67	63.93	refeased from the Unit 45 Thermal Oxidizer.	e J
			Unit 19 Sour Water Feed	1/15/12	voc	(*Additional information required)	198.7	Hydrocarbons from the ammonia acid											
			Tank (*need EQT)	1/15/12	H <sub>2</sub> S	(*Additional information required)	3.97	gas header were streamed out to flare.											
	Unauthorized				NOx	155.87	0.2**	Units were shutdown.											
	Discharge	2580-00013-			00	141.36	1.08**	Approximately											
KKK.	Notification for 136541	V4		-	SO <sub>2</sub>	3.78	165.83	4 hours after	LAC 33:111.501.C.4										
	{1/20/12 &	3039-V10	South Flare	1/15/12	VOC PM <sub>10</sub>	601.19 11.91	1.85** 0.02**	Unit 220 startup the											
	1/23/12)		EQT 0160 from Unit 19	9:00 AM- 9:30AM	PM <sub>2.5</sub>	Not permitted	0.02	following day, a similar incident											
					H₂S	0.02	1.8	took place.											
					NH <sub>3</sub>	Not permitted	0.81	Hydrocarbon carryover from											
					NOx	155.87	0.2**	the Unit 19 sour water stripper											
					Φ.	141.36	1.08**	caused Unit											
					SO <sub>2</sub>	3.78	165.83	220, 234, and											
			South Flare EQT 0160	1/14/12	VOC PM <sub>10</sub>	601.19	1.86** 0.02**	Unit 45 Thermal Oxidizers to											
			From Unit 233	6:56AM- 2:14 PM	PM <sub>2.3</sub>	Not Permitted	0.02	trip. The Thermal											
				- h	H <sub>2</sub> S	0.02	1.8	Oxidizer											
					NH <sub>3</sub>	Not Permitted	0.81	released a plume of SO <sub>2</sub> to the											
			South Flare EQT 0160	9:15AM N	x	155.87	87.39**	atmosphere.  During this											
			From Unit 10	1/15/12- 9:35 AM	со	141.36	475.48	Incident, the flare valve on											

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INGIDENT DATE	POLLUTANTS RELEASED	PERMIT LIMIT (max/bs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
				on 1/16/12	SO <sub>2</sub>	3.78	47.72	the fuel gas absorber	
Martin Control					VOC HRVOC	601.19	1,226.0 0.47	knockout drum opened to flare to relieve	v
					PM <sub>10</sub>	11.91	9.57**	pressure on the drum.	
					PM <sub>2.5</sub>	Not Permitted	9.57	Hydrocarbon from the carryover was also sent to the sour water storage tank which resulted in the tank venting to atmosphere. The flare valve from the fuel gas absorber knockout drum was closed at approximately 9:30 on January 16, 2012. This incident lasted roughly 55 hours. This report also states that the opacity limit was exceeded.	
LUL.	Unauthorized Okscharge Notification for T136618 (1/25/12)	3039-V10	Tube on Coker Distillate Product Fin Fans (205- 1351) In Unit 205	1/20/12	Sour Distillate	Not permitted	12.1 barrels	Approximately 12.1 barrets of Sour Distillate was released (0.12 barrets release to the ground and 11.98 barrets on the concrete slab of the unit and processed in the on-site Waste Water Treatment Plant) due to a tube with an eighty inch circumferential crack that propagated halfway around one tube in the Distillate Product Fin Fan, 205-1351. (*Provide results of the investigation/ root cause)	£AC 33:III.905

	REPORT (date)	PERMIT RUMBER	emission Point	INCIDENT DATE	POLLUTANTS RELEASED	PERMIT UMIT (max lbs/hr)	QUANTITY REPORTED (lbs)	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS
		tharge   Reation   3039-V10   S			Flammable gas		2,877	A fin fan tube was found to have	
MMM.	Unauthorized Discharge Notification		Tube on Hot Sep Fin Fans in	1/31/12	H₂S	Not permitted	82.79 0. ho	approximately a 0.071 inch pin hole leak in the	
IVITATIVA	MMM. Notification for 136885 (2/6/12)		Unit 215		Compressed Flammable Gas		2,877.14	hot separator overhead fin fan. (*Provide results of the investigation/ root cause.)	LAC 33:(III.905
NNN.	Unauthorized Discharge Notification for 2/27/12 Incident (2/9/12)	2580-00013- V4	FCC Regen. Vent EQT 0165	1/27/12	Hydrogen cyanide	Not permitted	149.8 lb/dəy	Respondent reported that a stack test was conducted December 2011 in response to learning of the possibility of the existence of hydrogen cyanide from a stack test performed at its Robinson, IL refinery.  Robinson performed the stack test per the ICR issued by the US EPA in March 2011.	LAC 33:III.501.C2

<sup>\*\*</sup>Amount of pollutant emitted was not above permit limit, and therefore, it is not a violation of the applicable permit. It is only for informational purposes.

Each unauthorized release of emissions is a violation of any applicable permit and associated requirement(s) listed above, La. R.S. 30:2057(A)(1) and 30:2057(A)(2), and LAC 33:III.501.C.4 or LAC 33:III.905.

VI.

The Respondent reported the following deviations from permitted operating parameters:

	REPORT (date)	PERMIT NUMBER	EMISSION TMIO9	INCIDENT DATE	OPERATING PARAMETER	POLLUTANTS INVOLVED	REPORTED CAUSE	REGULATORY  OF PERMIT  REQUIREMENTS
A.	First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V3	North Flare EQT 0162	1/3/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10	H₂S	The amount of H <sub>2</sub> S content was <0.1%. The duration of the incident was 172 minutes.	40 CFR 60.104(a)(1)

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INGIDENT DATE	OPERATING PARAMETER gr/dscf).	POLLUTANTS INVOLVED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
В.	First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V3	North Flare EQT 0162	1/16/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	H <sub>2</sub> S	The amount of H <sub>2</sub> S content was <0.1%. The duration of the incident was 1 minute.	40 CFR 60.104(a)(1)
C.	First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V3	North Flare EQT 0162	Began on 1/24/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	нұѕ	The amount of H <sub>2</sub> S content was unknown. The duration of the incident was 2085 minutes.	40 CFR 60.104(a)(1)
D.	First Quarter 2007 NSPS Subpart J Report (4/30/07)	(*Nat Reported)	Unit 43 Fuel Gas Mix Drum	2/14/07	3 hr rolling average of 160 ppm of H <sub>3</sub> S	H\$S	The new Distillate Hydroteating Unit's (NDHT) recycle gas compressors shutdown. The range was 253-258 ppm. The duration of the incident was 120 minutes.	40 CFR 60 Subpart J
E.	First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V4A	North Flare EQT 0162	3/24/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	нұ	The amount of H <sub>2</sub> S content was unknown. The duration of the incident was 30 minutes.	40 CFR 60.104(a)(1)
F.	Second Quarter 2007 NSPS Subpart J Report (7/30/07)	2893-V4A	South Flare EQT 0160	4/27/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	нұѕ	10-1802 Crude Overhead compressor relief valve intermittently relleving. The amount of H <sub>2</sub> S content was 2.72%. The duration of the incident was 14 minutes.	40 CFR 60.104(2)(1)
G.	Second Quarter 2007 NSPS Subpart J Report (7/30/07)	2893-V4A	North Flare EQT 0162	6/20/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	H <sub>2</sub> S	Maintenance was being performed on the shutdown solenoid on the FCCU's upper spent slide valve. While trying to make tie-ins to the Triconex System in the Satellite Building a fuse was	40 CFR 60.104(a)(1)

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	OPERATING PARAMETER	POLLUTANTS INVOLVED	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS
							blown causing the FCCU to shutdown. The amount of H <sub>2</sub> S content was 165 ppm. The duration of the incident was 24 minutes.	
н.	Second Quarter 2007 NSPS Subpart J Report (7/30/07)	2893-V4A	North Flare EQT 0162	6/20/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	H₄S	The amount of H <sub>2</sub> S content was unknown. The duration of the incident was 3 minutes.	40 CFR 60.104(a)(1)
ŧ.	Third Quarter 2007 NSPS Subpart J Report (10/30/07)	2893-V5	North Flare EQT 0162	8/18/07	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	H₂S	The amount of H <sub>2</sub> S content was 0.02%. The duration of the incident was 1440 minutes.	40 CFR 60.104(a)(1)
J.	Fourth Quarter 2007 NSPS Subpart J Report (1/30/08)	2893-V6A	Unit 43 Fuel Gas Mix Drum (*need EQT)	12/19/07	3 hr rolling average of 160 ppm of H <sub>2</sub> S	H₃S	The H <sub>2</sub> S ppm range was 180-367. The duration of the incident was 240 minutes.	40 CFR 60 Subpart I
K.	Second Quarter 2008 NSPS Subpart J Report (07/30/08)	2893-V6A	South Flare EQT 0160	4/3/08	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10 gr/dscf).	H₂S	The amount of H <sub>2</sub> S content was unknown. The duration of the incident was 9 minutes.	40 CFR 60.104(a)(1)
L	Third Quarter 2008 NSPS Subpart J Report (10/30/08)	(*Not Reported)	Unit 43 Fuel Gas System	9/07/08	3 hour limit of 160 ppm	н₄ѕ	High H <sub>2</sub> S in fuel gas mix drum. The rolling 3 hour limit of 160 ppm was exceeded for 2 hours.	40 CFR 60 Subpart J
м.	Third Quarter 2008 NSPS Subpart J Report (10/30/08)	(*Not Reported)	Unit 43 Fuel Gas System	9/23/08	3 hour limit of 160 ppm	H₂S	High H <sub>2</sub> S in fuel gas mix drum. The roiling 3 hour limit of 160 ppm was exceeded for 2 hours.	40 CFR 60 Subpart J
N.	Fourth Quarter 2008 NSPS Subpart J Report (01/30/09)	2893-V6A	North Flare EQT 0162	12/22/08	No owner or operator shall burn in any gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 230 mg/dscm (0.10	H₂S	Coker Debutanizer relieved to flare. The Respondent reported an exceedance of H <sub>2</sub> S as specified in 40 CFR 60.104(a)(1). The duration of the Incident was 1 minute. (*Provide	40 CFR 60.104(a)(1)

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	OPERATING PARAMETER	POLLUTANTS INVOLVED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
					gr/dscf).		amount of H₂S)	
o.	Title V 2009 Annual Compliance Certification (3/31/10)	2891-V7	Tank 150-13 EQT 0132	Not Reported	Notify DEQ in writing of any seal gap measurements at least 30 calendar days in advance of any gap measurements required by 40 CFR 63 Subpart G	None reported	Tank was inspected 2 days before the 30 calendar day DEQ notification period expired. Corrective action-reminded tank maintenance coordinator that inspections can not be started until 30 days after the DEQ notification letter date.	Specific Requirement 1022 40 CFR 63.654(h)(2)(ii)
Р.	Title V 2009 Annual Compliance Certification (3/31/10)	2891-V7	Tank 500-10 EQT 0178	Not Reported	Notify DEQ in writing of any seal gap measurements at least 30 calendar days in advance of any gap measurements required by 40 CFR 63 Subpart G	None reported	Tank was inspected 11 days before the 30 calendar day DEQ notification period expifed. Corrective action-reminded tank maintenance coordinator that inspections can not be started until 30 days after the DEQ notification letter date.	Specific Requirement 1168 40 CFR 63.654(h)(2)(ii)
Q.	Title V 2009 Annual Compliance Certification (3/31/10)	2891-V7	Tank 300-15 EQT 0225	Not Reported	Notify DEQ in writing of any seaf gap measurements at least 30 calendar days in advance of any gap measurements required by 40 CFR 63 Subpart G	None Reported	Tank was inspected 2 days before the 30 calendar day DEQ notification period expired. Corrective action-reminded tank maintenance coordinator that inspections can not be started until 30 days after the DEQ notification letter date.	Specific Requirement 1212 40 CFR 63.654(h)(2)(ii)
R.	Benzene NESHAP – First Quarter 2010 (4/30/10)	2891-V7	Tank 55-3 EQT 0107	3/3/10	Repairs must be completed no later than 45 days.	None Reported	EFR Semlannual secondary visual inspection completed 1/13/10. One problem detected. Corrected by 3/3/10 (four days late).	Specific Requirement 617 40 CFR 61.351(a)(2)
S.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (2/15/11)	3039-V8 2580- 00013-V0 (*provide permit # for the related emission point)	Valve – Tag No. 2051806	12/27/10 through 1/12/11	When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.	(°Not Reported)	Tag # 2051806, a valve, was found leaking on 12/27/10. It was repaired on 1/12/11, sixteen days after the leak was initially identified. This was due to miscommunication on repair technique.	Louisiana MACT Determination for Refineries dated July 26, 1994 40 CFR 60 Subpart GGGa
т,	Louisiana Consolidated Fugitive Emission Program Semiannual	3039-V8 2580- 00013-V0	("Not Reparted)	Second Half 2010	Each open- ended valve or line shall be	(*Not Reported)	During the reporting period, a total of 16 open-ended lines	Louisiana MACT Determination for Refineries dated

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	OPERATING PARAMETER	POLLUTANTS INVOLVED	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS
	Report (2/15/11)	{*provide permit # for the related emission point}			equipped with a cap, blind flange, plug, or a second valve and shall seal the open end at all times.		(OEL) were identified in self-audits that are conducted on a monthly basis. All were corrected at the time of discovery.	July 26, 1994 40 CFR 60 Subpart GGGa
U.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7	Reactor Charge Heater EQT 0195	1/1/10 through 7/11/10	Nitrogen oxides <= 40 ppmvd @ 0% excess air or 0.035 lb/MMBTU determined daily on a 365 successive operating day rolling average basis.	NO <sub>2</sub>	Early in 2010 was the shake down period for this unit (unit started up on 11/17/2009). Excess O <sub>2</sub> in stack. Initial Stack Test on 2/9/10 indicated NOx to be 42 ppmvd; follow-up Stack Test on 6/7/10 indicated the NOx to be 28 ppmvd.	Specific Requirement 133 40 CFR 60.102a(g)(1)(ii)
v.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V6	Reactor Charge Heater EQT 0195	1/1/10 through 6/7/10	Nitrogen oxides  <= 0.04 Ib/MMBTU. These limits shall apply when the heater is operating between 50 to 60% capacity. In no case the total NO <sub>2</sub> emissions shall exceed 7.76 tons per year.	NO₂	Early in 2010 was the shake down period for this unit (unit started up on 11/17/2009). Excess O <sub>2</sub> in stack. Initial stack test on 2/9/10 indicated 0.056 tb NOx/MMBTU; follow-up stack test on 6/7/10 indicated 0.028 lb NOx/MMBTU. Total NOx was 4.78 tons for 2010.	Specific Requirement 144 LAC 33:III.509
w.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7	Stripper Reboiler Heater EQT 0196	1/1/10 through 6/19/10	Nitrogen oxides  c= 40ppmvd @  0% excess air or  0.035 lb/MM  BTU  determined daily on a 365 successive operating day rolling average basis	. NO <sub>2</sub>	Early in 2010 was the shake down period for this unit (unit started up on 11/17/2009). Excess O <sub>2</sub> in stack. Initial Stack Test on 2/10/10 Indicated 41 ppm NO <sub>2</sub> , follow-up stack test on 6/8/10 Indicated 21 ppm NO <sub>2</sub> .	Specific Requirement 150 40 CFR 60.102a(g)(2)
X.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7	Stripper Reboiler Heater EQT 0196	1/1/10 through 6/8/10	Nitrogen dioxide ← 0.03 lb/MMBTU annual average. Equipped with Ultra Low NOX Burners (UNLB) without air preheat.	NO₂	Early in 2010 was the shake down period for this unit (unit started up on 11/17/2009). Excess O <sub>2</sub> in stack. Initial stack test on 2/10/10 indicated 0.056 lb NOx/MMBTU; follow-up stack test on 6/8/10 indicated 0.021 lb NOx/MMBTU. Total NOx was 4.78 tons for 2010.	Specific Requirement 160 LAC 33:III.S09

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT	OPERATING PARAMETER	POLLUTANTS	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
Υ.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7 3039-V8	HCU Train 1 Reactor Charge Heater EQT 0197	1/1/10 through 12/31/10	Particulate Matter (10 microns or less) <= 0.0075 Ib/MMBTU, 3- hour average, with optimum burner design and utilization of refinery fuel gas	PM <sub>10</sub>	Unit was in start-up, shake down period during early 2010 (start-up was 2/2/10). Performance test on 7/9/10 indicated PM factor of 0.015 Ib/MMBTU; new performance test was conducted in 2011 to verify operation postshake down period.	Specific Requirement 162 40 CFR 52.21
Z.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7 3039-V8	HCU Train 2 Reactor Charge Heater EQT 0198	1/1/10 through 12/31/10	Particulate Matter (10 microns or less) <= 0.0075 lb/MMBTU, 3- hour average, with optimum burner design and utilization of refinery fuel gas	PM <sub>10</sub>	Unit was in start-up, shake down period during early 2010 (start-up was 2/2/10). Performance test on 7/9/10 Indicated PM factor of 0.015 Ib/MMBTU; new performance test was conducted in 2011 to verify operation postshake down period.	Specific Requirement 178 40 CFR 52.21
AA.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7 3039-V8	North Ground Flare EQT 0282	1/1/10 through 12/31/10	Exit Velocity >=60 and < 400 ft/sec, as determined by the method specified in 40 CFR 63.11(b)(7)(i)	None reported	A ground flare is designed and configured to result in high exit tip velocities while maintaining superior combustion efficiency when compared to a traditional stick flare. A traditional flare stack test on 2/16/10 indicated high velocity.	Specific Requirement 373 40 CFR 63.11(b)(7)(ii)
B8.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7 3039-V8	South Ground Flare EQT 0284	1/1/10 through 12/31/10	Heat content >=300 BTU/scf. Determine the net heating value of the gas being combusted by the methods specified in 40 CFR 60.18(c)(3)(ii)	None reported	The south ground flare combusts a significant portion of low-BTU hydrogen which burns very well but pulls down the overall BTU content of the gas being combusted. A traditional flare stack test on 2/16/10 indicated a low BTU content for this gas due to the hydrogen.	Specific Requirement 388 40 CFR 60.18(c)(3)(ii)
CC.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7	South Ground Flare EQT 0284	3/4/10	Design and operate for no visible emissions, as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total	None reported	Emergency shutdown of the hydrocracker unit resulted in high opacity intermittently for 43 minutes.	Specific Requirement 386 40 CFR 60.18(c)(1)

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT	OPERATING PARAMETER	POLLUTANTS INVOLVED	REPORTED CAUSE.	REGULATORY or PERMIT
-					of 5 minutes during any two consecutive hours		COSE	REQUIREMENTS
DD.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7 3039-V8	South Ground Flare EQT 0284	1/1/10 through 12/31/10	Exit Velocity >=60 and < 400 ft/sec, as determined by the method specified in 40 CFR 63.11(b)(7)(i)	None reported	A ground flare is designed and configured to result in high exit tip velocities while maintaining superior combustion efficiency when compared to a traditional stick flare. A traditional flare stack test on 2/16/10 indicated high velocity.	Specific Requirement 397 40 CFR 63.11(b)(7)(ii)
€€.	Title V 2010 Annual Compliance Certification (3/31/11)	3039-V7 3039-V8	Platformer Heater EQT 0191 EQT 0192 EQT 0193	1/9/10 through 12/31/10	Nitrogen dloxide <= 0.02 lb/MMBTU annual average. Equipped with Ultra Low NOX Burners (UNLB) without air preheat.	NO₂	Upon start-up of the unit on 1/9/10, the original burners could not meet the NO <sub>2</sub> requirement because of a design flaw by John Zink. During 2010, all the original burners were changed out with new, more effective (lower NO <sub>2</sub> ) burners; work still continues.	Specific Requirement 99 Specific Requirement 112 Specific Requirement 118 40 CFR 52.21
FF.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (8/13/10)	(*Not Reported)	Tag # 635679, a pump with equipment number 63-1554-02 (*need FUG)	First Half 2010	Post inspection repair to be conducted immediately after repair attempt to confirm a repair was successful.	(*Not reported)	A pump was a leaking item on the Delays of Repair list. It was repaired, but no monitoring event was conducted at the time of repair. Therefore, the pump remained on the DOR list. It was found leaking again during the next monthly monitoring event.	Louisiana MACT Determination for Refineries dated July 26, 1994 40 CFR 60 Subpart GGGa
GG.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (8/13/10)	(*Not Reported)	Tag # 636466, a valve (*need FUG)	First Half 2010	When a leak is detected, it shall be repalred as soon as practicable, but not later than 15 calendar days after it is detected.	("Not Reported)	Valve was repaired 18 days after it was initially discovered leaking.	Louisiana MACT Determination for Refineries dated July 25, 1994 40 CFR 60 Subpart GGGa
кн.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (8/13/10)	(*Not Reported)	Tag # 275573, a valve (*need FUG)	First Half 2010	Post Inspection repair to be conducted immediately after repair attempt to confirm a repair was successful.	("Not Reported)	Valve was repaired, but no instrument reading verifying the date was recorded in the database.	Louisiana MACT Determination for Refineries dated July 26, 1994 40 CFR 60 Subpart GGGa

	REPORT	PERMIT	Englecton	Interests.	-		<u> </u>	REGULATORY
	(date)	NUMBER	POINT	INCIDENT DATE	OPERATING PARAMETER	POLLUTANTS	REPORTED CAUSE	or PERMIT REQUIREMENTS
(t.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (8/13/10)	(*Not Reported)	Tag # 261851, a valve (*need FUG)	First Half 2010	Repair of equipment on delay of repair shall occur before the end of the next process unit shutdown.	(°Not reported)	A valve was a leaking item on the Delay of Repair list. It was not repaired during the unit Turnaround shutdown. The root valve allowing the instrument block to be isolated was replaced. Therefore, upon discovery that the component repair had been overlooked, it was isolated and repaired.	Louisiana MACT Determination for Refinerles dated July 26, 1994 40 CFR 60 Subpart GGGa
μ.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (8/13/10)	(*Not reported)	(*Not Reported)	First Half 2010	Each open- ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve and shall seal the open end at all times.	None reported	During the reporting period, a total of 19 open-ended lines (OEL) were identified in self-audits that are conducted on a monthly basis. All were corrected at the time of discovery	Louisiana MACT Determination for Refineries dated July 26, 1994 40 CFR 60 Subpart GGGa
KX.	Third Quarter 2010 MSPS Subpart Ia Report (10/29/10)	2580- 00013-V0	Unit 25 FCCU Regenerator Wet Gas Scrubber EQT 0165	9/17/10	Calibrate CEMS Daily	None reported	More than 24 hours elapsed between daily calibrations.	40 CFR 60 Subpart Ja
Ľ.	Louisiana Consolidated Fugitive Emission Program Semiannual Report (2/15/11)	3039-V8 2580- 00013-V0 (*provide permit # for the related emission point)	Valve – Tag No. 2051806	12/27/10 through 1/12/11	When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.	(*Not reported)	Tag # 2051806, a valve, was found leaking on 12/27/10. It was repaired on 1/12/11, skteen days after the leak was initially identified. This was due to miscommunication on repair technique.	Louisiana MACT Determination for Refineries dated July 26, 1994 40 CFR 60 Subpart GGGa
MM.	First Quarter 2011 NSPS Subpart Ja Report (4/29/11)	2580- 00013-V1	FCC Regenerator Vent EQT 165	1/1/11- 3/31/11	Scrubber, liquid to gas ratio (>7.0, 3 hr average)	None Reported	None reported	Specific Requirement No. 1358 of Title V Permit No. 2580- 00013-V2

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

VII.

The Respondent reported the following deviations from monitoring requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	MONITORING PARAMETER	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS
A.	2005 First and Second Semiannual Monitoring Reports for Permit	2887-V1 and 2887-V2	Thermal Drying Unit- WW Feed	2005	vapor pressure	Vapor pressure sample not taken	Specific Requirement 79

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	MONITORING PARAMETER	REPORTED CAUSE	REGULATORY of PERMIT REQUIREMENTS
	2887-V1 and V2 (9/30/05 and 3/27/05)		Tank EQT 0051				
В.	2005 First Semiannual		Cracked Distillate Tank EQT 0075		vapor pressure		Specific Requirement 31
C.	Monitoring Report for Permit 2891-V1 (9/30/05)	2891-V1	Ballast Water Tank EQT 0107	1/3/05	vapor pressure	(*Provide Cause)	Specific Requirement 521
D.			Phenolic Water Tank EQT 0142		vapor pressure		Specific Requirement 926
E.	2006 Second Semiannual Monitoring Report for Permit 2887-V3 {3/26/07}	2887-V3	Thermal Drying Unit- WW Feed Tank EQT 0051	12/31/04- 12/31/06	vapor pressure	No measurable vapor pressure on product.	Specific Requirement 79 40 CFR 30.116(f)(2)
F.	Semiannual Certification and Inspection Report 40 CFR 60 Subpart QQQ (11/20/07)	(*Not Reported)	CB-14-12 on Unit 14- Distillate Hydrotreater (*need EQT)	May 2007- October 2007	Monthly inspection	Due to RADAR, CB-14-12 was missed during monthly inspections. The issue with the data collection system has since been resolved.	40 CFR 60 Subpart QQQ (*specific CFR requirement)
G.	Title V 2007 1 <sup>st</sup> Semiannual Monitoring Report (9/27/07)	2887-V3	Thermal Drying Unit- WW Feed Tank EQT 0051	Ongoing	Vapor pressure monitored by physical testing once every six months.	Vapor pressure sample was obtained but there was difficulty in running a vapor pressure for this non-typical product — too much studge and water.	Specific Requirement 64
н.	Title V Second Semiannual Monitoring Form- Permit No. 2887- V6 (3/27/09)	2887-V6	2 pump hubs 4 catch basins	November 2008 And December 2008	{" More information required}	An instance occurred in which 2 pump hubs and 4 catch basins failed to be monitored in Unit 36.	NSPS Subpart QQQ (40 CFR 60.690)
t.	Title V First Semiannual Monitoring Report – Permit 2887-V5 (9/29/08)	2887-V5	Thermal Drying Unit- WW Feed Tank EQT 0051	Ongoing	Vapor pressure monitored by physical testing once every six months.	Vapor pressure sample was obtained but there was difficulty in running a vapor pressure for this non-typical product- too much sludge and water.	Specific Requirement 57
J.	Title V – 2 <sup>nd</sup> Semlannual Monitoring Form (3/18/11)	2580- 00013-V0	Sweet Naphtha Tank EQT 0078	7/24/10 Through 8/7/10	Secondary seal or closure mechanism monitored by visual inspection/determination semiannually.	The semiannual secondary seal visual inspection was performed 14 days late. Inspection was due 7/24/10, but was inspected on 8/7/10.	Specific Requirement 258 LAC 33:III.2103.D.2.e
ĸ	Title V – 2 <sup>nd</sup> Semiannual Monitoring Form (3/18/11)	2580- 00013-V0	Bailast Water Tank EQT 0107	7/12/10 through 8/4/10	Inspect the external floating roof, the primary seal, the secondary seal, and fittings each time the vessel is emptied and degassed.	The semiannual secondary seal visual inspection was performed 23 days late. Inspection was due 7/12/10, but was inspected on 8/4/10.	Specific Requirement 685 40 CFR 60.113b(b)(6)
Ĺ.	Title V – 2 <sup>nd</sup> Semiannual Monitoring Form (3/18/11)	2580- 00013-V0	Platformate Tank EQT 0085	7/10/10 through 7/15/10	Secondary seal or closure mechanism monitored by visual inspection/determination semiannually.	The semiannual secondary seal visual inspection was performed S days late. Inspection was due	Specific Requirement 428 LAC 33:111.2103.D.Z.e

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	MONITORING PARAMETER	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
						7/10/10, but was inspected on 7/15/10	
м.	Title V – 2 <sup>nd</sup> Semiannual Monitoring Form {3/18/11}	2580- 00013-V0	Gasoline Tank EQT 0117	7/11/10 through 7/15/10	Secondary seal or closure mechanism monitored by visual inspection/determination semiannually.	The semiannual secondary seal visual inspection was performed 4 days late. Inspection was due 7/11/10, but was inspected on 7/15/10.	Specific Requirement 810 LAC 33:III.2103.D.2.e
N.	Title V – 2 <sup>™</sup> Semiannual Monitoring Form (3/18/11)	2580- 00013-V0	Crude Tank EQT 0089	7/14/10 through 7/15/10	Secondary seal or closure mechanism monitored by visual inspection/determination semiannually.	The semiannual secondary seal visual inspection was performed 1 day late. Inspection was due 7/14/10, but was inspected on 7/15/10.	Specific Requirement 461 LAC 33:III.2103.D.2.e
0.	40 CFR 60 Subpart QQQ Semiannual Certification and Inspection Report (7/28/11)	(*Not Reported)	API #2 (*need EQT)	March 2011	Semiannual inspection of the API #2 fixed roof and hatches were not included in the routine QQQ inspection.	(*Provide Cause)	40 CFR 60 Subpart QQQ ("specific CFR requirement)
P.	40 CFR 61 Subpart FF Quarterly Certification/ Compliance Report (7/18/11)	(*Not Reported)	(*Not reported)	June 2011	Collect and analyze samples at least once per month to measure the benzene concentrations of the waste stream exiting the treatment process.	Monthly end of line samples were not taken in June due to scheduling conflicts and expired safety requirements with the contractor.	40 CFR 61.354

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

VIII.

The Respondent reported the following emission exceedances:

	REPORT (date)	PERMIT NUMBER or UNIT	MORSIMA TAIO9	INCIDENT DATE	ROLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY  or PERMIT  REQUIREMENTS
A	2640-V3 General Conditions N	2640-V3 PSD-LA-	Coker Heater EQT 0027	1/3/05	SO2 (max 30.38 (*not provided) (nos lbs/hr) 1 hr		A steam valve was closed due	40 CFR 60
	& R Report (1/5/2005)	640	unknown	1/3/03	H₂S (160 ppm 3 hr standard)	(*not provided) 3 – 1 hr periods	to operator error.	Subpart 1 LAC 33:III.905
	Condition N 2640-V3				SO2 (113.72 ibs/hr)	not provided ( 142.15 lbs calculated)	Liquid hydrocarbon	
R		General	Thermal Oxidizer	1/11/05	H₂S (<0.01 lbs/hr)	(*not provided)	carry-over caused the thermal oxidizer	40 CFR 50
В.		No. 3 EQT 0031	41400	\$02 12 hour rolling average	(*not provided)	to flame out. Excess SO <sub>2</sub> emissions	LAC 33:III.501.C.4	
					opacity (*not provided)			occurred for 75 minutes.

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
					H₂S	>1 lb		
					H₂S	22 lbs	A local pressure controller closed due to	
c.	Unauthorized Discharge Notification for Incident 79261 (5/27/2005)	2640-V3	thermal oxidizers (*need EQT)	5/22/05	opacity (<20%)	30 mins	high pressure causing the thermal oxidizers to smoke and generate excess emissions.	LAC 33:III.501.C.4
D.	2640-V3 General Conditions N & R Report (6/24/05)	2640-V3	FCC Unit (*need EQT)	6/23/05	CO · (500 ppm)	596.43 ppm	An incorrect set point was entered on the Fractionator due to operator error.	40 CFR 60.103(a) LAC 33:III.905
					Benzene (3.78 lbs)	102 lbs		
					Ethylbenzene (1.04 lbs)	11 lbs		
					n-Hexane (11.56 lbs)	(11.56 lbs) 348 lbs On June 26,		
	Unauthorized Discharge Notification		Tank 150-6		2,2,4 – Trimethylpentane (15.07 lbs)	175 (bs	2005, a level indicator falled, indicating a	
E.	for Incident 80153	2891-V1	EQT 0076	6/28/05	Cumene (0.11 lbs)	0.41 lbs	problem with the tank. Two days later an	LAC 33:111.905
	(7/1/2005)				Napthalene (0.33 lbs)	0.45 lbs	operator noticed the roof	
					Toluene (26.74 lbs)	115 lbs	had sunk.	
					Xyiene (5.26 lbs)	45 lbs		
					VOCs (1098.68 lbs)	24,916 lbs	:	
					opacity (<20%)	20 mins	tow pressure in the product separator	
F.	Unauthorized Discharge Notification for Incident 81304 (8/19/05)	2893-V1	North Flare EQT 0162	8/14/05	hydrocarbons	1,327 lbs	caused the recycle gas compressor in the GDU to shutdown and the Splitter to	LAC 33:UI.501.C.4
					HRVOCs	81 lbs	overpressure and relieve to the flare.	
G.	2005 Consolidated Second Quarter General Condition IX.C and R.3 Report (9/16/05)	(*not provided)	FCC Unit (*need EQT)	6/23/2005	CO (500 ppm)	(*not provided)	Incorrect pressure set point was entered for the FCCU Main Fractionator.	LAC 33:III.501.C.4
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	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Consolidated Third Quarter General Condition IX.C and R.3 Report (12/21/05)	provided)	Thermal Oxidizer (*need EQT)		(500 ppm)	Above 500 ppm for 14 mins	level was upset while inventorying amine to the Gasoline Desulf Unit for unit startup.	ALLOHE WILKS
	General Condition				NO <sub>x</sub> (3.52 lbs/hr)	17.14 lbs	Fuel gas imbalance (excess gas from FCCU) resulted in	
ī,	XI.C First Quarter Report – 2007	2893-V3	North Flare EQT 0162	1/11/07	5O <sub>2</sub> (1.20 lbs/hr)	0.87 lbs**	over-pressuring mix drum causing a	LAC 33:III.501.C.4
	(6/22/07)				VOC Olefins (7.90 lbs/hr)	38.61 lbs 13.80 lbs	release to flare. The duration of the incident was 82 minutes.	
	General Condition XI.C First		South Flare		NO <sub>x</sub> (2.84 lbs/hr)	24.31 lbs	Both offsite Shell Offgas Compressors shut down which resulted in Unit 21 fuel	
1.	Quarter Report – 2007 (6/22/07)	2893-V3	EQT 0160	1/22/07	VOC Olefins (2.92 lbs/hr)	36.59 lbs 1.98 lbs	gas being routed to flare. The duration of the incident was 196 minutes.	LAC 33:III.501.C.4
	General Condition XI.C First				50 <sub>2</sub> (1.20 lbs/hr)	0.78 lbs**	Both offsite Shell Offgas Compressors shut down which resulted	
к.	Quarter Report — 2007 (6/22/07)	2893-V3	North Flare EQT 0162	1/23/07	Olefins (VOC 7.90 lbs/hr)	11.63 lbs	in Unit 21 fuel gas being routed to flare. The duration of the incident was 98 minutes intermittently.	LAC 33:(II.501.C.4
	General				SO <sub>2</sub> (1.32 lbs/hr)	0.03 lbs**	Both offsite Shell Offgas Compressors shut down	
L	Condition XI.C First Quarter Report — 2007 (6/22/07)	2893-V3	South Flare EQT 0160	1/23/07	NO <sub>3</sub> (2.84 lbs/hr)	131.57 lbs	which resulted in Unit 21 fuel gas being routed to flare. The duration of	LAC 33:III.501.C.4
					VOC Olefins (2.92 lbs/hr)	198.05 lbs 10.73 lbs	the incident was 824 minutes intermittently.	
м.	General Condition XI.C First Quarter Report – 2007	2893-V3	North Flare EQT 0162	1/24/07	VOC (7.90 lbs/hr)	80.8 lbs	Units purging normal butane rundown to take line out of service for replacement.	LAC 33:(II.501.C.4

	REPORT (date)	PERMIT NUMBER or UNIT.	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	(6/22/07)						The duration of the incident was 645 minutes intermittently.	
	General Condition XI.C First Quarter Report — 2007				H₂S (not permitted)	0.001 lbs	Drained the Crude Overhead suction drum to flare. The H <sub>2</sub> S	40 CFR
N.	(6/22/07) And First Quarter 2007 NSPS Subpart J Report (4/30/07)	2893-V4	South Flare EQT 0160	1/30/07	SO <sub>2</sub> (1.32 lbs/hr)	0.388 lbs**	content was 300 ppm. The duration of the incident was 10 minutes.	60.104(a)(1) LAC 33:III.501.C.4
О.	General Condition XI.C First Quarter Report – 2007 (6/22/07)	2893-V4	South Flare EQT 0160	2/5/07	VOC Olefins {2.92 lbs/hr}	577.43 lbs 1.20 lbs	Depressured butane drum for the LPG Truck unloading rack for annual regulatory inspection. The duration of the incident was 240 minutes.	LAC 33:III.501.C.4
	General Condition				NO <sub>x</sub> (5.61 lbs/hr)	16.33 lbs	Fuel gas mix drum pressure to flare opened as sweet fuel gas to flare was already open 100% due to	
P.	XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	South Flare EQT 0160	1/4/08	VOC Olefins (12.36 lbs/hr)	41.66 lbs 6.89 lbs	units shutting down for turnaround work. Put unit 42 boiler on fuel gas to help with pressure. The duration of the incident was 108	LAC 33:HI.501.C.4
					VOC HRVOC	5.04 lbs** 0.53 lbs**	minutes. Unit 19 Amine Oil Separator	
	General Condition XI.C First				(12.36 lbs/hr) H <sub>2</sub> S (not permitted)	0.06 lbs	overpressure while using fuel gas to pressure	
Q.	Quarter Report –	2893-V6A	South Flare EQT 0160	1/7/08	CO (15.28 lbs/hr)	24.13 lbs	amine into the vessel, relief valve open to	LAC 33:III.501.C.4
	2008 (6/27/08)				NO <sub>x</sub> (5.61 lbs/hr)	4.07 lbs**	flare. The duration of this incident was 5 minutes.	

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	General Condition				NO <sub>x</sub> 65.06 lbs		CAT unit upset pressured up Fuel gas Mix Drum, 43PC5355 opened to flare. Open 216431C	REQUIREMENTS
R.	XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	South Flare EQT 0160	1/10/08	VOC Olefins (12.36 lbs/hr)	165.96/bs 27.43 lbs	43 mbx drum vent controller and closed 43PC5355 fuel gas drum pressure flare valve. The duration of this incident was 266 minutes.	LAC 33:III.501.C.4
	General Condition				NO <sub>x</sub> (5.61 lbs/hr)	20.63 lbs	Shell shutdown one of their compressors due to high H <sub>2</sub> S spike in the fuel gas to Shell.	
<b>S</b> .	XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	South Flare EQT 0160	1/11/08	VOC Olefins (12.36 lbs/hr)	52.63 lbs 8.70 lbs	Fiare valve from mix drum opened due to Shell loosing one compressor. The duration of the incident was 71 minutes.	LAC 33:III.501.C.4
	General Condition XI.C First		South Flare		NO <u>.</u> (5.61 lbs/hr)	8.53 lbs	Both Shell Off gas compressors shutdown due to personnel	
Т.	Quarter Report 2008 (6/27/08)	2893-V6A	EQT 0160	1/14/08	VOC (12.36 lbs/hr)	25.34 lbs	working in the area and hit the lockout switch. The duration of this incident was 102 minutes.	LAC 33:III.501.C.4
U.	General Condition XI.C First Quarter	on rst South Flare	South Flare	1/15/08	NO <sub>z</sub> (5.61 lbs/hr)	10.38 lbs	CO-1 Norco shutdown one Shell Off Gas Compressor due to unit	LAC 33:III.501.C.4
	Report – 2008 (6/27/08)		EQT 0160		VOC Olefins (12.36 lbs/hr)	26.49 ibs 4.38 ibs	problems. The duration of the incident was 102 minutes.	
v.	General Condition XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	North Flare EQT 0162	1/16/08	VOC HRVOC (7.90 lbs/hr)	20.18 lbs 9.22 lbs	26-1304 Aftercooler Leak: Shell side depressure to flare. Picked up high LEL reading at Cat Cooling	40 CFR 60.104(#)(1) LAC 33:III.501.C.4

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	And First Quarter 2008 NSPS Subpart 1 Report (4/30/08)				H₂S (not permitted)	0.02 lbs	Tower. Investigation was done for the PGC Aftercooler Trim Coller and found process side of the exchangers were leaking	
					NO <sub>x</sub> (3.52 lbs/hr)	0.02 lbs**	into the cooling water side of the exchanger. The H <sub>2</sub> S content was unknown. The duration of the incident was 240 minutes.	
					SO₂ (1.20 lbs/hr)	0.01 lbs**	Flaring of Refinery Fuel gas from Unit	
W.	General Condition XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	North Flare EQT 0162	1/29/08	NO, (3.52 lbs/hr)	27.70 lbs	gas from Unit 43, 43PC5355, due to high pressure on fuel gas header due to Domain 4 dumping hydrogen into fuel gas system. The duration of	LAC 33:III.501.C.4
					VOC Olefins (7.90 lbs/hr)	72.44 lbs 12.29 lbs	the incident was 50 minutes.	
	General				VOC HRVOC (12.36 lbs/hr)	0.53 lbs** 0.40 lbs**	Unit 46 Charge Pump blew a seal and about	
	Condition XI.C First		South Flare		H <sub>2</sub> S (not permitted)	0.01 lbs	10 feet of 8 Inch line was	
X.	Quarter Report — 2008 (6/27/08)	2893-V6A	EQT 0160	2/2/08	NO <sub>2</sub> (5.61 lbs/hr)	0.15 lbs**	depressured to the south flare. The duration of the incident was 600 minutes.	LAC 33:III.501.C.4
	General				VOC (7.90 lbs/hr)	21.75 lbs	Unit 9 Penex Stabilizer to	
Υ.	Condition XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	North Flare EQT 0162	2/2/08	NO <sub>x</sub> (3.52 lbs/hr)	6.21 lbs	Stabilizer to depressure to flare for waterwash procedure. The duration of the incident was 120 minutes.	LAC 33:RI.501.C.4
Z.	General Condition XI.C First Quarter Report —	2893-V6A	South Flare EQT 0160	2/16/08	NO <sub>1</sub> (5.61 lbs/hr) VOC	8.70 lbs	Shutdown both Off Gas Compressors going to Shell, high H <sub>3</sub> S in fuel	LAC 33:III,501,C.4
etti aasaa oo ka ka aa ka aa ka aa aa aa aa aa aa aa	2008 (6/27/08)				Olefins (12.36 lbs/hr)	22.18 lbs 3.67 lbs	gas. The duration of the	

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS  RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
							incident was 67	
					VOC (7.90 lbs/hr)	91.6 lbs	The levels on the disulfide separator were not reading correctly	
AA.	General Condition XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	North Flare EQT 0162	3/5/08	NO <sub>x</sub> (3.52 lbs/hr)	85.9 lbs	causing disulfide oil to overflow to the sand filter. The sand filter was over pressured causing the 05- PSV-7042 to open to flare.	LAC 33::III.501.C.4
					CO (2.92llbs/hr)	472.8 lbs	The duration of the incident was 1293 minutes.	
					VOC HRVOC (7.90 lbs/hr)	0.8 lbs** While 0.8 lbs** performing Unit 0.3 lbs** S Flare checklist the natural gas header 5-PSV-		
88.	General Condition XI.C First Quarter Report – 2008 (6/27/08)	2893-V6A	North Flare EQT 0162	3/6/08	NO <sub>2</sub> (3.52 lbs/hr)	19.3 lbs	7102 was found teaking. Line was cool and sweating. Blocked the inlet to PSV-7102 then opened the	LAC 33:III.501.C.4
	(4,57,65,				CO (2.92 lbs/hr)	105.1 lbs	valve and checked for leakage appears to be holding. The duration of the incident was 30 minutes.	
	General Condition				VOC HRVOC (7.90 lbs/hr)	11.5 lbs 0.4 lbs	While performing Unit 5 Flare checklist	
cc.	XI.C First Quarter	2893-V6A	North Flare	3/12/08	NO <sub>2</sub> (3.52 lbs/hr)	289.2 lbs	the natural gas header 5-PSV-	1 AC 22-01 CO2 C 4
	Report 2008 (6/27/08)		EQT 0162	4, 24, 44	CO (2.92 lbs/hr)	1464.7 lbs	7102 was found leaking. The duration of the incident was 420 minutes.	LAC 33:III.501.C.4
DD.	General Condition XI.C First Quarter Report —	2893-V6A	North Flare EQT 0162	3/14/08	VOC HRVOC (7.90 lbs/hr)	105.08 lbs 80.10 lbs	Liquid in propylene knock drum at truck rack was boiled off to	LAC 33:III.501.C.4

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INGIDENT DATE	POLLUTANTS  RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY  or PERMIT  REQUIREMENTS
	2008 (6/27/08)				NO <sub>1</sub> (3.52 lbs/hr)	30.27 lbs	flare via 64- PCV-6014. When unloading P/P railcars, valve 64-640052 lifted and put product into the big knockout	reconcurrent
					CO (2.92 lbs/hr)	164.69 lbs	drum, which in turn went to the flare. The duration of the incident was 15 minutes.	
	General Condition XI.C First				VOC (7.90 lbs/hr)	23 lbs	Butane Splitter Trim Reboller tube failure. Transmitter 27- FC-4025 reading spiking, High % LEL reading on	
EE.	Quarter Report – 2008 (6/27/08)	2893-V6A	North Flare EQT 0162	3/20/08	NO <sub>2</sub> (3.52 lbs/hr)	6.7 lbs	FC-4025 reading spiking. High % LEL reading on the condensate return at 1600 hours. Isolated the Butane Splitter Trim Reboller. The duration of the incident was 60 minutes.	LAC 33:III.501.C.4
	General Condition				VOC HRVOC (7.90 lbs/hr)	32.95 lbs 24.14 lbs	The C3/C4 Splitter overhead relief valve, 26-RV- 3645 paid off at 311 psig for 3 minutes to	
FF.	XI.C First Quarter Report — 2008 (6/27/08) And First Quarter 2008 NSPS Subpart J Report	2893-V6A	North Flare EQT 0152	3/26/08	NO <sub>x</sub> (3.52 lbs/hr)	9.50 lbs	flare. The relief valve is set at 330 psig. Verified actual pressure was lower than the set pressure and blocked in RV and opened the bypass. RV	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
	(4/30/08)				5O <sub>2</sub> (1.20 lbs/hr)	0.0 <del>9</del> lbs**	was sent out for repair. The H <sub>2</sub> S content was unknown. The duration of the incident was 3 minutes.	
GG.	General Condition XI.C Second	2893-V6A	South Flare EQT 0160	4/1/08	5O <sub>2</sub> (1.32 lbs/hr)	0.13 lbs**	Marathon shutdown Off gas to Shell	LAC 33:III.501.C.4

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Quarter Report – 2008 (9/26/08)				NO₄ (5.61 lbs/hr)	83.76 lbs	Compressors due to high H <sub>2</sub> S of 100 ppm. Sweet fuel gas opened to flare to prevent flaring from mbx	
					VOC Olefins (12.36 lbs/hr)	222.02 lbs 6.83 lbs	drum. The duration of the incident was 230 minutes.	
	General Condition XI.C Second Quarter				H <sub>2</sub> S (not permitted)	0.772 lbs	Control valve 15LC6142 plugged up which caused flow to the H.P. Stripper to drop off and control valves to the feed heater to drop below trip setting and tripped heater.	
κн.	Report 2008 (9/26/08) And Second Quarter 2008 NSPS Subpart J Report (7/30/08)	2893-V6A	South Flare EQT 0160	4/3/08	VOC (12.36 lbs/hr)	0.307 lbs**	Also caused a low level in the LP. Stripper and the LP. Bottoms pumps to cavitate which led to loss of hot feed to the CAT. 3 feet of 6" pipe was drained to the fiare instead of the sewer. The H <sub>2</sub> S content was .22%. The duration of the incident was 1815 hours.	40 CFR 60.104(a)(1) LAC 33:III.501.C.4
					VOC HRVOC (12.36 lbs/hr)	25.73 lbs 0.28 lbs	Unit upset, Depentanizer tower pressured up and Depent	
n.	General Condition XI.C Second Quarter Report — 2008 (9/26/08)	2893-V6A	South Flare EQT 0160	4/17/08	NO <sub>x</sub> 7.45 lbs Dec tempe	OVHD 22PSV1537 went off to flare. Oecreased tower temperature by decreasing hot	LAC 33:111.501.C.4	
		(3) Ed (9)			CO {15.28 lbs/hr}	40.51 lbs	oil to reboiler and lowered tower pressure. The duration of the incident was 2 minutes.	
n.	General Condition	2893-V6A	North Flare EQT 0162	4/27/08	VOC HRVOC	0.7 lbs** 0.3 lbs**	05-1201 Coke drum pressured	40 CFR 60.104(a)(1)

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT
	XI.C Second Quarter	Ol Oliti			(7.90 lbs/hr)		up due to high	LAC 33:III.501.C.4
	Report - 2008 (9/26/08) And Second				NO <sub>2</sub> (3.52 lbs/hr)	0.4 lbs**	foaming in the drum 25 minutes after switch. The Coker suction drum vented to	
	Quarter 2008 NSPS Subpart J Report (7/30/08)				SO <sub>2</sub> (1.20 lbs/hr)	111.0 lbs	flare. The Drum OVHD was switched over to the B/D. When the pressure came down, it was switched back to the Fractionator to verify that the	
					CO (2.92 lbs/hr)	2.1 (bs**	line was clear. The H <sub>2</sub> S content was unknown. The duration of the incident was 2 minutes.	
					SO <sub>2</sub> (1.32 lbs/hr)	0.69 lbs**	Shell lost both off gas compressors due to loss of	
KK.	General Condition XI.C Second Quarter Report — 2008	2893-V6A	South Flare EQT 0160	5/1/08	NO <sub>z</sub> (5.61 lbs/hr)	7.83 lbs	air pressure and compressor station. Opened Unit 21 sweet fuel gas to flare to prevent mix	LAC 33:III.501.C.4
	(9/26/08)				VOC Olefins (12.36 lbs/hr)	20.74 lbs 0.64 lbs	drum valve from opening up. The duration of the incident was 26 minutes.	
U.	General Condition XI.C Second Quarter Report – 2008 (9/26/08)	2893-V6A	South Flare EQT 0160	S/7/08	VOC HRVOC (12.36 lbs/hr)	54.04 lbs 30.52 lbs	Took some pressure off of sphere 25-3 PGLN (nitrogen pressure) by depressuring to the flare. The duration of the incident was 460 minutes.	LAC 33:III.501.C.4
	Consti				5O <sub>2</sub> (1.32 lbs/hr)	0.65 lbs**	Shell compressors	
MM.	General Condition XI.C Second Quarter Report – 2008	2893-V6A	South Flare EQT 0160	5/14/08	NO <sub>3</sub> (5.61 lbs/hr)	14.32 lbs	down, flared 21HC6431 (sweet fuel gas) to flare to maintain fuel gas header	LAC 33:til.501.C4
	(9/26/08)				VOC Olefins (12.36 lbs/hr)	37.95 lbs 1.17 lbs	pressure. The duration of the incident was	

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY OF PERMIT REQUIREMENTS
ĸn.	General Condition XI.C Second Quarter Report – 2008 (9/26/08)	2893-V6A	South Flare EQT 0160	6/7/08	SO <sub>2</sub> (1.32 lbs/hr)	0.98 lbs**	21 HC6431 sweet fuel gas to flare and 43PC5355 fuel gas mix drum to flare opened due to shell losing both compressors. Unit 42 swapped their boiler to fuel gas to help with pressure. The duration of the incident was 54 minutes.	LAC 33;(II.501.C.4
					NO <sub>1</sub> (5.61 lbs/hr)	18.29 lbs		
					VOC Olefins (12.36 lbs/hr)	48.49 lbs 1.49 lbs		
			South Flare EQT 0160	6/7/08	SO <sub>2</sub> (1.32 lbs/hr)	1.56 (bs	Shell lost both compressors and the unit 21 flare valve 21HC6431 sweet fuel gas opened. Unit 42 swapped their boller to fuel gas to help with pressure.	
Co XI.6 OO. Q R	General Condition XI.C Second Quarter Report – 2008 (9/26/08)	2893-V6A			NO <sub>4</sub> (5.61 lbs/hr)	24.70 lbs		LAC 33:III.501.C.4
					VOC Olefins (12.36 lbs/hr)	65.48 lbs 2.02 lbs	The duration of the incident was 74 minutes.	
PP.	General Condition XI.C Second Quarter Report – 2008 (9/26/08)	2893-V6A	South Flare EQT 0160	6/6-7/08	VOC HRVOC (12.36 lbs/hr)	155.52 lbs 0.10 lbs	Started flaring sphere 25-6 due to pressure build up to 55\$\vec{a}\$. Switched iso R/D to sphere 25-5. The duration of the incident was 480 minutes.	LAC 33:III.501.C.4
	General Condition XI.C Third Quarter Report- 2008 (12/18/08)	7893-V6A	South Flare EQT 0160	7/8/08	\$0 <sub>2</sub> (1.32 fbs/hr)	0.35 lbs**	Both Shell Compressors shutdown opened 21PC6431 (sweet fuel gas to flare). The duration of the incident was 36 minutes.	EAC 33:till.501.C.4
QQ.					NO <sub>x</sub> (5.61 lbs/hr)	7.57 lbs**		
					VOC Olefins (12.36 lbs/hr)	20.07 lbs 0.62 lbs		
	General Condition XI.C Third Quarter Report- 2008 (12/18/08)	on ird 2893-V3A Sou EQ		7/8/08	SO <sub>2</sub> (1.32 lbs/hr)	0.47 lbs**	Both Shell Compressors shutdown opened 21PC6431 (sweet fuel gas to flare). The duration of the	LAC 33:III.501.C.4
RR.			South Flare EQT 0160		NO <sub>x</sub> (5.61 lbs/hr)	9.51 lbs		
					VOC Olefins	25.21 lbs 0.78 lbs		

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit) (12.36 lbs/hr)	QUANTITY REPORTED	REPORTED CAUSE Incident was 72	REGULATORY or PERMIT REQUIREMENTS
\$5.	General Condition XI.C Third Quarter Report- 2008 (12/18/08)	2893-V6A	South Flare EQT 0150	7/15/2008	SO <sub>2</sub> (1.32 lbs/hr)	0.27 lbs**	minutes.  Sweet fuel gas from Unit 21 to flare. Cat Unit startup. Shell Compressors down. Vented treated sweet fuel gas from U-21 FGA to prevent release of CAT olefins to flare header. The duration of the incident was 27 minutes.	LAC 33:III.501.C.4
					NO <sub>T</sub> (5.61 lbs/hr)	6.82 lbs		
					VOC Olefins (12.36 lbs/hr)	18.07 lbs 0.56 lbs		
π.	General Condition XI.C Third Quarter Report- 2008 (12/18/08)	2893-V6A	South Flare EQT 0160	7/15/08	SO₂ (1.32 (bs/hr)	0.65 (bs**	Sweet fuel gas from Unit 21 to flare. Cat Unit startup. Shell Compressors down. Vented treated sweet fuel gas from U-21 FGA to prevent release of CAT olefins to flare header. The duration of	LAC 33:III.501.C.4
					NO <sub>z</sub> (5.61 lbs/hr)	16.45 lbs		
					VOC Olefins (12.36 lbs/hr)	43.59 lbs 1.34 lbs	the incident was 100 minutes.	
UU. Co XI. Q: Repo			South Flare EQT 0160	7/15/08	5O <sub>2</sub> (1.32 lbs/hr)	5.94 lbs	21PC6431 sweet fuel gas to flare opened because CAT Unit started up in the fuel gas header. Monitored valve to ensure only the sweet fuel gas flare valve opened. The duration of the incident was 351 minutes.  43-PC-5355 fuel gas from mbc drum pressure controller opened to flare due to domain a starting up. The duration of the incident 58 minutes.	LAC 33:III.501,C.4
	General Condition XI.C Third Quarter Report- 2008 (12/18/08)	2893-V6A			NO <sub>3</sub> (5.61 lbs/hr)	82.28 lbs		
					VOC Olefins (12.36 lbs/hr)	218.09 lbs 6.71 lbs		
vv.	General Condition XI.C Third Quarter Report- 2008 (12/18/08)		No. at Co.	7/15/08	NO <sub>3</sub> (3.52 lbs/hr)	15.80 lbs		
			North Flare EQT 0162		VOC Olefins (7.90 lbs/hr)	40.30 lbs 6.66 lbs		LAC 33:III.501.C.4
ww.	General Condition	2893-V6A	South Flare EQT 0160	8/3/08	5O <sub>2</sub> (1.32 lbs/hr)	2.01 fbs	Fuel gas mix drum flare valve	LAC 33:III.501,C.4

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY  OF PERMIT  REQUIREMENTS
	XI.C Third Quarter Report- 2008 (12/18/08)				NO. (5.61 lbs/hr)	39.17 lbs	opened due to CAT unit starting up and both Shell compressors are down. Put	
					VOC Olefins (12.36 lbs/hr)	103.81 (bs 3.20 (bs	Unit 42 boiler on fuel gas. The duration of the incident was 107 minutes.	
	General	2893-V6A	South Flare EQT 0160	8/7/08	VOC HRVOC (12.36 lbs/hr)	54.05 lbs 1.48 lbs	Flaring sphere 10-3 due to high pressure on Tank 198 psl. Units unable to get out on Ce R/D due to high pressure in sphere 10-3. The duration of the incident was 60 minutes.	LAC 33:III.501.C.4
XX.	Condition XI.C Third Quarter Report- 2008 (12/18/08)				NO <sub>t</sub> (5.61 lbs/hr)	15.91 lbs		
					CO (15.28 lbs/hr)	86.59 lbs		
	General Condition XI.C Third	ndition CThird Parter art- 2008	South Flare EQT 0150	8/16/03	50 <sub>2</sub> (1.32 lbs/hr)	0.23 lbs	Shell compressor shutdown. Opened 21PC6431 controller to flare to keep mix drum from over pressuring. The duration of the incident was 16 minutes.	LAC 33:88.501.C.4
<b>YY</b> .					NO <sub>2</sub> (5.61 lbs/hr)	4.10 lbs		
	Report- 2008 (12/18/08)				VOC Olefins (12.36 lbs/hr)	10.68 lbs 0.33 lbs		
<b>7</b> Z.	Generat Condition XLC Third Quarter Report- 2008 (12/18/08)	2893-V6A	South Flare EQT 0150	8/27/08	SO₂ (1.32 lbs/hr)	0.55 lbs**	Both Shell compressors shutdown which pressured up the fuel gas header causing 21PC6431 sweet fuel gas to the flare. The duration of the incident was 51 minutes.	
					NO <sub>1</sub> (5.61 lbs/hr)	9.98 lbs		LAC 33:III.501.C.4
					VOC Olefins (12.36 lbs/hr)	26.45 lbs 0.81 lbs		
A3.	General Condition XI.C Third Quarter	Condition XI.C Third Quarter eport- 2008	North Flare EQT 0162 9/7/	9/7/08	NO <sub>x</sub> (3.52 lbs/hr)	13.58 lbs	Fuel gas system over pressured (43-PC-5355) fuel gas from mix drum pressure controller opened to flare while trying to lower bullet level. The duration of the incident was 51	LAC 33:III.501.C.4
	Report- 2008 (12/18/08)				VOC Olefins (7.90 lbs/hr)	34.65 lbs 5.73 lbs		

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INGIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE minutes.	REGULATORY or PERMIT REQUIREMENTS
вз.	2893-V6		South Flare EQT 0160	9/8/08	VOC HRVOC (12.36 lbs/hr) H <sub>2</sub> S (not permitted)	4.95 lbs** 0.31 lbs** 0.54 lbs	During the Unit  14 Distillate Hydrotreater startup after Hurricane Gustav, a level control valve failure caused liquid carryover to the Unit 32 Amine Unit causing a spike in gas flow rate to the Eccene compressors. While attempting to start a second Eccene compressor for the additional gas flow rate, the compressor that was online tripped, causing the suction drum to relieve to flare for approximately 5 minutes until both compressors were started up. Fuel gas imbalance resulted in over-pressuring mix drum causing a small release to the	LAC 33:III.501.C.4
		289 <b>3-</b> V6A			NO <sub>3</sub> (5.61 lbs/hr)	1.69 lbs**		
					SO <sub>2</sub> (1.32 lbs/hr)	205.58 lbs		
					CO (15.28 lbs/hr)	9.24 lbs**		
G.	General Condition XI.C Third Quarter Report- 2008 (12/18/08)		South Flare EQT 0160	9/8/08	50 <sub>7</sub> (1.32 (bs/hr)	5.68 lbs		
		2893-V6A			NO <sub>1</sub> (5.61 lbs/hr)	137.40 lbs		LAC 33:III.501.C.4
					VOC Olefins (12.36 ibs/hr)	364.19 lbs 11.21 lbs		
D3.	General Condition XI.C Third	2893-V6A	South Flare EQT 0160	9/9/08	SO <sub>2</sub> (1.32 lbs/hr)	0.98 lbs**	Fuel gas imbalance resulted in	LAC 33:III.501.C.4