

October 24, 2014

CERTIFIED: 7001 1140 0001 6090 5261

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 – 3rd 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 Third Quarter 2014. Also enclosed are the Data Assessment Reports for the appropriate CEMs.

For this reporting period, no CEMS had excess emissions greater than or equal to 1 percent of the total operating time. CEMS Downtime greater than 5 percent of the total operating time occurred at Boiler B-5 (EPN 2-00, EQT 0030) for Nitrous Oxide. Valero was unable to perform the make-up Relative Accuracy Test Assessments (RATA) that was missed in the 2<sup>nd</sup> Quarter at the BRU Reboiler (EPN 1-09, EQT 0127) for Nitrous Oxide due to access limitations to the sample point and the limited time the BRU Reboiler was in service in the 3<sup>rd</sup> Quarter. The alternate RATA procedures of 40 CFR 60, Performance Specification 2, Section 16 were performed instead.

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

(per 40 CFR 60.7(d))

Pollutant: Opacity

Applicable NSPS Subpart: \_\_J\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: 41,169 minutes

Emissions Data Summary <sup>1</sup>	
Duration of excess emissions in reporting period due to:	(minutes)
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(minutes)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	30
d. Other known causes	0
e. Unknown causes	30
2. Total CMS Downtime	30
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.1 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(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 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: CO corrected to 0% O<sub>2</sub> shall not exceed 500 ppm on a 1 hour rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 48i (CO)/Servomex 1155 (O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 7/26/14

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

Total source operating time in reporting period: 686 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
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] <sup>2</sup>	0.6 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: SO<sub>2</sub>

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

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (SO<sub>2</sub>)/Servomex 1155 (O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 7/26/14

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

Total source operating time in reporting period: 686 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
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] <sup>2</sup>	0.6 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: NO<sub>x</sub>

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

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: NOx corrected to 0% O<sub>2</sub> 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 (NOx)/Servomex 1155 (O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 7/26/14

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

Total source operating time in reporting period: 686 hours

Emissions Data Summary <sup>1</sup>	
Duration of excess emissions in reporting period due to:	(hours)
a. Startup/shutdown	(
b. Control equipment problems	C
c. Process problems	(
d. Other known causes	(
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 Summary <sup>1</sup>	
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] <sup>2</sup>	0.4 %

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

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO<sub>2</sub> corrected to 0% O<sub>2</sub> shall not exceed 250 ppm on a 12-hour rolling average

Monitor Manufacturer and Model No.: Brimstone SGX-231(SO<sub>2</sub>)/Rosemount Oxymitter 4000(O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 9/6/14 (SO<sub>2</sub>), 8/26/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 1,665 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
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	2
e. Unknown causes	0
2. Total CMS Downtime	6
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.4 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO<sub>2</sub> corrected to 0% O<sub>2</sub> shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: Brimstone 991-CEM-X(SO<sub>2</sub>)/ Rosemount Oxymitter 4000(O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 9/6/14 (SO<sub>2</sub>), 8/25/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 1,213 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: H2S

Applicable NSPS Subpart: J

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/22/14

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) and

MDH Product and Fractionator Heaters (EPN 2-92, EQT 0033)

Total source operating time in reporting period: EQT 0010 - 2,142 hours, EQT 0011 -2123 hours, EQT 0033 - 2208 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
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	2
e. Unknown causes	0
2. Total CMS Downtime	4
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.2 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: H2S

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/23/14

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 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: 2,208 hours

Emissions Data Summary <sup>1</sup>	
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 Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	
d. Other known causes	6
e. Unknown causes	0
2. Total CMS Downtime	7
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.3 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: H<sub>2</sub>S

Applicable NSPS Subpart: \_\_J\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/23/14

Process Unit(s) Description: Area 2 Fuel Drum for ROSE Heater (EPN 1-80, EQT 0014)

Total source operating time in reporting period: 684 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0%

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	4
e. Unknown causes	0
2. Total CMS Downtime	5
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.7 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: H2S

Applicable NSPS Subpart: <u>Ja</u>

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/23/14

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: 1,371 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0%

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	4
e. Unknown causes	0
2. Total CMS Downtime	5
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.4 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: H2S

Applicable NSPS Subpart: \_\_J\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/24/14

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

Total source operating time in reporting period: <u>851 hours</u>

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
CMS downtime in reporting period due to:	(hours)
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] <sup>2</sup>	0.1 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: H2S

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/25/14

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: 696 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
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] <sup>2</sup>	0.2 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: H<sub>2</sub>S

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/24/14

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

Total source operating time in reporting period: 1,408 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
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	29
e. Unknown causes	0
2. Total CMS Downtime	31
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	2.2 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: H<sub>2</sub>S

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/24/14

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

Total source operating time in reporting period: 1,635 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
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] <sup>2</sup>	0.2 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: NO<sub>x</sub>

Applicable NSPS Subpart: \_\_Db\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 8/30/14 (NOx), 8/31/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 1,408 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	50
d. Other known causes	195
e. Unknown causes	0
2. Total CMS Downtime	245
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	17.4%

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: NOx

Applicable NSPS Subpart: Db

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 8/29/14 (NOx), 8/28/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 1,635 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	47
d. Other known causes	33
e. Unknown causes	0
2. Total CMS Downtime	80
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	4.9 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

(per 40 CFR 60.7(d))

Pollutant: NO<sub>x</sub>

Applicable NSPS Subpart: \_\_\_Db\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (NOx), Thermo Environmental (O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 9/5/14 (NOx), 8/25/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 2,142 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	3
d. Other known causes	2
e. Unknown causes	0
2. Total CMS Downtime	5
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.2 %

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: NO<sub>x</sub>

Applicable NSPS Subpart: \_\_Ja\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: Nitrogen Oxide corrected to 0% O<sub>2</sub> shall not exceed 40 ppm on a 30-day rolling average

Monitor Manufacturer and Model No.: Thermo Environmental 42i (NOx)/(O<sub>2</sub>)

Date of Latest CMS Certification or Audit: Alternate RATA on 8/6/14, CGA on 8/30/14 (NOx), and 8/26/14 (O2)

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

Total source operating time in reporting period: 1,371 hours

Emissions Data Summary <sup>1</sup>	
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] <sup>2</sup>	0.0 %

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
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] <sup>2</sup>	0.4%

<sup>&</sup>lt;sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>2</sup> 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.

<sup>&</sup>lt;sup>3</sup> See Data Assessment Report for Benzene Recovery Unit Reboiler NOx/O<sub>2</sub> for more information.

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

Pollutant: Total Sulfur

Applicable NSPS Subpart: Ja<sup>1</sup> (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 9/1/14

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

Total source operating time in reporting period: 2,208 hours

Emissions Data Summary <sup>2</sup>					
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] <sup>3</sup>	0.0 %				

CMS Performance Summary <sup>2</sup>				
1. CMS downtime in reporting period due to:	(hours)			
a. Monitor equipment malfunctions	0			
b. Non-Monitor equipment malfunctions	0			
c. Quality assurance calibration	49			
d. Other known causes	20			
e. Unknown causes	0			
2. Total CMS Downtime	69			
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>3</sup>	3.1 %			

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>3</sup> 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.

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

Pollutant: Total Sulfur

Applicable NSPS Subpart: Ja<sup>1</sup> (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 9/1/14

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

Total source operating time in reporting period: 1,416 hours

Emissions Data Summary <sup>2</sup>							
Duration of excess emissions in reporting period due to:  (ho							
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] <sup>3</sup>	0.0 %						

CMS Performance Summary <sup>2</sup>				
1. CMS downtime in reporting period due to:	(hours)			
a. Monitor equipment malfunctions	0			
b. Non-Monitor equipment malfunctions	0			
c. Quality assurance calibration	51			
d. Other known causes	0			
e. Unknown causes	0			
2. Total CMS Downtime	51			
3. Total duration of CMS Downtime $x$ (100) [Total source operating time] <sup>3</sup>	3.6 %			

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;sup>3</sup> 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.

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

Pollutant: Total Sulfur

Applicable NSPS Subpart: Ja<sup>1</sup> (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 9/1/14

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

Total source operating time in reporting period: 2,208 hours

Emissions Data Summary <sup>2</sup>					
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] <sup>3</sup>	0.0 %				

CMS Performance Summary <sup>2</sup>				
CMS downtime in reporting period due to:	(hours)			
a. Monitor equipment malfunctions	0			
b. Non-Monitor equipment malfunctions	0			
c. Quality assurance calibration	52			
d. Other known causes	2			
e. Unknown causes	0			
2. Total CMS Downtime	54			
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>3</sup>	2.4 %			

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> For opacity, record all times in minutes. For gases, record all times in hours.

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.

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

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: <u>Ja</u>

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO<sub>2</sub> corrected to 0% O<sub>2</sub> shall not exceed 250 ppm on a 12-hour rolling average

Monitor Manufacturer and Model No.: Brimstone SGX-231(SO<sub>2</sub>)/Rosemount Oxymitter 4000(O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 9/6/14 (SO<sub>2</sub>), 8/26/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 1,665 hours

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

Ja CMS PERFORMANCE <sup>1</sup>							
Date	Start	End	Duration (hours)	Cause	Corrective Action		
7/14/14	10:04	11:04	1	Adjusted for calibration drift.	N/A		
8/26/14	14:00	15:00	1	O <sub>2</sub> Cylinder Gas Audit.	N/A		
9/6/14	07:55	09:55	2	SO <sub>2</sub> Cylinder Gas Audit.	N/A		
9/17/14	13:11	14:11	1	DCS power secured for DCS maintenance. Unavoidable loss of data	DCS power restored.		
9/22/14	10:57	11:57	1	retention. Analyzer remained in service.	Des power restored.		
TOTAL			6				

<sup>&</sup>lt;sup>1</sup>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.

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

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO<sub>2</sub> corrected to 0% O<sub>2</sub> shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: Brimstone 991-CEM-X(SO<sub>2</sub>)/Rosemount Oxymitter 4000(O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 9/6/14 (SO<sub>2</sub>), 8/25/14 (O<sub>2</sub>)

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

Total source operating time in reporting period: 1,213 hours

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

CMS PERFORMANCE <sup>1</sup>							
Date	Start	End	Duration (hours)	Cause	Corrective Action		
None			×				
ΓΟΤΑL			0				

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.

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

Pollutant: H2S

Applicable NSPS Subpart: \_\_Ja\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 7/23/14

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: 1,371 hours

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

Ja CMS PERFORMANCE <sup>1</sup>							
Date	Start	End	Duration (hours)	Cause	Corrective Action		
7/11/14	05:50	09:50	4	Analyzer malfunctioned after satisfactory daily calibration check.	Cleaned and replaced filters. Calibrated and returned to service.		
7/23/14	07:37	08:37	1	Cylinder Gas Audit	N/A		
TOTAL			5				

<sup>&</sup>lt;sup>1</sup>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.

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

Pollutant: NO<sub>x</sub>

Applicable NSPS Subpart: \_\_\_Db\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 8/30/14 (NOx), 8/31/14 (O2)

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

Total source operating time in reporting period: 1,408 hours

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

Date	Start	End	Duration (hours)	Cause	Corrective Action	
8/2/14 07: 8/5/14	07:55		50	Out of Control. The results of daily calibration checks on 8/3 and 8/4 were not recorded by the refinery data historian. Valero was in the process of transferring operations of this area to a new distributed control system (DCS)	Corrected the data management in the	
		07:55	50	and the data management of the automatic daily calibration checks was not set up correctly in the new DCS. B-5 was shutdown multiple times during this process, which reduced the Out of Control hours.	new DCS.	
9/16/14	10:03		195	damage. Valero could not repair the replacemen	Valero rush ordered the necessary replacement parts and brought in a	
9/24/14		12:03	193		specialist to repair the analyzer.	
TOTAL			245			

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

Pollutant: NO<sub>x</sub>

Applicable NSPS Subpart: \_\_Ja\_\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (NOx)/(O2)

Date of Latest CMS Certification or Audit: Alternate RATA on 8/6/14, CGA on 8/30/14 (NOx), and 8/26/14 (O2)<sup>2</sup>

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

Total source operating time in reporting period: 1,371 hours

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

Ja CMS PERFORMANCE <sup>1</sup>							
Date	Start	End	Duration (hours)	Cause	Corrective Action		
8/6/14	08:24	10:24	2	O <sub>2</sub> Alternate RATA	N/A		
8/6/14	13:30	15:30	2	NOx Alternate RATA	N/A		
8/26/14	14:55	15:55	1	O <sub>2</sub> Cylinder Gas Audit	N/A		
TOTAL			5				

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.

<sup>&</sup>lt;sup>2</sup> See Data Assessment Report for Benzene Recovery Unit Reboiler NOx/O<sub>2</sub> for more information.

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

Pollutant: Total Sulfur

Applicable NSPS Subpart: \_\_Ja<sup>1</sup>\_ (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 9/1/14

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

Total source operating time in reporting period: 2,208 hours

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

				Ja CMS PERFORMANCE <sup>2</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
9/1/14	09:51	10:51	1	Cylinder Gas Audit	N/A
9/17/14	13:11	14:11	1	DCS power secured for planned DCS maintenance. Unavoidable loss of data retention. Analyzer remained in service.	DCS power restored.
9/20/14	06:32	09:52	48	A temporary generator powering the analyzer shut down due to a blown fuse. The time the analyzer was shutdown coincided with the time the automatic daily calibration checks are performed. The replacement fuse was not onsite so a	Spare generator installed, power restored Daily calibration check satisfactory on
9/22/14		09:32	48	spare generator was installed and the analyzers were returned to service, but Valero failed to recognize that the daily calibration checks were missed on 9/21/14.	9/22/14.
9/22/14	10:57	11:57	1	DCS power secured for planned DCS maintenance. Unavoidable loss of data retention. Analyzer remained in service.	DCS power restored.
9/23/14	15:00		18	Samula numa failed Analyses office	Sample pump replaced. Calibrated and
9/24/14		09:00	18	Sample pump failed. Analyzer offline.	returned to service.
TOTAL			69		

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.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: Total Sulfur

Applicable NSPS Subpart: Ja<sup>1</sup> (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 9/1/14

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

Total source operating time in reporting period: 1,416 hours

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

Ja CMS PERFORMANCE <sup>2</sup>									
Date	Start	End	Duration (hours)	Cause	Corrective Action				
7/3/14	09:17	12:17	3	Adjusted for calibration drift.	N/A				
8/22/14	05:41		48	Out of Control. The calibration drift > 4 times the allowable limit on the low range high span	The automatic daily calibration check				
8/24/14		05:41	40	on 8/23/14. Valero failed to recognize this and take corrective action.	on 8/24/14 was satisfactory with no intervention.				
TOTAL			51						

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.

<sup>&</sup>lt;sup>2</sup> 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.

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

Pollutant: Total Sulfur

Applicable NSPS Subpart: <u>Ja<sup>1</sup></u> (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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: CGA on 9/1/14

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

Total source operating time in reporting period: 2,208 hours

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

				Ja CMS PERFORMANCE <sup>2</sup>		
Date	Start	End	Duration (hours)	Cause	Corrective Action	
8/15/14	08:01	09:01	1	Adjusted for calibration drift.	N/A	
8/17/14	10:43	11:43	1	Adjusted for calibration drift.	N/A	
8/20/14	10:30	11:30	1	Adjusted for calibration drift.	N/A	
9/1/14	09:51	10:51	1	Cylinder Gas Audit	N/A	
9/17/14	13:11	14:11	1	DCS power secured for planned DCS maintenance. Unavoidable loss of data retention. Analyzer remained in service.	DCS power restored.	
9/20/14	06:32			A temporary generator powering the analyzer shut down due to a blown fuse. The time the analyzer was shutdown coincided with the time the automatic daily calibration checks	Spare generator installed, power restored Daily calibration check satisfactory on	
9/22/14		06:32	are performed. The replacement fuse was no onsite so a spare generator was installed and the analyzers were returned to service, but Valero failed to recognize that the daily calibration checks were missed on 9/21/14.		9/22/14.	
9/22/14	10:57	11:57	1	DCS power secured for planned DCS maintenance. Unavoidable loss of data retention. Analyzer remained in service.	DCS power restored.	
TOTAL			54			

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.

<sup>&</sup>lt;sup>2</sup> 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 7/1/14 to 9/30/14
Date submitted: 10/30/14
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: <u>N/A</u>
2. Number of Days <u>N/A</u>
B. Corrective Actions: N/A

# DATA ASSESSMENT REPORT (per 40 CFR 60, Appendix F, Section 7)

Pollutant: C	CO				
Applicable 1	NSPS Subpart:J(Required b	y Consent Decree:	3:10-cv-00563-bbc	, Paragraph 27)	
Reporting po	eriod dates: From <u>7/1/14</u> to <u>9/30/1</u>	4			
Date submit	ted: 10/30/14				
Company:_'	Valero Refining - Meraux LLC				
Address: 25	500 East St. Bernard Highway, Mo	eraux, LA 70075			
Emission Li	mitation: CO corrected to 0% O	shall not exceed 5	00 ppm on a 1 hour	rolling average	
Monitor Ma	nufacturer and Model No.: Thern	no Environmental 4	48i (CO)/Servomex	1155 (O <sub>2</sub> )	
Process Uni	t(s) Description: #2 FCCU ESP	Stack (EPN 2-77, E	EQT 0032)		
CEM Sampl	ing Location: #2 FCCU ESP St	ack_			
CEM Span V	Value: Carbon Monoxide 1000 pp	om_			
I. ACCUF	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert.	CO #1 (low scale) 7/26/14 LL167039 1/31/14	CO #2 (high scale) 7/26/14 LL167048 1/31/14	O <sub>2</sub> #1 (low scale) 7/26/14 LL42560 1/28/13 EPA Protocol 1	O <sub>2</sub> #2 (high scale) 7/26/14 LL42613 1/30/13 EPA Protocol 1
	Type of Certification Certified Audit Value CEM Response Value Accuracy Standard	EPA Protocol 1 243.9 ppmv 264.5 ppmv 8.4% <15%	EPA Protocol 1 561.5 ppmv 567.0 ppmv 1.0% <15%	5.95 vol % 5.77 vol % 3.0% <15%	10.04 vol % 9.77 vol % 2.7% <15%
II. CALIB	RATION DRIFT ASSESSMENT	,			
A.	Out-of Control Periods:				
	1. Dates: <u>N/A</u>				
	2. Number of Days <u>N/A</u>				

B. Corrective Actions: N/A

# DATA ASSESSMENT REPORT (per 40 CFR 60, Appendix F, Section 7)

Pollutant: SO <sub>2</sub>				
Applicable NSPS Subpart:J (Require	ed by Consent Decr	ee: 3:10-cv-00563-l	obc, Paragraph 18)	
Reporting period dates: From 7/1/14 to 9/3	0/14			
Date submitted: 10/30/14				
Company: Valero Refining - Meraux LLC				
Address: 2500 East St. Bernard Highway,	Meraux, LA 70075	<u>;                                    </u>		
Emission Limitation: SO <sub>2</sub> corrected to 0%	O2 shall not excee	d 50 ppm on a 7 da	y rolling average a	nd 25 ppm on a 365 day rolling
average				
Monitor Manufacturer and Model No.: Th	ermo Environmenta	al 43i (SO <sub>2</sub> )/Servom	nex 1155 (O <sub>2</sub> )	
Process Unit(s) Description: #2 FCCU ES	SP Stack (EPN 2-77	, EQT 0032)		
CEM Sampling Location: #2 FCCU ESP	Stack			
CEM Span Value: Sulfur Dioxide 500 ppn	<u>n</u>			
I. ACCURACY ASSESSMENT RESUL	TS (CGA):			
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert.	SO <sub>2</sub> #1 (low scale) 7/26/14 LL167081 2/7/14	SO <sub>2</sub> #2 (high scale) 7/26/14 LL165997 2/8/13	O <sub>2</sub> #1 (low scale) 7/26/14 LL42560 1/28/13	O <sub>2</sub> #2 (high scale) 7/26/14 LL42613 1/30/13

EPA Protocol 1

279.2 ppmv

290.0 ppmv

3.9%

<15%

EPA Protocol 1

5.95 vol %

5.77 vol %

3.0%

<15%

EPA Protocol 1

10.04 vol %

9.77 vol %

2.7%

<15%

EPA Protocol 1

128.4 ppmv

133.5 ppmv

4.0%

<15%

#### II. CALIBRATION DRIFT ASSESSMENT

Accuracy

Standard

Type of Certification

Certified Audit Value

CEM Response Value

#### A. Out-of Control Periods:

N/A 1. Dates: 2. Number of Days N/A

B. Corrective Actions: N/A

#### DATA ASSESSMENT REPORT

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

Pollutant: NOx

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

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (NOx)/Servomex 1155 (O<sub>2</sub>)

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 (CGA):

	NOx #1	NOx #2	O <sub>2</sub> #1	O <sub>2</sub> #2
	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	7/26/14	7/26/14	7/26/14	7/26/14
Audit Gas Cylinder No.	LL167083	LL47213	LL42560	LL42613
Date of Audit Gas Cert.	2/14/14	2/4/13	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	55.1 ppmv	127.1 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	54.2 ppmv	133.2 ppmv	5.77 vol %	9.77 vol %
Accuracy	1.6%	4.8%	3.0%	2.7%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

	-		**
Α.	Out-of	Control	Periods:
	Out-OI	Common	i Cilous.

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)

Pol	lutant:	$SO_2$
1 01	iutant.	502

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO<sub>2</sub> corrected to 0% O<sub>2</sub> shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: Brimstone SGX-231(SO<sub>2</sub>)/Rosemount Oxymitter 4000(O<sub>2</sub>)

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 (CGA):

	SO <sub>2</sub> #1	SO <sub>2</sub> #2	O <sub>2</sub> #1	O <sub>2</sub> #2
	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	9/6/14	9/6/14	8/26/14	8/26/14
Audit Gas Cylinder No.	LL167081	LL165997	LL42560	LL42613
Date of Audit Gas Cert.	2/7/14	2/8/13	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	128.4 ppmv	279.2 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	123.0 ppmv	269.0 ppmv	6.20 vol %	10.20 vol %
Accuracy	4.2%	3.7%	4.2%	1.6%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

			CONTRACTOR OF THE PARTY OF THE
Α.	( )ut of	( antrol	Periods:
1.	Out-Or	Comuoi	I CHOUS.

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)

Pol	lutant:	$SO_2$	

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

Company: Valero Refining - Meraux LLC

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

Emission Limitation: SO<sub>2</sub> corrected to 0% O<sub>2</sub> shall not exceed 250 ppm on a 12-hour rolling average.

Monitor Manufacturer and Model No.: Brimstone 991-CEM-X (SO<sub>2</sub>), 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 (CGA):

	SO <sub>2</sub> #1	SO <sub>2</sub> #2	O <sub>2</sub> #1	O <sub>2</sub> #2
	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	9/6/14	9/6/14	8/25/14	8/25/14
Audit Gas Cylinder No.	LL167081	LL170749	LL42560	LL42613
Date of Audit Gas Cert.	2/7/14	2/10/14	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	128.4 ppmv	275.8 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	121.0 ppmv	266.0 ppmv	5.66 vol %	9.71 vol %
Accuracy	5.8%	3.6%	4.9%	3.3%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

#### A. Out-of Control Periods:

1. Dates: <u>N/A</u>

2. Number of Days N/A

B. Corrective Actions: N/A

Pollutant:  $H_2S$ 

Applicable NSPS Subpart: \_\_J\_

Reporting period dates:	From <u>7/1/14</u> to <u>9/30/14</u>				
Date submitted: 10/30/	14				
Company: Valero Refi	ning - Meraux LLC				
Address: 2500 East St	t. Bernard Highway, Meraux, LA 70075				
Emission Limitation: _	Hydrogen Sulfide shall not exceed 162 pp	om on a 3-hour roll	ing average.		
Monitor Manufacturer	and Model No.: Ametek 4661				
Source Unit: Area 1 F	uel Drum for Boiler TB-01 (EPN 1-06, EC	QT 0010)			
CEM Sampling Location	on: Area 1 Fuel Drum				
CEM Span Value: <u>Hy</u>	drogen Sulfide, 300 ppm				
I. ACCURACY ASS	SESSMENT RESULTS (CGA):				
	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard	H <sub>2</sub> S #1 ( <u>low scale</u> ) 7/22/14 CC403727 8/7/13 EPA Protocol 1 73.6 75.3 2.3% <15%	H <sub>2</sub> S #2 (high scale) 7/22/14 CC212507 8/7/13 EPA Protocol 1 169.9 169.7 0.1% <15%		
II. CALIBRATION D	DRIFT ASSESSMENT				
A. Out-of Co	ontrol Periods:				
1. Dates	.: <u>N/A</u>				
2. Number of Days <u>N/A</u>					
B. Corrective	e Actions: N/A				

Pollutant: H <sub>2</sub> S		
Applicable NSPS Subpart: <u>J and Ja</u> (Benzene Recovery Un	it Reboiler Subject	to Ja)
Reporting period dates: From 7/1/14 to 9/30/14		
Date submitted: 10/30/14		
Company: Valero Refining - Meraux LLC		
Address: 2500 East St. Bernard Highway, Meraux, LA 70075		
Emission Limitation: <u>Hydrogen Sulfide shall not exceed 162</u>	ppm on a 3-hour r	olling 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 Fraction (EPN 12-72A, EQT 022); ROSE Heater (EPN 1-80, EQT 0014) (EPN 17-72 a,b,c, EQT 0028); Platformer Debut Reboiler (EPN NHT Debut Reboiler (EPA 15-72, EQT 0024); NHT Depent Reb (EPN 5-73, EQT 0058); Benzene Recovery Unit Reboiler (EPN	; Vacuum Heater ( N 19-72, EQT 0029 poiler (EPA 16-72,	EPN 1-76, EQT 0013); Platformer Charge Heater (); NHT Charge Heater (EPN 14-72, EQT 0023);
CEM Sampling Location: Area 2 Fuel Drum		
CEM Span Value: Hydrogen Sulfide, 300 ppm		
I. ACCURACY ASSESSMENT RESULTS (CGA):		
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard	H <sub>2</sub> S #1 (low scale) 7/23/14 CC403727 8/7/13 EPA Protocol 1 73.6 73.7 0.1% <15%	H <sub>2</sub> S #2 (high scale) 7/23/14 CC212507 8/7/13 EPA Protocol 1 169.9 163.5 3.8% <15%
II. CALIBRATION DRIFT ASSESSMENT		
A. Out-of Control Periods:		
1. Dates: <u>N/A</u>		
2. Number of Days <u>N/A</u>		
B. Corrective Actions: N/A		

Pollutant: H <sub>2</sub> S				
Applicable NSPS Subpart: _	<u>J</u>			
Reporting period dates: Fror	m <u>7/1/14</u> to <u>9/30/14</u>			
Date submitted: 10/30/14				
Company: Valero Refining	- Meraux LLC			
Address: 2500 East St. Ber	nard Highway, Meraux, LA 70075			
Emission Limitation: <u>Hyd</u> ı	rogen Sulfide shall not exceed 162 pp	om on a 3-hour roll	ling average.	
Monitor Manufacturer and M	Model No.: Ametek 4661			
Process Unit(s) Description:	Area 4 Fuel Drum for Alky Reboil	er (EPN 1-77, EQT	T 0078)	
CEM Sampling Location: A	rea 4 Fuel Drum			
CEM Span Value: Hydroge	en Sulfide, 300 ppm			
I. ACCURACY ASSESS!	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy	H <sub>2</sub> S #1 (low scale) 7/24/14 CC403727 8/7/13 EPA Protocol 1 73.6 71.0 3.6%	H <sub>2</sub> S #2 (high scale) 7/24/14 CC212507 8/7/13 EPA Protocol 1 169.9 164.0 3.5%	
	Standard	<15%	<15%	
II. CALIBRATION DRIFT	Γ ASSESSMENT			
A. Out-of Control	Periods:			
1. Dates:	N/A			
2. Number of	f Days <u>N/A</u>			
B. Corrective Act	ions: N/A			
90 T 5 T 5 T 5 T 5 T				

Pollutant: H	$I_2S$			
Applicable N	NSPS Subpart:J	-		
Reporting pe	eriod dates: From 7	/1/14_to_9/30/14_		
Date submitt	ted: 10/30/14			
Company:_\	Valero Refining - M	Ieraux LLC		
Address: 2:	500 East St. Bernar	d Highway, Meraux, LA 70075		
Emission Lin	mitation: <u>Hydrog</u> e	en Sulfide shall not exceed 162 pp	om on a 3-hour roll	ing average.
Monitor Mai	nufacturer and Mod	lel No.: Ametek 4661		
Process Unit	(s) Description: A	rea 6 Fuel Drum for Hydrocracke	r & Hydrotreater C	Charge Heaters (EPN 1-00, EQT 0009)
CEM Sampl	ing Location: Area	a 6 Fuel Drum		
CEM Span V	/alue: <u>Hydrogen S</u>	Sulfide, 300 ppm		
I. ACCUR	RACY ASSESSME	NT RESULTS (CGA):		
		Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard	H <sub>2</sub> S #1 (low scale) 7/24/14 CC403727 8/7/13 EPA Protocol 1 73.6 72.4 1.7% <15%	H <sub>2</sub> S #2 (high scale) 7/24/14 CC212507 8/7/13 EPA Protocol 1 169.9 161.7 4.8% <15%
II. CALIBI	RATION DRIFT A	SSESSMENT		
A.	Out-of Control Per	riods:		
	1. Dates:	N/A		
	2. Number of Da	ays <u>N/A</u>		
B.	Corrective Actions	s:N/A		

Pollutant: H	$I_2S$			
Applicable 1	NSPS Subpart:J_			
Reporting pe	eriod dates: From 7/1	1/14 to 9/30/14		
Date submit	ted: 10/30/14			
Company:_\	Valero Refining - Me	eraux LLC		
Address: 25	500 East St. Bernard	Highway, Meraux, LA 70075		
Emission Li	mitation: <u>Hydroger</u>	n Sulfide shall not exceed 162 pp	om on a 3-hour roll	ing average.
Monitor Ma	nufacturer and Mode	el No.: Ametek 4661		
Process Unit	t(s) Description: Ar	ea 6 Fuel Drum for Boilers B-5 (	EPN 2-00, EQT 0	030) and B-6 (EPN 3-00, EQT 0048)
CEM Sampl	ing Location: Area	6 Fuel Drum_		
CEM Span V	Value: <u>Hydrogen St</u>	ılfide, 300 ppm		
I. ACCUF	ACT ASSESSMEN	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv)	H <sub>2</sub> S #1 (low scale) 7/25/14 CC403727 8/7/13 EPA Protocol 1 73.6	H <sub>2</sub> S #2 (high scale) 7/25/14 CC212507 8/7/13 EPA Protocol 1 169.9
		CEM Response Value (ppmv) Accuracy	71.7 2.6%	167.5 1.4%
		Standard	<15%	<15%
II. CALIBI	RATION DRIFT AS	SESSMENT		
A.	Out-of Control Peri	ods:		
	1. Dates:	N/A		
	2. Number of Day	ys <u>N/A</u>		
В.	Corrective Actions:	N/A		

Pollutant: NOx

Applicable NSPS Subpart: \_\_ Db

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (CGA):

	NOx #1	NOx #2	O <sub>2</sub> #1	O <sub>2</sub> #2
	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	8/30/14	8/30/14	8/31/14	8/31/14
Audit Gas Cylinder No.	LL165998	LL167083	LL42560	LL42613
Date of Audit Gas Cert.	2/4/14	2/14/14	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	24.69 ppmv	55.10 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	25.40 ppmv	56.00 ppmv	6.32 vol %	10.37 vol %
Accuracy	2.9%	1.6%	6.2%	3.3%
Standard	<15%	<15%	<15%	<15%

## II. CALIBRATION DRIFT ASSESSMENT

#### A. Out-of Control Periods:

- 1. Dates:  $8/2/14\ 07:55 - 8/5/14\ 07:55$ , 50 hours
- 2. Number of Days 2.1
- B. Corrective Actions: The results of daily calibration checks on 8/3 and 8/4 were not recorded by the refinery data historian. Valero was in the process of transferring operations of this area to a new distributed control system (DCS) and the data management of the automatic daily calibration checks was not set up correctly in the new DCS. B-5 was shutdown multiple times during this process, which reduced the Out of Control hours. Valero corrected the data management issue, but could not recover the data.

Pollutant: NO<sub>x</sub>

Applicable NSPS Subpart: Db

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (CGA):

	NOx #1	NOx #2	O <sub>2</sub> #1	O <sub>2</sub> #2
	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	8/29/14	8/29/14	8/28/14	8/28/14
Audit Gas Cylinder No.	LL165998	LL167083	LL42560	LL42613
Date of Audit Gas Cert.	2/4/14	2/14/14	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	24.69 ppmv	55.10 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	27.40 ppmv	56.70 ppmv	6.00 vol %	10.05 vol %
Accuracy	11.0%	2.9%	0.8%	0.1%
Standard	<15%	<15%	<15%	<15%

### II. CALIBRATION DRIFT ASSESSMENT

## A. Out-of Control Periods:

- 1. Dates:  $8/2/14 \ 08:12 - 8/5/14 \ 08:12, 47 \ hours$
- 2. Number of Days 2
- B. Corrective Actions: The results of daily calibration checks on 8/3 and 8/4 were not recorded by the refinery data historian. Valero was in the process of transferring operations of this area to a new distributed control system (DCS) and the data management of the automatic daily calibration checks was not set up correctly in the new DCS. B-6 was shutdown multiple times during this process, which reduced the Out of Control hours. Valero corrected the data management issue, but could not recover the data

Pol	lutant:	$NO_x$
1 01	iutani.	TIOX

Applicable NSPS Subpart: \_\_Db

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (NOx)/(O<sub>2</sub>)

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 (CGA):

	NOx #1	NOx #2	O <sub>2</sub> #1	O <sub>2</sub> #2
	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	9/5/14	9/5/14	8/25/14	8/25/14
Audit Gas Cylinder No.	LL47213	LL65256	LL42560	LL42613
Date of Audit Gas Cert.	2/4/13	2/18/13	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	127.1 ppmv	272.4 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	129.1 ppmv	272.0 ppmv	5.60 vol %	9.60 vol %
Accuracy	1.6%	0.1%	5.9%	4.4%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

A.	Out-of	Control	Periods:
11.	Out-OI	Control	i ciious.

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,

Applicable NSPS Subpart: Ja

Reporting period dates: From 7/1/14 to 9/30/14

Date submitted: 10/30/14

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 (NOx)/(O<sub>2</sub>) 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:

Alternate RATA Date of Audit Reference Method Average RM Value (ppmv)	NOx #1 8/6/2014 PS 2, Section 16 24.69 ppmv	NOx #2 8/6/2014 PS 2, Section 16 55.10 ppmv	O <sub>2</sub> #1 8/6/2014 PS 2, Section 16 5.96 vol %	O <sub>2</sub> #2 8/6/2014 PS 2, Section 16 10.04 vol %
Average CEM Value (ppmv) Accuracy	25.18 ppmv 1.98%	55.68 ppmv 1.05%	5.25 vol % 11.79%	9.37 vol % 6.67%
Limit	< 15 %	< 15 %	< 15 %	< 15 %
	NOx #1	NOx #2	O <sub>2</sub> #1	O <sub>2</sub> #2
<u>CGA</u>	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	8/30/14	8/30/14	8/26/14	8/26/14
Audit Gas Cylinder No.	LL165998	LL167083	LL42560	LL42613
Date of Audit Gas Cert.	2/4/14	2/14/14	1/28/13	1/30/13
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	24.69 ppmv	55.10 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	24.30 ppmv	53.30 ppmv	5.93 vol %	9.79 vol %
Accuracy	1.6%	3.3%	0.3%	2.5%
Standard	<15%	<15%	<15%	<15%

Valero failed to perform this RATA in the 2<sup>nd</sup> Quarter 2014. The BRU Reboiler was unexpectedly shutdown when the third party contractor that performs the RATA's was onsite. The RATA was not rescheduled in June when the BRU Reboiler returned to service. Valero has documented this as deviation in the Semi-Annual Title V Deviation Report. Valero rescheduled the contractor to return and perform this RATA in August, but the contractor could not gain access to the sampling points on the BRU Reboiler due on going work at the Hydrocracker Unit. The Alternate RATA procedure of Performance Specification 2, Section 16 was performed instead. The BRU Reboiler was shutdown, as planned, on 8/27/14.

## II. CALIBRATION DRIFT ASSESSMENT

A.	Out-of Control Periods:							
	1.	Dates:	N/A					
	2.	Number of Days _	N/A					
B.	Corrective Actions:		N/A					

Pollutant: Total Sulfur

Applicable NSPS Subpart:Ja(Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)									
Reporting period dates: From 7/1/14 to 9/30/14									
Date submitted: 10/30/14									
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, 10,0	00-1,000,000 ppm	<u>_</u>							
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard	H <sub>2</sub> S #1 (low scale) 9/1/14 LL54215 2/11/13 EPA Protocol 1 1021.0 1033.3 1.2% <15%	H <sub>2</sub> S #2 (high scale) 9/1/14 CC329595 1/31/15 Certified Gas 10000.0 9832.3 1.7% <15%							
<sup>1</sup> Valero unable to obtain EPA Protocol 1 certified gases greater than 1000 ppm.									
II. CALIBRATION DRIFT ASSESSMENT									
A. Out-of Control Periods:									
1. Dates: 9/20/14 06:32 – 9/22/14 06:32, 48 hours									
2. Number of Days2									
B. Corrective Actions: <u>See GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE</u> page on the North Flare Stack, North Flare Header for a description of causes and corrective actions.									

Pollutant: 7	Total Sulfur						
Applicable	NSPS Subpart:Ja_	_(Required by Consent Decree:	3:10-cv-00563-bb	c, Paragraph 49.a.ii)			
Reporting p	eriod dates: From 7/1/	/14 to 9/30/14					
Date submit	ted:_10/30/14						
Company:	Valero Refining - Mei	raux LLC					
		Highway, Meraux, LA 70075					
	mitation: None	-8					
	NO. 60 1 2 10 - 60 L 100 L	No.: Thermo Scientific SOLA I	T:				
				Floor Hondon			
		h Flare Stack (EPN 20-72, EQT	•	er Flare Header			
		Flare Stack, Hydrocracker Flare					
CEM Span	Value: Total Sulfur,	Dual Range: 0-10,000 ppm, 10,0	00-1,000,000 ppm	_			
I. ACCUI	RACY ASSESSMEN	T RESULTS (CGA):					
	<sup>1</sup> Valero unable	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard to obtain EPA Protocol 1 certifie	H <sub>2</sub> S #1 (low scale) 9/1/14 LL54215 2/11/13 EPA Protocol 1 1021.0 1029.0 0.8% <15% d gases greater tha	H <sub>2</sub> S #2 (high scale) 9/1/14 CC329595 1/31/15 Certified Gas 10000.0 9779.0 2.2% <15% n 1000 ppm.			
II. CALIB	RATION DRIFT ASS	SESSMENT					
A.	A. Out-of Control Periods:						
	1. Dates: 8/22/14 05:41 – 8/24/14 06:33, 48 hours						
	2. Number of Days2						
В.	B. Corrective Actions: <u>See GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS</u> PERFORMANCE page on the North Flare Stack, Hydrocracker Flare Header for a description of causes and corrective						
	FERFORMANCE P	age on the North Flare Stack, Hy	diocracker riare r	reader for a description of causes and corrective			

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

Pollutant: Total Sulfur

Reporting period dates: From 7/1/14 to 9/30/14								
Date submitted: 10/30/14								
Company: Valero Refining - Mer	raux 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								
CEM Span Value: Total Sulfur,		00.1.000.000.000						
CENT Spair Value. Total Sulful,	Duar Kange. 0-10,000 ppin, 10,0	00-1,000,000 ppiii	_					
I. ACCURACY ASSESSMENT RESULTS (CGA):								
		H <sub>2</sub> S #1	H <sub>2</sub> S #2					
	Mark on the grown was to	(low scale)	(high scale)					
	Date of Audit	9/1/14	9/1/14					
	Audit Gas Cylinder No.	LL54215	CC329595					
	Date of Audit Gas Cert.	2/11/13	1/31/15					
	Type of Certification	EPA Protocol 1	Certified Gas					
	Certified Audit Value (ppmv)	1021.0	10000.0					
	CEM Response Value (ppmv)	1016.7	10058.0					
	Accuracy	0.4%	0.6%					
	Standard	<15%	<15%					
Valero unable to obtain EPA Protocol 1 certified gases greater than 1000 ppm.								
I. CALIBRATION DRIFT ASSESSMENT								
A. Out-of Control Periods:								
1. Dates:	1. Dates: 9/20/14 06:32 – 9/22/14 06:32, 48 hours							
2. Number of Days2								
B. Corrective Actions: See GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS								
PERFORMANCE page on the South Flare Stack for a description of causes and corrective actions.								