



July 30, 2014

CERTIFIED: 7001 1140 0001 6090 9054

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 2014
Valero Refining - Meraux LLC, Agency Interest # 1238
2500 East St. Bernard Hwy., St. Bernard Parish, Meraux, LA
Title V Permit Numbers: 2500-00001-V10

Gentlemen,

Valero Refining, Meraux LLC hereby submits 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 2014. Also enclosed are the Data Assessment Reports for the appropriate CEMs.

For this reporting period, excess emissions greater than or equal to 1 percent of the total operating time occurred at the #3 SRU Incinerator (EPN 5-00, EQT 0079) for Sulfur Dioxide. No CEMS had downtime greater than 5 percent of the total operating time. A quarterly quality assurance test was missed at the BRU Reboiler (EPN 1-09, EQT 0127). Valero normally performs Relative Accuracy Test Assessments (RATAs) in the 2nd Quarter and the BRU was shutdown when the third party contractor was on site to perform the RATAs. The RATA was not rescheduled later in the quarter when the BRU returned to service. Also, the quarterly manufacturer's recommended maintenance was missed on the #2 FCCU ESP Stack (EPN 2-77, EQT 0032) Opacity analyzer due to the work order not clearly describing the work to be performed. Valero will document these as deviations in the Semi-Annual Title V Deviation Report. The RATA has been re-scheduled for the 1st week in August and the Opacity maintenance was performed on July 23, 2014.

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,


Jack E. Merrill
Vice President & General Manager
Valero Refining – Meraux LLC

Enclosures

cc: Mr. Mike Algero, LDEQ SE Regional Office, New Orleans, LA

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

(per 40 CFR 60.7(d))

Pollutant: **Opacity**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: Opacity shall not exceed 30% for more than one 6-minute interval in any 1-hour period

Monitor Manufacturer and Model No.: Teledyne Monitor Labs LightHawk 560

Date of Latest CMS Certification or Audit: Certification (4/20/13)

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

Total source operating time in reporting period: 131,040 minutes

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(minutes)</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>(minutes)</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: **CO**

Applicable NSPS Subpart: J (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 27)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: CO corrected to 0% O₂ shall not exceed 500 ppm on a 1 hour rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 48i (CO)/Servomex 1155 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/5/14

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

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

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	(hours)
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:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
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))

Pollutant: SO₂

Applicable NSPS Subpart: J (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 18)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 50 ppm on a 7 day rolling average and 25 ppm on a 365 day rolling average (Consent Decree Limits)

Monitor Manufacturer and Model No.: Thermo Environmental 43i (SO₂)/Servomex 1155 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/5/14

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

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	0
e. Unknown causes	0
2. Total CMS Downtime	2
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))

Pollutant: **NO_x**

Applicable NSPS Subpart: None (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 15)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: NO_x corrected to 0% O₂ shall not exceed 80 ppm on a 7 day rolling average and 40 ppm on a 365 day rolling average (Consent Decree Interim Limits)

Monitor Manufacturer and Model No.: Thermo Environmental 42i (NO_x)/Servomex 1155 (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/5/14

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

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

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	(hours)
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:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
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: SO₂

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

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	29
d. Other known causes	4
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: SO₂

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 991-CEM-X(SO₂)/ Rosemount Oxymitter 4000(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/6/14

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

Total source operating time in reporting period: 2,043 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	<i>(hours)</i>
a. Startup/shutdown	29
b. Control equipment problems	0
c. Process problems	0
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	29
3. Total duration of excess emissions x (100) [Total source operating time] ²	1.4 %

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	5
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	5
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.2 %

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

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

Total source operating time in reporting period: 1,951 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	(hours)
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:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	58
d. Other known causes	17
e. Unknown causes	0
2. Total CMS Downtime	75
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	3.8 %

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

Process Unit(s) Description: Area 1 Fuel Drum for Boiler B-7 (EPN 1-07, EQT 0011) and MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033)

Total source operating time in reporting period: EQT 0011 – 2,174 hours, EQT 0033 – 2,184 hours

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	(hours)
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:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	59
d. Other known causes	17
e. Unknown causes	0
2. Total CMS Downtime	76
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	3.5%

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: J

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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.

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 5/7/14

Process Unit(s) Description: Area 2 Fuel Drum for: Vacuum Heater (EPN 1-76, EQT 0013); ROSE Heater (EPN 1-80, EQT 0014); No.1 Crude Heater (EPN 12-72A, EQT 0022); NHT Charge Heater (EPN 14-72, EQT 0023); 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); DHT Charge Heater (EPN 5-73, EQT 0058)

Total source operating time in reporting period: (Hours) EQT 0013 – 2,184; EQT 0014 – 2,003; EQT 0022 – 2,184; EQT 0023 – 2,183; EQT 0024 – 2,183; EQT 0027 – 2,182; EQT 0028 – 2,184; EQT 0029 – 2,184; EQT 0058 – 2,184

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	4
d. Other known causes	3
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: H₂S

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

Process Unit(s) Description: Area 2 Fuel Drum for Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127)

Total source operating time in reporting period: 1,282 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	0.2 %

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

Process Unit(s) Description: Area 4 Fuel Drum for Alky Reboiler (EPN 1-77, EQT 0078)

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	4
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	4
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.2 %

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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:	(hours)
a. Startup/shutdown	0
b. Control equipment problems	0
c. Process problems	16
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	16
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.7 %

CMS Performance Summary¹	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	4
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	4
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.2 %

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

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)

Total source operating time in reporting period: EQT 0030 – 2,184 hours; EQT 0048 – 2,181 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	8
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	8
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.4 %

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	0
e. Unknown causes	0
2. Total CMS Downtime	2
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))

Pollutant: NO_x

Applicable NSPS Subpart: Db

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 Lumus 11, Serial No. 23042-5-8018413

Date of Latest CMS Certification or Audit: RATA on 5/13/14

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

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

Emissions Data Summary¹	
1. Duration of excess emissions in reporting period due to:	(hours)
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:	(hours)
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 Lumus 11, Serial No. 23042-5-8018413

Date of Latest CMS Certification or Audit: RATA on 5/13/14

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

Total source operating time in reporting period: 2,181 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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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), Thermo Environmental (O₂)

Date of Latest CMS Certification or Audit: RATA on 5/12/14

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

Total source operating time in reporting period: 1,951 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	5
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	5
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: Ja

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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: CGA on 3/15/14 (NO_x), and 1/30/14 (O₂)³

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

Total source operating time in reporting period: 1,282 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	54
e. Unknown causes	0
2. Total CMS Downtime	54
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	4.2 %

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 Valero did not perform a quarterly quality assurance test in the 2nd Quarter 2014. See Data Assessment Report for Benzene Recovery Unit Reboiler NO_x/O₂.

**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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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 Summary²	
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] ³	0.0 %

CMS Performance Summary²	
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	3
d. Other known causes	1
e. Unknown causes	0
2. Total CMS Downtime	4
3. Total duration of CMS Downtime x (100) [Total source operating time] ³	0.2 %

¹ According to 40 CFR 60.107a(e), existing monitoring systems capable of complying with Subpart Ja must comply with the monitoring requirements of Subpart Ja.

² For opacity, record all times in minutes. For gases, record all times in hours.

³ 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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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 Summary²	
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] ³	0.0 %

CMS Performance Summary²	
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	39
d. Other known causes	17
e. Unknown causes	0
2. Total CMS Downtime	56
3. Total duration of CMS Downtime x (100) [Total source operating time] ³	2.6 %

¹ According to 40 CFR 60.107a(e), existing monitoring systems capable of complying with Subpart Ja must comply with the monitoring requirements of Subpart Ja.

² For opacity, record all times in minutes. For gases, record all times in hours.

³ 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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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

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

Emissions Data Summary²	
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] ³	0.0 %

CMS Performance Summary²	
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	4
d. Other known causes	1
e. Unknown causes	0
2. Total CMS Downtime	5
3. Total duration of CMS Downtime x (100) [Total source operating time] ³	0.2 %

¹ According to 40 CFR 60.107a(e), existing monitoring systems capable of complying with Subpart Ja must comply with the monitoring requirements of Subpart Ja.

² For opacity, record all times in minutes. For gases, record all times in hours.

³ 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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

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

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

EXCESS EMISSIONS

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

CMS PERFORMANCE¹

Date	Start	End	Duration (hours)	Cause	Corrective Action
4/14/14	10:18	14:18	4	Shutdown for cleaning and inspection.	Calibrated and returned to service.
4/22/14	10:33	11:33	1	O ₂ Cylinder Gas Audit.	N/A
5/12/14	08:52		25	Out of Control. O ₂ daily calibration check > 2 %O ₂ .	Calibrated and returned to service.
5/13/14		09:52			
6/3/14	08:27	09:27	1	Adjusted for calibration drift.	N/A
6/9/14	13:03	14:03	1	Adjusted for calibration drift.	N/A
6/10/14	08:35	09:35	1	Adjusted for calibration drift.	N/A
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: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 991-CEM-X(SO₂)/ Rosemount Oxymitter 4000(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/6/14

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

Total source operating time in reporting period: 2,043 hours

EXCESS EMISSIONS

Date	Start	End	Duration (hours)	Max 12- HRA (ppm)	Cause	Corrective Action
4/20/14	17:10		12	> 500	SO ₂ at 0% O ₂ greater than 250 ppm, 12-HRA, with SO ₂ emissions less than 500 lbs/day above the allowable limit due to an unplanned shutdown of the #3 SRU. Valero shut down the #3 SRU after a tube failure in the Condenser caused the #3 TGT to flame out. Valero bypassed the #3 TGT to the incinerator while the #3 SRU was in the process of shutting down.	Valero quickly initiated the sulfur shedding procedure. Valero shut down the Gas Oil Hydrotreater/Hydrocracker and brought the remaining refinery units to minimum charge rate. Valero then shifted the remaining sulfur load to the #2 SRU and safely shut down the #3 SRU.
4/21/14		05:10				Valero identified the leaking tube at the steam inlet to the Condenser and plugged it along with several of the surrounding tubes. Valero determined the cause of the tube failure to be flow assisted corrosion caused by wet steam impingement. Valero determined that a steam trap removed for repair in 2008 was never re-installed. This allowed the wet steam to enter the Condenser and cause the erosion. Valero will re-install this steam trap and replace the impingement plate at the inlet of the Condenser at the next turnaround.
4/27/14	11:00		17	> 500	SO ₂ at 0% O ₂ greater than 250 ppm, 12-HRA, with SO ₂ emissions less than 500 lbs/day above the allowable limit during start up of the #3 SRU.	Valero completed the unit startup per the SSM Plan.
4/28/14		04:00				
TOTAL			29			

**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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 991-CEM-X(SO₂)/ Rosemount Oxymitter 4000(O₂)

Date of Latest CMS Certification or Audit: RATA on 5/6/14

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

Total source operating time in reporting period: 2,043 hours

CMS PERFORMANCE¹

Date	Start	End	Duration (hours)	Cause	Corrective Action
4/11/14	14:28	15:28	1	Adjusted for calibration drift.	N/A
5/19/14	12:50	14:50	2	Adjusted for calibration drift.	N/A
5/27/14	09:12	10:12	1	Adjusted for calibration drift.	N/A
5/29/14	13:14	14:14	1	Adjusted for calibration drift.	N/A
TOTAL			5		

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/7/14

Process Unit(s) Description: Area 2 Fuel Drum for Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127)

Total source operating time in reporting period: 1,282 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	
4/6/14	05:50	08:50	3	Analyzer offline. Sample pressure regulator failed after daily calibration check.	Pressure regulator replaced, calibrated and returned to service.	
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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: CGA on 3/15/14 (NO_x), and 1/30/14 (O₂)²

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

Total source operating time in reporting period: 1,282 hours

Ja EXCESS EMISSIONS

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

Ja CMS PERFORMANCE¹

Date	Start	End	Duration (hours)	Cause	Corrective Action
5/28/14	18:43	16:43	46	Out of Control. Valero had recently changed the Distributed Control System to Emerson Delta V and the data tags used to record the results of the daily calibration checks were set up incorrectly. The calibrations occurred and were likely satisfactory, but no record of them was retained.	Valero corrected the data tags.
6/25/14	08:10	15:10	7	Delta V Server maintenance. CEMS remained in service but data during this period was not recorded by the data historian.	Valero completed the server maintenance.
6/26/14	13:34	14:34	1		
TOTAL			54		

¹ In 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.

² Valero did not perform a quarterly quality assurance test in the 2nd Quarter 2014. See Data Assessment Report for Benzene Recovery Unit Reboiler NO_x/O₂.

**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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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 12-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE²

Date	Start	End	Duration (hours)	Cause	Corrective Action
5/8/14	10:25	13:25	3	Relative Accuracy Test Assessment	N/A
6/11/14	08:52	09:52	1	Taken offline to depressurize calibration gas lines while troubleshooting a suspected leak from the calibration gas to the sample line on the South Flare analyzer.	Valero completed the troubleshooting and returned the analyzer to service.
TOTAL			4		

¹ According to 40 CFR 60.107a(e), existing monitoring systems capable of complying with Subpart Ja must comply with the monitoring requirements of Subpart Ja.

² In 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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14 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 5/8/14

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 12- HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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 PERFORMANCE²					
Date	Start	End	Duration (hours)	Cause	Corrective Action
4/28/14	01:23	17:23	16	Analyzer reading questionable and near zero. Daily calibration check not automatically initiated. Instrument maintenance inspected the analyzer and found a low differential pressure across the analyzer indicating low sample flow. A small amount of liquids was found in the sample line.	Valero blew out the sample lines and adjusted the differential pressure across the analyzer. Once flow was restored, Valero calibrated and returned it service.
4/28/14	17:52	18:52	1	Calibration re-checked after clearing sample lines earlier.	Returned to service.
4/29/14	05:54		30	Out of Control. The calibration drift > 4 times the allowable limit on the high span, low range.	Valero maintenance checked out the analyzer and found no obvious cause for the excessive calibration drift. The sample flow was reset and the analyzer was a re-calibrated. Subsequent calibration checks were satisfactory and the problem did not reoccur.
4/30/14		11:54			
5/1/14	07:16	08:16	1	Analyzer taken offline and inspected again following the Out of Control period.	Valero suspects the problem may have been due to a flow restriction that cleared during the troubleshooting. The problem did not reoccur.
5/8/14	10:25	13:25	3	Relative Accuracy Test Assessment	N/A
5/9/14	11:10	11:10	1	Adjusted for calibration drift.	N/A
5/13/14	10:22	12:22	2	Adjusted for calibration drift.	N/A
5/16/14	09:12	10:12	1	Adjusted for calibration drift.	N/A
6/11/14	08:52	09:52	1	Taken offline to depressurize calibration gas lines while troubleshooting a suspected leak from the calibration gas to the sample line on the South Flare analyzer.	Valero completed the troubleshooting and returned the analyzer to service.
TOTAL			56		

¹ According to 40 CFR 60.107a(e), existing monitoring systems capable of complying with Subpart Ja must comply with the monitoring requirements of Subpart Ja.

² In 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: Ja¹ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 5/8/14

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 12-HRA (ppm)	Cause	Corrective Action
None						
TOTAL			0			

Ja CMS PERFORMANCE²

Date	Start	End	Duration (hours)	Cause	Corrective Action
5/8/14	10:25	13:25	3	Relative Accuracy Test Assessment	N/A
6/8/14	15:00	16:00	1	Adjusted for calibration drift.	N/A
6/11/14	08:52	09:52	1	Taken offline to depressurize calibration gas lines while troubleshooting a suspected leak from the calibration gas to the sample line on the South Flare analyzer.	Valero completed the troubleshooting and returned the analyzer to service.
TOTAL			5		

¹ According to 40 CFR 60.107a(e), existing monitoring systems capable of complying with Subpart Ja must comply with the monitoring requirements of Subpart Ja.

² In 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: **Opacity**

Applicable NSPS Subpart: J

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: Opacity shall not exceed 30% for more than one 6-minute interval in any 1-hour period

Monitor Manufacturer and Model No.: Teledyne Monitor Labs LightHawk 560

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

CEM Sampling Location: #2 FCCU ESP Stack

CEM Span Value: Opacity 100%

I. ACCURACY ASSESSMENT RESULTS

Not applicable to opacity monitors.

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: **CO**

Applicable NSPS Subpart: J (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 27)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: CO corrected to 0% O₂ shall not exceed 500 ppm on a 1 hour rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 48i (CO)/Servomex 1155 (O₂)

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

CEM Sampling Location: #2 FCCU ESP Stack

CEM Span Value: Carbon Monoxide 1000 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

CO corrected to 0% O ₂	
Date of Audit	5/5/14
Reference Method	EPA Method 10/ EPA Method 3A
Average RM Value (ppmv)	0.99
Average CEM Value (ppmv)	1.90
Accuracy	0.3 %
Limit	< 5 %

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: J (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 18)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO₂ corrected to 0% O₂ shall not exceed 50 ppm on a 7 day rolling average and 25 ppm on a 365 day rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 43i (SO₂)/Servomex 1155 (O₂)

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

CEM Sampling Location: #2 FCCU ESP Stack

CEM Span Value: Sulfur Dioxide 500 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

SO ₂ corrected to 0% O ₂	
Date of Audit	5/5/14
Reference Method	EPA Method 6C/ EPA Method 3A
Average RM Value (ppmv)	16.33
Average CEM Value (ppmv)	17.74
Accuracy	4.4 %
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: None (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 15)

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: Not Applicable

Monitor Manufacturer and Model No.: Thermo Environmental 42i (NO_x)/Servomex 1155 (O₂)

Process Unit(s) Description: #2 FCCU ESP Stack (EPN 2-77, EQT 0032)

CEM Sampling Location: #2 FCCU ESP Stack

CEM Span Value: Nitrogen Oxide 250 ppm

I. ACCURACY ASSESSMENT RESULTS (RATA):

NO _x corrected to 0% O ₂	
Date of Audit	5/5/14
Reference Method	EPA Method 7E/ EPA Method 3A
Average RM Value (ppmv)	52.41
Average CEM Value (ppmv)	42.81
Accuracy	18.8 %
Limit	< 20 %

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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	5/7/14
Reference Method	EPA Method 6C/ EPA Method 3A
Average RM Value (ppmv)	72.89
Average CEM Value (ppmv)	64.33
Accuracy	4.5 %
Limit	< 10 %

II. CALIBRATION DRIFT ASSESSMENT

A. Out-of Control Periods:

1. Dates: 5/12/14 08:52 – 5/13/14 09:52, 25 hours

2. Number of Days 1

B. Corrective Actions: See GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE page on the #2 SRU SO₂ for a description of causes and corrective actions.

DATA ASSESSMENT REPORT

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

Pollutant: SO₂

Applicable NSPS Subpart: Ja

Reporting period dates: From 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 991-CEM-X (SO₂), Rosemount Oxymitter 4000 (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	5/6/14
Reference Method	EPA Method 6C/ EPA Method 3A
Average RM Value (ppmv)	110.58
Average CEM Value (ppmv)	103.14
Accuracy	3.6 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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)

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	<u>5/7/14</u>	<u>5/7/14</u>
Reference Method	<u>EPA Method 11</u>	<u>EPA Method 11</u>
	<u>(Alternate RATA)</u>	<u>(Alternate RATA)</u>
Average RM Value (ppmv)	<u>83.50</u>	<u>165.60</u>
Average CEM Value (ppmv)	<u>87.51</u>	<u>165.84</u>
Accuracy	<u>2.59 %</u>	<u>0.53 %</u>
Limit	<u>< 15 %</u>	<u>< 15 %</u>

II. CALIBRATION DRIFT ASSESSMENT

A. Out-of Control Periods:

1. Dates: 6/20/14 06:13 – 6/20/14 12:13, 54 hours

2. Number of Days 2.3

B. Corrective Actions: Analyzer was offline and did not automatically perform a calibration check on 6/21 and 6/22. Valero called out a maintenance technician on 6/22 and found the sample filter plugged and no flow through the analyzer. The technician cleaned the analyzer, replaced the filter, calibrated the analyzer, and returned it to service.

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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: MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033); 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); DHT Charge Heater (EPN 5-73, EQT 0058); Benzene Recovery Unit Reboiler (EPN 1-09, EQT 0127)

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	<u>5/7/14</u>	<u>5/7/14</u>
Reference Method	<u>EPA Method 11</u>	<u>EPA Method 11</u>
	<u>(Alternate RATA)</u>	<u>(Alternate RATA)</u>
Average RM Value (ppmv)	<u>85.30</u>	<u>165.60</u>
Average CEM Value (ppmv)	<u>84.34</u>	<u>159.65</u>
Accuracy	<u>1.58 %</u>	<u>3.59 %</u>
Limit	<u>< 15 %</u>	<u>< 15 %</u>

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 Alky Reboiler (EPN 1-77, EQT 0078)

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	5/7/14	5/7/14
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	85.30	165.60
Average CEM Value (ppmv)	84.50	156.40
Accuracy	1.68 %	5.55 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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	<u>5/7/14</u>	<u>5/7/14</u>
Reference Method	<u>EPA Method 11</u>	<u>EPA Method 11</u>
	<u>(Alternate RATA)</u>	<u>(Alternate RATA)</u>
Average RM Value (ppmv)	<u>85.30</u>	<u>165.60</u>
Average CEM Value (ppmv)	<u>84.33</u>	<u>159.96</u>
Accuracy	<u>1.82 %</u>	<u>3.41 %</u>
Limit	<u>< 15 %</u>	<u>< 15 %</u>

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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	5/7/14	5/7/14
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	85.30	165.60
Average CEM Value (ppmv)	84.70	159.44
Accuracy	1.77 %	3.73 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 23042-5-8018413

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	
Date of Audit	5/13/14
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value	0.0375 lb/MMBtu
Average CEM Value	0.0444 lb/MMBtu
Accuracy	8.3 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 23042-5-8018413

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	
Date of Audit	5/13/14
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value	0.0359 lb/MMBtu
Average CEM Value	0.0452 lb/MMBtu
Accuracy	9.5 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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	
Date of Audit	5/12/14
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value	0.0279 lb/MMBtu
Average CEM Value	0.0269 lb/MMBtu
Accuracy	1.8 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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 corrected 0% O₂

Date of Audit

Reference Method

EPA Method 7E / EPA Method 3A

Average RM Value (ppmv)

Average CEM Value (ppmv)

Accuracy

Limit

< 10 %

Valero failed to perform this RATA or any quarterly quality assurance test in the 2nd Quarter 2014. The BRU Reboiler was unexpectedly shutdown when the third party contractor that performs the RATA's was on site in May. The RATA was not rescheduled in June when the BRU Reboiler returned to service. Valero will document this as deviation in the Semi-Annual Title V Deviation Report. Valero has scheduled the contractor to return and perform this RATA in the 1st week of August 2014.

II. CALIBRATION DRIFT ASSESSMENT

A. Out-of Control Periods:

1. Dates: 5/28/14 18:43 – 5/30/14 16:43, 46 hours

2. Number of Days 1.9

C. Corrective Actions: GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE page on the BRU Reboiler NO_x/O₂ for a description of causes and corrective actions.

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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

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	5/8/14	5/8/14
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	1021.00	10060.00 ¹
Average CEM Value (ppmv)	1041.99	9824.25
Accuracy	2.28 %	2.34 %
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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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

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	5/8/14	5/8/14
Reference Method	EPA Method 11 (Alternate RATA)	EPA Method 11 (Alternate RATA)
Average RM Value (ppmv)	1021.00	10060.00 ¹
Average CEM Value (ppmv)	1017.12	10005.84
Accuracy	1.16 %	0.54 %
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: 4/29/14 05:54 – 4/30/14 11:54, 30 hours

2. Number of Days 1.3

B. Corrective Actions: See GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE page on the North Flare Stack, Hydrocracker Flare Header for a description of causes and corrective actions.

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 4/1/14 to 6/30/14

Date submitted: 7/30/14

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

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	<u>5/8/14</u>	<u>5/8/14</u>
Reference Method	<u>EPA Method 11</u> <u>(Alternate RATA)</u>	<u>EPA Method 11</u> <u>(Alternate RATA)</u>
Average RM Value (ppmv)	<u>1021.00</u>	<u>10060.00¹</u>
Average CEM Value (ppmv)	<u>1032.99</u>	<u>10022.44</u>
Accuracy	<u>1.34 %</u>	<u>0.37 %</u>
Limit	<u>< 15 %</u>	<u>< 15 %</u>

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
