

January 30, 2016

CERTIFIED: 7011 2970 0002 0808 2708

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 – 4<sup>th</sup> Quarter 2015 Valero Refining - Meraux LLC, Agency Interest # 1238 2500 East St. Bernard Hwy., St. Bernard Parish, Meraux, LA Title V Permit Numbers: 2500-00001-V11

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 2015.

On November 11, 2015, the North Flare Stack (EPN 20-72, EQT 0035) and South Flare Stack (EPN 3-77, EQT 0049) became subject to the NSPS Subpart Ja requirements for flares. To fulfill these requirements, Valero has added three new H<sub>2</sub>S analyzers and three flare flow meters to this report and also commissioned a Flare Gas Recovery Unit. Two CEMS are required to measure the North Flare H<sub>2</sub>S and they are designated North Flare Header and Hydrocracker Flare Header. The H<sub>2</sub>S analyzers commenced operation on 11/12/15. The flow meters and high range total sulfur analyzers also required by NSPS Subpart Ja were already in operation to fulfill Consent Decree requirements.

For this reporting period, the new North Flare Stack (EPN 20-72, EQT 0035) H<sub>2</sub>S CEMS and South Flare Stack (EPN 3-77, EQT 0049) H<sub>2</sub>S CEMS had excess emissions greater than 1 % of the total operating time. The North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header H<sub>2</sub>S CEMS had downtime greater than 5 % of the total operating time. Enclosed are the Data Assessment Reports for the appropriate CEMs and the root cause and corrective action analysis required by NSPS Subpart Ja.

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) and 60.108a(d))

Pollutant: SO<sub>2</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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.: <u>Brimstone SGX-231(SO<sub>2</sub>)/Rosemount Oxymitter 4000(O<sub>2</sub>)</u>

Date of Latest CMS Certification or Audit: CGA on 10/21/15 (SO<sub>2</sub>), 10/20/15 (O<sub>2</sub>)

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

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	12
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	12
3. Total duration of excess emissions x (100) [Total source operating time] <sup>2</sup>	0.6 %

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>	0.2 %

<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: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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.: <u>Brimstone 991-CEM-X(SO<sub>2</sub>)/ Rosemount Oxymitter 4000(O<sub>2</sub>)</u>

Date of Latest CMS Certification or Audit: CGA on 10/21/15 (SO<sub>2</sub>), 10/20/15 (O<sub>2</sub>)

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

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	7
d. Other known causes	14
e. Unknown causes	0
2. Total CMS Downtime	21
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	1.0 %

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 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 10/26/15

Process Unit(s) Description: Area 1 Fuel Drum for Boiler TB-01 (EPN 1-06, EQT 0010), Boiler B-7 (EPN 1-07, EQT 0011), MDH

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

Total source operating time in reporting period: <u>EQT 0010- 2,208 hours</u>, <u>EQT 0011- 2,208 hours</u>, <u>EQT 0033-2,208 hours</u>

Emissions Data Summary <sup>1</sup>			
1. Duration of excess emissions in reporting period due to:	EQT 0010 (hours)	EQT 0011 (hours)	EQT 0033 (hours)
a. Startup/shutdown	0	0	0
b. Control equipment problems	0	0	0
c. Process problems	0	0	0
d. Other known causes	0	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] <sup>2</sup>	0.0 %	0.0 %	0.0 %

CMS Performance Summary <sup>1</sup>			
1. CMS downtime in reporting period due to:	EQT 0010 (hours)	EQT 0011 (hours)	EQT 0033 (hours)
a. Monitor equipment malfunctions	0	0	0
b. Non-Monitor equipment malfunctions	0	0	0
c. Quality assurance calibration	2	2	2
d. Other known causes	0	0	
e. Unknown causes	0	0	0
2. Total CMS Downtime	2	2	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.1 %	0.1 %	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. (Percentage based on the lowest operating time.)

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

Pol	llutant:	HaS
	uuuui.	11/0

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: CGA on 10/21/15

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); ROSE Heater (EPN 1-80, EQT 0014)

Total source operating time in reporting period: 2,208 (All Process Units)

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	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <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) and 60.108a(d))

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

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: CGA on 10/21/15

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

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	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <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: H<sub>2</sub>S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: CGA on 10/23/15

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

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	3
d. Other known causes	53
e. Unknown causes	0
2. Total CMS Downtime	56
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	2.5 %

<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 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: CGA on 10/27/15

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

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	40
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	40
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	1.8 %

<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 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 4661

Date of Latest CMS Certification or Audit: CGA on 7/23/15

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

Total source operating time in reporting period: <u>EQT 0030-2,097 hours; EQT 0048-2,208 hours</u>

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	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>	0.2 %

<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 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

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

Date of Latest CMS Certification or Audit: CGA on 11/12/15 (NOx), 11/4/15 (O<sub>2</sub>)

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

Total source operating time in reporting period: 2,097 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	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.1%

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(d))

Pollutant: NO<sub>x</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 Limas 11 (NOx), Magnos 27 (O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 11/12/15 (NOx), 11/4/15 (O<sub>2</sub>)

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

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	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <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: NO<sub>x</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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)/(O2)

Date of Latest CMS Certification or Audit: CGA on 12/7/15 (NOx), 12/7/15 (O<sub>2</sub>)

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

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] $^2$	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	52
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	52
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	2.4 %

<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: NO<sub>x</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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

Date of Latest CMS Certification or Audit: CGA on 11/18/15 (NOx), 11/18/15 (O<sub>2</sub>)

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

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	0
e. Unknown causeș	0
2. Total CMS Downtime	1
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) and 60.108a(d))

Pollutant: NO<sub>x</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

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

Date of Latest CMS Certification or Audit: CGA on 9/30/15 (NOx), 9/30/15 (O<sub>2</sub>)

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

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	102
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	102
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	4.6%

<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) and 60.108a(d))

Pollutant: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

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

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	30
d. Other known causes	160
e. Unknown causes	0
2. Total duration of excess emission	190
3. Total duration of excess emissions x (100) [Total source operating time] <sup>2</sup>	15.8 %

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	0
e. Unknown causes	0
2. Total CMS Downtime	3
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: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1<sup>st</sup> Quarter 2016

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

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	30
d. Other known causes	160
e. Unknown causes	0
2. Total duration of excess emission	190
3. Total duration of excess emissions x (100) [Total source operating time] <sup>2</sup>	15.8 %

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	0
d. Other known causes	134
e. Unknown causes	0
2. Total CMS Downtime	134
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	11.2 %

<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: \_\_\_Ja\_\_\_

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

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

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	23
d. Other known causes	160
e. Unknown causes	. 0
2. Total duration of excess emission	183
3. Total duration of excess emissions x (100) [Total source operating time] <sup>2</sup>	15.2 %

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	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>	0.3 %

<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: Total Sulfur

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 11/11/15

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

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	15
d. Other known causes	30
e. Unknown causes	0
2. Total CMS Downtime	45
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	2.0%

<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) and 60.108a(d))

Pollutant: Total Sulfur

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 11/11/15

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

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	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <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) and 60.108a(d))

Pollutant: Total Sulfur

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 11/11/15

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

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	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	2
3. Total duration of CMS Downtime x (100) [Total source operating time] <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) and 60.108a(d))

Pollutant: Flow

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

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

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				
c. Quality assurance calibration	. 0			
d. Other known causes				
e. Unknown causes				
2. Total CMS Downtime	8			
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: Flow

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

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

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	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) and 60.108a(d))

Pollutant: Flow

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

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

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	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(c) and 60.108a(d))

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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.: <u>Brimstone SGX-231(SO<sub>2</sub>)/Rosemount Oxymitter 4000(O<sub>2</sub>)</u>

Date of Latest CMS Certification or Audit: <u>CGA on 10/21/15 (SO<sub>2</sub>), 10/20/15 (O<sub>2</sub>)</u>

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

					EXCESS EMISSIONS	
Date	Start	End	Duration (hours)	Max 12- HRA (ppm)	Cause	Corrective Action
11/12/15	21:58	09:58	12	300	SO <sub>2</sub> at 0% O <sub>2</sub> greater than 250 ppm, 12-HRA, with SO <sub>2</sub> emissions less than 500 lbs/day above the allowable limit due to an unplanned shutdown of the #3 Tail Gas Burner. The Valero Operator made adjustments to the air:fuel ratio, within the limits of the operating procedure. The flame pattern flickered, causing the flame detectors to shut down the burner.	Valero restarted the burner within 10 minutes. Valero developed new console alarms for air:fuel ratio to prevent flame instability.
TOTAL			12			

				CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
10/20/15	10:11	11:11	1	O <sub>2</sub> Cylinder Gas Audit.	N/A
10/21/15	08:22	09:22	1	SO <sub>2</sub> Cylinder Gas Audit.	N/A
12/21/15	10:15	12:15	2	Adjusted for calibration drift.	N/A
12/22/15	10:30	11:30	1	Adjusted for calibration drift.	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: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 10/21/15 (SO<sub>2</sub>), 10/20/15 (O<sub>2</sub>)

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

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

				CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
10/13/15	11:12	15:12	4	Analyzer data lost during DCS hardware upgrade.	DCS upgrade completed, data flow restored.
10/14/15	09:56	10:56	1	Adjusted for calibration drift.	N/A
10/14/15	14:18	15:18	1	Adjusted for calibration drift.	N/A
10/15/15	07:51	08:51	1	Adjusted for calibration drift.	N/A
10/15/15	13:35	14:35	1	Adjusted for calibration drift.	N/A
10/20/15	13:22	14:22	1	O <sub>2</sub> Cylinder Gas Audit.	N/A
10/21/15	10:03	11:03	1	SO <sub>2</sub> Cylinder Gas Audit.	N/A
12/14/15	00:16	10:16	10	Analyzer off line and in alarm.	Calibrated and returned to service.
12/15/15	07:51	08:51	1	Analyzer offline to replace SO2 source lamp.	Calibrated and returned to service.
TOTAL			21		

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

Applicable NSPS Subpart: \_\_Ja

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 10/21/15

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

1.4.40.55				J	a 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
10/5/15	07:15	08:15	1	Adjusted for calibration drift.	N/A
10/21/15	07:51	08:51	1	Cylinder Gas Audit.	N/A
TOTAL			2		

<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: \_\_Ja\_\_

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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)/(O2)

Date of Latest CMS Certification or Audit: CGA on 11/18/15 (NOx), 11/18/15 (O<sub>2</sub>)

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

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

	Ja CMS PERFORMANCE <sup>1</sup>								
Date	Start	End	Duration (hours)	Cause	Corrective Action				
11/18/15	13:24	14:24	1	NOx/ O <sub>2</sub> Cylinder Gas Audit.	N/A				
TOTAL			1						

<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: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header<sup>1</sup>

					Ja EXCESS EMISSIONS			
Date	Start	End	Duration (hours)	Max 3- HRA (ppm)	Cause	Corrective Action		
11/12/15	00:00		160	300	$H_2S > 162$ ppm, 3-HRA. This period of excess emissions was due to construction delays of the Flare Gas	On 11/18/15, The FGRU was completed and placed in service. The North Flare vent gas is now		
11/18/15		16:00	100	300	Recovery Unit (FGRU). The normal H <sub>2</sub> S content of the gas sent to the North Flare is greater than the Subpart Ja limit.	captured, treated to remove H <sub>2</sub> S, and sent to the refinery fuel gas system.		
11/19/15	10:56	14:56	4	300	H <sub>2</sub> S > 162 ppm, 3-HRA due to the automatic shutdown of the FGRU compressor. The shutdown was initiated by a high pressure alarm in an electrical transformer.	Valero inspected the transformer and found a loose wire that caused the high-pressure indication. The loose wire was repaired and the FGRU was returned to service.		
12/3/15	19:00	21:00	26	300	H <sub>2</sub> S > 162 ppm, 3-HRA. See Subpart Ja Root Cause/Corrective Action Analysis dated 12/3/15 for Cause and Corrective Action.			
TOTAL			190					

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

Pollutant: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header<sup>1</sup>

				Ja CMS PERFORMANCE <sup>2</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
12/3/15	14:00	17:00	3	Analyzer taken offline to inspect the installation and set up due to the problems with the Hydrocracker Flare Header analyzer.	Calibrated and returned to service.
TOTAL			3		

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

<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: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header<sup>1</sup>

				Jan J	a EXCESS EMISSIONS	
Date	Start	End	Duration (hours)	Max 3- HRA (ppm)	Cause	Corrective Action
11/12/15	00:00		160	300	H <sub>2</sub> S > 162 ppm, 3-HRA. This period of excess emissions was due to construction delays of the Flare Gas	On 11/18/15, The FGRU was completed and placed in service. The North Flare vent gas is now
11/18/15		16:00	100	300	Recovery Unit (FGRU). The normal H <sub>2</sub> S content of the gas sent to the North Flare is greater than the Subpart Ja limit.	captured, treated to remove H <sub>2</sub> S, and sent to the refinery fuel gas system.
11/19/15	10:56	14:56	4	300	H <sub>2</sub> S > 162 ppm, 3-HRA due to the automatic shutdown of the FGRU compressor. The shutdown was initiated by a high pressure alarm in an electrical transformer. (This period overlapped with a period of analyzer downtime, but the Total Sulfur analyzer indicated that H <sub>2</sub> S was > 300 ppm so this period was counted as excess emissions instead of downtime)	Valero inspected the transformer and found a loose wire that caused the high-pressure indication. The loose wire was repaired and the FGRU was returned to service.
12/3/15	19:00	21:00	26	300	$H_2S > 162$ ppm, 3-HRA. See Subpart Ja F Analysis dated 12/3/15 for Cause and Corn	
TOTAL			190			

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

Pollutant: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), Hydrocracker Flare Header<sup>1</sup>

				Ja CMS PERFORMANCE <sup>2</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
11/19/15	09:27	10:56	1	Analyzer malfunctioned, output erratic	Analyzer adjusted, calibrated and
11/19/15	14:56	15:56	1	with frequent fault alarms. Data Invalid.	returned to service.
11/19/15	18:09	20:09	2	Several periods of analyzer	
11/20/15	07:02	15:02	8	malfunctions with erratic outputs and fault alarms. Data Invalid. On 11/29,	Valero brought a factory expert onsite
11/21/15	21:05	23:05	2	11/20, 11/21, and 11/26, the analyzer	who discovered that the analyzer had not been set-up correctly in the initial
11/26/15	03:24	06:24	3	would come out of these periods on its own without any human intervention.	installation. This was corrected and the
11/28/15	21:57		117	After the last period, Valero instrumentation was unable to calibrate	analyzer was calibrated and restored to operation.
12/3/15		18:57	117	the analyzer and place it online.	
TOTAL			134		

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

<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: H2S

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016\_

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

				J	a EXCESS EMISSIONS		
Date	Start	End	Duration (hours)	Max 3- HRA (ppm)	Cause	Corrective Action	
11/12/15	00:00				H <sub>2</sub> S > 162 ppm, 3-HRA. This period of excess emissions was due to	On 11/18/15, The FGRU was completed and placed in service.	
1/18/15		16:00	160	300	construction delays of the Flare Gas Recovery Unit (FGRU). The normal H <sub>2</sub> S content of the gas sent to the South Flare is greater than the Subpart Ja limit.	The South Flare vent gas is now captured, treated to remove H <sub>2</sub> S, and sent to the refinery fuel gas system.	
11/19/15	10:56	14:56	4	300	H <sub>2</sub> S > 162 ppm, 3-HRA due to the automatic shutdown of the FGRU compressor. The shutdown was initiated by a high-pressure alarm in an electrical transformer.	Valero inspected the transformer and found a loose wire that caused the high-pressure indication. The loose wire was repaired and the FGRU was returned to service.	
12/4/15	02:00	21:00	19	300	H <sub>2</sub> S > 162 ppm, 3-HRA. See Subpart Ja Root Cause/Corrective Action Analysis dated 12/3/15 for Cause and Corrective Action.		
TOTAL			183				

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

Pollutant: H2S

Applicable NSPS Subpart: \_\_Ja

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: Ametek 5100

Date of Latest CMS Certification or Audit: CEMS placed in service 11/11/15, Initial Certification will be completed in 1st Quarter

2016

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

				Ja CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
12/3/15	10:30	14:30	4	Analyzer taken offline to inspect the installation and set up due to the problems with the Hydrocracker Flare Header analyzer.	Calibrated and returned to service.
TOTAL			4		

<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: Total Sulfur

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 11/11/15

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

	Y			Ja CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
10/1/15	22:07		16		
10/2/15		14:07	10	Analyzer offline and in alarm due to low sample flow.	Adjusted inlet and outlet pressure regulators to restore sample flow.
10/12/15	15:51	20:51	5	1	
10/13/15	12:28	21:28	9	Analyzer shutdown for repairs.	Replaced sample pump.
10/20/15	12:42	14:42	2	Adjusted for calibration drift.	N/A
10/21/15	07:45	09:45	2	Adjusted for calibration drift.	N/A
10/22/15	12:43	17:43	5	Adjusted for calibration drift.	N/A
10/23/15	08:15	09:15	1	Adjusted for calibration drift.	N/A
10/26/15	08:50	12:50	4	Adjusted for calibration drift.	N/A
11/11/15	13:35	14:35	1	Cylinder Gas Audit	N/A
TOTAL			45		

<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: Total Sulfur

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 11/11/15

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

				Ja CMS PERFORMANCE <sup>1</sup>		
Date	Start	End	Duration (hours)	Cause		Corrective Action
11/11/15	12:57	14:57	2	Cylinder Gas Audit.	N/A	
TOTAL			2			

<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: Total Sulfur

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 11/11/15

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

Ja CMS PERFORMANCE <sup>1</sup>								
Date	Start	End	Duration (hours)	Cause	Corrective Action			
10/10/15	21:30	22:30	1	Adjusted for calibration drift.	N/A			
11/11/15	14:13	15:13	1	Cylinder Gas Audit.	N/A			
TOTAL			2					

<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.

## GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

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

Pollutant: Flow

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

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

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

				Ja CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
10/14/15	10:00	18:00	8	Flow meter shutdown to replace Channel 1 probes.	N/A
TOTAL			8		

<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.

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

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

Pollutant: Flow

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

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

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

Ja CMS PERFORMANCE <sup>1</sup>					
Date	Start	End	Duration (hours)	Cause	Corrective Action
None				***************************************	
TOTAL			0		

<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.

## GASEOUS AND OPACITY EXCESS EMISSIONS AND MONITORING SYSTEMS PERFORMANCE

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

Pollutant: Flow

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

Emission Limitation: None

Monitor Manufacturer and Model No.: GE Panametrics GF 868

Date of Latest CMS Certification or Audit: N/A

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

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

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

<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, Appendix F, Section 7)

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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	10/21/15	10/21/15	10/20/15	10/20/15
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	139.3 ppmv	283.3 ppmv	6.40 vol %	10.40 vol %
Accuracy	10.8%	2.7%	7.6%	3.6%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

A.	Out-of	Control	Periods:
л.	Out-OI	Comaoi	i ciious.

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

B. Corrective Actions: N/A

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

Pollutant: SO <sub>2</sub>						
Applicable NSPS Subpart:Ja_						
Reporting period dates: From 10/1/15 to 12/31/15						
Date submitted: 1/30/16						
Company: Valero Refining - Meraux	<u>x LLC</u>					
Address: 2500 East St. Bernard High	hway, Meraux, LA 70075	-				
Emission Limitation: SO <sub>2</sub> corrected	to 0% O2 shall not exceed	250 ppm on a 12-h	our rolling average.			
Monitor Manufacturer and Model No	o.: Brimstone 991-CEM-	X (SO <sub>2</sub> ), Rosemour	nt Oxymitter 4000 (	<u>O2)</u>		
Source unit: #3 SRU Incinerator (E	PN 5-00, EQT 0079)					
CEM Sampling Location: #3 SRU	Incinerator (#5-00)					
CEM Span Value: Sulfur Dioxide 5	500 ppm; Oxygen 25%					
I. ACCURACY ASSESSMENT R	ESULTS (CGA):					
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value CEM Response Value Accuracy Standard		SO <sub>2</sub> #2 (high scale) 10/21/15 LL170749 2/10/14 EPA Protocol 1 275.8 ppmv 275.0 ppmv 0.3% <15%	O <sub>2</sub> #1 (low scale) 10/20/15 LL42566 1/28/13 EPA Protocol 1 5.95 vol % 5.72 vol % 3.9% <15%	O <sub>2</sub> #2 (high scale) 10/20/15 LL42613 1/30/13 EPA Protocol 1 10.04 vol % 10.01 vol % 0.3% <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

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

Applicable NSPS Subpart:J						
Reporting period dates: From 10/1/15 to 12/31/15						
Date submitted: 1/30/16						
Company: Valero Refining - M	eraux LLC					
Address: 2500 East St. Bernard	l Highway, Meraux, LA 70075					
Emission Limitation: <u>Hydroge</u>	n Sulfide shall not exceed 162 pr	om on a 3-hour rol	ling average.			
Monitor Manufacturer and Mode	el No.: Ametek 4661					
Source Unit: Area 1 Fuel Drum	n for Boiler TB-01 (EPN 1-06, E	QT 0010)				
CEM Sampling Location: Area	1 Fuel Drum					
CEM Span Value: <u>Hydrogen S</u>	ulfide, 300 ppm					
I. ACCURACY 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 ( <u>low scale</u> ) 10/26/15 LL167084 2/24/14 EPA Protocol 1 77.2 78.0 1.1% <15%	H <sub>2</sub> S #2 (high scale) 10/26/15 LL167094 2/10/14 EPA Protocol 1 166.6 167.7 0.7% <15%			
II. CALIBRATION DRIFT AS	SESSMENT					
A. Out-of Control Periods:						
1. Dates: <u>N/A</u>						
2. Number of Day	ys <u>N/A</u>					
B. Corrective Actions:	N/A					

Pollutant: I	$H_2S$			
Applicable	NSPS Subpart: <u>J a</u>	and Ja (Benzene Recovery Un	nit Reboiler Subjec	t to Ja)
Reporting p	eriod dates: From _1	0/1/15 to 12/31/15		
Date submit	tted: 1/30/16			
Company:_	Valero Refining - M	eraux LLC_		
Address: 2:	500 East St. Bernard	Highway, Meraux, LA 70075		
Emission L	imitation: <u>Hydrog</u>	en Sulfide shall not exceed 162	ppm on a 3-hour	rolling average(J and Ja) and 60 ppm on a 365 day
rolling avera	age (Ja only)			
Monitor Ma	nufacturer and Mode	el No.: Ametek 4661		
(EPN 12-72 (EPN 17-72 NHT Debut	A, EQT 022); ROSI 2 a,b,c, EQT 0028); Reboiler (EPA 15-7	E Heater (EPN 1-80, EQT 0014) Platformer Debut Reboiler (EPN	; Vacuum Heater (N 19-72, EQT 0029) poiler (EPA 16-72,	2-92, EQT 0033); No.1 Crude Heater (EPN 1-76, EQT 0013); Platformer Charge Heater 9); NHT Charge Heater (EPN 14-72, EQT 0023); EQT 0027); DHT Charge Heater
CEM Sampl	ling Location: Area	a 2 Fuel Drum		
CEM Span '	Value: <u>Hydrogen S</u>	ulfide, 300 ppm		
I. ACCUI	RACY ASSESSMEN	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) 10/21/15 LL37408 3/5/15 EPA Protocol 1 75.7 77.0 1.7% <15%	H <sub>2</sub> S #2 (high scale) 10/21/15 LL167094 2/10/14 EPA Protocol 1 166.6 159.0 4.6% <15%
II. CALIB	RATION DRIFT AS	SESSMENT		
A.	Out-of Control Peri	iods:		
	1. Dates:	<u>N/A</u>		
	2. Number of Day	ys <u>N/A</u>		
B.	Corrective Actions:	N/A		

Pollutant: H <sub>2</sub> S						
Applicable NSPS Subpart:J_						
Reporting period dates: From 10/1/15 to 12/31/15						
Date submitted: 1/30/16						
Company: Valero Refining - M	leraux LLC					
Address: 2500 East St. Bernar	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 Mod	lel No.: Ametek 4661					
Process Unit(s) Description: A	rea 4 Fuel Drum for Merox Disul	fide Separator to P	latformer Charge Heater			
CEM Sampling Location: Area	4 Fuel Drum					
CEM Span Value: <u>Hydrogen S</u>	Sulfide, 300 ppm					
	· ·					
I. ACCURACY 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) 10/23/15 LL37408 3/5/15 EPA Protocol 1 75.7 72.3 4.5% <15%	H <sub>2</sub> S #2 (high scale) 11/10/15 LL167094 2/10/14 EPA Protocol 1 166.6 166.3 0.2% <15%			
II. CALIBRATION DRIFT A	SSESSMENT					
A. Out-of Control Per	riods:					
1. Dates: <u>N/A</u>						
2. Number of Da	ays <u>N/A</u>					
B. Corrective Actions	s: N/A					

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

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

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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 <sub>2</sub> S #1	H <sub>2</sub> S #2
	(low scale)	(high scale)
Date of Audit	10/27/15	10/27/15
Audit Gas Cylinder No.	LL167084	LL167094
Date of Audit Gas Cert.	2/24/14	2/10/14
Type of Certification	EPA Protocol 1	EPA Protocol 1
Certified Audit Value (ppmv)	77.2	166.6
CEM Response Value (ppmv)	78.0	167.7
Accuracy	1.1%	0.7%
Standard	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

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

- 1. Dates: 12/12/15, 05:16 12/13/15, 20:00
- 2. Number of Days <u>1.6 (39 hours)</u>
- B. Corrective Actions: On 12/13/15 from approximately 02:00-09:18, the analyzer appeared to be offline and did not perform the normally scheduled calibration check. At 09:18, the analyzer appeared to return to sampling on its own. Valero performed a calibration check at approximately 20:00, which was satisfactory without adjusting the analyzer.

Pollutant: H <sub>2</sub>	S					
Applicable N	SPS Subpart:J_					
Reporting period dates: From 10/1/15 to 12/31/15						
Date submitte	ed: <u>1/30/16</u>					
Company: V	alero Refining - Mo	eraux LLC				
Address: 250	00 East St. Bernard	Highway, Meraux, LA 70075				
Emission Lim	nitation: <u>Hydroge</u>	n Sulfide shall not exceed 162 pp	om on a 3-hour rol	ling average.		
Monitor Man	ufacturer and Mode	el No.: <u>Ametek 4661</u>				
Process Unit(	s) Description: <u>Ar</u>	ea 6 Fuel Drum for Boilers B-5	(EPN 2-00, EQT 0	030) and B-6 (EPN 3-00, EQT 0048)		
CEM Samplir	ng Location: Area	6 Fuel Drum				
CEM Span Va	alue: <u>Hydrogen S</u> ı	ılfide, 300 ppm				
		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 ( <u>low scale</u> ) 10/22/15 LL37408 3/5/15 EPA Protocol 1 75.7 71.8 5.2%	H <sub>2</sub> S #2 (high scale) 10/22/15 LL167094 2/10/14 EPA Protocol 1 166.6 167.7 0.7%		
		Standard	<15%	<15%		
II. CALIBRA	ATION DRIFT AS	SESSMENT				
Α. (	Out-of Control Peri	ods:				
1	. Dates:	N/A				
2	2. Number of Day	vs <u>N/A</u>				
В. О	Corrective Actions:	N/A				
-						

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

Pollutant:	NO.
i Omanan.	110

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

Company: Valero Refining - Meraux LLC

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

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

Monitor Manufacturer and Model No.: ABB Limas11( NOx), Magnos27 (O<sub>2</sub>)

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	11/12/15	11/12/15	11/4/15	11/4/15
Audit Gas Cylinder No.	LL165998	LL167083	LL53418	LL167062
Date of Audit Gas Cert.	2/4/15	2/14/14	1/28/14	1/28/14
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	24.7 ppmv	55.1 ppmv	6.01 vol %	10.01 vol %
CEM Response Value	25.1 ppmv	55.2 ppmv	6.02 vol %	10.03 vol %
Accuracy	1.6%	0.2%	0.2%	0.2%
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.	Coı	rrective Actions:	N/A		

Pollutant:	$NO_x$					
Applicable	NSPS Subpart:Db					
Reporting p	period dates: From <u>10/1/15</u> to	12/31/15				
Date submi	itted: 1/30/16					
Company:_	Valero Refining - Meraux LLC					
Address: 2	2500 East St. Bernard Highway, M	leraux, LA 70075				
Emission L	imitation: <u>Nitrogen Oxide shall</u>	not exceed 0.1 pour	nd/MMBtu on a 30	-day rolling average	e	
Monitor Ma	anufacturer and Model No.: ABI	B Limas11( NOx), N	Magnos27 (O <sub>2</sub> )			
Process Un	it(s) Description: Boiler B-6 (EP	N 3-00, EQT 0048)	<u>)                                    </u>			
CEM Samp	oling Location: Boiler B-6					
CEM Span	Value: Nitrogen Oxide 100 ppm	, Oxygen 25 %				
I. ACCU	RACY ASSESSMENT RESULT	S (CGA):  NOx #1 (low scale)	NOx #2 (high scale)	O <sub>2</sub> #1 (low scale)	O <sub>2</sub> #2 (high scale)	
	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value CEM Response Value Accuracy Standard	11/12/15 LL165998 2/4/15 EPA Protocol 1 24.7 ppmv 25.1 ppmv 1.6% <15%	11/12/15 LL167083 2/14/14 EPA Protocol 1 55.1 ppmv 55.2 ppmv 0.2% <15%	11/4/15 LL53418 1/28/14 EPA Protocol 1 6.01 vol % 6.05 vol % 0.7% <15%	11/4/15 LL167062 1/28/14 EPA Protocol 1 10.01 vol % 10.07 vol % 0.6% <15%	
II. CALIE	BRATION 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: NO<sub>x</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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)/(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):

	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	12/7/15	12/7/15	12/7/15	12/7/15
Audit Gas Cylinder No.	LL166013	LL65256	LL53418	LL167062
Date of Audit Gas Cert.	2/8/13	2/18/13	1/28/14	1/28/14
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	135.5 ppmv	272.4 ppmv	6.01 vol %	10.01 vol %
CEM Response Value	131.6 ppmv	261.0 ppmv	5.77 vol %	9.57 vol %
Accuracy	2.9%	4.2%	4.0%	4.4%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

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

1. Dates: 11/7/15, 07:08 - 11/9/15, 14:08

2. Number of Days 2.0 (49 hours)

B. Corrective Actions: The CEMS failed low on the high span calibration check on 11/8 and 11/9. The operator responsible for checking the daily calibrations did not check the calibration logs and did not initiate corrective action. Valero counseled the operator. Valero adjusted the analyzer and performed a satisfactory calibration check on 11/9.

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

			, ,			
Pollutant: NO,	s.					
Applicable NSI	Applicable NSPS Subpart:Ja					
Reporting perio	od dates: From <u>10/1/15</u> to 12	2/31/15				
Date submitted	: <u>1/30/16</u>					
Company: Val	ero Refining - Meraux LLC				•	
Address: 2500	East St. Bernard Highway, Me	eraux, LA 70075				
Emission Limit	ation: Nitrogen Oxide correc	eted to 0% O <sub>2</sub> shall	not exceed 40 ppm	on a 30-day rolling	g average	
	acturer and Model No.: Therr		· -			
	Description: Benzene Recove			_ <u>_</u>		
	Location: Benzene Recovery			<del></del>		
	ue: Nitrogen Oxide 100 ppm,					
<b></b>		<u> </u>				
I. ACCURAC	CY ASSESSMENT RESULTS	L(CGA):				
i. Account	OT ABBESSMENT RESOLTS	(CGA).				
C.	0.4	NOx #1	NOx #2	O <sub>2</sub> #1	O <sub>2</sub> #2	
	<u>GA</u> ate of Audit	(low scale) 11/18/15	(high scale) 11/18/15	(low scale) 11/18/15	(high scale) 11/18/15	
	udit Gas Cylinder No.	LL165998	LL167083	LL42566	LL42613	
	ate of Audit Gas Cert.	2/4/15	2/14/14	1/28/13	1/30/13	
	ype of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	
•	ertified Audit Value	24.7 ppmv	55.1 ppmv	5.95 vol %	10.04 vol %	
	EM Response Value	24.9 ppmv	54.3 ppmv	5.54 vol %	9.51 vol %	
	ccuracy	0.8%	1.5%	6.9%	5.3%	
Sta	andard	<15%	<15%	<15%	<15%	
II. CALIBRA	TION DRIFT ASSESSMENT					
A. Ou	ut-of Control Periods:					
1.	Dates: N/A					
2.	Number of DaysN/A					

B. Corrective Actions: N/A

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

Pollutant: NO<sub>x</sub>

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

Reporting period dates: From 10/1/15 to 12/31/15

Date submitted: 1/30/16

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

CEM Sampling Location: No.1 Crude Heater

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

#### I. ACCURACY ASSESSMENT RESULTS (CGA):

	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	10/21/15	10/21/15	10/21/15	10/21/15
Audit Gas Cylinder No.	LL165998	LL167083	LL42566	LL42613
Date of Audit Gas Cert.	2/4/15	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	24.7 ppmv	55.1 ppmv	5.95 vol %	10.04 vol %
CEM Response Value	25.4 ppmv	55.1 ppmv	6.00 vol %	10.05 vol %
Accuracy	3.0%	0.1%	0.9%	0.1%
Standard	<15%	<15%	<15%	<15%

<sup>&</sup>lt;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: 12/24/15, 06:17 – 12/28/15, 09:17

- 2. Number of Days <u>4.1 (99 hours)</u>
- B. Corrective Actions: At some unknown time on 12/24/15, the air conditioning for the Crude Heater Selective Catalytic Reduction (SCR) NOx/O<sub>2</sub> CEMS building automatically shut down due to a low O<sub>2</sub> reading in the CEMS building. The CEMS continued to operate in the overheated building but failed the next several daily calibration checks (12/25, 12/26, 12/27, and 12/28). Upon investigation, Valero discovered that the operator responsible for checking the daily CEMS calibrations was aware that the checks were bad, but did not initiate any corrective action. This was due to a typo on the instructions in the calibration logs and the mistaken belief that the two sets of process NOx/O<sub>2</sub> analyzers that control the ammonia injection to the SCR were a back-up to the compliance analyzers. On 12/28/15, Valero sent an instrument maintenance technician to the analyzers who quickly diagnosed that the building was overheated which was causing the CEMS to fail the daily calibration checks. The O<sub>2</sub> sensor that had tripped the air conditioning was found to have failed and was replaced. The air conditioning was restored and the CEMS were calibrated. Valero has corrected the typo in the calibration logs instruction and will refresher training with the shift operators on the proper response to bad calibration checks and clarify which analyzers are for compliance and explain why process analyzers are not acceptable backups.

Pollutant: Total Sulfur				
Applicable NSPS Subpart: <u>Ja</u> (Required by Consent Decree: 3:10-cv-00563-bbc, Paragraph 49.a.ii)				
Reporting period dates: From 10/1/15 to 12/31/15				
Date submitted: 1/30/16				
Company: Valero Refining - Meraux LLC				
Address: 2500 East St. Bernard Highway, Meraux, LA 70075				
Emission Limitation: None				
Monitor Manufacturer and Model No.: Thermo Scientific SOLA II				
Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North Flare Header				
CEM Sampling Location: North Flare Stack, North Flare Header (Y-AT-303)				
CEM Span Value: Total Sulfur, Dual Range: 0-10,000 ppm, 10,000-1,000,000 ppm				
I. ACCURACY ASSESSMENT RESULTS (CGA):				
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$				
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: Total Sulfur			
Applicable NSPS Subpart: <u>Ja</u> (Required by Conse	nt Decree: 3:10-cv-00563-bb	c, Paragraph 49.a.ii)	
Reporting period dates: From 10/1/15 to 12/31/15			
Date submitted: <u>1/30/16</u>			
Company: Valero Refining - Meraux LLC			
Address: 2500 East St. Bernard Highway, Meraux, LA	70075		
Emission Limitation: None_			
Monitor Manufacturer and Model No.: Thermo Scienti	fic SOLA II		
Process Unit(s) Description: North Flare Stack (EPN 20	——— 0-72, EQT 0035), Hydrocracl	ker Flare Header	
CEM Sampling Location: North Flare Stack, Hydrocra	•		
CEM Span Value: Total Sulfur, Dual Range: 0-10,000	•		
ACCURACY ASSESSMENT RESULTS (CGA):			
Date of Audit Audit Gas Cylinder N Date of Audit Gas Ce Type of Certification Certified Audit Value CEM Response Valu Accuracy Standard	ert. 2/11/13 EPA Protocol 1 e (ppmv) 1021.0	H <sub>2</sub> S #2 (high scale) 11/11/15 CC310552 8/11/15 Certified Gas <sup>1</sup> 10080.0 10165.7 0.9% <15%	
<sup>1</sup> Valero unable to obtain EPA Protoco	ol 1 certified gases greater tha	an 1000 ppm.	
I. CALIBRATION DRIFT ASSESSMENT			
A. Out-of Control Periods:			
1. Dates: <u>N/A</u>			
2. Number of DaysN/A			
B. Corrective Actions: N/A			

Pollutant: Total Sulfur				
Applicable NSPS Subpart:Ja	(Required by Consent Decree:	3:10-cv-00563-bb	c, Paragraph 49.a.ii)	
Reporting period dates: From 1	0/1/15 to 12/31/15			
Date submitted: 1/30/16				
Company: Valero Refining - Me	eraux LLC			
Address: 2500 East St. Bernard	Highway, Meraux, LA 70075			
Emission Limitation: None				
Monitor Manufacturer and Mode	l No.: Thermo Scientific SOLA	<u>II_</u>		
Process Unit(s) Description: Sou	oth Flare Stack (EPN 3-77, EQT	0049)_		
CEM Sampling Location: South	Flare Stack (Y-AT-304)			
CEM Span Value: Total Sulfur,	Dual Range: 0-10,000 ppm, 10,0	000-1,000,000 ppm		
	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 ( <u>low scale</u> ) 11/11/15 LL54215 2/11/13 EPA Protocol 1 1021.0	H <sub>2</sub> S #2 (high scale) 11/11/15 CC310552 8/11/15 Certified Gas <sup>1</sup> 10080.0	
	CEM Response Value (ppmv)	1044.3	10146.7	
	Accuracy Standard	2.3% <15%	0.7% <15%	
<sup>1</sup> Valero unable	to obtain EPA Protocol 1 certifie	ed gases greater tha	n 1000 ppm.	
II. CALIBRATION DRIFT AS:	SESSMENT			
A. Out-of Control Perio	ods:			
1. Dates:	N/A			
2. Number of Day	s <u>N/A</u>			
B. Corrective Actions:	N/A			