

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
							conjunction with the burners performing below expectations.	
L7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater B EQT 0148	12/23/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 3 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
M7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/23/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 2 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
N7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater B EQT 0148	12/23/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 3 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
O7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010	3039-V8	HCU Fractionator Heater EQT 0199	12/23/10	NO <sub>x</sub> (11.56 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heaters burners	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
	(3/31/11)						performing below expectations.	
P7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/25/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 8 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
Q7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater B EQT 0148	12/25/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
R7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/26/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 3 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
S7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/26/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heater running near the permitted firing rate in conjunction	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
							with the burners performing below expectations.	
T7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/26/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 2 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
U7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/26/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 11 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
V7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater B EQT 0148	12/26/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 3 hours due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
W7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/27/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 2 hours due to the heater running near the permitted	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
							firing rate in conjunction with the burners performing below expectations.	
X7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater B EQT 0148	12/28/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
Y7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/28/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
Z7.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	2580-00013-V0	Crude Atmospheric Heater A EQT 0147	12/29/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heater running near the permitted firing rate in conjunction with the burners performing below expectations.	LAC 33:III.501.C.4
A8.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half	2580-00013-V0	Crude Atmospheric Heater B EQT 0148	12/29/10	NO <sub>x</sub> (20.21 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heater	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
	Report 2010 (3/31/11)						running near the permitted firing rate in conjunction with the burners performing below expectations.	
B8.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	3039-V8	HCU Fractionator Heater EQT 0199	12/30/10	NO <sub>x</sub> (11.56 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 1 hour due to the heaters burners performing below expectations.	LAC 33:III.501.C.4
C8.	Louisiana General Condition XI.C and Part 70 General Condition R.3 Second Half Report 2010 (3/31/11)	3039-V8	HCU Fractionator Heater EQT 0199	12/30/10	NO <sub>x</sub> (11.56 lbs/hr)	(*Not Reported)	This heater exceeded its maximum hourly NO <sub>x</sub> permit limit for 5 hours due to the heaters burners performing below expectations.	LAC 33:III.501.C.4
D8.	Second Quarter 2010 NSPS Subpart J Report (7/30/10)	(*Not Reported)	Unit 243 Fuel Gas (*need EQT)	6/29/10	H <sub>2</sub> S (160 ppmv three hour average)	185.5 ppmv	(*Unknown Cause)	40 CFR 60 Subpart J
E8.	Second Quarter 2010 NSPS Subpart J Report (7/30/10)	(*Not Reported)	Unit 25 Charge Heater (*need EQT)	4/19/10 5/13/10 5/25/10 5/26/10	The Concentration of DGA must be kept >= 40 wt%	39.7 wt% 39.9 wt% 39.7 wt% 39.8 wt%	(*Process Problems)	40 CFR 60 Subpart J
F8.	Second Quarter 2010 NSPS Subpart J Report (7/30/10)	(*Not Reported)	Unit 5 Coker Charge Heater (*need EQT)	4/26/10	The Concentration of DGA must be kept >= 40 wt%	39.44 wt%	(*Unknown Cause)	40 CFR 60 Subpart J
G8.	Third Quarter 2010 NSPS Subpart J Report (10/29/10)	(*Not Reported)	Unit 5 Coker Charge Heater (*need EQT)	9/23/10	The Concentration of DGA must be kept >= 40 wt%	39.5 wt%	(*Unknown Cause)	40 CFR 60 Subpart J
H8.	Third Quarter 2010 NSPS Subpart J Report (10/29/10)	(*Not Reported)	Unit 25 Charge Heater (*need EQT)	7/18/10 8/10/10	The Concentration of DGA must be kept >= 40 wt%	38.6 wt% 37.8 wt%	(*Not Reported)	40 CFR 60 Subpart J
I8.	Third Quarter 2010 NSPS Subpart J Report (10/29/10)	(*Not Reported)	Unit 59 South Emergency Flare (*need EQT)	8/31/10	H <sub>2</sub> S (230 mg/dscm concentration)	2.44 lbs	Crude Unit 10 stabilizer overhead PSV lifted for 1 minute to the	40 CFR 60 Subpart J 40 CFR 60.104(a)(1)

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
							south flare.	
J8.	Fourth Quarter 2010 NSPS Subpart J Report (1/28/11)	(*Not Reported)	Unit 5 Coker Charge Heater (*need EQT)	10/27/10	The Concentration of DGA must be kept >= 40 wt%	38.4 wt%	(*Unknown Cause)	40 CFR 60 Subpart J
K8.	Fourth Quarter 2010 NSPS Subpart J Report (1/28/11)	(*Not Reported)	Unit 25 Charge Heater (*need EQT)	10/16/10	The Concentration of DGA must be kept >= 40 wt%	37.7 wt%	(*Not reported)	40 CFR 60 Subpart J
				11/19/10		37.7 wt%		
L8.	Fourth Quarter 2010 NSPS Subpart J Report (1/28/11)	(*Not Reported)	Unit 59 South Emergency Flare (*need EQT)	10/29/10	H <sub>2</sub> S (230 mg/dscm concentration)	(*Not Reported)	Isobutane sample station 1' flare was left open 10% after sampling.	40 CFR 60 Subpart J
M8.	Fourth Quarter 2010 NSPS Subpart J Report (1/28/11)	(*Not Reported)	Unit 59 South Emergency Flare (*need EQT)	11/23/10	H <sub>2</sub> S (230 mg/dscm concentration)	8.2 lbs	Due to an unexpected change in the feed composition to U15, the high pressure stripper column 151102 overfilled with liquid causing an overpressure scenario.	40 CFR 60 Subpart J
N8.	Consent Degree Semiannual Progress Report (7/29/11)	2580-00013-V1	HGO Charge Heater Unit 15 (*need EQT)	1/23/11	NOx (68.36 lbs/hr)	68.6-277.3 lbs/hr for six hours	(*Not Reported)	LAC 33:III.501.C.4
O8.	Consent Degree Semiannual Progress Report (7/29/11)	2580-00013-V1	Rose Hot Oil Heater (EQT 0170)	1/25/11	NOx (27.11 lbs/hr)	54.5-59.4 lb/hr for two hours	(*Not Reported)	LAC 33:III.501.C.4
P8.	Compliance Stack Test Results (5/9/11)	2580-00013-V2	Boiler No.1 (EQT 0171)	3/24-25/11	CO (1.40 max lb/hr)	(*Not Reported)	Exceeded the maximum pounds per hour permit limit for CO during a compliance test.	LAC 33:III.501.C.4 2580-00013-V2
Q8.	Refinery MACT II First Semiannual Compliance Report (7/28/11) Second Quarter 40 CFR 60 Subpart J	2580-00013-V2	Thermal Oxidizer No.1 EQT 0159 or Thermal Oxidizer No.2 EQT 0161 or Thermal Oxidizer	4/8/11	SO <sub>2</sub> (250 ppm)	SO <sub>2</sub> range was 1238.4-1243.8 ppm for 12 hours	None reported	Specific Requirement Nos. (EQT 0159) 1243 and 1246 or (EQT 0161) 1282 and 1285 or (EQT 0174) 1445 and 1449 (*provide EQT for

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Report (7/29/11)		No.3 EQT 0174 (*provide EQT for Unit 34)					Unit 34)
R8.	Refinery MACT II First Semiannual Compliance Report (7/28/11) Second Quarter 40 CFR 60 Subpart J Report (7/29/11)	2580- 00013-V2	Thermal Oxidizer No.1 EQT 0159 or Thermal Oxidizer No.2 EQT 0161 or Thermal Oxidizer No.3 EQT 0174 (*provide EQT for Unit 45)	4/8/11	SO <sub>2</sub> (250 ppm)	SO <sub>2</sub> range was 964.6-986.4 ppm for 11 hours	None reported	Specific Requirement Nos. (EQT 0159) 1243 and 1246 or (EQT 0161) 1282 and 1285 or (EQT 0174) 1445 and 1449 (*provide EQT for Unit 45)
S8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580- 00013-V1	FCCU Regenerator Vent EQT 0155	2/2/11	NO <sub>x</sub> (5.48 lbs/hr)	(*Not Reported)	CO promoter was over injected into the system causing the NO <sub>x</sub> emissions to increase above the maximum permitted lbs/hr limit.	LAC 33:III.501.C.4
T8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580- 00013-V1	FCCU Regenerator Vent EQT 0155	2/21/11	CO (*permit limit)	(*Not Reported)	This source exceeded its maximum hourly CO ppm limit due to accelerated CO levels during unit shutdown.	LAC 33:III.501.C.4
U8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580- 00013-V1	North Flare EQT 0162	2/21/11	NO <sub>x</sub> (2.90 lbs/hr) CO (3.15 lbs/hr) SO <sub>2</sub> (13.71 lbs/hr) VOC (21.05 lbs/hr) H <sub>2</sub> S (0.13 lbs/hr) PM <sub>10</sub> (0.19 lbs/hr)	7.321 lbs 6.155 lbs 0.025 lbs** 0.403 lbs** <0.001 lbs** 0.560 lbs	A pressure relief valve released fuel gas to the north flare via 43PC5355.	LAC 33:III.501.C.4
V8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580- 00013-V2	South Flare EQT 0160	4/8/11	NO <sub>x</sub> (155.87 lbs/hr) CO (141.36 lbs/hr) SO <sub>2</sub> (3.78 lbs/hr) VOC (601.19 lbs/hr) H <sub>2</sub> S (0.02 lbs/hr)	286.251 lbs 240.684 lbs 14.422 lbs 15.773 lbs 0.156 lbs	A pressure relief valve released sweet fuel gas to the south flare via 21PC6431.	LAC 33:III.501.C.4

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					PM <sub>10</sub> (11.91 lbs/hr)	21.907 lbs		
W8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	South Flare EQT 0160	4/9/11	NOx (155.87 lbs/hr)	573.221 lbs	A pressure relief valve released sweet fuel gas to the south flare via 21PC6431.	LAC 33:III.501.C.4
					CO (141.36 lbs/hr)	481.973 lbs		
					SO <sub>2</sub> (3.78 lbs/hr)	2.031 lbs**		
					VOC (601.19 lbs/hr)	31.586 lbs		
					H <sub>2</sub> S (0.02 lbs/hr)	0.022 lbs		
					PM <sub>10</sub> (11.91 lbs/hr)	43.869 lbs		
X8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	South Flare EQT 0160	4/10/11	NOx (155.87 lbs/hr)	464.383 lbs	A pressure relief valve released sweet fuel gas to the south flare via 21PC6431.	LAC 33:III.501.C.4
					CO (141.36 lbs/hr)	390.461 lbs		
					SO <sub>2</sub> (3.78 lbs/hr)	1.908 lbs**		
					VOC (601.19 lbs/hr)	25.588 lbs		
					H <sub>2</sub> S (0.02 lbs/hr)	0.021 lbs		
					PM <sub>10</sub> (11.91 lbs/hr)	35.540 lbs		
Y8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	South Flare EQT 0160	4/11/11	NOx (155.87 lbs/hr)	387.605 lbs	A pressure relief valve released sweet fuel gas to the south flare via 21PC6431.	LAC 33:III.501.C.4
					CO (141.36 lbs/hr)	325.905 lbs		
					SO <sub>2</sub> (3.78 lbs/hr)	13.344 lbs		
					VOC (601.19 lbs/hr)	21.358 lbs**		
					H <sub>2</sub> S (0.02 lbs/hr)	0.145 lbs		
					PM <sub>10</sub> (11.91 lbs/hr)	29.664 lbs		
Z8.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	North Flare EQT 0162	3/9/11	NOx (2.90 lbs/hr)	9.253 lbs	A pressure relief valve released fuel gas to the north flare via 43PCS355.	LAC 33:III.501.C.4
					CO (3.15 lbs/hr)	7.780 lbs		
					SO <sub>2</sub> (13.71 lbs/hr)	0.454 lbs**		
					VOC (21.05 lbs/hr)	0.510 lbs**		
					H <sub>2</sub> S (0.13 lbs/hr)	0.005 lbs**		
					PM <sub>10</sub> (0.19 lbs/hr)	0.708 lbs		
A9.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	North Flare EQT 0162	4/9/11	NOx (2.90 lbs/hr)	24.271 lbs	A pressure relief valve released fuel gas to the north flare via 43PCS355.	LAC 33:III.501.C.4
					CO (3.15 lbs/hr)	20.408 lbs		
					SO <sub>2</sub> (13.71 lbs/hr)	0.036 lbs**		
					VOC (21.05)	1.337 lbs**		

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					H <sub>2</sub> S (0.13 lbs/hr)	<0.001 lbs**		
					PM <sub>10</sub> (0.19 lbs/hr)	1.857 lbs		
B9.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	North Flare EQT 0162	4/10/11	NOx (2.90 lbs/hr)	22.877 lbs	A pressure relief valve released fuel gas to the north flare via 43PCS355.	LAC 33:III.501.C.4
				CO (3.15 lbs/hr)	19.235 lbs			
				SO <sub>2</sub> (13.71 lbs/hr)	0.334 lbs**			
				VOC (21.05 lbs/hr)	1.261 lbs**			
				H <sub>2</sub> S (0.13 lbs/hr)	<0.001 lbs**			
				PM <sub>10</sub> (0.19 lbs/hr)	1.751 lbs			
C9.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	2580-00013-V2	North Flare EQT 0162	4/11/11	NOx (2.90 lbs/hr)	12.233 lbs	A pressure relief valve released fuel gas to the north flare via 43PCS355.	LAC 33:III.501.C.4
				CO (3.15 lbs/hr)	10.285 lbs			
				SO <sub>2</sub> (13.71 lbs/hr)	0.027 lbs**			
				VOC (21.05 lbs/hr)	0.674 lbs**			
				H <sub>2</sub> S (0.13 lbs/hr)	<0.001 lbs**			
				PM <sub>10</sub> (0.19 lbs/hr)	0.936 lbs			
D9.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	3039-V9	North Ground Flare EQT 0282	3/10/11	NOx (11.83 lbs/hr)	66.507 lbs	A pressure relief valve released fuel gas to the north ground flare via 243PC0180-V2.	LAC 33:III.501.C.4
				CO (9.90 lbs/hr)	55.920 lbs			
				SO <sub>2</sub> (1.51 lbs/hr)	0.851 lbs**			
				VOC (21.05 lbs/hr)	3.665 lbs**			
				H <sub>2</sub> S (0.05 lbs/hr)	0.009 lbs**			
				PM <sub>10</sub> (0.90 lbs/hr)	5.090 lbs			
E9.	Louisiana General Condition XI.C and Part 70 General Condition R Report (9/30/11)	3039-V9	North Ground Flare EQT 0282	3/16/11	NOx (11.83 lbs/hr)	126.615 lbs	A control valve released fuel gas to the north ground flare via 55PC6878.	LAC 33:III.501.C.4
				CO (9.90 lbs/hr)	106.460 lbs			
				SO <sub>2</sub> (1.51 lbs/hr)	5.228 lbs			
				VOC (21.05 lbs/hr)	6.977 lbs**			
				H <sub>2</sub> S (0.05 lbs/hr)	0.057 lbs			
				PM <sub>10</sub> (0.90 lbs/hr)	9.690 lbs			
F9.	Louisiana General Condition XI.C and Part 70 General Condition R	3039-V9	North Ground Flare EQT 0282	6/4/11	NOx (11.83 lbs/hr)	137.096 lbs	A pressure relief valve released fuel gas to the north ground flare via 243PC0180-V2.	LAC 33:III.501.C.4
				CO (9.90 lbs/hr)	115.273 lbs			
				SO <sub>2</sub> (1.51 lbs/hr)	0.210 lbs**			

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	Report (9/30/11)				VOC (21.05 lbs/hr)	7.554 lbs**		
					H <sub>2</sub> S (0.05 lbs/hr)	0.002 lbs**		
					PM <sub>10</sub> (0.90 lbs/hr)	10.492 lbs		

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

Each emission exceedance 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).

### IX.

The Respondent reported the following deviations from fugitive emission requirements:

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	2005 First Semiannual Chapter 51 Fugitive Emission Report (5/13/05)	(*Not Reported)	Unit 5 (*need EQT)	October 2005	Due to database error 6 pumps were not monitored in October as required.	Louisiana MACT Determination for Refineries dated July 26, 1994
B.		2887-V2	Unit 10 FUG 0016			
C.		2887-V2	Unit 11 FUG 0017			
D.		2887-V2	Unit 25 FUG 0030	April 2005	Unit drains were not monitored annually as required in April 2005. The valves were monitored in November 2005.	Louisiana MACT Determination for Refineries dated July 26, 1994
E.		2891-V2	Unit 41 FUG 0049	November 2005	Three leaking valves were not re- monitored within sixty days as required.	Louisiana MACT Determination for Refineries dated July 26, 1994
F.	2005 First Semiannual NSPS Subpart GGG, NESHAP Subpart CC, and LAC 33:III.2121 Fugitive Emission Report (5/13/05)	2887-V2	Unit 7 FUG 0013	October 2005	Due to database error 13 pumps were not monitored in October as required.	40 CFR 60 Subpart GGG
G.		2887-V2	Unit 9 FUG 0015			40 CFR 63 Subpart CC
H.		2887-V2	Unit 14 FUG 0019			LAC 33:III.2121
I.		2887-V2	Unit 22 FUG 0027			40 CFR 63 Subpart CC
J.		2887-V2	Unit 27 FUG 0032			40 CFR 63 Subpart CC
K.		2887-V2	Unit 28 FUG 0033			LAC 33:III.2121
L.		2887-V2	Unit 46 FUG 0040			40 CFR 60 Subpart GGG
M.		2891-V2	Unit 63 FUG 0050			LAC 33:III.2121

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
N.	2005 Second Semiannual NSPS Subpart GGG, NESHAP Subpart CC, and LAC 33:III.2121 Fugitive Emission Report (11/14/05)	2887-V2	Unit 50 FUG 0044	September 2005	The Respondent added: 29 drains due to reclassification; 3 pumps due to reclassification; and 29 valves due to retagging. (*were these components previously monitored)	LAC 33:III.2121
O.	2005 Second Semiannual NSPS Subpart GGG, NESHAP Subpart CC, and LAC 33:III.2121 Fugitive Emission Report Supplement (2/14/06)	2887-V2	Unit 9 FUG 0015	December 2005	After retagging, the facility added: 4 compressors; 7 drains; and 460 valves in December. (*were these components previously monitored)	40 CFR 63 Subpart CC
P.	2006 First Semiannual Louisiana Consolidated Fugitive Emission Program Chapter 51 Report (8/15/06)	2887-V2	Unit 16 FUG 021	1/1/06- 6/30/06	After retagging, the facility added: 56 connectors; 52 valves; and 3 drains in June. (*were these components previously monitored)	Specific Requirement 142 Louisiana MACT Determination for Refineries dated July 26, 1994
Q.		2891-V4	Unit 41 FUG 049		After retagging, the facility added: 14 connectors; 13 valves; and 11 drains in May. (*were these components previously monitored)	Specific Requirement 1421 Louisiana MACT Determination for Refineries dated July 26, 1994
R.		2887-V2	Unit 50 FUG 041		After retagging, the facility added: 401 connectors; 326 valves; 17 PRVs; 4 pumps; and 18 drains in April. (*were these components previously monitored)	Specific Requirement 179 Louisiana MACT Determination for Refineries dated July 26, 1994
S.		2887-V2	Unit 67 FUG 051		After retagging, the facility added: 372 connectors; 296 valves; 16 drains; 9 PRDs; and 4 pumps in May. (*were these components previously monitored)	Specific Requirement 288 Louisiana MACT Determination for Refineries dated July 26, 1994
T.		2887-V2	Unit 8 FUG 014		After retagging, the facility added: 2 compressors; 27 drains; and 102 valves in June. (*were these components previously monitored)	40 CFR 63 Subpart CC
U.	LAC 33:III Chapter 21 Report (8/15/06)	2887-V2	Unit 14 FUG 019	1/1/06- 6/30/06	After retagging, the facility added: 25 drains; 1,042 valves in June. (*were these components previously monitored)	LAC 33:III.2121

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
V.		2887-V2	Unit 15 FUG 020		The facility reclassified 1 compressor as non-exempt and added after retagging: 14 drains; 2 pumps; and 616 valves in March. (*were these components previously monitored)	Specific Requirement 176 40 CFR 60 Subpart GGG LAC 33:III.2121
W.		2887-V2	Unit 22 FUG 027		After retagging, the facility added: 4 PRV; and 317 valves in March. (*were these components previously monitored)	Specific Requirement 202 40 CFR 63 Subpart CC LAC 33:III.2121
X.		2887-V2	Unit 23 FUG 028		After retagging, the facility added: 17 drains; and 9 valves in May. (*were these components previously monitored)	LAC 33:III.2121
Y.		2887-V2	Unit 43 FUG 039		After retagging, the facility added: 1 drain; and 140 valves in April. (*were these components previously monitored)	LAC 33:III.2121
Z.	2006 First Semiannual Monitoring Report for Permit 2887-V2 (9/25/05)	2887-V2	Unit 55 GDU Unit pump 55-1506-01 (*need FUG)	2/18/06	First attempt at repair not made within 5 days.	Louisiana MACT Determination for Refineries dated July 26, 1994
AA.	2006 First Semiannual Monitoring Report (9/25/05) and 2006 First Semiannual Louisiana Consolidated Fugitive Emission Program Chapter 51 Report (8/15/06)	2891-V4	Unit 5 FUG 0006	1/4/06- 6/30/06	Connectors were not monitored within one year of previous monitoring event. Connectors were scheduled to be monitored in May. Connectors will be monitored in August as retagging was completed in July 2006	Louisiana MACT Determination for Refineries dated July 26, 1994
BB.		2891-V4	Unit 41 FUG 0049		Connectors were not monitored within one year of previous monitoring event. Connectors were scheduled to be monitored in January. Connectors were monitored in May and no leaks were found.	
CC.		2891-V4	Unit 63 FUG 0050		Connectors were not monitored within one year of previous monitoring event. Connectors were scheduled to be monitored in June. Connectors will be monitored in August upon completion of retagging.	
DD.		2887-V2	Unit 12 FUG 0018		Connectors were not monitored within one year of previous monitoring event. Connectors were scheduled to be monitored in February. Connectors will be monitored in August.	
EE.	2006 Second Semiannual Louisiana Consolidated Fugitive	2887-V2	Unit 5 FUG 006	7/1/06- 12/31/06	After retagging, the facility added: 1 compressor; 858 connectors;	Louisiana MACT Determination for Refineries dated July 26,

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Emission Program m Chapter 51 Report (2/15/07)				1 drain; 15 PRVs; 7 pumps; and 1423 valves In November. (*were these components previously monitored)	1994
FF.		2887-V2	Unit 11 FUG 017		After retagging, the facility added: 344 valves; 297 connectors; 4 drains; and 2 PRVs In November. (*were these components previously monitored)	Louisiana MACT Determination for Refineries dated July 26, 1994
GG.		2887-V2	Unit 12 FUG 018		After retagging, the facility added: 4 compressors; 1582 connectors; 14 drains; 3PRVs; and 1539 valves In November. (*were these components previously monitored)	Louisiana MACT Determination for Refineries dated July 26, 1994
HH.		2887-V2	Unit 16 FUG 021		After retagging, the facility added: 56 connectors; 52 valves; and 3 drains In June. (*were these components previously monitored)	Louisiana MACT Determination for Refineries dated July 26, 1994
II.		2887-V2	Unit 26 FUG 031		After retagging, the facility added: 1228 connectors; 2 PRVs; and 800 valves In November. (*were these components previously monitored)	Louisiana MACT Determination for Refineries dated July 26, 1994
II.	2006 Second Semiannual Louisiana Consolidated Fugitive Emission NSPS Subpart GGG, NESHAP Subpart CC, and LAC 33:III Chapter 21 Report (2/15/07)	2887-V3	Unit 7 FUG 013	7/1/06- 12/31/06	After retagging, the facility added: 1 drain; and 122 valves In October. (*were these components previously monitored)	Specific Requirement 147 40 CFR 60 Subpart GGG LAC 33:III.2121
KK.		2887-V3	Unit 17 FUG 022		After retagging, the facility added: The facility added 100 valves In August. (*were these components previously monitored)	Specific Requirement 184 40 CFR 60 Subpart GGG LAC 33:III.2121
LL.		2887-V3	Unit 20 FUG 025		After retagging, the facility added: 10 drains and 123 valves In November. (*were these components previously monitored)	Specific Requirement 195 LAC 33:III.2121
MM.		2887-V3	Unit 27 FUG 032		After retagging, the facility added: 1,321 valves; 47 drains; and 10 PRVs In October. (*were these components previously	40 CFR 63 Subpart CC

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
					monitored)	
NN.		2887-V3	Unit 28 FUG 033		After retagging, the facility added: 129 valves; 2 compressors; and 2 PRVs In November. (*were these components previously monitored)	Specific Requirement 218 LAC 33:III.2121
OO.		2887-V3	Unit 32 FUG 0035		After retagging, the facility added: 30 drains; 1 pump; and 12 valves In November. (*were these components previously monitored)	Specific Requirement 221 LAC 33:III.2121
PP.		2887-V3	Unit 33 FUG 0033		After retagging, the facility added: 21 drains; and 41 valves In August. (*were these components previously monitored)	Specific Requirement 225 LAC 33:III.2121
QQ.		(*Not reported)	Unit 34 (*need FUG)		After retagging, the facility added: 16 drains; and 140 valves In November. (*were these components previously monitored)	LAC 33:III.2121
RR.		(*Not reported)	Unit 36 (*need FUG)		After retagging, the facility added: 35 drains; and 65 valves In November. (*were these components previously monitored)	LAC 33:III.2121
SS.		(*Not reported)	Unit 39 (*need FUG)		After retagging, the facility added: 34 drains; 4 pumps; and 35 valves In November. (*were these components previously monitored)	LAC 33:III.2121
TT.		(*Not reported)	Unit 42 (*need FUG)		After retagging, the facility added: 37 drains; and 66 valves In November. (*were these components previously monitored)	LAC 33:III.2121
UU.		(*Not reported)	Unit 45 (*need FUG)		After retagging, the facility added: 34 drains; and 115 valves In November. (*were these components previously monitored)	LAC 33:III.2121
VV.		(*Not reported)	Unit 46 (*need FUG)		After retagging, the facility added: 42 drains; 1 pump; and 451 valves In November. (*were these components previously monitored)	40 CFR 60 Subpart GGG

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
WW.		(*Not reported)	Unit 47 (*need FUG)		After retagging, the facility added: 31 drains; 3 PRVs; and 25 valves In November. (*were these components previously monitored)	LAC 33:III.2121
XX.		2887-V3	Unit 59 FUG 43		After retagging, the facility added: 7 drains; and 128 valves In August. (*were these components previously monitored)	Specific Requirement 244 40 CFR 63 Subpart CC LAC 33:III.2121
YY.		(*Not reported)	Unit 64 (*need FUG)		After retagging, the facility added: 10 drains; 1 pump; and 104 valves In November. (*were these components previously monitored)	LAC 33:III.2121
ZZ.		2887-V3	Unit 65 FUG 0045		After retagging, the facility added 7 drains in August. (*were these components previously monitored)	Specific Requirement 256 LAC 33:III.2121
A3.		2887-V3	Unit 66 FUG 0045		After retagging, the facility added: 102 valves; and 27 PRVs In October. (*were these components previously monitored)	Specific Requirement 259 40 CFR 60 Subpart GGG LAC 33:III.2121
B3.	2006 Annual Compliance Certification for Permit 2640-V5 (3/23/07)	2640-V5	FUG 0006	prior to July 2006	10 hubs, 1 dry box, and 1 catch basin were not inspected.	Specific Requirement 21 40 CFR 60.692(1-7)
C3.		2640-V5	FUG 0009		Retagging project identified previously unmonitored components.	Specific Requirement 23 LAC 33:III.2121.E.1
D3.		2640-V5	GRP 26 (*need FUG)		Retagging project identified previously unmonitored components.	Specific Requirements 74; 98-100; 106-109; 113- 115; 120-121; LAC 33:III.5109.A
E3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/07)	(*Not Reported)	Unit 63 Interconnect ing Pipeway (*need EQT)	During an April weekly pump inspection	3 pumps were not inspected.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994
F3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/07)	(*Not Reported)	Unit 63 Interconnect ing Pipeway (*need EQT)	During an June weekly pump inspection	8 pumps were not inspected.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994
G3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/07)	(*Not Reported)	Unit 34 Sulfur Plant No. 2	2/28/07	A valve (Tag No. 340177) was not repaired within 15 days.	Louisiana MACT Determination for Refineries dated July 26, 1994
H3.	Louisiana Consolidated Fugitive Emission Program First	(*Not Reported)	Unit 12	2/19/08	An OEL was discovered on the booster gas knock out drum.	Louisiana MACT Determination for Refineries dated July 26,

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Semiannual Report (8/14/08)					1994 or 40 CFR 60.592.a
I3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#275287 Tag#275809	1/15/08	Leak found: 01/15/2008 First Attempt of Repair: 01/17/2008 Leak Repaired: 02/06/2008 Leak not repaired within 15 days.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
J3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#275360; Tag#275746 Tag#276053 Tag#276078 Tag#276159 Tag#276161 Tag#276572 Tag#276588 Tag#276594 Tag#276601 A Tag#276639 Tag#276659 Tag#276689 Tag#276698 Tag#276708	1/17/08	Leak found: 01/17/2008 First Attempt of Repair: 01/28/2008 Leak Repaired: 01/28/2008 5 day initial attempt of repair not completed.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
K3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276082 Tag#276590 Tag#276597 Tag#276601 Tag#276699	1/17/08	Leak found: 01/17/2008 First Attempt of Repair : 01/28/2008 Leak Repaired: 01/30/2008 5 day initial attempt of repair not completed.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
L3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276106	1/17/08	Leak found: 01/17/2008 First Attempt of Repair: 01/28/2008 Leak Repaired: 01/31/2008 5 day initial attempt of repair not completed.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
M3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276158 Tag#276681	1/15/08	Leak found: 01/17/2008 First Attempt of Repair: 01/28/2008 Leak Repaired: 01/29/2008 5 day initial attempt of repair not completed.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
N3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#275880	1/15/08	Leak found: 01/15/2008 First Attempt of Repair: 01/17/2008 Leak Repaired: 02/04/2008 Leak not repaired within 15 days.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
O3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276142	1/09/08	Leak found: 01/09/2008 First Attempt of Repair: 01/09/2008 Leak Repaired: 01/29/2008 Leak not repaired within 15 days.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
P3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276660	1/17/08	Leak found: 01/17/2008 First Attempt of Repair: 01/28/2008 Leak Repaired: 02/06/2008 5 day initial attempt of repair not completed and Leak not repaired within 15 days.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
Q3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report	(*Not Reported)	Unit 27 Tag#276672 Tag#276745	1/17/08	Leak found: 01/17/2008 First Attempt of Repair: 01/26/2008 Leak Repaired: 02/06/2008 5 day initial attempt of repair not	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	(8/14/08)				completed and Leak not repaired within 15 days.	
R3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276745	1/18/08	Leak found: 01/18/2008 First Attempt of Repair: 01/29/2008 Leak Repaired: 02/06/2008 5 day initial attempt of repair not completed and Leak not repaired within 15 days.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
S3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/14/08)	(*Not Reported)	Unit 27 Tag#276755	1/18/08	Leak found: 01/18/2008 First Attempt of Repair: 01/28/2008 Leak Repaired: 01/29/2008 5 day initial attempt of repair not completed.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
T3.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report LAC 33:III.Chapter 51 (8/14/08)	(*Not Reported)	Unit 27 Tag#276847	1/18/08	Leak found: 01/18/2008 First Attempt of Repair: 01/28/2008 Leak Repaired: 01/28/2008 5 day initial attempt of repair not completed.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
U3.	Fugitive Emission Program Semiannual Report Units Subject to NSPS Subpart GGG, NESHAP Subpart CC and LAC 33:III.2121 (8/14/08)	(*Not Reported)	Unit 46 Fuel Gas purge line	6/2/08	During an internal audit an OEL was discovered on the fuel gas purge line.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592a
V3.	Fugitive Emission Program Semiannual Report Units Subject to NSPS Subpart GGG, NESHAP Subpart CC and LAC 33:III.2121 (8/14/08)	(*Not Reported)	Unit 7 Tag#076083 Tag#076767 Unit 09 Tag#097015 Unit 10 Tag#104345 Tag#107296	1/2/08	Leak found: 01/02/2008 First Attempt of Repair: 01/02/2008 Leak Repaired: 02/07/2008 Leak not repaired within 15 days.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592a
W3.	Fugitive Emission Program Semiannual Report Units Subject to NSPS Subpart GGG, NESHAP Subpart CC and LAC 33:III.2121 (8/14/08)	(*Not Reported)	Unit 7 Tag#076126 Unit 10 Tag#103718	1/2/08	Leak found: 01/02/2008 First Attempt of Repair: 01/03/2008 Leak Repaired: 02/07/2008 Leak not repaired within 15 days.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592a
X3.	Louisiana Consolidated Fugitive Emission Program Second Semiannual Report LAC 33:III.Chapter 51 (8/14/08)	(*Not Reported)	(*need FUG)	Week of August 25, 2008	During a third party audit on the week of August 25, two valves were identified as not in the system. (*were these components previously monitored)	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994
Y3.	Louisiana Consolidated Fugitive Emission Program Second Semiannual Report LAC 33:III.Chapter 51 (8/14/08)	(*Not Reported)	(*need FUG)	Week of August 25, 2008	Three open-ended lines were identified.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a
Z3.	Louisiana Consolidated Fugitive Emission Program Second Semiannual Report LAC 33:III.Chapter 51 (8/14/08)	(*Not Reported)	(*need FUG)	During Second Semiannual Reporting Period	Internal audits revealed open-ended lines on 3 occasions.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592.a

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A4.	Louisiana Consolidated Fugitive Emission Program Second Semiannual Report LAC 33:III.Chapter 51 (8/14/08)	N/A	N/A	Week of August 25, 2008	Purge material from a VOC sampling event was found in an uncovered bucket.	Louisiana MACT Determination for Refineries dated July 26, 1994
B4.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/15/11)	2580-00013-V0 or 3039-V8*	Valve Tag # 097345 (*need FUG)	1/6/11	First attempts at repair not completed within 5 days of a valve that was found leaking on 1/6/11 and repaired 1/12/11 due to failure of the data logger to properly download.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592a
C4.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/15/11)	2580-00013-V0 or 3039-V8	Pump Tag # 103913 (*need FUG)	1/1/11-6/30/11	Pump was on DOR and was isolated and out of service. The pump was repaired and put back into service without notification to the LDAR contractor.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592a
D4.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/15/11)	3039-V9	FUG 0060	1/1/11-6/30/11	On 6/27/11, the refinery experienced an unexpected shutdown in Unit 215. The unit was restarted on 7/19/11. During the shutdown, the unit was de-pressured and de-inventoried. Therefore, no LDAR monitoring could be conducted. Work scheduled for the unit included the monthly pump run and the previous leaker run for the following pumps: tag nos. 2150136, 2150168, 2150201, 2150224, 2150514, 2150534, 2150618, 2150642, 2150710, 2150728, 2152697, and 2152720 and the following previous leakers: 2150127, 2150167, 2150434, 2150436, 2150438, 21504408, 2150472, 2151087, 2151175, 2151176, 2151210, 2151416, 2151953, 2152179, 2152286, 2152655, 2153475, and 2153530A.	40 CFR 60.592a
E4.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/15/11)	2580-00013-V0 or 3039-V8	(*Not Reported)	1/1/11-6/30/11	6 open-ended lines were identified and corrected at the time of discovery.	Louisiana MACT Determination for Refineries dated July 26, 1994 or 40 CFR 60.592a
F4.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/15/11)	2580-00013-V2	FUG 0027	1/13/11	Unit 22 shutdown for a turnaround on 1/13/11 with open leaks. The unit was restarted on 1/27/11. The leaks were resolved as soon as repair technicians were allowed back in the unit.	Louisiana MACT Determination for Refineries dated July 26, 1994
G4.	Louisiana Consolidated Fugitive Emission Program First Semiannual Report (8/15/11)	2580-00013-V1	FUG 0019 and FUG 0020	First week of February 2011	Units 14 and 15 experienced unplanned shutdowns with leaks. The leaks were resolved as soon as repair technicians were allowed back in the unit.	Louisiana MACT Determination for Refineries dated July 26, 1994
H4.	Louisiana Consolidated Fugitive Emission Program Second Semiannual Report (2/15/11)	3039-V7 3039-V8	Valve Tag # 2051806 (*need FUG)	12/27/10	Valve was not repaired within 15 days due to miscommunication on repair technique.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for Refineries dated July 26, 1994
I4.	Louisiana Consolidated Fugitive Emission Program Second	3039-V7 3039-V8	(*need FUG)	7/1/10-12/31/10	16 open-ended lines were identified and corrected at the time of discovery.	40 CFR 60 Subpart GGGa Louisiana MACT Determination for

	REPORT (date)	PERMIT NUMBER	EMISSION POINT	INCIDENT DATE	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
	Semiannual Report (2/15/11)					Refineres dated July 26, 1994

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

X.

The Respondent failed to meet the following reporting requirements:

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
A.	2005 Second Semiannual Monitoring Report for Permit 2891-V2 (3/29/05)	2891-V2	Notify the Department 30 days prior to removing a tank for service.	6/30/05	(*Additional Information required)	40 CFR 63.654(h)(2)(ii)
B.	2006 Annual Compliance Certification for Permit 2640-V5 (3/23/07)	2640-V5	Within 60 days of initial startup, submit certification that the equipment necessary to comply with 40 CFR 60 Subpart QQQ has been installed and the required initial inspections have been conducted.	7/9/06	7/21/09	Specific Requirement 199 40 CFR 60.690
C.	2007 Specific Requirement Report	3039-V2	Annual Report of sum of fugitive emission for GRP0028 GME Fugitive Cap.	3/31/08	N/A	Specific Requirement 571
D.	2007 Specific Requirement Report	3039-V2	Annual Report of the heat input of the individual equipment and the overall total heat and the emissions for GRP0029 GME Heater/Boiler Cap.	3/31/08	N/A	Specific Requirement 572
E.	2007 Specific Requirement Report	3039-V2	Annual Report of the heat input of each thermal oxidizer and the overall total heat input and the emissions for GRP0030 GME Thermal Oxidizer Cap.	3/31/08	N/A	Specific Requirement 573
F.	Unauthorized Discharge Notification (1/8/10)	3039-V6	Prompt notification shall be provided within a time frame not to exceed 24 hours after learning of the discharge.	1/6/10	1/8/10	LAC 33:1.3917.A
G.	Unauthorized Discharge Notification Report (1/27/10)	2891-V6	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge	3/28/10	No updates submitted.	LAC 33:1.3925.A.3

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
			shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.			
H.	Unauthorized Discharge Notification Report (1/30/10)	2893-V9	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	3/31/10	No updates submitted.	LAC 33:1.3925.A.3
I.	Unauthorized Discharge Notification Report (1/31/10)	2887-V7	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	4/1/10	No updates submitted.	LAC 33:1.3925.A.3
J.	Unauthorized Discharge Notification Report (2/1/10) (Revised 9/29/10)	2640-V5	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	4/2/10	Revised report submitted 9/29/10 did not provide results of the investigation.	LAC 33:1.3925.A.3
K.	Unauthorized Discharge Notification Report (1/16/10)	2887-V7	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the	3/17/10	No updates submitted.	LAC 33:1.3925.A.3

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
			ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.			
L.	Unauthorized Discharge Notification Report (1/25/10)	2893-V11	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	3/26/10	No updates submitted.	LAC 33:1.3925.A.3
M.	Unauthorized Release Notification Report (1/18/10)	3039-V6	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	3/1/10	No updates submitted.	LAC 33:1.3925.A.3
N.	Unauthorized Discharge Notification Report (11/9/10)	(*Not Reported)	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.	1/8/11	No updates submitted.	LAC 33:1.3925.A.3
O.	Unauthorized Discharge Notification Report (12/2/10)	2580-00013-V0	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an	1/31/11	No updates submitted.	LAC 33:1.3925.A.3

	REPORT (date)	PERMIT NUMBER	REPORTING REQUIREMENT	DUE DATE	SUBMITTAL DATE	REGULATORY or PERMIT REQUIREMENTS
			ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted.			
P.	Unauthorized Discharge Notification Report (5/21/10)	2893-V11	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted	7/20/10	No updates submitted.	LAC 33:1.3925.A.3
Q.	Unauthorized Discharge Notification Report (8/27/10)	3039-V7	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted	10/26/10	No updates submitted.	LAC 33:1.3925.A.3
R.	Unauthorized Discharge Notification Report (9/17/10)	2893-V11 3039-V7	For information required by Subsection B of LAC 33:1.Chapter 39 that is not available at the time of submittal of the written notification report due to an ongoing investigation, updates of the status of the ongoing investigation of the unauthorized discharge shall be submitted every 60 days until the investigation has been completed and the results of the investigation have been submitted	11/16/10	No updates submitted.	LAC 33:1.3925.A.3

Each deviation from reporting requirements is a violation of the applicable permit(s) 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).

XI.

The Respondent reported the following permit deviations:

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	DESCRIPTION	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	2005 Annual Compliance Certification for Permit 2887-V2 (3/31/06)	2887-V2	Unit 10 FUG 0016	2/15/05	None reported	Intermittent; flash column bypassed for 12.5 hours; samples collected had benzene concentrations of <10 ppm.	Flash column bypassed for 12.5 hours.	Specific Requirement Nos. 125 and 126 40 CFR 61.349(b) and (c)
B.	2006 Consolidated First Quarter General Condition XI.C Report (6/30/06)	(*Not Reported)	Unit 22 (*EQT needed)	1/25/06	VOC (39.7 lbs)	The non-condensable gases were in the SGP Depentanizer during startup which caused the Depentanizer to over pressurize and relieve to the South Flare (EQT 0160).	Unit alarms were inadvertently disabled.	LAC 33:III.905
C.	2006 Annual Compliance Certification for Permit 2640-V5 (3/23/07)	2640-V5	Unit 55 GRP 0026	through December 2006	None reported	-	Equip a closed purge system.	Specific Requirement 101
			FUG 0006	prior to July 2006	-	-	1 catch basin did not have a water seal.	Specific Requirement 180
D.	Semiannual Certification and Inspection Report for 40 CFR 60 Subpart QQQ (11/20/07)	(*Not Reported)	Unit 5-Coker Unit (*need EQT)	May 2007	None Reported	A catch basin in Unit 5 was without any type of vapor control. In May 2007, a water seal control was placed in the catch basin thus complying with QQQ regulations.	(*None Reported)	40 CFR 60 Subpart QQQ (*specific CFR requirement)
E.	Semiannual Certification and Inspection Report for 40 CFR 60 Subpart QQQ (11/20/07)	(*Not Reported)	Unit 35-BFW Treating Unit (*need EQT)	May 2007	None Reported	A catch basin in Unit 36 was without any type of vapor control. In May 2007, a water seal control was placed in the catch basin thus complying with QQQ regulations.	(*None Reported)	40 CFR 60 Subpart QQQ (*specific CFR requirement)

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	POLLUTANTS RELEASED (permit limit)	DESCRIPTION	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
F.	40 CFR 60 Subpart QQQ Semiannual Certification and Inspection Report (7/28/11)	(*Not Reported)	API #1 Back Bay (*need EQT)	9/21/10	(*Additional information required)	2 vent lines routed from the separator back bay into a covered sump downstream. The sump vents to atmosphere without control.	(*None Reported)	40 CFR 60 Subpart QQQ (*specific CFR requirement)
G.	40 CFR 60 Subpart QQQ Semiannual Certification and Inspection Report (7/28/11)	(*Not Reported)	API #1 Back Bay (*need EQT)	9/21/10	(*Additional information required)	Two sample hatches were not equipped with latching mechanisms.	(*None Reported)	40 CFR 60 Subpart QQQ (*specific CFR requirement)
H.	40 CFR 63 Subpart CC Refinery MACT Semiannual Report (7/22/11)	2580-00013-V1	Sour Naphtha Tank EQT 0129	1/5/11	None reported	2 vacuum breaker gaskets required replacement.	(*None Reported)	Specific Requirement No. 990
I.	40 CFR 63 Subpart CC Refinery MACT Semiannual Report (7/22/11)	2580-00013-V1	Sour Naphtha Tank EQT 0129	1/5/11	None reported	Three socks needed to be fabricated and installed on the support legs.	(*None Reported)	Specific Requirement No. 992
J.	40 CFR 63 Subpart CC Refinery MACT Semiannual Report (7/22/11)	2580-00013-V1	Ballast Water Tank EQT 0107	1/10/11	None reported	2 vacuum breaker gaskets required replacement.	(*None Reported)	Specific Requirement No. 669
K.	40 CFR 63 Subpart CC Refinery MACT Semiannual Report (7/22/11)	2580-00013-V1	Sour Kerosene Tank EQT 0132	1/12/11	None reported	2 vacuum breaker gaskets required replacement.	(*None Reported)	Specific Requirement No. 1033
L.	40 CFR 60 Subpart QQQ Semiannual Certification and Inspection Report (7/28/11)	(*Not Reported)	Tank 100-4 (*need EQT)	3/1/11 & 4/11/11	*Additional information required	Gasket on a vacuum breaker on Tank 100-4 was missing.	(*None Reported)	40 CFR 60 Subpart QQQ (*specific CFR requirement)
M.	40 CFR 63 Subpart CC Refinery MACT Semiannual Report (7/22/11)	2580-00013-V1	Sour Kerosene Tank EQT 0133	4/25/11	None reported	Vacuum breakers were open while the roof was not landed. Repaired 6/7/11.	(*None Reported)	Specific Requirement No. 1054
N.	2011 Annual Tank Second Seal Gap Measurement and Inspection Reports (6/16/11)	2580-00013-V2	Sour Kerosene Tank EQT 0133	5/3/11	None reported	Vacuum breakers were open with the roof not on the bottom.	(*None Reported)	Specific Requirement No. 948
O.	2011 Annual Tank Second Seal Gap Measurement and Inspection Reports (6/16/11)	2580-00013-V2	Gasoline Tank EQT 0226	5/4/11	None reported	One vacuum breaker was missing a gasket.	(*None Reported)	Specific Requirement No. 1578

Each deviation from a permit requirement(s) 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).

## COMPLIANCE ORDER

Based on the foregoing, the Respondent is hereby ordered:

### I.

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

### II.

To submit to the Enforcement Division, within sixty (60) days after receipt of this **COMPLIANCE ORDER**, a written report that includes required information as denoted by an asterisk (\*) in paragraphs V and XI of the Findings of Fact and the following table:

	REPORT (date)	PERMIT NUMBER or UNIT	EMISSION POINT	INCIDENT DATE	OPERATING PARAMETER/ DESCRIPTION	POLLUTANTS INVOLVED (permit limit)	QUANTITY REPORTED	REPORTED CAUSE	REGULATORY or PERMIT REQUIREMENTS
A.	2005 Consolidated Second Quarter General Condition IX.C and R.3 Report (9/16/05)	2893-V0	North Flare EQT 0162	6/25/05	The Gas Con debutanizer over pressured during startup.	VOC (7.9 lbs/hr)	6.9 lbs	(*cause)	(*More information required)
B.	2005 Consolidated Fourth Quarter General Condition IX.C Report (12/21/05)	(*Not Reported)	Tank 500-1 (*EQT needed)	11/5/05	One of the leg pins which supports the floating roof of the tank came out and crude oil seeped out.	Benzene (*permit limit)	0.01 lbs	(*cause)	(*More information required)
						VOC (*permit limit)	15 lbs		
C.	2005 Consolidated Second Quarter General Condition IX.C and R.3 Report (9/16/05)	2893-V0	North Flare EQT 0162	6/25/05	The Gas Con debutanizer over pressured during startup.	VOC (7.9 lbs/hr)	6.9 lbs	(*cause)	(*More information required)
D.	General Condition XI.C First Quarter Report – 2007 (6/22/07)	(*Not Reported)	Rundown line in 63 pipeway (*More information required)	1/3/07	2 pin holes in butane rundown line in 63 pipeway between pipe supports.	VOC	106.67 lbs	(*cause and maintenance)	(*More information required)
E.	General Condition XI.C First Quarter Report – 2007 (6/22/07)	(*Not Reported)	28-1305 Reactor Product Trlm Condenser (*More information required)	1/7/07	Pin hole leak was discovered in reactor product trlm condenser.	Butane (*permit limit)	178 lbs	(*cause and maintenance)	(*More information required)
F.	General Condition XI.C First Quarter Report – 2007 (9/24/07)	(*Not Reported)	Unit 28 3' butane line (*More information required)	4/10/07	3' butane line from Unit 28, which ties into the butane rundown line, developed a pinhole leak.	SO <sub>2</sub>	0.00 lbs	(*cause and maintenance)	(*More information required)
						NO <sub>x</sub>	0.00 lbs		
						VOC	3.93 e -05 lbs		
						Benzene	0.00 lbs		
						H <sub>2</sub> S	1.11 e -08 lbs		
						C1 + C2	4.91 e -02 lbs		
Butane	6 lbs								