

**STATE OF LOUISIANA**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**IN THE MATTER OF:**

**CITGO PETROLEUM CORPORATION**

**AI # 1250**

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

\* **Settlement Tracking No.**  
\* **SA-AE-24-0073**  
\*  
\* **Enforcement Tracking No.**  
\* **AE-CN-21-00378**  
\*  
\* **Docket No. 2023-0683-DEQ**  
\*

**SETTLEMENT AGREEMENT**

The following Settlement Agreement is hereby agreed to between CITGO Petroleum Corporation (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

**I**

Respondent is a corporation that owns and/or operates a petroleum refinery located in Sulphur, Calcasieu Parish, Louisiana (“the Facility”).

**II**

On October 20, 2021, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement Tracking No. AE-CN-21-00378 (Exhibit 1).

**III**

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

#### IV

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

#### V

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of ONE HUNDRED SIXTY THOUSAND AND NO/100 DOLLARS (\$160,000.00), of which Seven Thousand Sixty-Eight and 75/100 Dollars (\$7,068.75) represents the Department's enforcement costs, in settlement of the claims set forth in this Settlement Agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

#### VI

Respondent further agrees that the Department may consider the permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement Agreement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

#### VII

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

Department to enforce this Settlement Agreement.

## VIII

This Settlement Agreement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and Settlement Agreement, the Department considered the factors for issuing civil penalties set forth in La. R.S. 30:2025(E) of the Act.

## IX

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

## X

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

## XI

Payment is to be made within thirty (30) days from notice of the Secretary's signature. If payment is not received within that time, this Settlement Agreement is voidable at the option of the Department. The Respondent shall provide its tax identification number when submitting payment. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed

or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form attached hereto.

## XII

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

## XIII

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

**CITGO PETROLEUM CORPORATION**

BY: \_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed)

TITLE: \_\_\_\_\_

THUS DONE AND SIGNED in duplicate original before me this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_, at \_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC (ID # \_\_\_\_\_)

\_\_\_\_\_  
(stamped or printed)


**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
Aurelia S. Giacometto, Secretary

BY: \_\_\_\_\_  
Jerrie "Jerry" Lang, Assistant Secretary  
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_, at Baton Rouge, Louisiana.

\_\_\_\_\_  
NOTARY PUBLIC (ID # \_\_\_\_\_)

\_\_\_\_\_  
(stamped or printed)

Approved:   
\_\_\_\_\_  
Jerrie "Jerry" Lang, Assistant Secretary

JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE

OCT 20 2021

CERTIFIED MAIL (7012 2210 0001 1915 8749)  
RETURN RECEIPT REQUESTED

**CITGO PETROLEUM CORPORATION**  
c/o C T Corporation System  
Agent for Service of Process  
3867 Plaza Tower Drive  
Baton Rouge, LA 70816



**RE: CONSOLIDATED COMPLIANCE ORDER  
& NOTICE OF POTENTIAL PENALTY  
ENFORCEMENT TRACKING NO. AE-CN-21-00378  
AGENCY INTEREST NO. 1250**

Dear Sir/Madam:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is hereby served on **CITGO PETROLEUM CORPORATION (RESPONDENT)** for the violation(s) described therein.

Compliance is expected within the maximum time period established by each part of the **COMPLIANCE ORDER**. The violation(s) cited in the **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Antoinette Cobb at (225) 219-3072 or via email at [antoinette.cobb@la.gov](mailto:antoinette.cobb@la.gov).

Sincerely,

A handwritten signature in black ink that reads "Angela Marse".

Angela Marse  
Administrator  
Enforcement Division

AM/AFC/afc  
Alt ID No. 0520-00016  
Attachment

c: **Citgo Petroleum Corporation**  
**c/o Ms. Phyllis Holifield, Manager-Environmental Protection Dept.**  
**P. O. Box 1562**  
**Lake Charles, LA 70602**

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

**IN THE MATTER OF**

**CITGO PETROLEUM CORPORATION  
CALCASIEU PARISH  
ALT ID NO. 0520-00016**

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

\*  
\*  
\* **ENFORCEMENT TRACKING NO.**  
\*  
\* **AE-CN-21-00378**  
\*  
\* **AGENCY INTEREST NO.**  
\*  
\* **1250**  
\*

**CONSOLIDATED  
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY**

The following **CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY** is issued to **CITGO PETROULEUM CORPORATION (RESPONDENT)** by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

**FINDINGS OF FACT**

I.

The Respondent owns and/or operates the Lake Charles Manufacturing Complex (the Facility), a petroleum refinery, located at 1601 Louisiana Highway 108 East in Sulphur, Calcasieu Parish, Louisiana. The Facility operates or has operated under the authority of the following Air Permits:

Logistics Area	Title V	2796-V14	08/20/2020	04/11/2022
		2796-V13	11/30/2018	04/11/2022
		2796-V12	08/17/2018	04/11/2022
		2796-V11	04/11/2017	04/11/2022
CAT Area	Title V	2908-V10	03/07/2019	07/15/2021



		2908-V9	10/24/2017	07/15/2021
		2908-V8	07/15/2016	07/15/2021
Reformer Area	Title V	2920-V4	08/08/2021	08/08/2026
		2920-V3	05/13/2016	05/13/2021
Thermal Area	Title V	2930-V7	05/05/2021	05/05/2026
		2930-V6	01/24/2020	01/20/2021
		2930-V5AA	12/27/2016	01/20/2021
ATT	Title V	2935-V11	09/17/2020	10/28/2021
		2935-V10	02/02/2020	10/28/2021
		2935-V9	11/28/2018	10/28/2021
		2935-V8	12/21/2017	10/28/2021
		2935-V7AA	10/24/2017	10/28/2021
		2935-V7	08/01/2017	10/28/2021
		2935-V6	04/06/2017	10/28/2021
CLAW Plant	Title V	3009-V6	09/16/2021	09/16/2026
		3009-V5	03/23/2018	09/07/2021
		3009-V4	09/07/2016	09/07/2021
Sites Service Area	Title V	3010-V5	09/20/2019	11/03/2021
		3010-V4AA	12/27/2016	11/03/2021
Prevention of Significant Deterioration (PSD)	PSD	PSD-LA-570(M-2)	06/15/2021	06/15/2031
		PSD-LA-691 (M-2)	03/25/2021	03/25/2031
		PSD-LA-691 (M-1)	04/18/2018	04/18/2028
		PSD-LA-643 (M-4)	12/18/2015	12/18/2025
		PSD-LA-222 (M-2)	11/07/2017	11/07/2027

## II.

The Department received an Unauthorized Discharge Notification Report for Incident No. T186788 dated September 7, 2018, and a Follow-Up Unauthorized Discharge Notification Report dated September 27, 2018. According to the reports, on August 22, 2018, the vapor recovery system shutdown during a transfer of benzene product to a barge. The product transfer did not shutdown. The vapors pressured up in the barge vent line and relieved from pressure relief device, 347PSV0845. The event lasted for approximately 1.33 hours and resulted in the release of 662 lbs of benzene.

The Respondent reported the release was due to loading without an automatic emergency shutdown system in place. The Respondent is required make a verbal notification within 24 hours after learning of a discharge that exceeded a reportable quantity. In the Unauthorized Discharge Notification Report dated September 7, 2018, the Respondent reported 662 lbs of benzene was released on August 22, 2018. The release started at 1:21 PM and ended at 2:42 PM. The reportable quantity for benzene is 10 lbs. The Respondent reported the verbal notification was made on September 5, 2018. The failure to make the required notification within 24 hours after learning of a discharge that exceeded a reportable quantity is a violation of LAC 33:I.3917.A, LAC 33:III.927.A, and La. R.S. 30:2057(A)(2). The Respondent is required to submit a written report for any unauthorized discharge that requires notification under LAC 33:I.3915.A, 3917, or 3923 within seven (7) calendar days after the expiration of the time allowed for the notification. The report submitted to the Department was postmarked September 7, 2018. Failure to submit the written report within seven (7) calendar days after expiration of the time allowed for notification is a violation of LAC 33:I.3925.A, LAC 33:III.927.A, and La. R.S. 30:2057(A)(2). In the Follow-Up Unauthorized Discharge Notification Report dated September 27, 2018, the Respondent did not determine if the release was preventable or not; the Respondent reported the incident was under investigation. The Respondent is required to submit written updates of the status of an ongoing investigation for an unauthorized discharge every sixty (60) days until the investigation is completed and the results of the investigation have been submitted. Failure to submit the 60-day update report is a violation of LAC 33:I.3925.A.3 and La. R.S. 30:2057(A)(2). In correspondence dated February 8, 2021, the Respondent reported the event was preventable. Failure to operate control equipment, any device or contrivance, operating procedure or abatement scheme to prevent or reduce air pollution, in the proper manner is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

### III.

The Department received an Unauthorized Discharge Notification Report for Incident No. T187273 dated October 4, 2018, and Follow-Up Unauthorized Discharge Notification Reports dated October 30, 2018, December 26, 2018, February 21, 2019, and April 17, 2019. According to the reports, on September 27, 2018, the external floating roof on Tank 41 Recovered Oil Floating Roof Tank (EQT 0091) was found to be listing. Efforts were undertaken to empty the tank. On September 28, 2018, at 10:20 AM the floating roof sunk while draining the tank. Oil was discovered leaking from the tank bottom at 2 PM on September 28, 2018. The event lasted for approximately 23 hours and resulted in the

release of approximately 1,337 barrels (398,161 lbs) of liquid crude oil from the tank and approximately 1,339 barrels (407,517 lbs) of VOC evaporated from the top of the tank's floating roof and surrounding dike area. The table below lists the constituents released.

Benzene	2,600 lbs	Gas
Toluene	8,976 lbs	Gas
Mixed Xylenes	13,677 lbs	Gas
Ethylbenzene	2,119 lbs	Gas

The investigation determined the incident was due to corrosion under the floating roof rim angle that allowed water/product into the pontoons that exceeded the buoyancy of the roof. The Respondent determined the event was preventable. Failure to operate control equipment, any device or contrivance, operating procedure or abatement scheme to prevent or reduce air pollution, in the proper manner is a violation of LAC 33:III.905.A and La. R.S. 30:2057(A)(1) and 30:2057(A)(2). Failure to keep the roof floating on the liquid at all times is a violation of 40 CFR 60.112b(a)(2)(iii), 40 CFR 63.640(n)(2) and (8), LAC 33:III.2103.D, and La. R.S. 30:2057(A)(2).

#### IV.

On or about November 4-6, 2020, and October 5, 2021, the Department conducted file reviews to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits. While the review is not complete, the Department noted the violations found in Paragraphs V-X of the Findings of Fact portion of this enforcement action.

#### V.

The Respondent reported the following violations of permitted operating parameters:

A.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2796-V11	EQT 0007 Vapor Combustion System (VCS) Marine Dock	07/12/2017-12/29/2017 (428 hours)	Operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction.	The equipment was in service without proper controls in place.  <i>Temperature Indicator (TI) was not installed in proper location on outlet of VCS.*</i>	40 CFR 63.562(e), Specific Requirement 82
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B.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2798-V11	EQT 0007 Vapor Combustion System Marine Dock	09/22/2017 (1.65 hours)	Opacity <= 20%	Oxygen starved Vapor Combustion System.	LAC 33:III.1101.B, Specific Requirement 94
C.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0038 A Cat-Wet Gas Scrubber	07/23/2017 (1 hour)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	Loss of steam from high pressure boilers to Fluidized Catalytic Cracking Units (FCCUs) during Powerhouse upset caused the process air blowers to slowdown. The loss of air to regenerator caused exceedances.	40 CFR 60.103(a), 40 CFR 63.1565(a), Specific Requirements 24, 32, & 37
D.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0039 B Cat-Wet Gas Scrubber	07/23/2017 (1 hour)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	Loss of steam from high pressure boilers to FCCUs during Powerhouse upset caused the process air blowers to slowdown. The loss of air to regenerator caused exceedances.	40 CFR 60.103(a), 40 CFR 63.1565(a), Specific Requirements 45, 53, & 58
E.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0039 B Cat-Wet Gas Scrubber	07/23/2017 (1 hour)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	Loss of steam from high pressure boilers to FCCUs during Powerhouse upset caused the process air blowers to slowdown. The loss of air to regenerator caused exceedances.	40 CFR 60.103(a), 40 CFR 63.1565(a), Specific Requirements 45, 53, & 58
				07/23/2017- 07/24/2017 (3 hours)			
				07/24/2017 (1 hour)			
				07/24/2017 (1 hour)			
F.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0040 C Cat-Wet Gas Scrubber	07/24/2017 (1 hour)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	Loss of steam from high pressure boilers to FCCUs during Powerhouse upset caused the process air blowers to slowdown. The loss of air to regenerator caused exceedances.	40 CFR 60.103(a), 40 CFR 63.1565(a), Specific Requirements 67, 75, & 80
				07/25/2017 (2 hours)			
				07/25/2017 (1 hour)			

G.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0320 CGH Furnace B-101	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 87
H.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0321 CGH Furnace B-102	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 91
I.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0322 CGH Reboiler, B-103	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 95
J.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0323 CGH Furnace, B-201	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) [162 ppm]	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 99

K.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0324 CGH Furnace, B-202	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) (162 ppm)	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 103
L.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0325 CGH Reboiler, B-203	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) (162 ppm)	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 107
M.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	GRP 0119 Furnace Cap	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) (162 ppm)	F-2 fuel gas drum exceeded 162 ppm 3-hour rolling average due to a process upset at the Powerhouse resulting in the loss of all four (4) high pressure boilers and generators. There were five (5) 3-hour period exceedances.	40 CFR 60.104(a)(1), Specific Requirement 151
N.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	GRP 0119 Furnace Cap  EQT 0241 Unicracker B-1, B-2, B-3, B-4, and B-5 Furnace	10/11/2017 (6 minutes)	Opacity ≤ 20%	There were visible emission from Unicracker B-2 Furnace stack for six (6) minutes due to a rapid reduction in unit rate after loss of H2 production from C Reformer.	LAC 33:III.1101.B, Specific Requirement 161

O.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	RLP 0017 C-Reformer CCR Regenerator Vent	12/06/2017- 12/07/2017 (24 hours)	Existing continuous catalytic reforming unit (CCR) must reduce HCl by 97% if using a control device or to 10 ppmv (dry at 3% O <sub>2</sub> ), whichever is less stringent.	During the startup of the C-Reformer CCR system, the daily average temperature at the inlet of the chloride system exceeded 344 F, which was the limit established during stack testing at which 97% reduction is achieved.	40 CFR 63.1567, Specific Requirement 190
P.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B- 501, B-502, B- 506	07/29/2017- 08/03/2017 (32 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-501,502,506 furnaces (EQT 0237) exceeded the upper oxygen limit intermittently during unit feed rate adjustments while Unicracker was shutting down.*	Specific Requirement 231
Q.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B- 501, B-502, B- 506	08/05/2017- 08/07/2017 (42 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-501,502,506 furnaces (EQT 0237) exceeded the upper oxygen limit intermittently during C-Reformer shutdown.*	Specific Requirement 231
R.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B- 501, B-502, B- 506	08/25/2017- 08/29/2017 (71 hours) 08/30/2017- 08/31/2017 (10 hours) 09/03/2017 (2 hours) 09/04/2017 (1 hour)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-501,502,506 furnaces (EQT 0237) exceeded the upper oxygen limit during C-Reformer startup.*	Specific Requirement 231
S.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B- 501, B-502, B- 506	10/11/2017- 10/12/2017 (29 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-501,502,506 furnaces (EQT 0237) exceeded the upper oxygen limit during C-Reformer E501 upset.*	Specific Requirement 231
T.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B- 501, B-502, B- 506	12/29/2017 (6 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-501,502,506 furnaces (EQT 0237) exceeded the upper oxygen limit during C-Reformer E501 upset.*	Specific Requirement 231

U.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area EQT 0237 C-Reformer B-501, B-502, B-506	07/29/2017-07/31/2017 (29 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-501,502,506 furnaces (EQT 0237) exceeded the upper oxygen limit during C-Reformer E501 upset.*	Specific Requirement 231
V.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area EQT 0238 C-Reformer B-503, B-504, B-505	08/06/2017-08/07/2017 (21 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-503,504,505 furnaces (EQT 0238) exceeded the upper oxygen limit due to unit rate adjustments during Unicracker shutdown.*	Specific Requirement 231
W.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area EQT 0238 C-Reformer B-503, B-504, B-505	08/27/2017-08/29/2017 (46 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-503,504,505 furnaces (EQT 0238) exceeded the upper oxygen limit during C-Reformer startup.*	Specific Requirement 231
X.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area EQT 0238 C-Reformer B-503, B-504, B-505	10/11/2017 (9 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-503,504,505 furnaces (EQT 0238) exceeded the upper oxygen limit during C-Reformer upset.*	Specific Requirement 231
Y.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	UNF 0006 Reformer Area EQT 0238 C-Reformer B-503, B-504, B-505	12/29/2017 (17 hours)	Comply with the requirements of PSD-LA-222 (M-1).	C-Reformer B-503,504,505 furnaces (EQT 0238) exceeded the upper oxygen limit intermittently during C-Reformer E501 upset.*	Specific Requirement 231
Z.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0271 Power House Boiler BSA	07/23/2017 (7 hours)	The owner or operator shall not burn in any fuel gas combustion device any fuel gas that contains H <sub>2</sub> S in excess of 162 ppmv (3-hour rolling average)	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	40 CFR 60.102a(g)(1)(ii), Specific Requirement 19



A2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	<p>GRP 0122 Furnace Cap</p> <p>EQT 0239 Coker II B-201 Furnace</p> <p>EQT 0240 Coker II B-202 Furnace</p> <p>EQT 0249 Vacuum Furnace B-201</p> <p>EQT 0251 Vacuum Furnace B-1</p> <p>EQT 0252 Coker 1 Furnace B-101</p> <p>EQT 0253 Coker 1 Furnace B-201</p> <p>EQT 0254 SRF Furnace B-5</p> <p>EQT 0255 C Topper Furnace B-1C</p> <p>EQT 0256 C Topper Furnace B-2C</p> <p>EQT 0257 Feed Prep Furnace B-101</p>	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) (162 ppm)	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	40 CFR 60.104(a)(1), Specific Requirement 261
B2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	<p>GRP 0124 Powerhouse Boiler Cap</p> <p>EQT 0264 Power House Boiler B1C</p> <p>EQT 0267 Power House Boiler B2</p> <p>EQT 0268 Power House Boiler B2A</p> <p>EQT 0270 Power House Boiler B3C</p>	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide ≤ 0.1 gr/dscf (230 mg/dscm) (162 ppm)	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	40 CFR 60.104(a)(1), Specific Requirement 279

C2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-V5AA	GRP 0138 PSD Furnace Cap  EQT 0247 A-Topper Furnace B-4  EQT 0248 B-Topper Furnace B-104  EQT 0396 1A-CV-1 Furnace, B101A  EQT 0397 1B-CV-1 Furnace, B101B  EQT 0398 2A-CV-1 Furnace, B102A  EQT 0399 2B-CV-1 Furnace, B102B	07/23/2017 (7 hours)	Fuel gas: Hydrogen sulfide $\leq 0.1$ gr/dscf (230 mg/dscm) [162 ppm]	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	40 CFR 60.104(a)(1), Specific Requirement 296
D2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-VB	EQT 0297 Sulfen Vent Stack	10/18/2017- 10/19/2017 (24 hours)	Hydrogen sulfide $\leq 10$ ppmv @ 0% excess air	Failed to operate and maintain source, in a manner consistent with safety and good air pollution control practices for minimizing emissions.	40 CFR 60.104(a)(2)(ii), Specific Requirement 27
E2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap	12/08/2017 (3 hours)	Fuel gas: Hydrogen sulfide $\leq 162$ ppm	H <sub>2</sub> S exceeded 162 ppm for one (1) 3-hour period when flaring occurred at the B-16 flare. Flaring was associated with the purging of the JC-101C compressor following an unplanned shut down.	40 CFR 60.103a(h), Specific Requirement 93
F2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0350 B-11 Flare	10/22/2017 (1.3 hours)	Operate with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f)(2)	The pilot gas regulator was set higher than recommended.	Specific Requirements 61, 62, 63, 64, 65, 66, 95, 99, 101, 102, 107, and 131
G2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	3010-V4AA	EQT 0351 B-12 Flare	12/15/2017 (0.1 hour)	Operate with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f)(2)	While steaming the flare molecular seal, the pilots were extinguished.	Specific Requirements 61, 62, 63, 64, 65, 66, 95, 99, 101, 102, 107, and 131

H2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0521 B-105 Flare	07/23/2017 (0.11 hour)	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 of 5 minutes during any two consecutive hours.	Unit upset and flaring caused by the unplanned shutdown of powerhouse steam boilers. Adequate steam not added to prevent smoking.	Specific Requirements 78, 79, 80, 94, 101, 102, 107, and 131
I2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0343 B-1 Flare	01/17/2018-01/18/2018 (19 hours)	Fuel gas: Hydrogen sulfide ≤ 162 ppm	H <sub>2</sub> S exceeded 162 ppm for 17 3-hour periods due to malfunctions of a B-1 Flare switching valve. This allowed a small amount of sour gas to bypass the caustic scrubber.	40 CFR 60.103a(h), Specific Requirement 93
I2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0352 B-16 Flare	01/17/2018-01/19/2018 (24 hours)	Fuel gas: Hydrogen sulfide ≤ 162 ppm	H <sub>2</sub> S exceeded 162 ppm for 18 3-hour periods due to flaring associated with a malfunction of the JC102 compressor and associated unit shutdown and subsequent unit startup.	40 CFR 60.103a(h), Specific Requirement 93
K2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0350 B-11 Flare	05/23/2018 (4 hours)	Fuel gas: Hydrogen sulfide ≤ 162 ppm	H <sub>2</sub> S exceeded 162 ppm for two (2) 3-hour periods due to leaking switching valve.	40 CFR 60.103a(h), Specific Requirement 93
L2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0354 CB-11 Flare	01/03/2018 (0.9 hours)	Operate with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f)(2)	Unable to determine primary cause of the loss of pilot flames.	40 CFR 60.18(c)(2), 40 CFR 63.11(f)(2), Specific Requirements 95, 99, 101, 102, 107, and 131
M2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	CRG 0001 Group A Tanks	05/23/2018-05/25/2018 (34 hours)	Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.	Tank vacuum breakers were planned in the maintenance position while tank was in operation.	Specific Requirement 1

N2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	EQT 0007 Vapor Combustion System Marine Dock	01/04/2018 (0.92 hours)	Opacity <= 20%	Oxygen starved Vapor Combustion System	LAC 33:III.1101.B, Specific Requirement 94
Q2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	EQT 0007 Vapor Combustion System Marine Dock	01/06/2018-06/29/2018 (84 hours)	Operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction.	Equipment in service without proper controls in place  <i>Temperature Indicator (TI) was not installed in proper location on outlet of VCS. *</i>	40 CFR 63.562(e), Specific Requirement 82
P2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0038 A Cat-Wet Gas Scrubber	01/07/2018 (2 hours)	Maintain a 1.0 lb PM per 1000 lbs of coke burn daily average rate out of the Wet Gas Scrubber pursuant to NSPS Subpart J and NESHAP Subpart UUU emission limits as determined by parameters defined in the latest AMP	On January 7, 2018, operations installed incorrect suction screens to suction line on JP90A pump, causing water pressure to drop and resulting in A-Cat's quench section pump pressure to fall below the Alternate Monitoring Parameter (AMP) limit for compliance.	40 CFR 60.102(a)(2), 40 CFR 63.1564(a)(1), Specific Requirements 23 and 31, and 36
Q2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0038 A Cat-Wet Gas Scrubber	01/07/2018 (2 hours)	Use the following Operating Parameter Limits (OPLs) in lieu of Continuous Operating Monitoring System (COMS) as delineated in the Alternate Monitoring	On January 7, 2018, operations installed incorrect suction screens to suction line on JP90A pump, causing water pressure to drop and resulting in A-Cat's quench section pump pressure to fall below the Alternate Monitoring Parameter (AMP) limit for compliance.	Specific Requirement 44

RZ.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0038 A Cat-Wet Gas Scrubber	04/05/2018 (1 hour)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	40 CFR 60.103(a), 40 CFR 63.1565(a), Specific Requirements 24 and 33
SZ.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0038 A Cat-Wet Gas Scrubber	03/30/2018 (1 hour) 03/30/2018 (2 hours) 03/31/2018 (1 hour) 04/01/2018 (3 hours) 04/02/2018 (1 hour) 04/03/2018 (2 hours) 04/03/2018 (2 hours) 04/05/2018 (2 hours)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Specific Requirement 38
TZ.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0039 B Cat-Wet Gas Scrubber	03/30/2018- 03/31/2018 (6 hours) 03/31/2018 (2 hours) 03/31/2018 (1 hour)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Specific Requirement 60

U2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0040 C Cat-Wet Gas Scrubber	03/30/2018 (5 hours)	Maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis at 0% oxygen	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Specific Requirement 82
V2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2935-V8	EQT 0297 Sulfen Vent Stack	03/30/2018- 09/31/2018 (6.12 hours)	Hydrogen sulfide: Refinery H <sub>2</sub> S gas streams are controlled by the SRU and their TGTU, which are subject to NSPS Subpart I standards, which are more stringent than LAC 33:III.1509	B1C boiler trip resulted in loss of steam control at C SRU pit vent.	LAC 33:III.1509, Specific Requirement 34

W2.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2935-V8	LNF 0005 AAT Area EQT 0293 Thermal Oxidizer 8-407	07/01/2018-09/30/2018 (2,208 hours)	Install, operate, and maintain each continuous parameter monitoring system according to the requirements in paragraphs (c)(1) through (5) of this section.  At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion, unless the CPMS has a redundant temperature sensor	The 3 <sup>rd</sup> Quarter visual inspection of EQT 0293 Thermal Oxidizer was not conducted. A visual inspection of EQT 0293 Thermal Oxidizer temperature sensor was conducted 2 days prior to the beginning of the 3 <sup>rd</sup> Quarter	40 CFR 63.1572(c)(1)
X2.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2935-V8	EQT 0297 Sulfen Vent Stack	08/10/2018 (1.78 hours)	Hydrogen sulfide: Refinery H <sub>2</sub> S gas streams are controlled by the SRU and their TGTU, which are subject to RSPS Subpart J standards, which are more stringent than LAC 33:III.1509	Transmitter failure on TS1465. The failure made TS1465 read incorrect temperatures on the vent line, shutting down the pit vent system at C SRU.	LAC 33:III.1509, Specific Requirement 34
Y2.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2796-V11	EQT 0007 Vapor Combustion System Marine Dock	08/07/2018-08/08/2018 (8.75 hours) 08/11/2018-08/12/2018 (11.75 hours) 08/29/2018-08/30/2018 (17.75 hours)	Operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction.	Equipment in service without proper controls in place.  Temperature Indicator (TI) was not installed in proper location on outlet of VCS. *	40 CFR 63.562(e), Specific Requirement 82

22.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2930-V5AA	EQT 0267 3(K-6) Powerhouse Boiler #2 GRP 0124 3(K-6) Boiler CAP- Powerhouse CAP	10/27/2018 (0.12. hours)	Opacity <=20%	Boiler air/fuel ratio process analyzer malfunctioned causing black smoke to be released from stack.	LAC 33:III.1311.C, Specific Requirements 290 and 335
A3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2920-V3	UNF 0006 Reformer Area EQT 0237 C-Reformer B-501, B-502, B-506	07/19/2018-07/20/2018 (18 hours)	Comply with the requirements of PSD-LA-222 (M-1).	O2% limit at B-501,2,6 (EQT 0237) exceeded during unit rate cuts following loss of refinery high pressure boilers.*	Specific Requirement 231
B3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2920-V3	UNF 0006 Reformer Area EQT 0237 C-Reformer B-501, B-502, B-506	10/22/2018-10/23/2018 (11 hours)	Comply with the requirements of PSD-LA-222 (M-1).	Upper O2% limit at B-501,2,6 (EQT 0237) exceeded during a C Reformer upset. The upset occurred after losing the JPS12A boiler feed water pump.*	Specific Requirement 231
C3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2920-V3	UNF 0006 Reformer Area EQT 0237 C-Reformer B-501, B-502, B-506	10/23/2018 (5 hours)	Comply with the requirements of PSD-LA-222 (M-1).	Upper O2% limit at B-501,2,6 (EQT 0237) exceeded during a C Reformer upset. The upset occurred after losing the JPS12A boiler feed water pump.*	Specific Requirement 231
D3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2920-V3	UNF 0006 EQT 0238 C-Reformer B-503, B-504, B-505 Furnaces	10/22/2018-10/23/2018 (13 hours)	Comply with the requirements of PSD-LA-222 (M-1).	Upper O2% limit at B-503,4,5 (EQT 0238) exceeded during a C Reformer upset. The upset occurred after losing the JPS12A boiler feed water pump.*	Specific Requirement 231
E3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap EQT 0352 B-16 Flare	11/19/2018 (3 hours)	Fuel gas: Hydrogen sulfide <= 162 ppm	H <sub>2</sub> S exceeded 162 ppm for one (1) 3-hour period. During ULSD startup recycle gas was being purged to B-16 flare to turn over the atmosphere of the recycle loop from N2 to H2 to aid catalyst sulfiding.	40 CFR 60.103a(h), Specific Requirement 93 NFA, exempt



F3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0343 B-1 Flare	10/30/2018 (6.5 hours)	Operate with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f)(2)	Pilot supply gas was shutdown while isolating a leaking regulator. No regulated material was being flared during this outage.	40 CFR 60.692-5(c), 40 CFR 63.113(a)(1)(i), Specific Requirements 58, 59, and 60
G3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0343 B-1 Flare	07/19/2018 (0.2 hours)	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 of 5 minutes during any two consecutive hours	Flaring caused by loss of steam pressure to refinery operating units. The loss of high pressure boilers was initiated by unplanned shutdown of the JG4A generator.	40 CFR 60.18(c)(2), 40 CFR 60.692-5(c), 40 CFR 63.113(a)(1)(i), Specific Requirements 58, 59, 60, 94, 101, 102, 107, and 131
H3.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0521 B-105 Flare	07/20/2018 (0.15 hours)	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 of 5 minutes during any two consecutive hours	Flaring caused by loss of steam pressure to refinery operating units. The loss of high pressure boilers was initiated by unplanned shutdown of the JG4A generator.	40 CFR 60.692-5(c), 40 CFR 63.113(a)(1)(i), 40 CFR 63.1566(a)(1)(i), Specific Requirements 78, 79, and 80
I3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap  EQT 0354 CB-11 Flare	01/12/2019- 01/13/2019 (1.4 hours)	Operate with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f)(2).	Irregular supply pressure to pilots may have contributed to outages.	40 CFR 60.18(c)(2), 40 CFR 60.18(e), Specific Requirements 95, 99, 101, 102, 107, and 131
J3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area  EQT 0350 B-11 Flare	02/11/2019 (0.53 hours) Intermittent	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any two consecutive hours	Uncracker unit shutdown associated with the unplanned shutdown of the JC2 compressor. There was a failure to diagnose the cause of low pressure of the primary lube oil pump as the pump was placed back into service. In addition, there was a malfunctioning PRD on the discharge of the JP24 turbine.	40 CFR 60.692-5(c), 40 CFR 63.113(a)(1)(i), Specific Requirements 61, 62, 63, 101, 102, 107, and 131
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)						

K3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area	02/11/2019 (0.38 hours) Intermittent	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any two consecutive hours	Uncracker unit shutdown associated with the unplanned shutdown of the IC2 compressor. There was a failure to diagnose the cause of low pressure of the primary lube oil pump as the pump was placed back into service. In addition, there was a malfunctioning PRD on the discharge of the JP24 turbine.	40 CFR 60.692-5(c), 40 CFR 63.113(a)(1)(i), Specific Requirements 64, 65, 66, 101, 102, 107, and 131
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)		EQT 0351 B-12 Flare				
L3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap	01/16/2019 (0.76 hours) Intermittent	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any two consecutive hours	Steam was taken off flare to make tie-ins for project associated with new 40 CFR 63.670 requirements	40 CFR 60.590s, Specific Requirements 101, 107, and 131
M3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area	02/22/2019 (0.41 hours) Intermittent	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any two consecutive hours	Insufficient steam added to flare tip to prevent intermittent smoking.	40 CFR 60.692-5(c), 40 CFR 63.113(a)(1)(i), Specific Requirements 61, 62, 63, 101, 102, 107, and 131
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)		EQT 0350 B-11 Flare	04/27/2019 (0.25 hours) Intermittent			
N3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area	04/27/2019 (0.25 hour)	Operate flare to maintain the net heating value of flare combustion zone gas (NHV <sub>2</sub> ) at or about 270 (Btu/scf) determined on a 15-minute block period basis when regulated materials is routed to the flare for at least 15-minutes.	CEMS analyzer did not accurately quantify propane when calculating vent gas BTU.	40 CFR 63.670(e), Specific Requirement 107
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)		EQT 0350 B-11 Flare				

03.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area	02/22/2019 (0.25 hour)	Operate flare to maintain the net heating value of flare combustion zone gas (NHVcz) at or about 270 (Btu/scf) determined on a 15-minute block period basis when regulated materials is routed to the flare for at least 15-minutes.	Low NHVcz resulting from system swings associated with Targa meter testing.	40 CFR 63.670(e), Specific Requirement 107
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)		EQT 0354 CB-11 Flare				
P3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area	02/26/2019 (4.15 hours)	Operate flare to maintain the net heating value of flare combustion zone gas (NHVcz) at or about 270 (Btu/scf) determined on a 15-minute block period basis when regulated materials is routed to the flare for at least 15-minutes.	Insufficient supplemental natural gas added to flare during nitrogen purge activities.	40 CFR 63.670(e), Specific Requirement 107
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)		EQT 0352 B-16 Flare	02/27/2019 (3.75 hours)			
Q3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	3010-V4AA	UNF 0007 Site Services Area	05/27/2019 (3 hours)	Operate flare to maintain the net heating value of flare combustion zone gas (NHVcz) at or about 270 (Btu/scf) determined on a 15-minute block period basis when regulated materials is routed to the flare for at least 15-minutes.	Insufficient supplemental natural gas added to flare due to an incorrect steam flow being used in the Net Heating Value calculation. Steam flow selector is based on valve output.	40 CFR 63.670(e), Specific Requirement 107
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)		EQT 0350 B-11 Flare				
R3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	3010-V4AA	EQT 0357 Misc Power Sources	01/14/2019-02/19/2019 (864 hours)	Comply with all applicable requirements for non-emergency generators of this subpart, Subpart IIII	Long term rental engine changed classification from non-road to stationary and did not meet stationary tier requirements.  <i>Corrective action: Rental engine was replaced with engine meeting tier and tiered requirements for long term use of rental equipment was re-emphasized.</i>	40 CFR 60.4204, Specific Requirements 69 and 70

S3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0064 B-14 Flare (B/C Dock)	01/22/2019 (0.32 hour)	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 of 5 minutes during any two consecutive hours	Oxygen starved Vapor Combustor System	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), Specific Requirements 139 and 163
T3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0064 B-14 Flare (B/C Dock)	01/21/2019 (0.32 hour)	Opacity <= 20%	Oxygen starved Vapor Combustor System	LAC 33:III.1311.C, Specific Requirement 183
U3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	2796-V13	EQT 0064 B-14 Flare (B/C Dock)	05/12/2019 (0.30 hour)	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 of 5 minutes during any two consecutive hours	Oxygen starved Vapor Combustor System	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), Specific Requirements 139 and 163
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)						
V3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0064 B-14 Flare (B/C Dock)	05/12/2019 (0.30 hour)	Opacity <= 20%	Oxygen starved Vapor Combustor System	LAC 33:III.1311.C, Specific Requirement 183
W3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	02/12/2019 (0.23 hours)	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 of 5 minutes during any two consecutive hours	Flare showed intermittent periods of smoke.	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), Specific Requirements 207 and 247
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)						
X3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	02/12/2019 (0.23 hours)	Opacity <= 20%	Flare showed intermittent periods of smoke.	LAC 33:III.1311.C, Specific Requirement 253

Y3.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report January-June 2019 (07/30/2019)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	03/04/2019-03/05/2019 (0.18 hours)	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 of 5 minutes during any two consecutive hours	Flare showed intermittent periods of smoke.	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), Specific Requirements 207 and 247
	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)						
Z3.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	03/04/2019-03/05/2019 (0.18 hours)	Opacity <= 20%	Flare showed intermittent periods of smoke.	LAC 33:III.1311.C, Specific Requirement 253
A4.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0064 B-14 Flare ("B/C" Dock)	03/08/2019 (1.50 hours)	Heat content >= 300 BTU (11.2 MJ/scm)	AC controller value displayed to operators did not match calorimeter derived value used for compliance.	40 CFR 60.18(c)(3)(ii), 40 CFR 63.11(b)(6)(ii), Specific Requirements 141 and 166
B4.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0064 B-14 Flare ("B/C" Dock)	03/09/2019 (0.25 hours)	Heat content >= 300 BTU (11.2 MJ/scm)	Flare being manually controlled. Inerted vapor from ship caused lower BTU in vent gas.	40 CFR 60.18(c)(3)(ii), 40 CFR 63.11(b)(6)(ii), Specific Requirements 141 and 166
				03/09/2019 (0.25 hours)			
				03/10/2019 (0.25 hours)			
C4.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	04/02/2019 (0.25 hours)	Monitor flares to ensure that they are operated and maintained in conformance with their designs.	Pressure swings in the DGF system caused flare tip excursion.	40 CFR 60.18(d), Specific Requirement 210
				05/21/2019 (0.25 hours)			
D4.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	01/30/2019-07/18/2019 (4,063.50 hours)	On or after January 30, 2019, the flare shall meet the requirements of 40 CFR 63.670	A ¾ inch line was discovered connecting two vessels to the B700 flare bypassing the calorimeter.	40 CFR 63.647(c), 40 CFR 63.670(j)(3), Specific Requirement 252
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)				Except as provided in paragraphs (j)(5) and (6) of this section, the owner or operator shall install, operate, calibrate, and maintain a calorimeter capable of continuously measuring, calculating, and recording Net heating value of flare vent gas (NHV <sub>g</sub> ) at standard conditions.		

E4.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2920-V3	UNF 0006 Reformer Area EQT 0237 C-Reformer B-501, B-502, B-506	02/11/2019 (2 hours)	Comply with the requirements of PSD-LA-222 (M-1).	Upper O2K limit at B-501,2,6 was exceeded during unit rate cuts following an unplanned shutdown of Unitracker due to the loss of IC2 while swapping tube oil pumps.*	Specific Requirement 231
F4.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2908-V10	EQT 0040 C-Cat Wet Gas Scrubber	04/04/2019 (1 hour)	During normal operation, maintain a concentration based limit of CO out of the Wet Gas Scrubber at 500 ppmvd on a 1-hour average basis of oxygen.	The facility experienced a heavy rain event that resulted in the loss of steam pressure rapidly. The refinery wide upset resulted in 1 hour of exceedance of the CO emission standard.	40 CFR 63.1565(a), Specific Requirements 82 and 85
G4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0297 Sulften Vent Stack	07/30/2019-07/31/2019 (5.02 hours intermittent)	Hydrogen sulfide: Refinery H <sub>2</sub> S gas streams are controlled by the SRU and their TGTU, which are subject to N5PS Subpart J standards, which are more stringent than LAC 33:III.1509	Instrument air leaks and faulty wiring caused multiple pit vent trips and resulted in use of alternate educator to atmosphere.	LAC 33:III.1509, Specific Requirement 42
H4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0297 Sulften Vent Stack	09/12/2019 (0.45 hour)	Comply with the requirement of 40 CFR 63.1568(a)(4) during periods of startup and shutdown.	Nitrogen purge gas sent to thermal oxidizer during shut down for turnaround. Minimum stack temperature not maintained. Stack outlet oxygen concentration not monitored.	40 CFR 63.1568(a)(4), Specific Requirement 39
I4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0298 TG-II Vent Stack	09/12/2019 (0.45 hour)	Comply with the requirement of 40 CFR 63.1568(a)(4) during periods of startup and shutdown.	Nitrogen purge gas sent to thermal oxidizer during shut down for turnaround. Minimum stack temperature not maintained. Stack outlet oxygen concentration not monitored.	40 CFR 63.1568(a)(4), Specific Requirement 39

J4.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report July-December 2019 (01/29/2020)	3010-V4AA	GRP 0138 Refinery Flare Cap	07/15/2019 (1 hour)	For each flare, the owner or operator shall operate the flare to maintain the net heating value of flare combustion zone gas (NHV <sub>z</sub> ) at or above 270 British thermal units per standard cubic feet (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare for at least 15-minutes	Supplemental natural gas controller was maintained in manual mode following steam valve maintenance.  Actual NHV <sub>cz</sub> = 264, 264, 265, 265	40 CFR 63.670(e)
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)		EQT 0350 B-11 Flare				
K4.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report July-December 2019 (01/29/2020)	3010-V4AA	GRP 0138 Refinery Flare Cap	07/17/2019 (0.5 hour)	For each flare, the owner or operator shall operate the flare to maintain the net heating value of flare combustion zone gas (NHV <sub>z</sub> ) at or above 270 British thermal units per standard cubic feet (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare for at least 15-minutes	Change in material being flared in addition to large swing in steam measurement contributed to low NHV <sub>cz</sub> .  Actual NHV <sub>cz</sub> = 208, 255	40 CFR 63.670(e)
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)		EQT 0350 B-11 Flare				
L4.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report July-December 2019 (01/29/2020)	3010-V5	GRP 0138 Refinery Flare Cap	10/01/2019 (0.15 hour Intermittent)	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during 2 consecutive hours	Unit upset (loss of steam to IC1) resulted in flaring from the Alkylation unit.	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), 40 CFR 63.670(c), Specific Requirements 45, 46, 47, 96, 103, 104, 109
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)		EQT 0343 B-1 Flare				

M4.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report July-December 2019 (01/29/2020)	3010-V5	GRP 0138 Refinery Flare Cap	12/05/2019 (0.20 hour intermittent)	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during 2 consecutive hours	Carbonic acid corrosion on the C114 reboiler necessitating shutdown.	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), 40 CFR 63.670(c), Specific Requirements 45, 46, 47, 96, 103, 104, 109
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)		EQT 0343 B-1 Flare				
N4.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report July-December 2019 (01/29/2020)	3010-V5	GRP 0138 Refinery Flare Cap	11/20/2019 (0.8 hour intermittent)	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during 2 consecutive hours	Unscheduled shutdown of the 327/CS15 compressor.	40 CFR 60.18(c)(1), 40 CFR 63.11(b)(4), 40 CFR 63.670(c), Specific Requirements 48, 49, 50, 96, 103, 104, 109
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)		EQT 0350 B-11 Flare				
O4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2796-V13	EQT 0007 Vapor Combustion System Marine Dock	07/19/2019 (0.13 hour)	Opacity <= 20%	Oxygen starved Vapor Combustor.	LAC 33:11.1101.B, Specific Requirement 72
P4.	Refinery MACT Subparts CC, R, and U Semiannual Periodic Report July-December 2019 (01/29/2020)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	11/20/2019 (0.55 hours)	Monitor flares to ensure that they are operated and maintained in conformance with their designs.	Loss of plot on the B700 temporary flare due to a power loss at the temporary flare panel.	40 CFR 60.18(d), 40 CFR 60.18(f)(2), Specific Requirements 210, 212, 213, 218, 233, 238, 245, 249, and 251
	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)						
Q4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2796-V13	EQT 0066 B-700 Wastewater Treatment Flare	01/30/2019-10/31/2019 (6,584.65 hours)	Monitor the flare to ensure that they are operated and maintained in conformance with their designs	After putting B700 flare into service, the JB700 Blower tripped. Electricians were called out to troubleshoot the blower driver in Sub 57. Blower was discovered to be installed backwards, so the air assisted flare calculations were not representative of true operations during this time.	40 CFR 63.647(c), 40 CFR 63.11(b)(1), 40 CFR 60.18(d), Specific Requirements 252, 245, and 210
				11/21/2019 (0.70 hour)			



R4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2796-V13	EQT 0064 B-14 Flare ("B"/"C" Dock)	07/01/2019- 12/17/2019	Operate and maintain in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown, and malfunction	Glycol in the upstream orifice tap of B-14 flare leaked out, and it was replaced by water condensate. This resulted in erroneous steam value readings.	40 CFR 63.562(e), 40 CFR 63.651(e) Specific Requirement 170, 182, 192, and 193
S4.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2920-V3	GRP 0119 3(RFMR)CAP1 Furnace Cap  EQT 0237 C Reformer B- 501, B-502, B- 506 Furnaces	11/20/2019 (0.15 hours)	Opacity <= 20%	Visible smoke observed from C Reformer B-501,2,6 for more than 5 minutes in one (1) hour following C-Reformer upset due to JCS15 shutdown.	LAC 33:III.1101.B, Specific Requirement 161
T4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2796-V13	EQT 0064 B-14 Flare ("B"/"C" Dock)	02/13/2020 (0.25 hours)	Heat content >= 300 BTU/scf	Not enough natural gas sent to the flare.	40 CFR 60.18(c)(3)(ii), 40 CFR 63.11(b)(6)(ii), Specific Requirements 141 & 166
U4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0343 B-1 Flare	01/02/2020 (0.25 hours)	The flare shall meet the requirements of 40 CFR 63.670.  Operate flare to maintain the net heating value of flare combustion zone gas (NHV cz) at or above 270 (BTU/scf) determined on a 15-minute block period basis when regulated material is routed to the flare	While performing maintenance on the caustic scrubber, the steam controller did not function correctly.	40 CFR 63.270(c), Specific Requirement 109
V4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0343 B-1 Flare	01/02/2020 (0.14 hours intermittent)	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.	While performing maintenance on the caustic scrubber, the steam controller did not function correctly.	40 CFR 60.18(c)(1), 40 CFR 60.692-5(c), Specific Requirements 45, 46, 47, 96, 103, 104, 109

W4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0343 B-1 Flare	03/22/2020 (0.16 hours intermittent)	Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.	Liquid hydrogen build up in flare water seal drum.	40 CFR 60.18(c)(1), 40 CFR 60.692-S(c), Specific Requirements 45, 46, 47, 96, 103, 104, 109
X4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0350 B-11 Flare	01/15/2020 (2.25 hours intermittent)	The flare shall meet the requirements of 40 CFR 63.670.  <i>Operate flare to maintain the net heating value of flare combustion zone gas (NHV cz) at or above 270 (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare</i>	C-Reformer unit being shutdown with nitrogen purge to flare.	40 CFR 63.670(e), Specific Requirement 109
Y4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0350 B-11 Flare	03/10/2020 (0.5 hours)	The flare shall meet the requirements of 40 CFR 63.670.  <i>Operate flare to maintain the net heating value of flare combustion zone gas (NHV cz) at or above 270 (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare</i>	C-Reformer unit startup with nitrogen purge to flare.	40 CFR 63.670(e), Specific Requirement 109
Z4.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0352 B-16 Flare	04/06/2020 (0.75 hours)	The flare shall meet the requirements of 40 CFR 63.670.  <i>Operate flare to maintain the net heating value of flare combustion zone gas (NHV cz) at or above 270 (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare</i>	Low BTU content occurred during the B104 blinding when vent gas flow to the flare decreased.	40 CFR 63.670(e), Specific Requirement 109

AS.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	3010-V5	GRP 0138 Refinery Flare Cap  EQT 0352 B-16 Flare	05/20/200 (0.75 hours)	The flare shall meet the requirements of 40 CFR 63.670.  <i>Operate flare to maintain the net heating value of flare combustion zone gas (NHV cz) at or above 270 (Btu/scf) determined on a 15-minute block period basis when regulated material is routed to the flare</i>	Inadequate action taken during nitrogen purge associated with the shutdown of the F131B vessel.	40 CFR 63.670(e), Specific Requirement 109
BS.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B-501, B-502, B-506	01/01/2020 (2 hours)	Comply with the requirements of PSD-LA-222 (M-1).	The unplanned shutdown of JCS04A compressor resulted in reduction in firing rate and elevated oxygen levels. The automatic shutdown was initiated by high vibration caused by liquid ingestion into the recycle cylinder.*	Specific Requirement 231
CS.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B-501, B-502, B-506	03/27/2020 (6 hours)	Comply with the requirements of PSD-LA-222 (M-1).	The unplanned shutdown of the JCS15 compressor resulted in a reduction in firing rate and elevated oxygen levels. The shutdown was initiated by the failure of a T & T high pressure check valve.*	Specific Requirement 231

DS	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2920-V3	UNF 0006 Reformer Area  EQT 0237 C-Reformer B-501, B-502, B-506	06/13/2020 (2 hours)	Comply with the requirements of PSD-LA-222 (M-1).	Trip of boiler feed water pump resulted in reduction in firing rate and elevated oxygen levels. The cause of the trip was due to elevated vibrations/bearing failure and motor starter circuit was not properly energized on spare pump.*	Specific Requirement 231
ES	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2920-V3	GRP 0119 3(RFMR) CAP 1  EQT 0237 C-Reformer B-501, B-502, B-506	03/27/2020 (0.38 hours)	Opacity <= 20%	The unplanned shutdown of the JCS15 compressor resulted in an upset of B-501,2,6 furnaces. The shutdown was initiated by the failure of a T & T high pressure check valve.	LAC 33:III.1101.B, Specific Requirement 161

\*The Respondent provided the information in a response to an information request dated February 8, 2021

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

## VI.

The Respondent reported the following violations of monitoring and/or inspection requirements:

A.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2796-V11	EQT 0007 Vapor Combustion System Marine Dock	07/12/2017-12/29/2017 (428 hours)	Temperature monitored by temperature monitoring device continuously. Install the monitor at the exhaust point of the combustion control device but not within the combustion zone.	The temperature was not monitored at the exhaust point of the combustor.	40 CFR 63.564(e)(4), Specific Requirement 88
B.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	EQT 0007 Vapor Combustion System Marine Dock	01/01/2018-04/18/2018 (438 hours)	Temperature monitored by temperature monitoring device continuously. Install the monitor at the exhaust point of the combustion control device but not within the combustion zone.	The temperature was not monitored at the exhaust point of the combustor.	40 CFR 63.564(e)(4), Specific Requirement 88

C.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	FUG 0012 3 (Misc)6 Oil Movement Fugitives	05/08/2018-05/16/2018	Make a first attempt at repair no later than five (5) days after each leak is detected.	Remonitoring of PSV was not conducted within five (5) days	LAC 33:III.5109.A, Specific Requirement 363
D.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	FUG 0012 3 (Misc)6 Oil Movement Fugitives	01/01/2018-06/12/2018	Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected.	Fifteen (15) day repair missed	LAC 33:III.5109.A, Specific Requirement 363
E.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2796-V13	FUG 0012 3 (Misc)6 Oil Movement Fugitives	12/13/2018-12/20/2018	Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected.	Fifteen (15) day repair not met	LAC 33:III.5109.A, Specific Requirement 363
F.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	FUG 0015 3 (Misc)5 AAT Area Fugitives	12/01/2019-12/17/2019	Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected.	Failure to validate repair within 15 day discovery of visual leak	LAC 33:III.5109.A, Specific Requirement 206
G.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2796-V13	CRG 0001 Group A Tanks	12/31/2019-01/14/2020	Seal gap area & width monitored by measurement at the regulation's specified frequency.	The annual seal inspection for Tank 22 (EQT 0086) was not conducted.	Specific Requirement 4

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).VII.

## VII.

The Respondent reported the following emission exceedances:

A.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0038 A Cat-Wet Gas Scrubber	07/24/2017 (2 hours)	SO <sub>2</sub> (208.14 max lb/hr)	Not reported	Loss of steam from High Pressure boilers to FCCUs during Powerhouse upset caused the process air blowers to slowdown. The loss of air to regenerator caused exceedances.	Emission Rates for Criteria Pollutants
B.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0034 BLCOH Stabilizer Reboiler	07/11/2017 (5 hours)	SO <sub>2</sub> (2.79 max lb/hr)	Not reported	Weekly lab results indicated high total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
C.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2908-V8	EQT 0322 CGH Reboiler B-103	07/11/2017 (5 hours)	SO <sub>2</sub> (3.82 max lb/hr)	Not reported	Weekly lab results indicated high total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
D.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0238 C-Reformer B-503, 504, 505 Furnaces	09/05/2017 (1 hour)	SO <sub>2</sub> (87.73 max lb/hr)	Not reported	F-535 fuel gas drum weekly samples detected elevated total sulfur in the fuel gas.	Emission Rates for Criteria Pollutants

E.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0237 C-Reformer B-501, 502, 506 Furnaces	07/23/2017 (1 hour)	SO <sub>2</sub> (24.87 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
F.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0238 C-Reformer B-503, 504, 505 Furnaces	07/23/2017 (3 hours)	SO <sub>2</sub> (87.73 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
G.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0241 Unicracker B-1, B-2, B-3, B-4, and B-5 Furnace	07/23/2017 (1 hour)	SO <sub>2</sub> (23.38 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
H.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0224 A-Reformer B-101 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (17.65 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
I.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0229 B-Reformer B-401 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (6.95 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
J.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0230 B-Reformer B-402 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (6.42 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
K.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0232 B-Reformer B-406 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (6.57 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants

L.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0231 B-Reformer B-403, 404, 405 Furnaces	07/23/2017 (2 hours)	SO <sub>2</sub> (31.55 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
M.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0233 ALCOH B-101 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (4.35 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
N.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0234 ALCOH B-102 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (6.34 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
O.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0235 ALCOH B-103 Furnace	07/23/2017 (1 hour)	SO <sub>2</sub> (5.03 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
P.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0227 BOH B-601 Furnace	07/23/2017 (2 hours)	SO <sub>2</sub> (2.67 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
Q.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0228 BOH B-602 Furnace	07/23/2017 (1 hour)	SO <sub>2</sub> (3.9 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
R.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0225 Sulfolane B-201 Furnace	07/23/2017 (3 hours)	SO <sub>2</sub> (8.71 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants

S.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0226 Sulfolane B-202	07/23/2017 (3 hours)	SO <sub>2</sub> (6.11 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
T.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	EQT 0236 ISOM B-101 Furnace	07/23/2017 (1 hour)	SO <sub>2</sub> (1.53 max lb/hr)	Not reported	There was high total sulfur in the F-104 and F-535 fuel gas drums due to a process upset at the Powerhouse resulting in the loss of all four (4) high-pressure boilers and both generators.	Emission Rates for Criteria Pollutants
U.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0249 Vacuum Furnace B- 201	07/11/2017 (5 hours)	SO <sub>2</sub> (15.28 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
V.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0251 Vacuum Furnace B-1	07/11/2017 (5 hours)	SO <sub>2</sub> (17.88 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
W.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0254 SRF Furnace B-5	07/11/2017 (5 hours)	SO <sub>2</sub> (5.13 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
X.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0255 C Topper Furnace B-1C	07/11/2017 (5 hours)	SO <sub>2</sub> (16.27 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
Y.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0257 Feed Prep Furnace B- 101	07/11/2017 (5 hours)	SO <sub>2</sub> (16.29 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
Z.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	GRP 0126 PSD Furnace Cap  EQT 0248 B-Topper Furnace B- 104	07/11/2017 (5 hours)	SO <sub>2</sub> (62.11 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
A2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	GRP 0126 PSD Furnace Cap  EQT 0396 1A-CV-1 Furnace, 8101A	07/11/2017 (5 hours)	SO <sub>2</sub> (14.32 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants



B2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	GRP 0126 PSD Furnace Cap EQT 0397 18-CV-1 Furnace, 8101B	07/11/2017 (5 hours)	SO <sub>2</sub> (14.32 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
C2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	GRP 0126 PSD Furnace Cap EQT 0398 24-CV-1 Furnace, 8102A	07/11/2017 (5 hours)	SO <sub>2</sub> (21.49 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
D2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	GRP 0126 PSD Furnace Cap EQT 0399 28-CV-1 Furnace, 8102B	07/11/2017 (5 hours)	SO <sub>2</sub> (21.49 max lb/hr)	Not reported	Weekly lab result indicated higher total sulfur in fuel gas.	Emission Rates for Criteria Pollutants
E2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0253 Coker 1 Furnace, 8-201	07/23/2017 (2 hours)	SO <sub>2</sub> (12.22 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	Emission Rates for Criteria Pollutants
F2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0239 Coker II 8-201 Furnace	07/23/2017 (3 hours)	SO <sub>2</sub> (19.86 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	Emission Rates for Criteria Pollutants
G2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2930-VSAA	EQT 0240 Coker II B- 202 Furnace	07/23/2017 (1 hour)	SO <sub>2</sub> (19.86 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of powerhouse steam boilers.	Emission Rates for Criteria Pollutants
H2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-V8	EQT 0297 Sulfiter Vent Stack	07/23/2017 (1 hour)	Reduced Sulfur Compounds (RSC) (Not Reported)	Not reported	Unit upset caused by unplanned shutdown of Powerhouse steam boilers.	Emission Rates for Criteria Pollutants
I2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-V8	EQT 0298 YG-II Vent Stack	07/23/2017 (6 hours)	SO <sub>2</sub> (Not reported)	Not reported	Unit upset caused by unplanned shutdown of Powerhouse steam boilers.	Emission Rates for Criteria Pollutants
J2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-V8	EQT 0312 Sulfur Pit A-SRU	07/23/2017- 07/24/2017 (14 hours)	SO <sub>2</sub> (0.03 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of Powerhouse steam boilers.	Emission Rates for Criteria Pollutants
K2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-V8	EQT 0313 Sulfur Pit C-SRU	07/23/2017 (6 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of Powerhouse steam boilers.	Emission Rates for Criteria Pollutants
L2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-V8	EQT 0314 Sulfur Pit D-SRU	07/23/2017 (6 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of Powerhouse steam boilers.	Emission Rates for Criteria Pollutants

M2.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2935-V8	EQT 0315 Sulfur Pit E-SRU	07/23/2017 (7 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown of Powerhouse steam boilers.	Emission Rates for Criteria Pollutants
N2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0038 A Cat-Wet Gas Scrubber	03/31/2018 (2 hours)	CO (987.42 max lb/hr)	Not reported	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Emission Rates for Criteria Pollutants
O2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0038 A Cat-Wet Gas Scrubber	04/05/2018 (1 hour)	SO <sub>2</sub> (208.14 max lb/hr)	Not reported	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Emission Rates for Criteria Pollutants
P2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0039 B Cat-Wet Gas Scrubber	03/30/2018-03/31/2018 (2 hours)	CO (987.42 max lb/hr)	Not reported	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Emission Rates for Criteria Pollutants
Q2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	EQT 0040 C Cat-Wet Gas Scrubber	03/30/2018-03/31/2018 (2 hours)	CO (987.42 max lb/hr)	Not reported	On March 30, 2018, an emergency shutdown of C4 Recovery's JC101 impacted fuel gas system and tripped boilers at the Powerhouse which led to emergency shutdowns of FCCUs due to Refinery steam issues. Exceedances occurred during shutdown, hot standby, and startup.	Emission Rates for Criteria Pollutants
R2.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2935-V8	EQT 0314 3(DX-K)1-3 Sulfur Pit D-SRU	06/27/2018 (1 hour)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Unit upset caused by unplanned shutdown on E-001 Wash Column.	Emission Rates for Criteria Pollutants

SZ.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2935-V8	EQT 0313 3(OX-K)1-2 Sulfur Pit C-SRU	07/19/2018 (3 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	On July 19, 2018, low steam pressure necessitated the shutdown of various refinery process units, including the SRU's and their respective TGTU's. The low steam was caused by the loss of the JG4A electrical generator and the powerhouse high pressure boilers.	Emission Rates for Criteria Pollutants
TZ.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2935-V8	EQT 0314 3(OX-K)1-3 Sulfur Pit D-SRU	07/19/2018- 07/22/2018 (80 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	On July 19, 2018, low steam pressure necessitated the shutdown of various refinery process units, including the SRU's and their respective TGTU's. The low steam was caused by the loss of the JG4A electrical generator and the powerhouse high pressure boilers.	Emission Rates for Criteria Pollutants
UZ.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2935-V8	EQT 0297 Sulfen Vent Stack	07/22/2018 (2 hours)	H <sub>2</sub> S (1.29 max lb/hr)	Not reported	On July 19, 2018, low steam pressure necessitated the shutdown of various refinery process units, including the SRU's and their respective TGTU's. The low steam was caused by the loss of the JG4A electrical generator and the powerhouse high pressure boilers.	Emission Rates for Criteria Pollutants
VZ.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2908-V9	EQT 0038 A Cat Wet Gas Scrubber	07/20/2018 (6 hours)	CO (987.42 max lb/hr)	Not reported	On July 19, 2018, low steam pressure necessitated the shutdown of various refinery process units, including the SRU's and their respective TGTU's. The low steam was caused by the loss of the JG4A electrical generator and the powerhouse high pressure boilers.	Emission Rates for Criteria Pollutants
				07/24/2018 (1 hour)		Not reported		
WZ.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2908-V9	EQT 0039 B Cat Wet Gas Scrubber	07/20/2018 (2 hours)	CO (987.42 max lb/hr)	Not reported	On July 19, 2018, low steam pressure necessitated the shutdown of various refinery process units, including the SRU's and their respective TGTU's. The low steam was caused by the loss of the JG4A electrical generator and the powerhouse high pressure boilers.	Emission Rates for Criteria Pollutants

X2.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2930-V6	EQT 0398 B102A Furnace	04/02/2019 (7 hours)	SO <sub>2</sub> (21.49 max lb/hr)	Not reported	SO <sub>2</sub> maximum pounds per hour limit was exceeded due to high Mercaptan in fuel gas. SO <sub>2</sub> emitted from B102A furnace was 3.87 lb greater than the permit allows.	Emission Rates for Criteria Pollutants
Y2.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0313 Sulfur Pit C-SRU	07/30/2019-07/31/2019 (11 hours intermittent)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Instrument air leaks and faulty wiring caused multiple pit vent trips and resulted in use of alternate educator to atmosphere.	Emission Rates for Criteria Pollutants
Z2.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0314 Sulfur Pit D-SRU	09/13/2019 (15.48 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Approved maintenance activities exceeded permitted emission rates for SO <sub>2</sub> .	Emission Rates for Criteria Pollutants
A3.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0313 Sulfur Pit C-SRU	10/18/2019 (34.8 hours)	SO <sub>2</sub> (0.02 max lb/hr)	Not reported	Approved maintenance activities exceeded permitted emission rates for SO <sub>2</sub> .	Emission Rates for Criteria Pollutants
B3.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2935-V9	EQT 0312 Sulfur Pit A-SRU	10/25/2019 (20.3 hours)	SO <sub>2</sub> (0.03 max lb/hr)	Not reported	Approved maintenance activities exceeded permitted emission rates for SO <sub>2</sub> .	Emission Rates for Criteria Pollutants

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

### VIII.

The Respondent reported the following deviations from fugitive emission requirements:

A.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	FUG 0013 Reformer Area Fugitives	08/02/2017	Equipment in service without proper controls in place. One (1) open-ended line (OEL) in the C Reformer [327-VOC-1347]	40 CFR 63.167, LAC 33:III.5109.A, Specific Requirements 31 & 115
B.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	2920-V3	FUG 0013 Reformer Area Fugitives	08/07/2017	Equipment in service without proper controls in place. One (1) OEL in the A Reformer [315-VOC-0869]	40 CFR 63.167, LAC 33:III.5109.A, Specific Requirements 31 & 115
C.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (03/27/2018)	2930-V5AA	FUG 0014 3(MISC)1 Fugitives	03/29/2018	Equipment in service without proper controls in place. One (1) OEL was discovered.	LAC 33:III.5109.A, Specific Requirement 225

D.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2796-V11	FUG 0012 3 (Misc) ON Movement Fugitives	01/25/2018, 02/02/2018	Equipment in service without proper controls in place. Four (4) OELs were discovered.	LAC 33:III.5109.A, Specific Requirement 367
E.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	FUG 0006 3(MISC)2 CAT Area Fugitives	06/18/2018	Equipment in service without proper controls in place. One (1) OEL was found at the PFU during this semi-annual period.	Specific Requirements 157 and 158
F.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2935-V8	FUG 0015 3(MISC)5 AAT Area Fugitives	02/13/2018, 05/14/2018	Equipment in service without proper controls in place; Number of equipment=2.	LAC 33:III.5109.A, Specific Requirement 191
G.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	2908-V9	FUG 0006 3(MISC)2 CAT Area Fugitives	11/08/2018	Equipment in service without proper controls in place. One (1) OEL was found in C4 Recovery during this semi-annual period.	Specific Requirements 158
H.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2796-V13	FUG 0012 3 (Misc) Oil Movement Fugitives	01/28/2019, 06/10/2019	Equipment in service without proper controls in place.	Specific Requirement 387
I.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	2920-V3	FUG 0013 Reformer Area Fugitives	02/20/2019	Equipment in service without proper controls in place. One (1) open-ended line (OEL) in the C Reformer [327-VOC-1347]	40 CFR 63.167, LAC 33:III.5109.A, Specific Requirements 31 & 115
J.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2920-V3	FUG 0013 Reformer Area Fugitives	08/03/2019	Equipment in service without proper controls in place. One (1) OEL in the Reformer Area. [ISOM 333-VOC-0233]	40 CFR 63.167, LAC 33:III.5109.A, Specific Requirements 31 & 115
K.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2908-V10	FUG 0006 3(MISC)2 CAT Area Fugitives	07/16/2019	Equipment in service without proper controls in place. One (1) OEL was found in A Cat during this semiannual reporting period.	LAC 33:III.5109.A, Specific Requirement 164
L.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2908-V10	FUG 0006 3(MISC)2 CAT Area Fugitives	01/16/2020	Equipment in service without proper controls in place. One (1) OEL was found in A Cat during this semiannual reporting period.	LAC 33:III.5109.A, Specific Requirement 164
M.	Part 70 1 <sup>st</sup> Half of 2020 Deviation and Monitoring Report (09/16/2020)	2930-V6	FUG 0014 3(MISC)1 Thermal Area Fugitives	06/23/2020	Equipment in service without proper controls in place.	Specific Requirement 118

Each failure to meet 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, La. R.S. 30:2057(A)(1), and 30:2057(A)(2).

## IX.

The Respondent failed to meet the following reporting requirements:

A.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	2908-V9	A report showing the average hourly firing rate for each month for all furnaces/reboilers under the Cap for the preceding calendar year, as well as the average hourly firing rate for each twelve consecutive month period, shall be submitted to the Office of Environmental Compliance, Surveillance Division by February 15 <sup>th</sup> .	02/15/2018	03/20/2018	Specific Requirement 247
B.	Unauthorized Discharge Notification for Department Incident No. T182626 on February 2, 2018	N/A	Submit a written report for any unauthorized discharge that requires notification under LAC 33:I.3915.A, 3917, or 3923 within seven (7) calendar days after the expiration of the time allowed for the notification.	02/08/2018*	Not submitted	LAC 33:I.3925.A, LAC 33:III.927.A
C.	Unauthorized Discharge Notification for Department Incident No. T183950 on April 3, 2018	N/A	Submit a written report for any unauthorized discharge that requires notification under LAC 33:I.3915.A, 3917, or 3923 within seven (7) calendar days after the expiration of the time allowed for the notification.	04/10/2018**	Not submitted	LAC 33:I.3925.A, LAC 33:III.927.A

\* The Respondent submitted an extension request for the submission of the 7-day unauthorized discharge notification report dated February 7, 2018. A follow-up/final report for incident was submitted to the Department dated March 8, 2018. A correction to the March 8, 2018 report was submitted dated May 15, 2018.

\*\*The Respondent submitted an extension request for the submission of the 7-day unauthorized discharge notification report dated April 9, 2018. A follow-up/final report for the incident was submitted to the Department dated May 15, 2018.

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

X.

The Respondent reported the following recordkeeping violations:

A.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap	07/17/2017-07/30/2017 (318 hours)	<p>Comply with all applicable provisions of Subpart Ja by November 15, 2015</p> <p><i>The owner or operator of a flare that is subject to the H<sub>2</sub>S concentration requirement in §60.103a(h) shall install, operate, calibrate and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis) of H<sub>2</sub>S in the fuel gases before being burned in any fuel gas combustion device or flare.</i></p>	Meter left in calibration state following QC check and not returned to normal.	40 CFR 60.107a(e)(2), Specific Requirement 92
B.	Part 70 2 <sup>nd</sup> Half of 2017 Deviation and Monitoring Report (03/26/2018)	3010-V4AA	UNF 0007 Site Services Area	07/17/2017-07/30/2017 (318 hours)	<p>Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored</p>	Meter left in calibration state following QC check and not returned to normal.	LAC 33:III.535, Specific Requirement 174
C.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	3010-V4AA	GRP 0138 Refinery Flare Cap	04/05/2018-04/24/2018 (79 hours)	<p>Comply with all applicable provisions of Subpart Ja by November 15, 2015</p> <p><i>The owner or operator of a flare that is subject to the H<sub>2</sub>S concentration requirement in §60.103a(h) shall install, operate, calibrate and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis) of H<sub>2</sub>S in the fuel gases before being burned in any fuel gas combustion device or flare.</i></p>	Total sulfur analyzer failed multiple validations in the month.	40 CFR 60.107a(a)(2), Specific Requirement 92

D.	Part 70 1 <sup>st</sup> Half of 2018 Deviation and Monitoring Report (09/27/2018)	3010-V4AA	UNP 0007 EQT 0343 B-1 Flare	06/21/2018-07/01/2018 (231.3 hours)	Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored	Flare flow meter- pressure correction tap remained closed following calibration.	LAC 33:III,535, Specific Requirement 174
E.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap	10/03/2018 (11 hours)	Comply with all applicable provisions of Subpart Ja by November 15, 2015  <i>The owner or operator of a flare that is subject to the H<sub>2</sub>S concentration requirement in §60.103a(h) shall install, operate, calibrate and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis) of H<sub>2</sub>S in the fuel gases before being burned in any fuel gas combustion device or flare.</i>	H <sub>2</sub> S and Total Sulfur (Flare) CEMS had to be taken out of service for installation of additional CEMS to meet the 40 CFR 63 Subpart CC (residual risk) requirements. 10% of monthly downtime exceeded due to reduced operating hours in month.	40 CFR 60.107a(a)(2), Specific Requirement 92
				10/03/2018 (12 hours)			
F.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	GRP 0138 Refinery Flare Cap	10/30/2018-11/26/2018 (610 hours)	Comply with all applicable provisions of Subpart Ja by November 15, 2015  <i>The owner or operator of a flare that is subject to the H<sub>2</sub>S concentration requirement in §60.103a(h) shall install, operate, calibrate and maintain an instrument for continuously monitoring and recording the concentration by volume (dry basis) of H<sub>2</sub>S in the fuel gases before being burned in any fuel gas combustion device or flare.</i>	Changes were made to the instrument designation in the control system and not mirrored in the recordkeeping system resulting in a loss of records for this time period.	40 CFR 60.107a(a)(2), Specific Requirement 92



G.	Part 70 2 <sup>nd</sup> Half of 2018 Deviation and Monitoring Report (03/27/2019)	3010-V4AA	UNF 0007 Site Services Area EQT 0343 B-1 Flare	07/01/2018-07/16/2018 (369 hours)	Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored	Flare flow meter- pressure correction tap remained closed following calibration.	LAC 33:III.535, Specific Requirement 174
H.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	3010-V4AA	UNF 0007 Site Services Area EQT 0350 B-11 Flare	05/18/2019-05/29/2019 (165 hours Intermittent)	Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored	Extensive troubleshooting identified a leaking solenoid as the cause of the 327A156D/LO analyzer malfunction.	LAC 33:III.535, Specific Requirement 174
I.	Part 70 1 <sup>st</sup> Half of 2019 Deviation and Monitoring Report (09/17/2019)	3010-V4AA	UNF 0007 Site Services Area EQT 0351 B-12 Flare	04/04/2019-04/14/2019 (76 hours Intermittent)	Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored	It is believed low air pressure caused analyzer flame outages.	LAC 33:III.535, Specific Requirement 174
J.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	3010-V4AA	UNF 0007 Site Services Area EQT 0350 B-11 Flare	07/11/2019-07/15/2019 (101 hours)	Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored	Steam flow measurement was in error due to misapplication of glycol into the instrument impulse lines.	LAC 33:III.535, Specific Requirement 174
K.	Part 70 2 <sup>nd</sup> Half of 2019 Deviation and Monitoring Report (03/26/2020)	2930-V5AA	EQT 0266 Powerhouse Boiler B1-A	10/29/2019-10/30/2019 (34 hours)	Data availability for Continuous Monitoring- the minimum degree of data availability shall be at least 90 percent (based on a monthly average) of the operating time of the emissions unit or activity being monitored	NOx/O2 CEMS down for >10% of the operating hours in month after startup from turnaround. Total operating hours for the month were 98.	LAC 33:III.535, Specific Requirement 345

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

## **COMPLIANCE ORDER**

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

**I.**

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

**II.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the final Unauthorized Discharge Notification Report for the incident cited in Paragraph II of the **FINDINGS OF FACT** portion of this action. The report should include all the requirements outlined in LAC 33:1.3925.B, specifically, B.14-a determination as to whether or not the discharge was preventable.

**III.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, a written report providing the actual concentration, heat content, opacity, and/or emission quantities, as applicable, for the violations cited in Paragraph V.B-C, G-N, Z-E2, I2-K2, N2, R2-U2, Z2, E3, T3, V3, X3, Z3-B4, F4, O4, S4-U4, X4-A5, and E5 of the **FINDINGS OF FACT** portion of this action.

**IV.**

To submit to the Enforcement Division, within thirty (30) days after receipt of the **COMPLIANCE ORDER**, the reported cause for the violation cited in Paragraph V.D2 of the **FINDINGS OF FACT** portion of the action.

**V.**

To submit to the Enforcement Division, within thirty (30) days after receipt of the **COMPLIANCE ORDER**, a written report identifying any emissions exceedances or other noncompliance that occurred due to the violations cited in Paragraph V. P2-Q2 of the **FINDINGS OF FACT** portion of this action.

**VI.**

To submit to the Enforcement Division, within thirty (30) days after receipt of the **COMPLIANCE ORDER**, the EQT number and description for each tank in violation of the regulation and/or requirement cited in Paragraph V.M2 of the **FINDINGS OF FACT** portion of the action.

**VII.**

To submit to the Enforcement Division, within thirty (30) days after receipt of the **COMPLIANCE ORDER**, the actual temperature achieved and any emission exceedances (as applicable) as it relates to the violations cited in Paragraph V.H4-I4 of the **FINDINGS OF FACT** portion of the action.

**VIII.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the quantities for the emission exceedances in excess of the permitted limits (in lbs) cited in Paragraph VII.A-B3 and any permitted limits denoted as "Not reported" of the **FINDINGS OF FACT** portion of this action.

**IX.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the number of open-ended lines (OELs) discovered cited in Paragraph VIII.H and M of the **FINDINGS OF FACT** portion of this action.

**X.**

To submit to the Enforcement Division, within thirty (30) days after receipt of this **COMPLIANCE ORDER**, the percentage of data availability/retention for the violations cited in Paragraph X.B-K of the **FINDINGS OF FACT** portion of this action.

**XI.**

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

Office of Environmental Compliance  
Post Office Box 4312  
Baton Rouge, Louisiana 70821-4312  
Attn: Antoinette Cobb  
Re: Enforcement Tracking No. AE-CN-21-00378  
Agency Interest No. 1250

**THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:**

**I.**

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

**II.**

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

Department of Environmental Quality  
Office of the Secretary  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302  
Attn: Hearings Clerk, Legal Division  
Re: Enforcement Tracking No. AE-CN-21-00378  
Agency Interest No. 1250

**III.**

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

**IV.**

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

**V.**

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

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

**VI.**

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

**VII.**

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

**NOTICE OF POTENTIAL PENALTY**

**I.**

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

**II.**

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

**III.**

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

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


IV.

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

V.

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

Baton Rouge, Louisiana, this 2nd day of October, 2021.

  
\_\_\_\_\_  
Lourdes Iturralde  
Assistant Secretary  
Office of Environmental Compliance

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

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

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



Enforcement Tracking No.	AE-CN-21-00378	Contact Name	Antoinette Cobb
Agency Interest (AI) No.	1250	Contact Phone No.	(225)219-3072
Alternate ID No.	0520-00016		
Respondent:	Citgo Petroleum Corporation	Facility Name:	Lake Charles Manufacturing Complex
	c/o C T Corporation System	Physical Location:	1601 Louisiana Highway 108 East
	Agent for Service of Process		
	3867 Plaza Tower Drive	City, State, Zip:	Sulphur, LA 70665
	Baton Rouge, LA 70816	Parish:	Calcasieu

**STATEMENT OF COMPLIANCE**

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

**SETTLEMENT OFFER (OPTIONAL)**

*(check the applicable option)*

<input type="checkbox"/>	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart 1.Chapter 7.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-21-00378), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.
<input type="checkbox"/>	In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-21-00378), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> <li>• Monetary component = \$ _____</li> <li>• Beneficial Environmental Project (BEP) component (optional) = \$ _____</li> <li>• <b>DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.</b></li> </ul>
<input type="checkbox"/>	The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-21-00378) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

**CERTIFICATION STATEMENT**

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

<b>Respondent's Signature</b>	<b>Respondent's Printed Name</b>	<b>Respondent's Title</b>
<b>Respondent's Physical Address</b>	<b>Respondent's Phone #</b>	<b>Date</b>

**MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:**

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