



July 30, 2019

CERTIFIED: 7016 2710 0001 0589 3365

Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312

Re: NSPS Excess Emissions & CEM Performance Report – 2nd Quarter 2019
Valero Refining - Meraux LLC, Agency Interest # 1238
2235 Jacob Drive, St. Bernard Parish, Meraux, LA
Title V Permit Numbers: 2500-00001-V17

Dear Sir or Madam,

Valero Refining, Meraux LLC is submitting this Excess Emissions and Monitoring Systems Reports, per LAC 33:III, Chapter 30, 40 CFR 60.7(c), 40 CFR 60.108a(d) and 40 CFR 63.1575 for the Second Quarter 2019.

For this reporting period, no CEMS had excess emissions greater than 1% of the total operating time and no CEMS had downtime greater than 5% of the total operating time. The new NO_x and O₂ CEMS on the NHT Charge Heater (EPN 1-17, EQT 0159) and the MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033) were certified in July. The certification reports will be submitted separately.

Enclosed are the Data Assessment Reports for the appropriate CEMs and information required by NSPS Subpart Ja, 40 CFR 60.108a(d). Subpart Ja root cause and corrective action analysis reports are included with this submittal. This will be reported as a deviation in the next Semi-Annual Title V Deviation Report. Updates to previously submitted Subpart Ja root cause and corrective action analysis reports are also included if corrective actions were completed in this reporting period.

Should you have any questions regarding this submission, please contact Mr. Justin Stubbe at (504) 271-4141.

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Regards,

A handwritten signature in black ink that reads 'Leslie Sullivan' in a cursive script.

Leslie Sullivan
Vice President and General Manager
Meraux Refinery

Enclosures

cc: Mr. Brian Tusa, LDEQ SE Regional Office, New Orleans, LA

CEMS Overview - Valero (Meraux) Refinery

UNIT	GAS	NSPS Subpart	STANDARD	MAKE	MODEL
#2 SRU	SO2*	Ja	250 ppm, 12-HRA	Brimstone	SGX-231
	O2	Ja	NA	Rosemount	Oxymitter 4000
#3 SRU	SO2*	Ja	250 ppm, 12-HRA	ABB	Limas AO2000 Uras 26
	O2	Ja	NA	Magnos	Magnos 206
Boiler B-5	NOx	Db	0.2 #/MMBtu, 30-DRA	ABB	Limas 11
	O2	Db	NA	ABB	Magnos 27
Boiler B-6	NOx	Db	0.2 #/MMBtu, 30-DRA	ABB	Limas 11
	O2	Db	NA	ABB	Magnos 27
Area 1 Fuel Drum	H2S	J	162ppm, 3-HRA	Ametek	4661
Area 2 Fuel Drum	H2S	J	162ppm, 3-HRA	Ametek	4661
Area 4 Fuel Drum	H2S	J	162ppm, 3-HRA	Ametek	4661
HC Boiler Fuel Drum	H2S	J	162ppm, 3-HRA	Ametek	4661
HC Heater Fuel Drum	H2S	J	162ppm, 3-HRA	Ametek	4661
Boiler TB-01	NOx	Db	0.2 #/MMBtu, 30-DRA	Thermo	42i
	O2	Db	NA		
BRU Reboiler	NOx	Ja	40 ppm, 30-DRA	Thermo	42i
	O2	Ja	NA		
Crude Heater ¹	NOx	N/A	N/A	ABB	Limas 11
	O2	N/A	N/A	ABB	Magnos 27
MDH Heaters ¹	NOx	N/A	N/A	ABB	URAS 26
	O2	N/A	N/A	ABB	Magnos 206
NHT Charge Heater	NOx	Ja	40 ppm, 30-DRA	ABB	URAS 26
	O2	Ja	NA	ABB	Magnos 206
North Flare	Total Sulfur	Ja	500 lbs SO2/24 hrs (including HC Header)	Thermo	Sola II
	H2S	Ja	162 ppm, 3-HRA	Ametek	5100
	SCFH, MW	Ja	500,000 scf/24 hrs (including HC Header)	GE Panametrics	GF868
HC Header	Total Sulfur	Ja	500 lbs SO2/24 hrs (including North Header)	Thermo	Sola II
	H2S	Ja	162 ppm, 3-HRA	Ametek	5100
	SCFH, MW	Ja	500,000 scf/24 hrs (including North Header)	GE Panametrics	GF868
South Flare	Total Sulfur	Ja	500 lbs SO2/24 hrs	Thermo	Sola II
	H2S	Ja	162 ppm, 3-HRA	Ametek	5100
	SCFH, MW	Ja	500 lbs Total S/24 hrs	GE Panametrics	GF868

¹ CEMS installed per Consent Decree 10-cv-563

NOTE: NSPS Ja requires a Detailed Report on CEMS performance in addition to the Summary Report.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 250 ppm on a 12-hour rolling average

Monitor Manufacturer and Model No.: Brimstone SGX-231(SO₂)/Rosemount Oxymitter 4000(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/3/19

Process Unit(s) Description: #2 SRU Incinerator (EPN 1-93, EQT 0019)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	9
e. Unknown causes	0
2. Total CMS Downtime	10
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.5 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: ABB AO2000 Uras 26(SO₂)/ Magnos 206 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/2/19

Process Unit(s) Description: #3 SRU Incinerator (EPN 5-00, EQT 0079)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average

Monitor Manufacturer and Model No.: Ametek, #4661

Date of Latest CMS Certification or Audit: RATA on 5/3/19

Process Unit(s) Description: Area 1 Fuel Drum for Boiler TB-01 (EPN 1-06, EQT 0010); Boiler B-7 (EPN 1-07, EQT 0011); MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033); DHT Charge Heater (EPN 5-73, EQT 0058)

Total source operating time in reporting period: EQT 0010-1,209 hours, EQT 0011-2,166 hours, EQT 0033-2,184 hours, EQT 0058-2,061 hours

Emissions Data Summary¹				
1. Duration of excess emissions in reporting period due to:	<i>EQT 0010</i> (hours)	<i>EQT 0011</i> (hours)	<i>EQT 0033</i> (hours)	<i>EQT 0058</i> (hours)
a. Startup/shutdown	0	0	0	0
b. Control equipment problems	0	0	0	0
c. Process problems	0	0	0	0
d. Other known causes	0	0	0	0
e. Unknown causes	0	0	0	0
2. Total duration of excess emission	0	0	0	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %	0.0 %	0.0 %	0.0 %

CMS Performance Summary¹				
1. CMS downtime in reporting period due to:	<i>EQT 0010</i> (hours)	<i>EQT 0011</i> (hours)	<i>EQT 0033</i> (hours)	<i>EQT 0058</i> (hours)
a. Monitor equipment malfunctions	0	0	0	0
b. Non-Monitor equipment malfunctions	0	0	0	0
c. Quality assurance calibration	0	0	0	0
d. Other known causes	0	0	0	0
e. Unknown causes	0	0	0	0
2. Total CMS Downtime	0	0	0	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %	0.0 %	0.0 %	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted. (Percentage based on the lowest operating time.)

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND

MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Subpart J: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: RATA on 5/2/19

Process Unit(s) Description: Area 2 Fuel Drum for: Vacuum Heater (EPN 1-76, EQT 0013); No.1 Crude Heater (EPN 12-72A, EQT 0022); NHT Debut Reboiler (EPN 15-72, EQT 0024); NHT Depent Reboiler (EPN 16-72 EQT 0027); Platformer Charge Heater (EPN 17-72 a,b,c , EQT 0028); Platformer Debut Reboiler (EPN 19-72, EQT 0029); ROSE Heater (EPN 1-80, EQT 0014)

Total source operating time in reporting period: EQT 0013-2,184 hours; EQT 0022-2,184 hours; EQT 0024-2,184 hours; EQT 0027-2,184 hours; EQT 0028-2,184 hours; EQT 0029-2,184 hours; EQT 0014-2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>All EQT's (hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>All EQT's (hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Subpart Ja: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average and 60 ppm on a 365 day rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: RATA on 5/2/19

Process Unit(s) Description: Area 2 Fuel Drum for: Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127); NHT Charge Heater (EPN 1-17, EQT 0159)

Total source operating time in reporting period: EQT 0127-2,184 hours; EQT 0159-2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>All EQT's (hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>All EQT's (hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: RATA on 5/1/19

Process Unit(s) Description: Area 4 Fuel Drum for Merox Disulfide Separator to Platformer Charge Heater

Total source operating time in reporting period: 2,172 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	1
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: RATA on 5/6/19

Process Unit(s) Description: Area 6 Fuel Drum for Hydrocracker & Hydrotreater Charge Heaters (EPN 1-00, EQT 0009)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	2
d. Other known causes	7
e. Unknown causes	0
2. Total CMS Downtime	9
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.4 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: RATA on 5/2/19

Process Unit(s) Description: Area 6 Fuel Drum for Boiler B-5 (EPN 2-00, EQT 0030) and Boiler B-6 (EPN 3-00, EQT 0048)

Total source operating time in reporting period: EQT 0030-2,182 hours; EQT 0048-0 hours³

Emissions Data Summary¹		
	<i>EQT 0030 (hours)</i>	<i>EQT 0048 (hours)</i>
1. Duration of excess emissions in reporting period due to:		
a. Startup/shutdown	0	0
b. Control equipment problems	0	0
c. Process problems	0	0
d. Other known causes	0	0
e. Unknown causes	0	0
2. Total duration of excess emission	0	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %	0.0 %

CMS Performance Summary¹		
	<i>EQT 0030 (hours)</i>	<i>EQT 0048 (hours)</i>
1. CMS downtime in reporting period due to:		
a. Monitor equipment malfunctions	0	0
b. Non-Monitor equipment malfunctions	0	0
c. Quality assurance calibration	1	0
d. Other known causes	0	0
e. Unknown causes	0	0
2. Total CMS Downtime	1	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

³ Boiler B-6 ran on purchased natural gas for the entire Quarter.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide shall not exceed 0.1 pound/MMBtu on a 30-day rolling average.

Monitor Manufacturer and Model No.: ABB Limas11(NOx), Magnos27 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/7/19

Process Unit(s) Description: Boiler B-5 (EPN 2-00, EQT 0030)

Total source operating time in reporting period: 2,182 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide shall not exceed 0.1 pound/MMBtu on a 30-day rolling average.

Monitor Manufacturer and Model No.: ABB Limas11(NOx), Magnos27 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: Boiler B-6 (EPN 3-00, EQT 0048)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide shall not exceed 0.1 pound/MMBtu on a 30-day rolling average.

Monitor Manufacturer and Model No.: Thermo Environmental 42i (NO_x)/(O₂)

Date of Latest CMS Certification or Audit: RATA on 6/28/19

Process Unit(s) Description: Boiler TB-01 (EPN 1-06, EQT 0010)

Total source operating time in reporting period: 1,209 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide corrected to 0% O₂ shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 42i (NO_x)/(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/6/19

Process Unit(s) Description: Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	3
e. Unknown causes	0
2. Total CMS Downtime	3
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.1 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide corrected to 0% O₂ shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: ABB Limas11(NOx), Magnos27 (O₂)

Date of Latest CMS Certification or Audit: Initial Certification (RATA) Performed on 7/15/19

Process Unit(s) Description: NHT Charge Heater (EPN 1-17, EQT 0159)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	7
e. Unknown causes	0
2. Total CMS Downtime	7
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.3 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: N/A (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 36.a)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: ABB Limas11(NOx), Magnos27 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/6/19

Process Unit(s) Description: No.1 Crude Heater (EPN 12-72A, EQT 0022)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	1
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: N/A (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 36.a)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: ABB Limas11(NOx), Magnos27 (O₂)

Date of Latest CMS Certification or Audit: Initial Certification (RATA) Performed on 7/16/19

Process Unit(s) Description: MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	33
e. Unknown causes	0
2. Total CMS Downtime	33
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	1.5 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: RATA on 5/7/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: RATA on 5/7/19

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	1
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	1
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	6
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	6
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.3 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

Total source operating time in reporting period: 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	33
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	33
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	1.5 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **Flow**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

Total source operating time in reporting period: 2,184 hours

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **Flow**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

Total source operating time in reporting period: 2,184 hours

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time]²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(d) and 60.108a(d))

Pollutant: **Flow**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

Total source operating time in reporting period: 2,184 hours

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	<i>(hours)</i>
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	0
3. Total duration of CMS Downtime x (100) [Total source operating time]²	0.0 %

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 250 ppm on a 12-hour rolling average

Monitor Manufacturer and Model No.: Brimstone SGX-231(SO₂)/Rosemount Oxymitter 4000(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/3/19

Process Unit(s) Description: #2 SRU Incinerator (EPN 1-93, EQT 0019)

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 12-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE ¹						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
4/4/19	13:00	20:00	7	Analyzer offline due to loss of electrical power from a damaged conduit.	Analyzer was placed on temporary power, calibrated, and returned to service.	
4/5/19	10:00	11:00	1	Adjusted for calibration drift.	N/A	
4/5/19	13:00	14:00	1	Adjusted for calibration drift.	N/A	
4/22/19	13:00	14:00	1	Analyzer shut down to transfer from temporary power back to normal power.	Calibrated and returned to service.	
TOTAL			10			

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: ABB AO2000 Uras 26(SO₂)/ Magnos 206 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/2/19

Process Unit(s) Description: #3 SRU Incinerator (EPN 5-00, EQT 0079)

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 12-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE ¹						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
None						
TOTAL			0			

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average and 60 ppm on a 365 day rolling average

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: RATA on 5/2/19

Process Unit(s) Description: Area 2 Fuel Drum for: Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127); NHT Charge Heater (EPN 1-17, EQT 0159)

Total source operating time in reporting period: EQT 0127-2,184 hours; EQT 0159-2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 3-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE ¹						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
None						
TOTAL			0			

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide corrected to 0% O₂ shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 42i (NO_x)/(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/6/19

Process Unit(s) Description: Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127)

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 30-DRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE ¹						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
6/11/19	14:00	16:00	2	Annual preventative maintenance.	N/A	
6/19/19	09:00	10:00	1	Adjusted for calibration drift.	N/A	
TOTAL			3			

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide corrected to 0% O₂ shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: ABB Limas11(NOx), Magnos27 (O₂)

Date of Latest CMS Certification or Audit: Initial Certification Performed on 7/15/19

Process Unit(s) Description: NHT Charge Heater (EPN 1-17, EQT 0159)

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 30-DRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE ¹						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
4/23/19	11:00	14:00	3	Offline to troubleshoot high variation of NOx analyzer output with factory technician.	Calibrated and returned to service.	
5/9/19	10:00	14:00	4	Offline to troubleshoot high variation of NOx analyzer output. Analyzer was swapped with the MDH NOx analyzer to determine if the high variation of the MDH NOx analyzer was due to the analyzer or the MDH installation.	Calibrated and returned to service.	
TOTAL			7			

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 3-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE²						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
None						
TOTAL			0			

¹Due to the physical arrangement of the headers supplying the North Flare Stack (EPN 20-72, EQT 0035), two analyzers are required to measure H₂S concentration of the gas combusted in the North Flare. Conservatively, excess emission on either of these analyzers will be considered excess emissions at the North Flare. However, the CEMS performance will be tracked separately.

²In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: RATA on 5/7/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 3-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE²						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
None						
TOTAL			0			

¹Due to the physical arrangement of the headers supplying the North Flare Stack (EPN 20-72, EQT 0035), two analyzers are required to measure H₂S concentration of the gas combusted in the North Flare. Conservatively, excess emission on either of these analyzers will be considered excess emissions at the North Flare. However, the CEMS performance will be tracked separately.

²In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: RATA on 5/7/19

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

Total source operating time in reporting period: 2,184 hours

Ja EXCESS EMISSIONS						
Date	Start	End	Duration (hours)	Max 3-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE ²						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
5/20/19	13:00	14:00	1	Adjusted for calibration drift.	N/A	
TOTAL			1			

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

Total source operating time in reporting period: 2,184 hours

Ja CMS PERFORMANCE ¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
5/8/19	13:00	14:00	1	Relative Accuracy Test Audit.	N/A
TOTAL			1		

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

Total source operating time in reporting period: 2,184 hours

Ja CMS PERFORMANCE¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
4/18/19	13:00	15:00	2	Adjusted for calibration drift.	N/A
5/8/19	13:00	14:00	1	Relative Accuracy Test Audit.	N/A
6/28/19	09:00	12:00	3	Analyzer adjusted for improper operation after switching to the high range during the daily validation check. The high range is not used for Ja compliance.	Calibrated and returned to service.
TOTAL			6		

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Date of Latest CMS Certification or Audit: RATA on 5/8/19

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

Total source operating time in reporting period: 2,184 hours

Ja CMS PERFORMANCE¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
5/8/19	13:00	14:00	1	Relative Accuracy Test Audit.	N/A
6/28/19	10:00		32	Out of Control. Daily calibration check >4X the allowable limit below the span gas value. The analyzer began operating improperly following preventative maintenance on 6/27 that involved blowing out the sample lines.	Valero adjusted the sampling system flow rate and pressure balance then calibrated and returned the analyzer to service.
6/29/19		18:00			
TOTAL			33		

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **Flow**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

Total source operating time in reporting period: 2,184 hours

Ja CMS PERFORMANCE ¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
None					
TOTAL			0		

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **Flow**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

Total source operating time in reporting period: 2,184 hours

Ja CMS PERFORMANCE ¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
None					
TOTAL			0		

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

**GASEOUS AND OPACITY EXCESS EMISSIONS AND
MONITORING SYSTEMS PERFORMANCE**

(per 40 CFR 60.7(c) and 60.108a(d))

Pollutant: **Flow**

Applicable NSPS Subpart: Ja (Also Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

Total source operating time in reporting period: 2,184 hours

Ja CMS PERFORMANCE¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
None					
TOTAL			0		

¹In accordance with 40 CFR 60.108a(d)(6), changes made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit have been compared with operation of the control system and affected facility before and following the period of data unavailability to ensure that any changes made in operation of the emission control system during the period of data unavailability did not affect the ability of the system to meet the applicable emission limit.

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: Brimstone SGX-231(SO₂)/Rosemount Oxymitter 4000(O₂)

Source unit: #2 SRU Incinerator (EPN 1-93, EQT 0019)

CEM Sampling Location: #2 SRU Incinerator (#1-93)

CEM Span Value: Sulfur Dioxide 500 ppm; Oxygen 25%

I. ACCURACY ASSESSMENT RESULTS (RATA):

SO ₂ corrected to 0% O ₂	
Date of Audit	5/3/19
Reference Method	EPA Method 6C/ EPA Method 3A
Average RM Value (ppmv)	50.29
Average CEM Value (ppmv)	51.40
Accuracy	1.34 %
Limit	< 10%

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: ABB AO2000 Uras 26(SO₂)/ Magnos 206 (O₂)

Source unit: #3 SRU Incinerator (EPN 5-00, EQT 0079)

CEM Sampling Location: #3 SRU Incinerator (#5-00)

CEM Span Value: Sulfur Dioxide 500 ppm; Oxygen 25%

I. ACCURACY ASSESSMENT RESULTS (RATA):

SO ₂ corrected to 0% O ₂	
Date of Audit	5/2/19
Reference Method	EPA Method 6C/ EPA Method 3A
Average RM Value (ppmv)	30.95
Average CEM Value (ppmv)	27.26
Accuracy	2.54 %
Limit	< 10%

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Source Unit: Area 1 Fuel Drum for Boiler TB-01 (EPN 1-06, EQT 0010); Boiler B-7 (EPN 1-07, EQT 0011); MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033); DHT Charge Heater (EPN 5-73, EQT 0058)

CEM Sampling Location: Area 1 Fuel Drum

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/3/19	5/3/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	81.94	172.10
Average CEM Value (ppmv)	80.71	173.51
Accuracy	1.51 %	0.82 %
Limit	< 15 %	< 15 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: J and Ja (Benzene Recovery Unit Reboiler Subject to Ja)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average(J and Ja) and 60 ppm on a 365 day rolling average (Ja only)

Monitor Manufacturer and Model No.: Ametek 4661

Source Unit: Area 2 Fuel Drum for: No.1 Crude Heater (EPN 12-72A, EQT 022); ROSE Heater (EPN 1-80, EQT 0014); Vacuum Heater (EPN 1-76, EQT 0013); Platformer Charge Heater (EPN 17-72 a,b,c , EQT 0028); Platformer Debut Reboiler (EPN 19-72, EQT 0029); NHT Charge Heater (EPN 14-72, EQT 0023); NHT Debut Reboiler (EPA 15-72, EQT 0024); NHT Depent Reboiler (EPA 16-72, EQT 0027); Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127); NHT Charge Heater (EPN 1-17, EQT 0159)

CEM Sampling Location: Area 2 Fuel Drum

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/2/19	5/2/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	81.94	172.10
Average CEM Value (ppmv)	77.05	169.94
Accuracy	5.96 %	1.26 %
Limit	< 15 %	< 15 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Process Unit(s) Description: Area 4 Fuel Drum for Merox Disulfide Separator to Platformer Charge Heater

CEM Sampling Location: Area 4 Fuel Drum

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/1/19	5/1/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	81.94	172.10
Average CEM Value (ppmv)	75.56	175.66
Accuracy	7.79 %	2.07 %
Limit	< 15 %	< 15 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Process Unit(s) Description: Area 6 Fuel Drum for Hydrocracker & Hydrotreater Charge Heaters (EPN 1-00, EQT 0009)

CEM Sampling Location: Area 6 Fuel Drum

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/6/19	5/6/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	78.39	166.70
Average CEM Value (ppmv)	69.52	145.27
Accuracy	11.31 %	12.85 %
Limit	< 15 %	< 15 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 4661

Process Unit(s) Description: Area 6 Fuel Drum for Boilers B-5 (EPN 2-00, EQT 0030) and B-6 (EPN 3-00, EQT 0048)

CEM Sampling Location: Area 6 Fuel Drum

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/2/19	5/2/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	81.94	172.10
Average CEM Value (ppmv)	74.17	163.40
Accuracy	9.48 %	5.06 %
Limit	< 15 %	< 15 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide shall not exceed 0.1 pound/MMBtu on a 30-day rolling average.

Monitor Manufacturer and Model No.: ABB Limas11(NO_x), Magnos27 (O₂)

Process Unit(s) Description: Boiler B-5 (EPN 2-00, EQT 0030)

CEM Sampling Location: Boiler B-5

CEM Span Value: Nitrogen Oxide 100 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

NO _x lb/MMBtu	
Date of Audit	5/7/19
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value	0.03102 lb/MMBtu
Average CEM Value	0.03276 lb/MMBtu
Accuracy	0.89 %
Limit	< 10 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide shall not exceed 0.1 pound/MMBtu on a 30-day rolling average.

Monitor Manufacturer and Model No.: ABB Limas11 (NO_x), Magnos27 (O₂)

Process Unit(s) Description: Boiler B-6 (EPN 3-00, EQT 0048)

CEM Sampling Location: Boiler B-6

CEM Span Value: Nitrogen Oxide 100 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

NO _x lb/MMBtu	
Date of Audit	5/8/19
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value	0.02153 lb/MMBtu
Average CEM Value	0.02359 lb/MMBtu
Accuracy	1.05 %
Limit	< 10 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide shall not exceed 0.1 pound/MMBtu on a 30-day rolling average.

Monitor Manufacturer and Model No.: Thermo Environmental Model 42i (NO_x)/(O₂)

Process Unit(s) Description: Boiler TB-01 (EPN 1-06, EQT 0010)

CEM Sampling Location: Boiler TB-01

CEM Span Value: Nitrogen Oxide 500 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

NO _x lb/MMBtu	
Date of Audit	6/28/19
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value	0.03344 lb/MMBtu
Average CEM Value	0.03165 lb/MMBtu
Accuracy	1.18 %
Limit	< 10 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide corrected to 0% O₂ shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: Thermo Environmental Model 42i (NO_x)/(O₂)

Process Unit(s) Description: Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127)

CEM Sampling Location: Benzene Recovery Unit Reboiler

CEM Span Value: Nitrogen Oxide 100 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

	NO _x at 0% O ₂	O ₂
Date of Audit	5/6/19	5/6/19
Reference Method	EPA Method 7E	EPA Method 3A
Average RM Value	25.37 ppmv at 0% O ₂	7.493 vol %
Average CEM Value	24.63 ppmv at 0% O ₂	7.348 vol %
Accuracy	0.97 %	N/A
Limit	< 10 %	N/A

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Nitrogen Oxide corrected to 0% O₂ shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: ABB Limas11 (NO_x), Magnos27 (O₂)

Process Unit(s) Description: NHT Charge Heater (EPN 1-17, EQT 0159)

CEM Sampling Location: NHT Charge Heater

CEM Span Value: Nitrogen Oxide 100 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

Initial Certification Performed on 7/15/19.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: N/A (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 36.a)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: ABB Limas11 (NO_x), Magnos27 (O₂)

Process Unit(s) Description: No.1 Crude Heater (EPN 12-72A, EQT 0022)

CEM Sampling Location: No.1 Crude Heater

CEM Span Value: Nitrogen Oxide 100 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

	NO _x	O ₂
Date of Audit	5/6/19	5/6/19
Reference Method	EPA Method 7E	EPA Method 3A
Average RM Value	5.42 ppmv	6.23 vol %
Average CEM Value	4.30 ppmv	6.37 vol %
Accuracy	2.18 %	N/A
Limit	< 10 %	N/A

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **NO_x**

Applicable NSPS Subpart: N/A (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 36.a)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: ABB Limas11 (NO_x), Magnos27 (O₂)

Process Unit(s) Description: MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033)

CEM Sampling Location: MDH Product and Fractionator Heaters

CEM Span Value: Nitrogen Oxide 100 ppm, Oxygen 25 %

I. ACCURACY ASSESSMENT RESULTS (RATA):

Initial Certification Performed on 7/16/19.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

CEM Sampling Location: North Flare Stack, North Flare Header (Y-AT-801)

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S</u>
Date of Audit	5/8/19
Reference Method	EPA Method 11
Average RM Value (ppmv)	18.04 ppmv
Average CEM Value (ppmv)	19.69 ppmv
Accuracy	2.48 %
Limit	< 10 %

¹ Valero unable to obtain EPA Protocol 1 certified gases for the Methane balanced audit gas required by this analyzer.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

CEM Sampling Location: North Flare Stack, Hydrocracker Flare Header (Y-AT-800)

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S</u>
Date of Audit	5/7/19
Reference Method	EPA Method 11
Average RM Value (ppmv)	4.15 ppmv
Average CEM Value (ppmv)	1.99 ppmv
Accuracy	2.16 %
Limit	< 10 %

¹ Valero unable to obtain EPA Protocol 1 certified gases for the Methane balanced audit gas required by this analyzer.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm on a 3-hour rolling average.

Monitor Manufacturer and Model No.: Ametek 5100

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

CEM Sampling Location: South Flare Stack (Y-AT-802)

CEM Span Value: Hydrogen Sulfide, 300 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S</u>
Date of Audit	5/7/19
Reference Method	EPA Method 11
Average RM Value (ppmv)	12.48 ppmv
Average CEM Value (ppmv)	11.86 ppmv
Accuracy	1.04 %
Limit	< 10 %

¹ Valero unable to obtain EPA Protocol 1 certified gases for the Methane balanced audit gas required by this analyzer.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header

CEM Sampling Location: North Flare Stack, North Flare Header (Y-AT-303)

CEM Span Value: Total Sulfur, Dual Range: 0-10,000 ppm, 10,000-1,000,000 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/8/19	5/8/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	1013.00	10020.00 ¹
Average CEM Value (ppmv)	1079.14	10102.02
Accuracy	6.53 %	0.82 %
Limit	< 15 %	< 15 %

¹ Valero unable to obtain EPA Protocol 1 certified gases greater than 1000 ppm.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header

CEM Sampling Location: North Flare Stack, Hydrocracker Flare Header (Y-AT-302)

CEM Span Value: Total Sulfur, Dual Range: 0-10,000 ppm, 10,000-1,000,000 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/8/19	5/8/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	1013.00	10020.00 ¹
Average CEM Value (ppmv)	1000.89	10026.45
Accuracy	1.20 %	0.06 %
Limit	< 15 %	< 15 %

¹ Valero unable to obtain EPA Protocol 1 certified gases greater than 1000 ppm.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: N/A

DATA ASSESSMENT REPORT

(per 40 CFR 60, Appendix F, Section 7)

Pollutant: **Total Sulfur**

Applicable NSPS Subpart: Ja (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/19 to 6/30/19

Date submitted: 7/30/19

Company: Valero Refining - Meraux LLC

Address: 2500 East St. Bernard Highway, Meraux, LA 70075

Emission Limitation: None

Monitor Manufacturer and Model No.: Thermo Scientific SOLA II

Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 0049)

CEM Sampling Location: South Flare Stack (Y-AT-304)

CEM Span Value: Total Sulfur, Dual Range: 0-10,000 ppm, 10,000-1,000,000 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

	<u>H₂S #1</u>	<u>H₂S #2</u>
Date of Audit	5/8/19	5/8/19
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	1013.00	10020.00 ¹
Average CEM Value (ppmv)	1053.96	10119.75
Accuracy	4.04 %	1.00 %
Limit	< 15 %	< 15 %

¹ Valero unable to obtain EPA Protocol 1 certified gases greater than 1000 ppm.

II. CALIBRATION DRIFT ASSESSMENT

A. Out of Control Periods:

1. Dates: N/A

2. Number of Days N/A

B. Corrective Actions: See GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE page for the South Flare Stack, Total Sulfur analyzer for causes and corrective actions. (Page 36)

Appendix A

Ja Root Cause and Corrective Action Analysis

Subpart Ja Root Cause / Corrective Action AnalysisIncident Number: N/A*The information contained below satisfies the requirements of the NSPS Subpart Ja 60.108a(c)(6).*
 Report: Final
 Refinery: Valero (Meraux)
 Incident Type: Flaring (Flow)
 Emissions Source(s): North Flare (EPN 20-72, EQT 0035)

 Date of Event: 6/14/19
 Date Analysis Completed: N/A

(1.) (60.108a(c)(6)(i))

A description of the Discharge:

This discharge resulted from the normal shutdown of the Hydrocracker Unit to repair a section of piping that a Valero inspection had found to be damaged by corrosion. The discharge included activities such as depressurization and N2 sweeping of the affected area to prepare it for welding. After the repair was completed, a normal start up of the Hydrocracker Unit was performed.

(2.) (60.108a(c)(6)(ii) and (60.108a(c)(6)(ix))

 Date and Time the discharge was first identified 6/14/19 8:43
 Date/Time the discharge had ceased 6/16/19 1:20
 Duration of Discharge (Calculated) 40.6 hrs.

(3.) (60.108a(c)(6)(viii))

The steps taken to limit the emissions during the discharge:

Valero followed its Flare Minimization Plan and Operations Procedures to minimize the volume of this discharge. Additional purges and Nitrogen volume was required to comply with the maintenance vent provisions of 40 CFR 63.643 as well as additional supplemental natural gas required to comply with the Net Heating Value of the Combustion Zone limit (> 270 Btu/scf) of 40 CFR 63.670, that became effective on January 30, 2019.

(4.) (60.108a(c)(6)(xi))

Necessity of RC/CAA: Determine and state whether a RC/CAA is necessary:

Note: If the discharge was a result of a planned startup or shutdown, a RC/CAA analysis is not required if the flare management plan was followed.

Did the discharge result from a planned startup or shutdown?	<u>Yes</u>	(Yes/No)
Was the flare management plan followed?	<u>Yes</u>	(Yes/No/N/A)
Is the event exempt from a RC/CCA based on the answers above?	<u>Yes</u>	(Yes/No)

- If yes, skip section 5-7.

(5.) (60.108a(c)(6)(ix))

Root Cause Analysis: Describe in detail the Root Cause(s) of the Incident, to the extent determinable:
 Did this discharge result from root causes identified in a previous analysis? No (Yes/No)
 N/A

(6.) (60.108a(c)(6)(ix))

Corrective Action Analysis: Include a description of the recommended corrective action(s) or an explanation of why corrective action is not
 Is corrective action required? No (Yes/No)
 N/A

(7.) (60.108a(c)(6)(x))

Corrective Action Schedule: Include corrective actions already completed within the first 45 days following the discharge. For those not completed, provide a schedule for implementation, including proposed commencement and completion dates.

N/A

(8.)

The measured or calculated cumulative quantity of gas discharged over the discharge duration.

Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

	(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))	
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow-weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
6/13/19 8:00	6/14/19 7:00	3,585	18	2.0	0.0
6/13/19 9:00	6/14/19 8:00	100,288	12	2.2	0.0
6/13/19 10:00	6/14/19 9:00	692,190	2	2.3	0.0
6/13/19 11:00	6/14/19 10:00	1,000,566	1	2.4	0.0
6/13/19 12:00	6/14/19 11:00	1,000,566	19	2.4	0.0
6/13/19 13:00	6/14/19 12:00	1,029,345	81	2.8	0.0
6/13/19 14:00	6/14/19 13:00	1,033,885	49	1.5	0.0
6/13/19 15:00	6/14/19 14:00	1,033,898	22	1.4	0.0
6/13/19 16:00	6/14/19 15:00	1,033,899	20	1.3	0.0
6/13/19 17:00	6/14/19 16:00	1,033,899	19	1.3	0.0
6/13/19 18:00	6/14/19 17:00	1,130,962	130	3.4	0.0
6/13/19 19:00	6/14/19 18:00	1,146,990	18	3.5	0.0
6/13/19 20:00	6/14/19 19:00	1,156,332	17	3.5	0.0
6/13/19 21:00	6/14/19 20:00	1,156,365	16	3.5	0.0
6/13/19 22:00	6/14/19 21:00	1,159,249	19	3.5	0.0
6/13/19 23:00	6/14/19 22:00	1,164,159	16	3.5	0.0
6/14/19 0:00	6/14/19 23:00	1,164,169	19	3.5	0.0
6/14/19 1:00	6/15/19 0:00	1,164,161	22	3.5	0.0
6/14/19 2:00	6/15/19 1:00	1,164,150	24	3.5	0.0
6/14/19 3:00	6/15/19 2:00	1,164,140	23	3.5	0.0
6/14/19 4:00	6/15/19 3:00	1,178,056	31	3.6	0.0
6/14/19 5:00	6/15/19 4:00	1,509,195	33	5.4	0.0
6/14/19 6:00	6/15/19 5:00	2,261,514	12	6.9	0.0
6/14/19 7:00	6/15/19 6:00	2,977,010	7	7.7	0.0
6/14/19 8:00	6/15/19 7:00	3,622,564	3	8.1	0.0
6/14/19 9:00	6/15/19 8:00	3,955,411	7	8.4	0.0
6/14/19 10:00	6/15/19 9:00	3,706,580	20	9.4	0.1
6/14/19 11:00	6/15/19 10:00	4,004,339	27	12.1	0.1
6/14/19 12:00	6/15/19 11:00	4,104,712	49	12.9	0.1
6/14/19 13:00	6/15/19 12:00	4,138,785	118	13.7	0.1
6/14/19 14:00	6/15/19 13:00	4,132,659	56	13.7	0.1
6/14/19 15:00	6/15/19 14:00	4,132,676	18	13.7	0.1
6/14/19 16:00	6/15/19 15:00	4,253,054	61	14.9	0.1
6/14/19 17:00	6/15/19 16:00	4,351,667	48	15.7	0.1
6/14/19 18:00	6/15/19 17:00	4,331,615	66	14.5	0.1
6/14/19 19:00	6/15/19 18:00	4,503,352	49	15.9	0.1
6/14/19 20:00	6/15/19 19:00	4,552,854	25	16.2	0.1
6/14/19 21:00	6/15/19 20:00	4,687,502	34	16.9	0.1
6/14/19 22:00	6/15/19 21:00	4,831,245	22	17.5	0.1
6/14/19 23:00	6/15/19 22:00	4,847,786	20	17.5	0.1
6/15/19 0:00	6/15/19 23:00	4,975,776	22	18.0	0.1
6/15/19 1:00	6/16/19 0:00	5,160,754	21	18.6	0.1
6/15/19 2:00	6/16/19 1:00	5,181,895	20	18.7	0.1
6/15/19 3:00	6/16/19 2:00	5,181,893	17	18.7	0.1
6/15/19 4:00	6/16/19 3:00	5,167,966	17	18.6	0.1
6/15/19 5:00	6/16/19 4:00	4,836,814	17	16.8	0.1
6/15/19 6:00	6/16/19 5:00	4,084,481	16	15.3	0.1
6/15/19 7:00	6/16/19 6:00	3,368,959	16	14.4	0.1

(8.)

The measured or calculated cumulative quantity of gas discharged over the discharge duration.

Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow-weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
6/15/19 8:00	6/16/19 7:00	2,723,389	15	14.1	0.1
6/15/19 9:00	6/16/19 8:00	2,293,832	14	13.6	0.1
6/15/19 10:00	6/16/19 9:00	1,950,758	11	12.5	0.1
6/15/19 11:00	6/16/19 10:00	1,344,620	17	9.7	0.1
6/15/19 12:00	6/16/19 11:00	1,244,247	16	8.9	0.0
6/15/19 13:00	6/16/19 12:00	1,181,395	15	7.6	0.0
6/15/19 14:00	6/16/19 13:00	1,179,714	12	7.6	0.0
6/15/19 15:00	6/16/19 14:00	1,179,684	13	7.6	0.0
6/15/19 16:00	6/16/19 15:00	1,059,305	14	6.3	0.0
6/15/19 17:00	6/16/19 16:00	960,692	14	5.5	0.0
6/15/19 18:00	6/16/19 17:00	883,681	15	4.6	0.0
6/15/19 19:00	6/16/19 18:00	695,915	12	3.1	0.0
6/15/19 20:00	6/16/19 19:00	637,076	12	2.8	0.0
6/15/19 21:00	6/16/19 20:00	502,403	8	2.1	0.0
6/15/19 22:00	6/16/19 21:00	355,775	8	1.5	0.0