



January 30, 2015

CERTIFIED: 7001 1140 0001 6090 5568

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 – 4th 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 Fourth 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 #3 SRU Incinerator (EPN 5-00, EQT 0079) for Sulfur Dioxide and the South Flare Stack (EPN 3-77, EQT 0049) Total Sulfur Analyzer. In addition to the normally scheduled Cylinder Gas Audit (CGA's), Valero also performed the make-up Relative Accuracy Test Assessment (RATA) that was missed in the 2nd Quarter at the BRU Reboiler (EPN 1-09, EQT 0127) for Nitrous Oxide on 12/1/14.

The #2 FCCU did not operate in the Fourth Quarter 2014; therefore, no data on the #2 FCCU CEMS appears in this report.

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) and 60.108a(d))

Pollutant: SO₂

Applicable NSPS Subpart: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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: CGA on 12/12/14 (SO₂), 10/24/14 (O₂)

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

Total source operating time in reporting period: 2,149 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	9
e. Unknown causes	0
2. Total CMS Downtime	14
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.6 %

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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: CGA on 12/11/14 (SO₂), 10/24/14 (O₂)

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

Total source operating time in reporting period: 878 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	74
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	74
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	8.4 %

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

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

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

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/23/14

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 – 1,817 hours, EQT 0011 – 1,690 hours, EQT 0033 – 2,208 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	0
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. (Percentage based on the lowest operating time.)

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/24/14

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: EQT 0013, 0022 - 2,208 hours; EQT 0023, 0024, 0027 - 2,205 hours; EQT 0028 - 2,005 hours; EQT 0029 - 1998 hours; EQT 0058 - 2203 hours

Emissions Data Summary¹		
1. Duration of excess emissions in reporting period due to:	<i>EQT 0029 (hours)</i>	<i>All Others (hours)</i>
a. Startup/shutdown	0	0
b. Control equipment problems	0	0
c. Process problems	0	0
d. Other known causes	0	0
e. Unknown causes	0	0
2. Total duration of excess emission	0	0
3. Total duration of excess emissions x (100) [Total source operating time] ²	0.0%	0.0%

CMS Performance Summary¹		
1. CMS downtime in reporting period due to:	<i>EQT 0029 (hours)</i>	<i>All Others (hours)</i>
a. Monitor equipment malfunctions	0	0
b. Non-Monitor equipment malfunctions	0	0
c. Quality assurance calibration	7	7
d. Other known causes	4	4
e. Unknown causes	0	0
2. Total CMS Downtime	11	11
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.6 %	0.5 %

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

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

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

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

Pollutant: H₂S

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/24/14

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

Total source operating time in reporting period: 1,357 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	0.4 %

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

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

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

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

Pollutant: **H₂S**

Applicable NSPS Subpart: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/24/14

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: 1,492 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	7
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	7
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.5 %

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

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

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

(per 40 CFR 60.7(d))

Pollutant: H₂S

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/12/14

Process Unit(s) Description: Merox Disulfide Separator to Platformer Charge Heater

Total source operating time in reporting period: 808 hours

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

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

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: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 11/11/14

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: 1,191 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	48
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	48
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	4.0 %

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

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

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

(per 40 CFR 60.7(d))

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/25/14

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

Total source operating time in reporting period: 1,792 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	28
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	28
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	1.6 %

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/25/14

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

Total source operating time in reporting period: 1,474 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	28
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	28
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	1.9 %

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/28/14 (NO_x), 10/27/14 (O₂)

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

Total source operating time in reporting period: 1,792 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	50
e. Unknown causes	0
2. Total CMS Downtime	52
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	2.9%

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/28/14 (NO_x), 10/27/14 (O₂)

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

Total source operating time in reporting period: 1,474 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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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: CGA on 10/26/14 (NO_x), 10/25/14 (O₂)

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

Total source operating time in reporting period: 1,817 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	3
d. Other known causes	0
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) and 60.108a(d))

Pollutant: NO_x

Applicable NSPS Subpart: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

Company: Valero Refining - Meraux LLC

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

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

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

Date of Latest CMS Certification or Audit: RATA on 12/1/14³

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

Total source operating time in reporting period: 1,492 hours

Emissions Data Summary ¹	
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 Summary ¹	
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	10
e. Unknown causes	0
2. Total CMS Downtime	12
3. Total duration of CMS Downtime x (100) [Total source operating time] ²	0.8%

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.

³ See Data Assessment Report for Benzene Recovery Unit Reboiler NO_x/O₂ for more information.

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/10/14

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 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	10
d. Other known causes	21
e. Unknown causes	0
2. Total CMS Downtime	31
3. Total duration of CMS Downtime x (100) [Total source operating time] ³	1.4 %

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 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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/10/14

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

Total source operating time in reporting period: 1,857 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	2
d. Other known causes	19
e. Unknown causes	0
2. Total CMS Downtime	51
3. Total duration of CMS Downtime x (100) [Total source operating time] ³	3.6 %

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/10/14

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

Total source operating time in reporting period: 490 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	28
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	28
3. Total duration of CMS Downtime x (100) [Total source operating time] ³	5.7 %

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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: CGA on 12/12/14 (SO₂), 10/24/14 (O₂)

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

Total source operating time in reporting period: 2,149 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
10/17/14	10:48	19:28	9	Sample system contaminated with particulate material that prevented SO ₂ measurement.	Cleaned SO ₂ cell windows, purged sample lines, replaced sample filters, and calibrated analyzer.
10/24/14	07:49	08:49	1	O ₂ Cylinder Gas Audit.	N/A
11/17/14	05:51	08:51	3	Sample flow pressure regulator failed.	Regulator repaired and analyzer returned to service.
12/12/14	10:15	11:15	1	SO ₂ Cylinder Gas Audit.	N/A
TOTAL			14		

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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: CGA on 12/11/14 (SO₂), 10/24/14 (O₂)

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

Total source operating time in reporting period: 878 hours

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

CMS PERFORMANCE ¹					
Date	Start	End	Duration (hours)	Cause	Corrective Action
11/16/14	12:53	13:53	1	Adjusted for calibration drift.	N/A
11/28/14	09:00		72	Out of Control. Calibration drift > 4 times the allowable limit below the high span reference gas concentration on 11/29/14.	See Data Assessment Report for #3 SRU Incinerator SO ₂ /O ₂ . (Page 26)
12/01/14		09:00			
12/11/14	13:27	14:27	1	SO ₂ Cylinder Gas Audit	N/A
TOTAL			74		

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 10/24/14

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: 1,492 hours

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

Ja CMS PERFORMANCE ¹						
Date	Start	End	Duration (hours)	Cause		Corrective Action
10/24/14	21:05	23:05	2	Cylinder Gas Audit		N/A
11/13/14	08:27	13:27	5	Analyzer taken offline for cleaning and filter change out.		N/A
TOTAL			7			

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

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

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

Pollutant: **NO_x**

Applicable NSPS Subpart: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

Company: Valero Refining - Meraux LLC

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

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

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

Date of Latest CMS Certification or Audit: RATA on 12/1/14

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

Total source operating time in reporting period: 1,492 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
10/19/14	02:08	12:08	10	BRU Reboiler ran without analyzer being in service.	Analyzer calibrated and placed in service.
10/24/14	13:08	14:08	1	O ₂ Cylinder Gas Audit	N/A
10/25/14	07:47	08:47	1	NO _x Cylinder Gas Audit	N/A
TOTAL			12		

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 See Data Assessment Report for Benzene Recovery Unit Reboiler NO_x/O₂ for more information.

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/10/14

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 ²					
Date	Start	End	Duration (hours)	Cause	Corrective Action
11/3/14	10:17	17:17	7	Arc Flash damaged a circuit breaker on the same bus that powers this analyzer. Power locked out for repairs.	Repairs completed, power restored, analyzer calibrated and returned to service.
11/13/14	13:56	14:56	1	Adjusted for calibration drift.	N/A
11/14/14	23:35		10	Analyzer offline due to low Instrument Air pressure. Analyzer was restarted once, it ran for about an hour and then it went offline again.	Valero adjusted the instrument air system to provide higher-pressure air to the analyzers.
11/15/14		09:35			
11/15/14	10:40	14:40	4		
11/16/14	10:06	11:06	1	Adjusted for calibration drift.	N/A
11/18/14	15:34	16:34	1	Adjusted for calibration drift.	N/A
11/20/14	08:03	10:03	2	Adjusted for calibration drift.	N/A
11/22/14	08:38	09:38	1	Adjusted for calibration drift.	N/A
11/26/14	08:00	10:00	2	Adjusted for calibration drift.	N/A
11/26/14	13:30	14:30	1	Adjusted for calibration drift.	N/A
12/10/14	12:55	13:55	1	Cylinder Gas Audit	
TOTAL			31		

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/10/14

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

Total source operating time in reporting period: 1,857 hours

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

Ja CMS PERFORMANCE ²					
Date	Start	End	Duration (hours)	Cause	Corrective Action
11/3/14	10:17	17:17	7	Arc Flash damaged a circuit breaker on the same bus that powers this analyzer. Power locked out for repairs.	Repairs completed, power restored, analyzer calibrated and returned to service.
11/14/14	23:35		10	Analyzer offline due to low Instrument Air pressure. Analyzer was restarted once, it ran for about 4 hours and then it went offline again.	Valero adjusted the instrument air system to provide higher-pressure air to the analyzers.
11/15/14		09:35			
11/15/14	14:46	16:46	2		
11/22/14	08:25	09:25	1	Adjusted for calibration drift.	N/A
12/10/14	10:23	11:23	1	Cylinder Gas Audit	N/A
TOTAL			21		

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 12/10/14

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

Total source operating time in reporting period: 490 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
11/8/14	17:04	17:04	1	Adjusted for calibration drift.	N/A
11/10/14	06:02	11:02	5	Offline for maintenance on analyzer control valves.	Calibrated and returned to service.
11/10/14	11:02		22	Out of Control. Calibration drift > 4 times the allowable limit below the high span reference gas concentration on 11/21/14.	See Data Assessment Report for South Flare Stack Total Sulfur. (Page 38)
11/11/14		10:51			
TOTAL			28		

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: SO₂

Applicable NSPS Subpart: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	SO ₂ #1 (low scale)	SO ₂ #2 (high scale)	O ₂ #1 (low scale)	O ₂ #2 (high scale)
Date of Audit	12/12/14	12/12/14	10/24/14	10/24/14
Audit Gas Cylinder No.	LL41929	LL170749	LL42566	LL42613
Date of Audit Gas Cert.	11/11/14	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	125.7 ppmv	275.8 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	124.7 ppmv	276.3 ppmv	6.20 vol %	10.20 vol %
Accuracy	0.8%	0.2%	4.2%	1.6%
Standard	<15%	<15%	<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: **SO₂**

Applicable NSPS Subpart: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	SO ₂ #1 (low scale)	SO ₂ #2 (high scale)	O ₂ #1 (low scale)	O ₂ #2 (high scale)
Date of Audit	12/11/14	12/11/14	10/24/14	10/24/14
Audit Gas Cylinder No.	LL41929	LL170749	LL42566	LL42613
Date of Audit Gas Cert.	11/11/14	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	125.7 ppmv	275.8 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	143.3 ppmv	293.0 ppmv	5.67 vol %	9.70 vol %
Accuracy	14.0%	6.2%	4.7%	3.4%
Standard	<15%	<15%	<15%	<15%

II. CALIBRATION DRIFT ASSESSMENT

A. Out-of Control Periods:

1. Dates: 11/28/14 09:00 – 12/1/14 09:00, 72 hours

2. Number of Days 3

B. Corrective Actions: The #3 SRU was started up and began operation on 11/28/14 at 09:00. The daily calibration check of the SO₂ CEMS was > 4 times below the high span reference gas concentration prior to the start up. On each of the following days from 11/29/14 to 12/1/14 the daily calibration check was > 2 times below the high span reference gas concentration. Valero failed to notice this condition until 12/1/14 when the SO₂ CEMS was adjusted and a satisfactory calibration check was performed. Valero counseled the personnel responsible for checking the daily calibration drift checks.

DATA ASSESSMENT REPORT

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

Pollutant: H_2S

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H_2S #1 (low scale)	H_2S #2 (high scale)
Date of Audit	10/23/14	10/23/14
Audit Gas Cylinder No.	CC403727	CC212507
Date of Audit Gas Cert.	8/7/13	8/7/13
Type of Certification	EPA Protocol 1	EPA Protocol 1
Certified Audit Value (ppmv)	73.6	169.9
CEM Response Value (ppmv)	76.3	169.0
Accuracy	3.6%	0.5%
Standard	<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: H_2S

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

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H_2S #1 (low scale)	H_2S #2 (high scale)
Date of Audit	10/24/14	10/24/14
Audit Gas Cylinder No.	CC403727	CC212507
Date of Audit Gas Cert.	8/7/13	8/7/13
Type of Certification	EPA Protocol 1	EPA Protocol 1
Certified Audit Value (ppmv)	73.6	169.9
CEM Response Value (ppmv)	74.7	162.7
Accuracy	1.5%	4.2%
Standard	<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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H ₂ S #1 (low scale)	H ₂ S #2 (high scale)
Date of Audit	12/12/14	12/12/14
Audit Gas Cylinder No.	CC403727	CC212507
Date of Audit Gas Cert.	8/7/13	8/7/13
Type of Certification	EPA Protocol 1	EPA Protocol 1
Certified Audit Value (ppmv)	73.6	169.9
CEM Response Value (ppmv)	70.7	168.0
Accuracy	4.0%	1.1%
Standard	<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: H_2S

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H_2S #1 (low scale)	H_2S #2 (high scale)
Date of Audit	11/11/14	11/11/14
Audit Gas Cylinder No.	CC403727	CC212507
Date of Audit Gas Cert.	8/7/13	8/7/13
Type of Certification	EPA Protocol 1	EPA Protocol 1
Certified Audit Value (ppmv)	73.6	169.9
CEM Response Value (ppmv)	71.3	164.3
Accuracy	3.2%	3.3%
Standard	<15%	<15%

II. CALIBRATION DRIFT ASSESSMENT

A. Out-of Control Periods:

1. Dates: 11/29/14 05:00 – 12/1/14 05:00, 48 hours

2. Number of Days 2

B. Corrective Actions: The automatic daily calibration check sequence was not executed on 11/30/14 and no calibration check was performed. Valero failed to notice this and take corrective action. On 12/1/14, the automatic sequence was executed and a satisfactory calibration check was performed. Valero could not determine the reason that the automatic sequence failed. Valero counseled the personnel responsible for monitoring the daily calibration checks.

DATA ASSESSMENT REPORT

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

Pollutant: **H₂S**

Applicable NSPS Subpart: J

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H ₂ S #1 (low scale)	H ₂ S #2 (high scale)
Date of Audit	10/25/14	10/24/14
Audit Gas Cylinder No.	CC403727	CC212507
Date of Audit Gas Cert.	8/7/13	8/7/13
Type of Certification	EPA Protocol 1	EPA Protocol 1
Certified Audit Value (ppmv)	73.6	169.9
CEM Response Value (ppmv)	78.7	167.7
Accuracy	6.9%	1.3%
Standard	<15%	<15%

II. CALIBRATION DRIFT ASSESSMENT

A. Out-of Control Periods:

1. Dates: 12/2/14 05:06 – 12/3/14 08:06, 27 hours

2. Number of Days 1.1

B. Corrective Actions: On 12/3/14, the automatic daily calibration check was > 4 times the limit above the high span reference gas. Valero adjusted and calibrated the analyzer and returned it to service.

DATA ASSESSMENT REPORT

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

Pollutant: **NO_x**

Applicable NSPS Subpart: Db

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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):

	NO _x #1 (low scale)	NO _x #2 (high scale)	O ₂ #1 (low scale)	O ₂ #2 (high scale)
Date of Audit	10/28/14	10/28/14	10/27/14	10/27/14
Audit Gas Cylinder No.	LL168198	LL167083	LL42566	LL42613
Date of Audit Gas Cert.	12/2/13	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	24.4 ppmv	55.1 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	24.5 ppmv	56.5 ppmv	5.90 vol %	10.00 vol %
Accuracy	0.4%	2.5%	0.8%	0.4%
Standard	<15%	<15%	<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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (low scale)	NOx #2 (high scale)	O ₂ #1 (low scale)	O ₂ #2 (high scale)
Date of Audit	10/28/14	10/28/14	10/27/14	10/27/14
Audit Gas Cylinder No.	LL168198	LL167083	LL42566	LL42613
Date of Audit Gas Cert.	12/2/13	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	24.4 ppmv	55.1 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	25.8 ppmv	56.5 ppmv	6.10 vol %	10.10 vol %
Accuracy	5.7%	2.5%	2.5%	0.6%
Standard	<15%	<15%	<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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	NO _x #1 (low scale)	NO _x #2 (high scale)	O ₂ #1 (low scale)	O ₂ #2 (high scale)
Date of Audit	10/26/14	10/26/14	10/25/14	10/25/14
Audit Gas Cylinder No.	LL47213	LL65256	LL42566	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	128.5 ppmv	270.7 ppmv	5.60 vol %	9.60 vol %
Accuracy	1.1%	0.6%	5.9%	4.4%
Standard	<15%	<15%	<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: Ja

Reporting period dates: From 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA and RATA):

<u>CGA</u>	<u>NO_x #1</u> <u>(low scale)</u>	<u>NO_x #2</u> <u>(high scale)</u>	<u>O₂ #1</u> <u>(low scale)</u>	<u>O₂ #2</u> <u>(high scale)</u>
Date of Audit	10/25/14	10/25/14	10/24/14	10/24/14
Audit Gas Cylinder No.	LL168198	LL167083	LL42566	LL42613
Date of Audit Gas Cert.	12/2/13	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	24.4 ppmv	55.1 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	24.2 ppmv	53.0 ppmv	6.10 vol %	10.10 vol %
Accuracy	0.8%	3.8%	2.5%	0.6%
Standard	<15%	<15%	<15%	<15%

Date of Audit	12/01/14
Reference Method	EPA Method 7E / EPA Method 3A
Average RM Value (ppmv)	15.33
Average CEM Value (ppmv)	14.84
Accuracy	2.5 %
Limit	< 10 %

Valero did not perform this RATA in the 2nd 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 and a CGA was performed. 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 to on going work at the Hydrocracker Unit. The Alternate RATA procedure of Performance Specification 2, Section 16 was performed instead. Then the BRU Reboiler was shutdown, as planned, on 8/27/14. Valero performed the RATA above when the BRU Reboiler was in-service with no access restrictions.

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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H ₂ S #1 (low scale)	H ₂ S #2 (high scale)
Date of Audit	12/10/14	12/10/14
Audit Gas Cylinder No.	LL54215	CC329595
Date of Audit Gas Cert.	2/11/13	1/31/14
Type of Certification	EPA Protocol 1	Certified Gas
Certified Audit Value (ppmv)	1021.0	10080.0
CEM Response Value (ppmv)	1006.7	9728.0
Accuracy	1.4%	3.5%
Standard	<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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H ₂ S #1 (low scale)	H ₂ S #2 (high scale)
Date of Audit	12/10/14	12/10/14
Audit Gas Cylinder No.	LL54215	CC329595
Date of Audit Gas Cert.	2/11/13	1/31/14
Type of Certification	EPA Protocol 1	Certified Gas
Certified Audit Value (ppmv)	1021.0	10080.0
CEM Response Value (ppmv)	999.3	9944.3
Accuracy	2.1%	1.3%
Standard	<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 10/1/14 to 12/31/14

Date submitted: 1/30/15

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 (CGA):

	H ₂ S #1 (low scale)	H ₂ S #2 (high scale)
Date of Audit	12/10/14	12/10/14
Audit Gas Cylinder No.	LL54215	CC329595
Date of Audit Gas Cert.	2/11/13	1/31/14
Type of Certification	EPA Protocol 1	Certified Gas
Certified Audit Value (ppmv)	1021.0	10080.0
CEM Response Value (ppmv)	976.7	10031.3
Accuracy	4.3%	0.5%
Standard	<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: 11/10/14 11:02 – 11/11/14 09:02, 22 hours

2. Number of Days 0.9

B. Corrective Actions: Maintenance was performed on the analyzer's sample flow control valves on 11/10/14. On 11/11/14, the calibration drift check was unsatisfactory and the analyzer was out of control. Valero adjusted the valves again and calibrated the analyzer. The problem did not reoccur.