

April 30, 2016

CERTIFIED: 7011 2970 0002 0808 5020

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 – 1st Quarter 2016

Valero Refining - Meraux LLC, Agency Interest # 1238 2500 East St. Bernard Hwy., St. Bernard Parish, Meraux, LA

Title V Permit Numbers: 2500-00001-V12

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 First Quarter 2016.

For this reporting period, no CEMS had excess emissions greater than 1 % of the total operating time and no CEMS had downtime greater than 5 % of the total operating time. Enclosed are the Data Assessment Reports for the appropriate CEMs and information required by NSPS Subpart Ja, 40 CFR 60.108a(d). Additionally, Valero has reviewed its records and could not find evidence that two root cause and corrective action analysis reports from the 4th Quarter 2015 were submitted with the 4th Quarter Excess Emissions and Monitoring Systems Reports; therefore, they are included with this submittal.

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,

Eric Brown

**Director Refinery Operations** Valero Refining - Meraux LLC

Enclosures

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

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

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From \_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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 1/18/16 (SO<sub>2</sub> & O<sub>2</sub>)

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

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

CMS Performance Summary <sup>1</sup>		
1. CMS downtime in reporting period due to:	(hours)	
a. Monitor equipment malfunctions	0	
b. Non-Monitor equipment malfunctions	0	
c. Quality assurance calibration	28	
d. Other known causes	2	
e. Unknown causes	0	
2. Total CMS Downtime	30	
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	1.4 %	

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

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

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

Pollutant: SO<sub>2</sub>

Applicable NSPS Subpart: \_\_Ja\_

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/18/16 (SO<sub>2</sub> & O<sub>2</sub>)

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

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

CMS Performance Summary <sup>1</sup>		
1. CMS downtime in reporting period due to:	(hours)	
a. Monitor equipment malfunctions	0	
b. Non-Monitor equipment malfunctions	0	
c. Quality assurance calibration	1	
d. Other known causes	5	
e. Unknown causes	0	
2. Total CMS Downtime	6	
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.3 %	

<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))

Pollutant: H2S

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From \_\_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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 1/20/16

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: EQT 0010- 2,035 hours, EQT 0011- 2,046 hours, EQT 0033-1,974 hours

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	0
2. Total duration of excess emission	0	0	0
3. Total duration of excess emissions x (100) [Total source operating time] $^2$	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	1	1	1
d. Other known causes	0	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>	0.0 %	0.0 %	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))

n 1	1	** ~
Pol	lutant:	H <sub>2</sub> S

Applicable NSPS Subpart: \_\_J

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/20/16

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: <u>EQT 0013-2,183 hours</u>; <u>EQT 0022-2,183 hours</u>; <u>EQT 0023-2,059 hours</u>; <u>EQT 0024-2,048 hours</u>; <u>EQT 0027-2,045 hours</u>; <u>EQT 0028-2,068</u>; <u>EQT 0029-2,021 hours</u>; <u>EQT 0058 – 2,154 hours</u>; <u>EQT 0014 - 2,183 hours</u>

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

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

<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: H2S

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/20/16

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	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 %

<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))

Pol	lutant:	$H_2S$
1 0	ilutailt.	1120

Applicable NSPS Subpart: \_ J

Reporting period dates: From \_1/1/16\_to\_3/31/16

Date submitted: 4/30/16

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 1/19/16

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	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	1
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.0 %

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

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

(per 40 CFR 60.7(d))

Pollutant: H2S

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/19/16

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	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	1
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.0 %

<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))

Pol	lutant:	$H_2S$

Applicable NSPS Subpart: \_\_J\_

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/19/16

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 0030-2,180 hours</u>; EQT 0048-2,176 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	6
d. Other known causes	0
e. Unknown causes	0
2. Total duration of excess emission	6
3. Total duration of excess emissions x (100) [Total source operating time] <sup>2</sup>	0.3 %

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

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

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

(per 40 CFR 60.7(d))

Pollutant: NO<sub>x</sub>

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/21/16 (NOx & O<sub>2</sub>)

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

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 \_\_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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 1/21/16 (NOx & O2)

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 \_1/1/16\_to\_3/31/16

Date submitted: 4/30/16

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

Date of Latest CMS Certification or Audit: CGA on 1/20/16 (NOx & O2)

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

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

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	28
d. Other known causes	5
e. Unknown causes	0
2. Total CMS Downtime	33
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	1.6 %

<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: NO<sub>x</sub>

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/25/16 (NOx & O<sub>2</sub>)

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

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

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	55
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	56
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	3.0 %

<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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 (O<sub>2</sub>)

Date of Latest CMS Certification or Audit: CGA on 1/19/16 (NOx & O2)

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

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

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

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

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

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

Pollutant: H2S

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

Reporting period dates: From \_1/1/16\_to 3/31/16

Date submitted: 4/30/16

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: <u>Initial Certification RATA on 2/11/16</u>

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

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

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	28
d. Other known causes	2
e. Unknown causes	0
2. Total CMS Downtime	30
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	1.4%

<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: H2S

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

Reporting period dates: From \_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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: <u>Initial Certification RATA on 2/11/16</u>

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

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

CMS Performance Summary <sup>1</sup>	
CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	1
d. Other known causes	5
e. Unknown causes	3
2. Total CMS Downtime	9
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.5 %

<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) and 60.108a(d))

Pollutant: H2S

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

Reporting period dates: From \_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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: Initial Certification RATA on 2/10/16

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

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

CMS Performance Summary <sup>1</sup>	
1. CMS downtime in reporting period due to:	(hours)
a. Monitor equipment malfunctions	0
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	1
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: Total Sulfur

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/25/16

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

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

CMS Performance Summary <sup>1</sup>			
1. CMS downtime in reporting period due to:	(hours)		
a. Monitor equipment malfunctions	0		
b. Non-Monitor equipment malfunctions	0		
c. Quality assurance calibration	8		
d. Other known causes	0		
e. Unknown causes	0		
2. Total CMS Downtime	8		
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>			

<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 \_1/1/16\_to \_3/31/16

Date submitted: 4/30/16

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 1/25/16

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	(		
b. Control equipment problems	(		
c. Process problems	(		
d. Other known causes	(		
e. Unknown causes	C		
2. Total duration of excess emission			
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	18		
e. Unknown causes	0		
2. Total CMS Downtime	20		
3. Total duration of CMS Downtime x (100) [Total source operating time] <sup>2</sup>	0.9 %		

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

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

(per 40 CFR 60.7(d) 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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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

CMS Performance Summary <sup>1</sup>			
CMS downtime in reporting period due to:	(hours)		
a. Monitor equipment malfunctions	0		
b. Non-Monitor equipment malfunctions	0		
c. Quality assurance calibration	7		
d. Other known causes	36		
e. Unknown causes	0		
2. Total CMS Downtime	43		
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: Flow

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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>			
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 \_1/1/16\_to\_3/31/16

Date submitted: 4/30/16

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>					
. 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 \_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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>			
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 \_1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/18/16 (SO<sub>2</sub> & O<sub>2</sub>)

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
None						
TOTAL			0			

				CMS PERFORMANCE <sup>1</sup>		
Date Start E		End	Duration (hours)	Cause	Corrective Action	
1/18/16	09:50	11:50	2	SO <sub>2</sub> and O <sub>2</sub> Cylinder Gas Audit.	N/A	
2/4/16	09:16	11:16	2	Adjusted for calibration drift.	N/A	
2/16/16	07:13		26	Out of Control. SO <sub>2</sub> Calibration drift > 4	See Data Assessment Report #2 SRU	
2/17/16		09:13	26	times the allowable limit on 2/17/16.	Incinerator. (Page 36)	
TOTAL			30			

<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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/18/16 (SO<sub>2</sub> & O<sub>2</sub>)

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

					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		
1/18/16	13:38	14:38	1	SO <sub>2</sub> and O <sub>2</sub> Cylinder Gas Audit.	N/A		
1/25/16	08:43	13:43	5	SO <sub>2</sub> analyzer went into fault after performing a satisfactory calibration check.	Valero cleaned the cell windows, calibrated the analyzer, and returned i to service.		
TOTAL			6				

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

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

Pollutant: H2S

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

Reporting period dates: From \_1/1/16\_to\_3/31/16

Date submitted: 4/30/16

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 1/20/16

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

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

				Ja CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
1/20/16	10:06	11:06	1	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: NO<sub>x</sub>

Applicable NSPS Subpart: \_\_Ja

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/25/16 (NOx & O<sub>2</sub>)

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

				Ja	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				
1/20/16	05:30		5.5	O <sub>2</sub> cell failed. Replacement spare stored	Valero rush ordered a new cell and				
1/22/16		12:30	55	on site was also bad.	returned the O <sub>2</sub> analyzer to service.				
1/25/16	08:05	09:05	1	NOx/ O <sub>2</sub> Cylinder Gas Audit.	N/A				
TOTAL			56						

<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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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: <u>Initial Certification RATA on 2/11/16</u>

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

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

				Ja CMS PERFORMANCE <sup>2</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
3/9/16	11:24		28	Analog output card failed. Analyzer remained in service, but data was not transmitted to the DCS and recorded by the refinery data historian. Valero	Valero replaced the analog card on
3/10/16		15:24	20	monitored the analyzer output on the maintenance network. There was no flaring on this header after 3/10/16 14:04.	3/17/16.
3/17/16	11:55	12:55	1	Adjusted for calibration drift.	N/A
3/17/16	13:57	14:57	1	Adjusted for calibration drift.	N/A
TOTAL			30		

<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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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: <u>Initial Certification RATA on 2/11/16</u>

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

				Ja H	EXCESS EMISSIONS	
Date	Start	End	Duration (hours)	Max 3- HRA (ppm)	Cause	Corrective Action
None.						
TOTAL			190			

	Ja CMS PERFORMANCE <sup>2</sup>									
Date	Start	End	Duration (hours)	Cause	Corrective Action					
1/5/16	07:04	10:04	3	Analyzer malfunctioned during the daily calibration check and held the high span value for almost 2 hours before going offline.	Valero maintenance calibrated the analyzer and returned it to service.					
2/11/16	10:15	13:15	3	Analyzer shut down due to an internal communication fault.	Valero maintenance rebooted that analyzer, calibrated it, and returned it to service.					
2/28/16	13:06	14:06	1	Adjusted for calibration drift.	N/A					
3/17/16	15:03	16:03	1	Offline to troubleshoot internal						
3/18/16	13:36	15:36	1	communication fault alarms with factory representative.	N/A					
TOTAL			9							

<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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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: <u>Initial Certification RATA on 2/10/16</u>

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

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

				Ja CMS PERFORMANCE <sup>1</sup>	
Date	Start	End	Duration (hours)	Cause	Corrective Action
3/17/16	16:05	17:05	1	Offline for inspection by factory representative.	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: Total Sulfur

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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 1/25/16

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

Ja CMS PERFORMANCE <sup>1</sup>						
Date	Start	End	Duration (hours)	Cause	Corrective Action	
1/11/15	13:13	15:13	2	Adjusted for calibration drift.	N/A	
1/11/15	17:23	16:23	1	Adjusted for calibration drift.	N/A	
1/25/16	10:58	11:58	1	Cylinder Gas Audit	N/A	
3/31/16	11:09	12:09	1	During the daily calibration check the		
3/31/16	12:33	17:43	3	automatic sequence skipped the low range, high span gas. The high range, low span gas was performed satisfactory. Both of these points use the same gas bottle for the reference gas.	Valero maintenance adjusted the sample flow rate to the analyzer and the problem did not reoccur.	
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.

(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 \_1/1/16\_to\_3/31/16\_

Date submitted: 4/30/16

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 1/25/16

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
1/5/16	00:00	11:00	11	Analyzer went offline due to low sample flow. Valero investigated and found that the analyzer building ventilation system had been left in continuous purge mode that constantly brought in outside air instead of auto. Ambient temperatures dropped low enough to affect this analyzers operation.	Valero restored the ventilations system to normal, started up and calibrated the analyzer, and returned it to service.
1/6/15	07:40	08:40	1	Adjusted for calibration drift.	N/A
1/25/16	10:09	11:09	1	Cylinder Gas Audit.	N/A
3/31/16	05:47	12:19	7	The circuit breaker that powers the sample pump and sample line heat trace tripped taking the analyzer offline.  Valero could not determine the cause for the breaker trip.	Valero restored power and started up the analyzer. It was calibrated and returned to service. The breaker trip did not reoccur.
TOTAL			20		

<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 \_1/1/16\_to\_3/31/16

Date submitted: 4/30/16

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 1/25/16

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
1/11/15	06:05	12:05	6	Analyzer malfunctioned while transitioning out of the daily calibration check sequence to sample due to low instrument air pressure.	Valero restored instrument air pressure and performed a second satisfactory calibration check
1/11/15	12:45	13:45	1	Adjusted for calibration drift.	N/A
1/11/15	18:05	19:05	1	Adjusted for calibration drift.	N/A
1/25/16	12:50	13:50	1	Cylinder Gas Audit.	N/A
3/4/16	12:15		29	During a unit start up, the MDH Fractionator PSV lifted causing liquids	Valero extensively purged the liquids ou
3/5/16		17:15	29	to enter the sample line and cause this analyzer to malfunction.	of the sample system. Valero calibrated the analyzer and returned it to service.
3/7/16	07:52	09:52	1	Adjusted for calibration drift.	N/A
3/9/16	08:32	10:32	2	Adjusted for calibration drift.	N/A
3/28/16	08:38	09:38	1	Second calibration check performed. Valero suspected that higher than normal H <sub>2</sub> S readings were due to an analyzer problem.	The higher than normal H2S reading wer accurate and the analyzer was reading accurately.
TOTAL			43		

<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: Flow

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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

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 60.7(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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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

	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 60.7(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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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)

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 \_1/1/16\_to \_3/31/16

Date submitted: 4/30/16

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	1/18/16	1/18/16	1/18/16	1/18/16
Audit Gas Cylinder No.	LL41929	LL170749	LL53418	LL167062
Date of Audit Gas Cert.	11/11/14	2/10/14	1/28/14	1/28/14
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	125.7 ppmv	275.8 ppmv	6.01 vol %	10.01 vol %
CEM Response Value	136.3 ppmv	279.3 ppmv	6.33 vol %	10.40 vol %
Accuracy	8.4%	1.3%	5.3%	3.9%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

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

1. Dates: \_\_2/16/16, 07:13 - 2/17/16, 09:13

2. Number of Days \_\_\_1.1 (26 hours)\_

B. Corrective Actions: On 2/17/15, the SO<sub>2</sub> analyzer's response to the span value was > 4 time the allowable limit below the reference gas due to restricted sample flow. Valero instrumentation technicians replaced sample line and probe filters and blew out the sample line.

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

Pollutant: 5	$SO_2$					
Applicable	NSPS Subpart:Ja					
Reporting p	period dates: From _1/1/16_to_3/3	1/16				
Date submi	tted: 4/30/16	*				
Company:_	Valero Refining - Meraux LLC					
Address: 2	500 East St. Bernard Highway, M	eraux, LA 70075				
Emission L	imitation: SO <sub>2</sub> corrected to 0% C	2 shall not exceed 2	250 ppm on a 12-ho	our rolling average.	_	
Monitor Ma	anufacturer and Model No.: Bri	mstone 991-CEM-X	K (SO <sub>2</sub> ), Rosemoun	t Oxymitter 4000 (	02)_	
Source unit	: #3 SRU Incinerator (EPN 5-00	, EQT 0079)				
CEM Samp	ling Location: #3 SRU Incineral	tor (#5-00)				
CEM Span	Value: Sulfur Dioxide 500 ppm	; Oxygen 25%				
I. ACCU	RACY ASSESSMENT RESULTS	S (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> #1 (low scale) 1/18/16 LL41929 11/11/14 EPA Protocol 1 125.7 ppmv 133.3 ppmv 6.0% <15%	SO <sub>2</sub> #2 (high scale) 1/18/16 LL170749 2/10/14 EPA Protocol 1 275.8 ppmv 276.0 ppmv 0.1% <15%	O <sub>2</sub> #1 (low scale) 1/18/16 LL53418 1/28/14 EPA Protocol 1 6.01 vol % 5.60 vol % 6.8% <15%	O <sub>2</sub> #2 (high scale) 1/18/16 LL167062 1/28/14 EPA Protocol 1 10.01 vol % 9.76 vol % 2.5% <15%	
II. CALIB	RATION DRIFT ASSESSMENT					
A.	Out-of Control Periods:					
	1. Dates: <u>N/A</u>	-1				
	2. Number of Days N/A					
В.	Corrective Actions: N/A					

Pollutant: H <sub>2</sub> S		-	
Applicable NSPS Subpart:J_			
Reporting period dates: From <u>1/1/16</u> to <u>3/31/16</u>			
Date submitted: 4/30/16			
Company: Valero Refining - Meraux LLC			
Address: 2500 East St. Bernard Highway, Meraux, LA 70075			
Emission Limitation: <u>Hydrogen Sulfide shall not exceed 162 pp</u>	om on a 3-hour rol	ling average.	
Monitor Manufacturer and Model No.: Ametek 4661			
Source Unit: Area 1 Fuel Drum for Boiler TB-01 (EPN 1-06, EQ	QT 0010)		
CEM Sampling Location: Area 1 Fuel Drum			
CEM Span Value: <u>Hydrogen Sulfide, 300 ppm</u>			
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv)	H <sub>2</sub> S #1 (low scale) 1/20/16 LL167084 2/24/14 EPA Protocol 1 77.2	H <sub>2</sub> S #2 (high scale) 1/20/16 LL167094 2/10/14 EPA Protocol 1 166.6	
CEM Response Value (ppmv) Accuracy	76.7 0.6%	165.7 0.5%	
Standard	<15%	<15%	
II. 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: H <sub>2</sub> S					
Applicable NSPS Subpart: J and Ja (Benzene Recovery Unit Reboiler Subject to Ja)					
Reporting period dates: From 1/1/16 to 3/31/16					
Date submitted: 4/30/16					
Company: Valero Refining	- Meraux LLC				
Address: 2500 East St. Bern	ard Highway, Meraux, LA 70075				
Emission Limitation: Hyd	rogen Sulfide shall not exceed 162	ppm on a 3-hour r	colling average(J and Ja) and 60 ppm on a 365 day		
rolling average (Ja only)					
Monitor Manufacturer and M	Model No.: Ametek 4661				
(EPN 12-72A, EQT 022); R (EPN 17-72 a,b,c , EQT 002 NHT Debut Reboiler (EPA 1	OSE Heater (EPN 1-80, EQT 0014);	Vacuum Heater ( N 19-72, EQT 0029 oiler (EPA 16-72,	2-92, EQT 0033); No.1 Crude Heater (EPN 1-76, EQT 0013); Platformer Charge Heater (D); NHT Charge Heater (EPN 14-72, EQT 0023); (EQT 0027); DHT Charge Heater		
CEM Sampling Location:	Area 2 Fuel Drum				
CEM Span Value: Hydroge	n Sulfide, 300 ppm_				
I. ACCURACY ASSESSM	MENT 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) 1/20/16 LL167084 2/24/14 EPA Protocol 1 77.2 75.8 1.7% <15%	H <sub>2</sub> S #2 (high scale) 1/20/16 LL167094 2/10/14 EPA Protocol 1 166.6 164.2 1.4% <15%		
II. CALIBRATION DRIFT	ASSESSMENT				
A. Out-of Control	Periods:				
1. Dates:	N/A				
2. Number of	Days N/A				
B. Corrective Acti	ons: N/A				
-					

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

Applicable N	NSPS Subpart:J_	e.				
Reporting pe	eriod dates: From <u>1</u>	/1/16_to_3/31/16_				
Date submitt	ted: 4/30/16					
Company:_\	/alero Refining - Me	eraux LLC				
Address: 2:	500 East St. Bernard	Highway, Meraux, LA 70075				
Emission Lin	mitation: <u>Hydroge</u>	n Sulfide shall not exceed 162 pp	om on a 3-hour roll	ling average.		
Monitor Mar	nufacturer and Mode	el No.: Ametek 4661				
Process Unit	(s) Description: Ar	ea 4 Fuel Drum for Merox Disul	fide Separator to P	Platformer Charge Heater		
CEM Sampl	ing Location: Area	4 Fuel Drum				
CEM Span V	/alue: <u>Hydrogen St</u>	ulfide, 300 ppm				
I. ACCUR	ACY ASSESSMEN	NT RESULTS (CGA):				
	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$					
II. CALIBE	RATION DRIFT AS	SESSMENT				
Α.	Out-of Control Peri	ods:				
	1. Dates:	N/A				
2. Number of DaysN/A						
В.	Corrective Actions:	N/A				

Pollutant: H <sub>2</sub> S					
Applicable NSPS Subpart: J					
Reporting period dates: From <u>1/1/16</u> to <u>3/31/16</u>					
Date submitted: 4/30/16					
Company: Valero Refining - M	eraux LLC				
Address: 2500 East St. Bernard	d Highway, Meraux, LA 70075				
Emission Limitation: <u>Hydroge</u>	n Sulfide shall not exceed 162 pp	om on a 3-hour roll	ing average.		
Monitor Manufacturer and Mode	el No.: Ametek 4661				
Process Unit(s) Description: A	rea 6 Fuel Drum for Hydrocracke	r & Hydrotreater (	Charge Heaters (EPN 1-00, EQT 0009)		
CEM Sampling Location: Area	6 Fuel Drum				
CEM Span Value: Hydrogen S	ulfide, 300 ppm				
I. ACCURACY ASSESSMEN	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) 1/19/16 LL167084 2/24/14 EPA Protocol 1 77.2 77.5 0.5% <15%	H <sub>2</sub> S #2 (high scale) 1/19/16 LL167094 2/10/14 EPA Protocol 1 166.6 167.9 0.8% <15%		
II. CALIBRATION DRIFT AS	SSESSMENT				
A. Out-of Control Per	iods:				
1. Dates:	N/A				
2. Number of Da	ys <u>N/A</u>				
B. Corrective Actions	:N/A				
The contract of the contract o					

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

Pollutant: H	$I_2S$			
Applicable N	NSPS Subpart:J_			
Reporting pe	eriod dates: From <u> </u>	/1/16_to_3/31/16_		
Date submit	ted: 4/30/16			
Company:_\	Valero Refining - Mo	eraux LLC		
Address: 25	500 East St. Bernard	Highway, Meraux, LA 70075		
Emission Li	mitation: <u>Hydroge</u>	n Sulfide shall not exceed 162 pp	om on a 3-hour roll	ing average.
Monitor Mar	nufacturer and Mode	el No.: Ametek 4661		
Process Unit	(s) Description: Ar	ea 6 Fuel Drum for Boilers B-5 (	(EPN 2-00, EQT 0	030) and B-6 (EPN 3-00, EQT 0048)
CEM Sampl	ing Location: Area	6 Fuel Drum		
CEM Span V	/alue: <u>Hydrogen S</u> i	ulfide, 300 ppm		
I. ACCUR	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) 1/19/16 LL167084 2/24/14 EPA Protocol 1 77.2 77.1 0.1% <15%	H <sub>2</sub> S #2 (high scale) 1/19/16 LL167094 2/10/14 EPA Protocol 1 166.6 165.7 0.5% <15%
II. CALIBI	RATION DRIFT AS	SESSMENT		
Α.	Out-of Control Peri	iods:		
	1. Dates:	N/A		
	2. Number of Day	ys <u>N/A</u>		
B.	Corrective Actions:	N/A		

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

Pollutant:	$NO_x$
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Applicable NSPS Subpart: \_\_\_Db\_\_

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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)

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	1/21/16	1/21/16	1/21/16	1/21/16
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	<b>EPA Protocol 1</b>
Certified Audit Value	24.7 ppmv	55.1 ppmv	6.01 vol %	10.01 vol %
CEM Response Value	26.1 ppmv	56.2 ppmv	6.03 vol %	10.05 vol %
Accuracy	5.7%	2.0%	0.3%	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

Pollutant: NO <sub>x</sub>						
Applicable NSPS Subpart:Db						
Reporting period dates: From <u>1/1/16</u> to <u>3/31</u>	/16					
Date submitted: 4/30/16						
Company: Valero Refining - Meraux LLC						
Address: 2500 East St. Bernard Highway, Me	eraux, LA 70075					
Emission Limitation: <u>Nitrogen Oxide shall n</u>	not exceed 0.1 pour	d/MMBtu on a 30-	day rolling average	<u>.                                    </u>		
Monitor Manufacturer and Model No.: ABB	Limas11( NOx), M	lagnos27 (O <sub>2</sub> )				
Process Unit(s) Description: Boiler B-6 (EPN	N 3-00, EQT 0048)	_				
CEM Sampling Location: Boiler B-6						
CEM Span Value: Nitrogen Oxide 100 ppm,	Oxygen 25 %			*		
I. ACCURACY ASSESSMENT RESULTS	(CGA):					
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value CEM Response Value Accuracy Standard	NOx #1 (low scale) 1/21/16 LL165998 2/4/15 EPA Protocol 1 24.7 ppmv 24.7 ppmv 0.0% <15%	NOx #2 (high scale) 1/21/16 LL167083 2/14/14 EPA Protocol 1 55.1 ppmv 54.8 ppmv 0.5% <15%	O <sub>2</sub> #1 (low scale) 1/21/16 LL53418 1/28/14 EPA Protocol 1 6.01 vol % 6.04 vol % 0.5% <15%	O <sub>2</sub> #2 (high scale) 1/21/16 LL167062 1/28/14 EPA Protocol 1 10.01 vol % 10.06 vol % 0.5% <15%		
I. CALIBRATION DRIFT ASSESSMENT						
A. Out-of Control Periods:						
1. Dates: <u>N/A</u>						
2. Number of Days N/A						
B. Corrective Actions: N/A						

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

Pollutant: NO<sub>x</sub>

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

Reporting period dates: From 1/1/16 to 3/31/16

Date submitted: 4/30/16

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	1/20/16	1/20/16	1/20/16	1/20/16
Audit Gas Cylinder No.	LL170762	LL35027	LL53418	LL167062
Date of Audit Gas Cert.	2/7/14	2/11/14	1/28/14	1/28/14
Type of Certification	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1	EPA Protocol 1
Certified Audit Value	139.4 ppmv	277.5 ppmv	6.01 vol %	10.01 vol %
CEM Response Value	137.8 ppmv	270.3 ppmv	5.57 vol %	9.33 vol %
Accuracy	1.1%	2.6%	7.3%	6.8%
Standard	<15%	<15%	<15%	<15%

#### II. CALIBRATION DRIFT ASSESSMENT

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

1. Dates: 2/28/

2/28/16, 07:09 - 2/29/16, 7:09

- 2. Number of Days 1.0 (24 hours)
- B. Corrective Actions: The CEMS failed low on the high span calibration check on 2/29/16. Less than an hour later, Valero shut down this boiler due to a tube rupture that leaked steam into the firebox and exhaust stack. Valero believes that this excess steam interfered with the calibration check. The analyzer was check out and calibrated and the boiler was returned to service on 3/6/16. Subsequent calibration checks were satisfactory.

Pollutant: NO <sub>x</sub>					
Applicable 1	NSPS Subpart:Ja				
Reporting po	eriod dates: From <u>1/1/16</u> to <u>3/31</u>	/16			
Date submit	ted: 4/30/16				
Company:	Valero Refining - Meraux LLC				
Address: 25	500 East St. Bernard Highway, Me	eraux, LA 70075			
Emission Li	mitation: Nitrogen Oxide correc	ted to 0% O2 shall 1	not exceed 40 ppm	on a 30-day rolling	average
Monitor Ma	nufacturer and Model No.: Therr	no Environmental M	Model 42i (NOx)/(0	$O_2$ )	
Process Unit	t(s) Description: Benzene Recove	ry Unit Reboiler (E	PN 1-09, EQT 012	7)	
CEM Sampl	ing Location: Benzene Recovery	Unit Reboiler			
CEM Span V	Value: Nitrogen Oxide 100 ppm,	Oxygen 25 %			
I. ACCUF	RACY ASSESSMENT RESULTS	(CGA):			
	CGA Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value CEM Response Value Accuracy Standard	NOx #1 (low scale) 1/25/16 LL165998 2/4/15 EPA Protocol 1 24.7 ppmv 24.5 ppmv 0.8% <15%	NOx #2 (high scale) 1/25/16 LL167083 2/14/14 EPA Protocol 1 55.1 ppmv 53.7 ppmv 2.5% <15%	O <sub>2</sub> #1 (low scale) 1/25/16 LL53418 1/28/14 EPA Protocol 1 6.01 vol % 5.69 vol % 5.3% <15%	O <sub>2</sub> #2 (high scale) 1/25/16 LL167062 1/28/14 EPA Protocol 1 10.01 vol % 9.71 vol % 3.0% <15%
II. CALIBRATION DRIFT ASSESSMENT					
A.	A. Out-of Control Periods:				
	1. Dates: <u>N/A</u>				
	2. Number of Days N/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 1/1/16 to 3/31/16

Date submitted: 4/30/16

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)/(O2)

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

CEM Sampling Location: No.1 Crude Heater

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

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

	NOx #1	NOx #2	$O_2 #1$	O <sub>2</sub> #2
CGA	(low scale)	(high scale)	(low scale)	(high scale)
Date of Audit	1/19/16	1/19/16	1/19/16	1/19/16
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	23.1 ppmv	61.8 ppmv	5.93 vol %	9.50 vol %
Accuracy	6.5%	12.2%	1.3%	5.1%
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:

B. Corrective Actions: N/A

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

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

Pollutant: H2S	
Applicable NSPS Subpart:Ja	
Reporting period dates: From 1/1/16 to 3/31/16	
Date submitted: 4/30/16	
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	r rolling average.
Monitor Manufacturer and Model No.: Ametek 5100	
Process Unit(s) Description: North Flare Stack (EPN 20-72, EQT 0035), North	Flare Header
CEM Sampling Location: North Flare Stack, North Flare Header (Y-AT-801)	
CEM Span Value: H <sub>2</sub> S, 0-300 ppm	
Date of Audit Reference Method Average RM Value (ppmv) Average CEM Value (ppmv) Accuracy Limit  II. CALIBRATION DRIFT ASSESSMENT	H <sub>2</sub> S #1 2/11/16 EPA Method 11 2.39 ppmv 3.07 ppmv 2.47 % < 10 %
A. Out-of Control Periods:  1. Dates: N/A	
2. Number of Days N/A	
B. Corrective Actions: N/A	

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

Pollutant: H2S					
Applicable NSPS Subpart:Ja_	-				
Reporting period dates: From _1/1	1/16_to_3/31/16_				
Date submitted: 4/30/16					
Company: Valero Refining - Mer	aux LLC_				
Address: 2500 East St. Bernard F	lighway, Meraux, LA 70075				
Emission Limitation: <u>Hydrogen</u>	Sulfide shall not exceed 162 ppm on a 3-hou	r rolling average.			
Monitor Manufacturer and Model	No.: Ametek 5100				
Process Unit(s) Description: North	n Flare Stack (EPN 20-72, EQT 0035), Hydr	ocracker Flare Header			
CEM Sampling Location: North I	Flare Stack, Hydrocracker Flare Header (Y-	AT-800)			
CEM Span Value: H <sub>2</sub> S, 0-300 pp	om_				
I. ACCURACY ASSESSMENT	Date of Audit Reference Method Average RM Value (ppmv) Average CEM Value (ppmv) Accuracy Limit	H <sub>2</sub> S #1 2/11/16 EPA Method 11 2.36 ppmv 2.32 ppmv 0.54 % < 10 %			
II. CALIBRATION DRIFT ASSESSMENT					
A. Out-of Control Perio	ds:				
1. Dates:	N/A				
2. Number of Days	N/A				

B. Corrective Actions: N/A

Pollutant: H2S		
Applicable NSPS Subpart:Ja		
Reporting period dates: From 1/1/16 to 3/31/16		
Date submitted: 4/30/16		
Company: Valero Refining - Meraux LLC		
Address: 2500 East St. Bernard Highway, Meraux, LA 70075		
Emission Limitation: Hydrogen Sulfide shall not exceed 162 ppm of	on a 3-hour rolling ave	erage.
Monitor Manufacturer and Model No.: Ametek 5100		
Process Unit(s) Description: South Flare Stack (EPN 3-77, EQT 004	49)	
CEM Sampling Location: South Flare Stack (Y-AT-802)		
CEM Span Value: H <sub>2</sub> S, 0-300 ppm		
I. ACCURACY ASSESSMENT RESULTS (RATA):	H <sub>2</sub> S #1	H <sub>2</sub> S #@
Date of Audit	2/10/16	4/5/16
Reference Method Average RM Value (ppmv)	EPA Method 11 6.49 ppmv	EPA Method 11 21.13 ppmv
Average CEM Value (ppmv)	24.28 ppmv	19.41 ppmv
Accuracy	14.62 %1	2.15 %1
Limit	< 10 %	< 10 %
II. CALIBRATION DRIFT ASSESSMENT		
A. Out-of Control Periods:		
1. Dates: <u>N/A</u>		
2. Number of DaysN/A		
B. Corrective Actions: N/A		
Analyzer failed the initial RATA for certification due to a bad conn	ection to the sample s	ystem. Valero performed the RATA agair
on 4/5/16 and the analyzer passed.		

<sup>50</sup> 

Pollutant: Total Sulfur					
Applicable NSPS Subpart: <u>Ja</u>	(Required by Consent Decree:	3:10-cv-00563-bb	c, Paragraph 49.a.ii)		
Reporting period dates: From _1/	1/16_to_3/31/16_				
Date submitted: 4/30/16					
Company: Valero Refining - Me	raux LLC				
Address: 2500 East St. Bernard I	Highway, Meraux, LA 70075				
Emission Limitation: None					
Monitor Manufacturer and Model	No.: Thermo Scientific SOLA	II			
Process Unit(s) Description: Nort	h Flare Stack (EPN 20-72, EQT	0035), North Flare	e Header		
CEM Sampling Location: North					
CEM Span Value: Total Sulfur,	Dual Range: 0-10,000 ppm, 10,0	00-1,000,000 ppm	_		
I. ACCURACY ASSESSMEN	T RESULTS (CGA):				
<sup>1</sup> Valero unable	Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard to obtain EPA Protocol 1 certifie	H <sub>2</sub> S #1 (low scale) 1/25/16 LL54215 2/11/13 EPA Protocol 1 1021.0 1041.7 2.0% <15% d gases greater tha	H <sub>2</sub> S #2 (high scale) 1/25/16 CC409041 11/24/15 Certified Gas 10020.0 10065.7 0.5% <15% n 1000 ppm.		
II. CALIBRATION DRIFT ASS	SESSMENT				
<ul><li>A. Out-of Control Perio</li><li>1. Dates:</li><li>2. Number of Days</li></ul>	N/A				
B. Corrective Actions:	,				

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

Pollutant: Total Sulfur						
Applicable NSPS Subpart: <u>Ja</u> (Required by Consent Decree:	3:10-cv-00563-bb	c, Paragraph 49.a.ii)				
Reporting period dates: From 1/1/16 to 3/31/16						
Date submitted: 4/30/16						
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), Hydrocrack	ter Flare Header				
CEM Sampling Location: North Flare Stack, Hydrocracker Flare	•					
CEM Span Value: Total Sulfur, Dual Range: 0-10,000 ppm, 10,0	mqq 000,000,1-00					
I. ACCURACY ASSESSMENT RESULTS (CGA):	W G #1					
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) 1/25/16 LL54215 2/11/13 EPA Protocol 1 1021.0 1044.0 2.3% <15%	H <sub>2</sub> S #2 (high scale) 1/25/16 CC409041 11/24/15 Certified Gas 10020.0 10254.3 2.3% <15%				
<sup>1</sup> Valero unable to obtain EPA Protocol 1 certifie	d gases greater tha	n 1000 ppm.				
II. 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:(Required by Consent Decree	3:10-cv-00563-bb	c, Paragraph 49.a.ii)				
Reporting period dates: From <u>1/1/16</u> to <u>3/31/16</u>						
Date submitted: 4/30/16						
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: South Flare Stack (EPN 3-77, EQT						
CEM Sampling Location: South Flare Stack (Y-AT-304)	•					
CEM Span Value: Total Sulfur, Dual Range: 0-10,000 ppm, 10,	mgg 000,000,1-000					
		_				
I. ACCURACY ASSESSMENT RESULTS (CGA):						
Date of Audit Audit Gas Cylinder No. Date of Audit Gas Cert. Type of Certification Certified Audit Value (ppmv) CEM Response Value (ppmv) Accuracy Standard  1 Valero unable to obtain EPA Protocol 1 certified	H <sub>2</sub> S #1 (low scale) 1/25/16 LL54215 2/11/13 EPA Protocol 1 1021.0 1057.0 3.5% <15% ed gases greater tha	H <sub>2</sub> S #2 (high scale) 1/25/16 CC409041 11/24/15 Certified Gas 10020.0 10087.3 0.7% <15% n 1000 ppm.				
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						

Subpart Ja Root Cause / Co	rrective Action Analysis	Impact Incident Numb	er: 162062
The information contained below s	atisfies the requirements of the NSPS Subpart J	a 60.108a(c)(6).	
Source Information: Refinery: Incident Type: Emissions Source(s):	Valero (Meraux) Flaring North Flare (EPN 20-72, EQT 0035) South Flare (EPN 3-77, EQT 0049)	Date of Eve	
(1.) A description of the Discharge: The North Flare exceeded the NSPS	Ia standard for 24-hour flow (>500,000 scf) due	e to a malfunction of the Platformer	(60.108a(c)(6)(i)) Net Gas Compressor.
Date an	AND THE RESERVE THE PARTY OF TH	(60.108a(c)(6)( /22/15 1:00 22/15 16:03 15.0 hrs	ii)) and (60.108a(c)(6)(ix))
The loss of the compressor resulted venting to the flare header. Opera	on and/or quantity of SO <sub>2</sub> emissions associated in a high volume of hydrogen venting to the Notions and Maintenance made several attempts anel to troubleshoot and repair. The compresso	orth Flare. There was no change in t to re-start the compressor. Valero c	
(4.) Necessity of RC/CAA: Determine a	nd state whether a RC/CAA is necessary based o	on the startup of a unit.	(60.108a(c)(6)(xi))
Did the discharge result from a pla Was the flare management plan fo Is the event exempt from an RC/CC - If yes, skip section 8-10.	llowed?	No Yes No	(Yes/No) (Yes/No) (Yes/No)
Did this discharge result from root The motor vibration probes on the	etail the Root Cause(s) of the Incident, to the excauses identified in a previous analysis? inboard side of the compressor motor were faul ry low compared to the vibration probes on the	No lty. A contributing factor was that th	(60.108a(c)(6)(ix))  (Yes/No)  te trip set points on the
ls corrective action required? (1) Change the alarm and trip set p (2) Revise OPS-P-ST-017 ("Startup o	a description of the recommended corrective a  Yes (Yes/No)  oints on the Net Gas Compressor motor vibratio  f Net Gas Compressor") procedure to provide ac  up to dissipate magnetism from the NGC shaft.	on probes.	
completed, provide a schedule for (1) Change the alarm and trip set p (2) Revise OPS-P-ST-017 ("Startup o (Completed 1/5/16).	e corrective actions already completed within the implementation, including proposed commence oints on the Net Gas Compressor motor vibration of Net Gas Compressor") procedure to provide act of the Net Gas Compressor of	ement and completion dates. on probes. (Completed on 1/10/16) dditional guidance on restarting the	NGC after a trip.

(8.)
The measured or calculated cumulative quantity of gas discharged over the discharge duration.
Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
	_	SCF	ppmv	lbs	lbs as H2S
11/21/15 1:00	11/22/2015 0:00	28357	2372	12.4	0.1
11/21/15 2:00	11/22/2015 1:00	665882	2257	15.2	0.1
11/21/15 3:00	11/22/2015 2:00	845154	2144	14.6	0.1
11/21/15 4:00	11/22/2015 3:00	901857	2036	14.1	0.1
11/21/15 5:00	11/22/2015 4:00	1013883	1929	13.8	0.1
11/21/15 6:00	11/22/2015 5:00	1031705	1831	12.6	0.1
11/21/15 7:00	11/22/2015 6:00	1154601	1717	12.1	0.1
11/21/15 8:00	11/22/2015 7:00	1281310	1619	13.9	0.1
11/21/15 9:00	11/22/2015 8:00	1365585	1517	15.3	0.1
11/21/15 10:00	11/22/2015 9:00	1427309	1414	16.2	0.1
11/21/15 11:00	11/22/2015 10:00	1489480	1310	17.9	0.1
11/21/15 12:00	11/22/2015 11:00	1552692	1207	19.1	0.1
11/21/15 13:00	11/22/2015 12:00	1611288	1103	20.3	0.1
11/21/15 14:00	11/22/2015 13:00	1668921	993	21.0	0.1
11/21/15 15:00	11/22/2015 14:00	1691389	899	21.1	0.1
11/21/15 16:00	11/22/2015 15:00	1692640	798	21.0	0.1
11/21/15 17:00	11/22/2015 16:00	1692793	806	21.0	0.1
11/21/15 18:00	11/22/2015 17:00	1692242	707	20.8	0.1
11/21/15 19:00	11/22/2015 18:00	1691884	609	20.6	0.1
11/21/15 20:00	11/22/2015 19:00	1691889	548	20.6	0.1
11/21/15 21:00	11/22/2015 20:00	1691586	454	20.5	0.1
11/21/15 22:00	11/22/2015 21:00	1691670	405	20.5	0.1
11/21/15 23:00	11/22/2015 22:00	1691670	322	20.5	0.1
11/22/15 0:00	11/22/2015 23:00	1691681	275	20.5	0.1
11/22/15 1:00	11/23/2015 0:00	1691608	229	20.5	0.1
11/22/15 2:00	11/23/2015 1:00	1051491	264	16.4	0.1
11/22/15 3:00	11/23/2015 2:00	869491	300	15.7	0.1
11/22/15 4:00	11/23/2015 3:00	809859	333	14.9	0.1
11/22/15 5:00	11/23/2015 4:00	693462	368	13.1	0.1
11/22/15 6:00	11/23/2015 5:00	670981	396	12.2	0.1
11/22/15 7:00	11/23/2015 6:00	544989	438	11.2	0.1
11/22/15 8:00	11/23/2015 7:00	419226	471	9.0	0.1

Subpart Ja Root Cause /	Corrective Action Analysis		Impact Incident Number:	162482
The information contained belo	ow satisfies the requirements of the NSF	PS Subpart Ja 60.108	a(c)(6).	
Source Information: Refinery:	Valero (Meraux)			
Incident Type:	Flaring		Date of Event:	12/3/2015
Emissions Source(s):	North Flare (EPN 20-72, EQT	0035)	Date Analysis Completed:	1/8/2016
	South Flare (EPN 3-77, EQT 0		-	2,0,2020
(1.)				(60.108a(c)(6)(i)
A description of the Discharge:				(00.1000(c)(0)(1)
	he Flare Gas Recovery Unit's compresso	rs were switched froi	m Y-C-002 to Y-C-001 due to I	low differential
pressure on the injection oil sys	tem for the Y-C-002 compressor. At app	roximately 18:53, the	e Y-C-001 compressor experie	enced a system-
initiated unplanned shutdown	due to low suction pressure. Valero was	unable to restart Y-	C-002 due to the failure of th	e injection oil numn
to provide enough pressure to	give the start permissive for the compre	ssor. Valero re-starte	ed compressor Y-C-001 sever	d times but it
automatically shutdown shortly			a compressor r c dol severe	ii tiiiies, but it
	•			
(2.)			(60 108a(c)(6)(ii)) ar	nd (60.108a(c)(6)(ix))
	ne the discharge was first identified	12/3/15 18:20	(00.100a(c)(0)(11)) at	id (60.106a(c)(6)(ix))
	ate/Time the discharge had ceased	12/4/15 17:50	•	
	Duration of Discharge (Calculated)	23.5	•	
		23.3	.'''3	
	both FGRU compressors and re-started t	he FGRU was soon a	s was practicable.	
(4.)				(60.108a(c)(6)(xi))
Necessity of RC/CAA: Determin Note: If the discharge was a resu was followed.	ne and state whether a RC/CAA is necess fult of a planned startup or shutdown, a Ri	sary: C/CAA analysis is not	required if the flare manager	ment plan
Did the discharge result from a	planned startup or shutdown?		No (	Yes/No)
Was the flare management plar				Yes/No/N/A)
Is the event exempt from a RC/	CCA based on the answers above?			Yes/No)
- If yes, skip section 5-8.			,	, , , , ,
(5.)				(60.108a(c)(6)(ix))
Root Cause Analysis: Describe i	n detail the Root Cause(s) of the Incider	nt, to the extent dete	erminable:	(00.2004(0)(0)(,))
	oot causes identified in a previous analy			Yes/No)
	Y-C-002, was shutdown after Valero rec			
Valero inspected the injection of	il system and found that the suction stro . Valero also inspected the flare gas suc	iner to the injection	oil pump was fouled. This st	rainer was cleaned
was heavily fouled with rust sca	le and dirt, even though the upstream a	lunley strainer which	h has a finer mesh was found	d to be clean with
no evidence of debris contained	in / on the screen. Valero determined	that this material the	at nlugged the inlet screen w	as due to using
Mississippi River water as the hy	ydro test fluid prior to commissioning th	e FGRU in Novembei	r 2015.	us due to using
Post Causalsh				
Root Cause(s):	the budge test of this window significant			
	the hydro-test of this piping circuit was			
	verify that piping is flushed post hydro-			
	the inlet to Y-C-001 became fouled, and	tnere was no indicat	ion that it was fouling.	1
l) Injection oil strainer, Y-M-017	, joi 1-C-uuz was joulea.			
				1

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

Corrective Action Analysis: Include a description of the recommended corrective action(s) or an explanation of why corrective action is

Is corrective action required?

Yes

(Yes/No)

1) Compare existing refinery hydro-test procedure with the DEP's and API 686, and determine if changes are needed that pertain to flushing and cleaning of piping post-hydro-test.

2) Add a delta-pressure calculation indicator across each compressor's inlet screen to the DCS.

(60.108a(c)(6)(x))

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

1) Compare existing refinery hydro-test procedure with the DEP's and API 686, and determine if changes are needed that pertain to flushing and cleaning of piping post-hydro-test.

Commencement Date: 1/8/16
Estimated Completion Date: 1/31/16

2) Add a delta-pressure calculation indicator across each compressor's inlet screen to the DCS .

Completed: 1/11/16

(8.)

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
12/2/2015 18:00	12/3/2015 17:00	1041	523	11.3	0.0
12/2/2015 19:00	12/3/2015 18:00	17613	564	15.7	0.1
12/2/2015 20:00	12/3/2015 19:00	54879	620	20.2	0.1
12/2/2015 21:00	12/3/2015 20:00	90899	650	23.4	0.1
12/2/2015 22:00	12/3/2015 21:00	127311	682	27.5	0.1
12/2/2015 23:00	12/3/2015 22:00	155796	710	32.2	0.1
12/3/2015 0:00	12/3/2015 23:00	192807	739	36.4	0.2
12/3/2015 1:00	12/4/2015 0:00	228015	772	41.5	0.2
12/3/2015 2:00	12/4/2015 1:00	261658	803	47.2	0.2
12/3/2015 3:00	12/4/2015 2:00	294941	842	52.6	0.3
12/3/2015 4:00	12/4/2015 3:00	326283	889	58.7	0.3
12/3/2015 5:00	12/4/2015 4:00	357908	932	65.2	0.3
12/3/2015 6:00	12/4/2015 5:00	392758	976	71.8	0.4
12/3/2015 7:00	12/4/2015 6:00	427699	927	76.0	0.4
12/3/2015 8:00	12/4/2015 7:00	463715	853	80.1	0.4
12/3/2015 9:00	12/4/2015 8:00	506632	877	89.2	0.4
12/3/2015 10:00	12/4/2015 9:00	543160	906	96.6	0.5
12/3/2015 11:00	12/4/2015 10:00	629348	932	102.5	0.5
12/3/2015 12:00	12/4/2015 11:00	660392	993	106.0	0.6
12/3/2015 13:00	12/4/2015 12:00	693598	943	109.6	0.6
12/3/2015 14:00	12/4/2015 13:00	721267	975	115.9	0.6
12/3/2015 15:00	12/4/2015 14:00	752984	907	121.7	0.6
12/3/2015 16:00	12/4/2015 15:00	788983	849	123.9	0.7
12/3/2015 17:00	12/4/2015 16:00	821686	893	121.3	0.7
12/3/2015 18:00	12/4/2015 17:00	831927	939	113.0	0.7
12/3/2015 19:00	12/4/2015 18:00	815355	898	108.7	0.6
12/3/2015 20:00	12/4/2015 19:00	778089	950	104.2	0.6
12/3/2015 21:00	12/4/2015 20:00	742069	920	101.0	0.6
12/3/2015 22:00	12/4/2015 21:00	705657	889	96.8	0.5
12/3/2015 23:00	12/4/2015 22:00	677172	860	92.1	0.5
12/4/2015 0:00	12/4/2015 23:00	640161	832	88.0	0.5
12/4/2015 1:00	12/5/2015 0:00	604953	798	82.9	0.5
12/4/2015 2:00	12/5/2015 1:00	571310	855	77.1	0.4

#### (8.)

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
12/4/2015 3:00	12/5/2015 2:00	538027	816	71.7	0.4
12/4/2015 4:00	12/5/2015 3:00	506684	770	65.7	0.4
12/4/2015 5:00	12/5/2015 4:00	475059	727	59.1	0.4

	Corrective Action Analysis	Impact Incident Number:	N/A
The information contained belo	ow satisfies the requirements of the NSPS Subpart Jo	ı 60.108a(c)(6).	
Source Information:			
Refinery:	Valero (Meraux)		
Incident Type:	Flaring	Data of Frank	42/44/2045
Emissions Source(s):		Date of Event:	12/11/2015
Emissions source(s).	North Flare (EPN 20-72, EQT 0035)	Date Analysis Completed:	N/A
(1.)			(60.108a(c)(6)(
A description of the Discharge: Valero conducted a planned sh followed by a planned start up.	utdown the Benezene Recovery Unit (BRU) and purg	ed the Reactor with hot nitrogen to r	eactivate the catalyst,
(2.)		(60.108a(c)(6)(ii	)) and (60.108a(c)(6)(ix
Date and Tin	ne the discharge was first identified 12/11/2	15 22:25	
		15 19:35	
	Duration of Discharge (Calculated)	<b>69.2</b> hrs	
(3.)			(60.108a(c)(6)(viii
The steps taken to limit the em	issions during the discharge.		(00.108a(c)(0)(viii
flare while the remaining refine (4.)	ry units venteu to the FGRO.		
			(60 108a(c)(6)(vi)
	ne and state whether a RC/CAA is necessary: ult of a planned startup or shutdown, a RC/CAA analy	sis is not required if the flare manager	(60.108a(c)(6)(xi)
Note: If the discharge was a resu was followed.	ult of a planned startup or shutdown, a RC/CAA analy		nent plan
Note: If the discharge was a result was followed.  Did the discharge result from a	ult of a planned startup or shutdown, a RC/CAA analy planned startup or shutdown?	Yes(	nent plan Yes/No)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plan	ult of a planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed?	Yes (	nent plan Yes/No) Yes/No/N/A)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plan	ult of a planned startup or shutdown, a RC/CAA analy planned startup or shutdown?	Yes (	nent plan Yes/No)
Note: If the discharge was a resu was followed.  Did the discharge result from a Was the flare management plan Is the event exempt from a RC/	ult of a planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed?	Yes (	nent plan Yes/No) Yes/No/N/A)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plat is the event exempt from a RC/- If yes, skip section 5-8.	ult of a planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed?	Yes Yes (	nent plan Yes/No) Yes/No/N/A) Yes/No)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plat is the event exempt from a RC/- If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in the section of the s	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above?	Yes ( Yes ( Yes ( Yes ( Yes ( Yes (  Yes ( Yes	nent plan Yes/No) Yes/No/N/A) Yes/No) (60.108a(c)(6)(ix)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plated is the event exempt from a RC/	ult of a planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above?	Yes ( Yes ( Yes ( Yes ( Yes ( Yes (  Yes ( Yes	nent plan Yes/No) Yes/No/N/A) Yes/No)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plai is the event exempt from a RC/- If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from ren/A	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above?	Yes ( Yes ( Yes ( Yes ( Yes ( Yes (  Yes ( Yes	ment plan  Yes/No)  Yes/No/N/A)  Yes/No)  (60.108a(c)(6)(ix)  Yes/No)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plant is the event exempt from a RC/- If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from ren/A	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above? in detail the Root Cause(s) of the Incident, to the extent causes identified in a previous analysis?	Yes (Yes Yes (Yes Yes (Yes (Yes (Yes (Ye	rent plan Yes/No) Yes/No/N/A) Yes/No) (60.108a(c)(6)(ix) Yes/No) (60.108a(c)(6)(ix)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plai is the event exempt from a RC/- If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from row/A  (6.)  Corrective Action Analysis: Incl	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above? in detail the Root Cause(s) of the Incident, to the extent causes identified in a previous analysis?	Yes (Yes Yes (Yes Yes (Yes (Yes (Yes (Ye	rent plan Yes/No) Yes/No/N/A) Yes/No) (60.108a(c)(6)(ix) Yes/No) (60.108a(c)(6)(ix)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plai is the event exempt from a RC/- If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from ren/A  (6.)  Corrective Action Analysis: Include its corrective action required?	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above? in detail the Root Cause(s) of the Incident, to the extent causes identified in a previous analysis?	Yes (Yes Yes (Yes Yes (Yes (Yes (Yes (Ye	rent plan Yes/No) Yes/No/N/A) Yes/No) (60.108a(c)(6)(ix) Yes/No) (60.108a(c)(6)(ix)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plais the event exempt from a RC/ - If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from result.	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above? in detail the Root Cause(s) of the Incident, to the extent causes identified in a previous analysis?	Yes (Yes Yes (Yes Yes (Yes (Yes (Yes (Ye	rent plan Yes/No) Yes/No/N/A) Yes/No) (60.108a(c)(6)(ix) Yes/No) (60.108a(c)(6)(ix)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plais the event exempt from a RC/ - If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from result.  (6.)  Corrective Action Analysis: Includes corrective action required?  N/A	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above? in detail the Root Cause(s) of the Incident, to the extent causes identified in a previous analysis?	Yes (Yes Yes (Yes Yes (Yes (Yes (Yes (Ye	rent plan Yes/No) Yes/No/N/A) Yes/No) (60.108a(c)(6)(ix) Yes/No) (60.108a(c)(6)(ix)
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plais the event exempt from a RC/ - If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from result from result from result from results and the second corrective Action Analysis: Includes corrective action required?  N/A  (7.)	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? In followed? In detail the Root Cause(s) of the Incident, to the extended causes identified in a previous analysis?  The provious analysis?  The provious analysis?	Yes Yes Yes Yes  Tent determinable: No  Ction(s) or an explanation of why core	Yes/No) Yes/No/N/A) Yes/No)  (60.108a(c)(6)(ix) Yes/No)  (60.108a(c)(6)(ix) rective action is not
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plais the event exempt from a RC/ - If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from result from result from result from results and the second corrective Action Analysis: Includes corrective action required?  N/A  (7.)	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? n followed? CCA based on the answers above? in detail the Root Cause(s) of the Incident, to the extent causes identified in a previous analysis?	Yes Yes Yes Yes  Tent determinable: No  Ction(s) or an explanation of why core	Yes/No) Yes/No/N/A) Yes/No)  (60.108a(c)(6)(ix) Yes/No)  (60.108a(c)(6)(ix) rective action is not
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plais the event exempt from a RC/ - If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from resul	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? In followed? In detail the Root Cause(s) of the Incident, to the extended causes identified in a previous analysis?  The provious analysis?  The provious analysis?	Yes Yes Yes Yes  tent determinable: No  ction(s) or an explanation of why core	Yes/No) Yes/No/N/A) Yes/No)  (60.108a(c)(6)(ix) Yes/No)  (60.108a(c)(6)(ix) rective action is not
Note: If the discharge was a result was followed.  Did the discharge result from a Was the flare management plais the event exempt from a RC/ - If yes, skip section 5-8.  (5.)  Root Cause Analysis: Describe in Did this discharge result from resul	planned startup or shutdown, a RC/CAA analy planned startup or shutdown? In followed? CCA based on the answers above?  In detail the Root Cause(s) of the Incident, to the extended control causes identified in a previous analysis?  The provious analysis?  The provious analysis?  The provious analysis?	Yes Yes Yes Yes  tent determinable: No  ction(s) or an explanation of why core	Yes/No) Yes/No/N/A) Yes/No)  (60.108a(c)(6)(ix) Yes/No)  (60.108a(c)(6)(ix) Yes/No  (60.108a(c)(6)(ix)

(8.

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr	last hour of 24 b-	24-hr cumulative	TRS or H2S ppm	ATT 100 220	24-hr cumulative
Period	Last hour of 24-hr Period	volume of flared gas above Baseline	(24-hr average, flow- weighted)	24-hr cumulative SO2	reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
12/10/15 22:00	12/11/15 21:00	0	0	0.2	0.0
12/10/15 23:00	12/11/15 22:00	7,231	3	0.4	0.0
12/11/15 0:00	12/11/15 23:00	21,800	5	0.5	0.0
12/11/15 1:00	12/12/15 0:00	90,872	6	0.6	0.0
12/11/15 2:00	12/12/15 1:00	217,991	6	0.8	0.0
12/11/15 3:00	12/12/15 2:00	345,109	6	1.2	0.0
12/11/15 4:00	12/12/15 3:00	472,226	6	1.5	0.0
12/11/15 5:00	12/12/15 4:00	599,343	7	1.7	0.0
12/11/15 6:00	12/12/15 5:00	726,461	8	1.8	0.0
12/11/15 7:00	12/12/15 6:00	853,579	8	1.9	0.0
12/11/15 8:00	12/12/15 7:00	980,697	9	2.1	0.0
12/11/15 9:00	12/12/15 8:00	1,107,815	9	2.2	0.0
12/11/15 10:00	12/12/15 9:00	1,234,932	9	2.3	0.0
12/11/15 11:00	12/12/15 10:00	1,362,049	9	2.4	0.0
12/11/15 12:00	12/12/15 11:00	1,489,165	9	2.5	0.0
12/11/15 13:00	12/12/15 12:00	1,616,281	10	2.6	0.0
12/11/15 14:00	12/12/15 13:00	1,743,398	10	2.8	0.0
12/11/15 15:00	12/12/15 14:00	1,870,514	10	2.9	0.0
12/11/15 16:00	12/12/15 15:00	1,997,630	10	3.1	0.0
12/11/15 17:00	12/12/15 16:00	2,124,745	11	3.2	0.0
12/11/15 18:00	12/12/15 17:00	2,251,861	11	3.3	0.0
12/11/15 19:00	12/12/15 18:00	2,378,977	11	3.4	0.0
12/11/15 20:00	12/12/15 19:00	2,506,094	11	3.5	0.0
12/11/15 21:00	12/12/15 20:00	2,633,211	12	3.5	0.0
12/11/15 22:00	12/12/15 21:00	2,760,328	12	3.5	0.0
12/11/15 23:00	12/12/15 22:00	2,880,213	9	3.5	0.0
12/12/15 0:00	12/12/15 23:00	2,992,761	7	3.5	0.0
12/12/15 1:00	12/13/15 0:00	3,050,804	7	3.5	0.0
12/12/15 2:00	12/13/15 1:00	3,050,802	7	3.4	0.0
12/12/15 3:00	12/13/15 2:00	3,050,801	7	3.3	0.0
12/12/15 4:00	12/13/15 3:00	3,050,800	7	3.2	0.0
12/12/15 5:00	12/13/15 4:00	3,050,799	7	3.2	0.0
12/12/15 6:00	12/13/15 5:00	3,050,798	6	3.2	0.0
12/12/15 7:00	12/13/15 6:00	3,050,796	6	3.2	0.0
12/12/15 8:00	12/13/15 7:00	3,050,794	6	3.2	0.0
12/12/15 9:00	12/13/15 8:00	3,050,792	6	3.2	0.0
12/12/15 10:00	12/13/15 9:00	3,050,790	6	3.2	0.0
12/12/15 11:00	12/13/15 10:00	3,050,787	6	3.2	0.0
12/12/15 12:00	12/13/15 11:00	3,050,784	6	3.2	0.0
12/12/15 13:00	12/13/15 12:00	3,050,782	6	3.2	0.0
12/12/15 14:00	12/13/15 13:00	3,050,780	6	3.2	0.0
12/12/15 15:00	12/13/15 14:00	3,050,779	6	3.2	0.0
12/12/15 16:00	12/13/15 15:00	3,050,777	6	3.1	0.0
12/12/15 17:00	12/13/15 16:00	3,050,775	6	3.1	0.0
12/12/15 18:00	12/13/15 17:00	3,050,773	6	3.0	0.0
12/12/15 19:00	12/13/15 18:00	3,050,771	6	3.0	0.0
12/12/15 20:00	12/13/15 19:00	3,050,768	6	3.0	
12/12/15 21:00	12/13/15 19:00	3,050,765	6	2.9	0.0
12/12/15 22:00	12/13/15 21:00	3,050,762	6	2.9	0.0
12/12/15 23:00	12/13/15 22:00	3,049,895	6		0.0
12/13/15 0:00	12/13/15 23:00	3,049,892		2.9	0.0
12/13/15 1:00	12/14/15 0:00	3,049,888	6	2.9	0.0

(8.)
The measured or calculated cumulative quantity of gas discharged over the discharge duration.
Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
12/13/15 2:00	12/14/15 1:00	3,049,883	6	2.8	0.0
12/13/15 3:00	12/14/15 2:00	3,049,877	6	2.8	0.0
12/13/15 4:00	12/14/15 3:00	3,049,871	6	2.8	0.0
12/13/15 5:00	12/14/15 4:00	3,049,864	6	2.7	0.0
12/13/15 6:00	12/14/15 5:00	3,049,856	6	2.7	0.0
12/13/15 7:00	12/14/15 6:00	3,049,847	5	2.7	0.0
12/13/15 8:00	12/14/15 7:00	3,049,836	5	2.7	0.0
12/13/15 9:00	12/14/15 8:00	3,041,218	5	2.7	0.0
12/13/15 10:00	12/14/15 9:00	2,962,407	6	2.8	0.0
12/13/15 11:00	12/14/15 10:00	2,879,217	6	2.7	0.0
12/13/15 12:00	12/14/15 11:00	2,789,714	7	2.7	0.0
12/13/15 13:00	12/14/15 12:00	2,677,072	8	2.7	0.0
12/13/15 14:00	12/14/15 13:00	2,563,498	10	2.7	0.0
12/13/15 15:00	12/14/15 14:00	2,449,606	12	2.7	0.0
12/13/15 16:00	12/14/15 15:00	2,335,304	14	2.7	0.0
12/13/15 17:00	12/14/15 16:00	2,225,227	15	2.7	0.0
12/13/15 18:00	12/14/15 17:00	2,113,187	17	2.7	0.0
12/13/15 19:00	12/14/15 18:00	1,999,917	18	2.6	0.0
12/13/15 20:00	12/14/15 19:00	1,881,223	20	2.5	0.0
12/13/15 21:00	12/14/15 20:00	1,754,109	20	2.5	0.0
12/13/15 22:00	12/14/15 21:00	1,626,996	20	2.3	0.0
12/13/15 23:00	12/14/15 22:00	1,500,746	19	2.2	0.0
12/14/15 0:00	12/14/15 23:00	1,373,633	19	2.2	0.0
12/14/15 1:00	12/15/15 0:00	1,246,521	19	2.1	0.0
12/14/15 2:00	12/15/15 1:00	1,119,409	19	2.0	0.0
12/14/15 3:00	12/15/15 2:00	992,298	19	1.7	0.0
12/14/15 4:00	12/15/15 3:00	865,188	19	1.5	0.0
12/14/15 5:00	12/15/15 4:00	738,078	18	1.4	0.0
12/14/15 6:00	12/15/15 5:00	610,970	18	1.3	0.0
12/14/15 7:00	12/15/15 6:00	483,863	17	1.2	0.0
12/14/15 8:00	12/15/15 7:00	356,758	17	1.1	0.0

Subpart Ja Root Cause / Corrective Action Analysis		Impact Incident Number: N/A		
The information contained below satisfie	es the requirements of the NSPS Subpar	t Ja 60.108a(c)(6).		
Source Information:	V-1 (**)			
Refinery:	Valero (Meraux)	Time of Supplies 19		
Incident Type:	Flaring	Date of Event:	2/25/2016	
Emissions Source(s):	South Flare (EPN 3-77, EQT 0049)	Date Analysis Completed:	N/A	
(1.)			(60.108a(c)(6)(i))	
A description of the Discharge: The Middle Distaillate Hydrotreater was	nulse nurged with H2 prior to start up			
The Made Distallate Hydrotreater was	puise purgeu with H2 phor to start up.			
(2.)		(60.108a(c)(6)(ii)) a	nd (60.108a(c)(6)(ix))	
and Time the discharge was first identified	2/25/16 17:28			
Date/Time the discharge had ceased				
Duration of Discharge (Calculated)	hrs			
(3.)			(60.108a(c)(6)(viii))	
The steps taken to limit the emissions du	ring the discharge:			
Valero followed its Flare Minimization Pl	an and Operations Procedures to minin	nize the volume of this discharge.		
(4.)			(60.108a(c)(6)(xi))	
<b>Necessity of RC/CAA: Determine and sta</b> Note: If the discharge was a result of a pla was followed.	te whether a RC/CAA is necessary: nned startup or shutdown, a RC/CAA an	alysis is not required if the flare manage	ment plan	
Did the discharge result from a planned s	tartup or shutdown?	Yes	(Yes/No)	
Was the flare management plan followed	N.T.		(Yes/No/N/A)	
Is the event exempt from a RC/CCA based			(Yes/No)	
- If yes, skip section 5-7.			(163/140)	
(5.) Root Cause Analysis: Describe in detail tl	no Poot Course(s) of the Incident to the	autant data main abla	(60.108a(c)(6)(ix))	
Did this discharge result from root causes			()//>	
N/A	identified iff a previous analysis?	No	(Yes/No)	
(6.)			(60.108a(c)(6)(ix))	
Corrective Action Analysis: Include a des		e action(s) or an explanation of why co	rrective action is	
Is corrective action required?  N/A	No (Yes/No)			
(7.)			(60.108a(c)(6)(x))	
Corrective Action Schedule: Include corre			ge. For those not	
completed, provide a schedule for impler	nentation, including proposed comme	ncement and completion dates.		
N/A				

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

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
2/24/2016 17:00	2/25/2016 16:00	1083	55	1.4	0.0
2/24/2016 18:00	2/25/2016 17:00	7873	67	1.9	0.0
2/24/2016 19:00	2/25/2016 18:00	34938	77	2.1	0.0
2/24/2016 20:00	2/25/2016 19:00	57030	82	9.1	0.0
2/24/2016 21:00	2/25/2016 20:00	66816	87	12.0	0.0
2/24/2016 22:00	2/25/2016 21:00	172647	104	12.4	0.1
2/24/2016 23:00	2/25/2016 22:00	222543	119	14.7	0.1
2/25/2016 0:00	2/25/2016 23:00	231928	128	18.6	0.1
2/25/2016 1:00	2/26/2016 0:00	281060	140	20.1	0.1
2/25/2016 2:00	2/26/2016 1:00	373134	150	20.7	0.1
2/25/2016 3:00	2/26/2016 2:00	414956	160	24.2	0.1
2/25/2016 4:00	2/26/2016 3:00	451091	164	26.7	0.1
2/25/2016 5:00	2/26/2016 4:00	563076	172	28.0	0.1
2/25/2016 6:00	2/26/2016 5:00	635949	180	29.8	0.2
2/25/2016 7:00	2/26/2016 6:00	669220	190	31.1	0.2
2/25/2016 8:00	2/26/2016 7:00	720440	199	31.5	0.2
2/25/2016 9:00	2/26/2016 8:00	763900	206	33.6	0.2
2/25/2016 10:00	2/26/2016 9:00	793858	210	35.6	0.2
2/25/2016 11:00	2/26/2016 10:00	843843	195	36.4	0.2
2/25/2016 12:00	2/26/2016 11:00	899987	204	37.5	0.2
2/25/2016 13:00	2/26/2016 12:00	932701	210	39.0	0.2
2/25/2016 14:00	2/26/2016 13:00	974090	217	39.8	0.2
2/25/2016 15:00	2/26/2016 14:00	1037477	223	40.4	0.2
2/25/2016 16:00	2/26/2016 15:00	1075788	228	40.4	0.2
2/25/2016 17:00	2/26/2016 16:00	1114301	203	39.5	0.2
2/25/2016 18:00	2/26/2016 17:00	1124003	195	39.2	0.2
2/25/2016 19:00	2/26/2016 18:00	1099930	194	39.0	0.2
2/25/2016 20:00	2/26/2016 19:00	1085687	195	32.0	0.2
2/25/2016 21:00	2/26/2016 20:00	1076131	202	29.1	0.2
2/25/2016 22:00	2/26/2016 21:00	970526	193	28.8	0.2
2/25/2016 23:00	2/26/2016 22:00	920667	194	26.4	0.2
2/26/2016 0:00	2/26/2016 23:00	911371	199	22.6	0.1
2/26/2016 1:00	2/27/2016 0:00	862239	186	21.0	0.1
2/26/2016 2:00	2/27/2016 1:00	770194	190	20.4	0.1
2/26/2016 3:00	2/27/2016 2:00	728372	181	16.9	0.1
2/26/2016 4:00	2/27/2016 3:00	692894	184	14.4	0.1
2/26/2016 5:00	2/27/2016 4:00	580908	183	13.2	0.1
2/26/2016 6:00	2/27/2016 5:00	508036	174	11.4	0.1
2/26/2016 7:00	2/27/2016 6:00	474764	164	10.1	0.1

Subpart Ja Root Cause / Corrective Action Analysis		Impact Incident Number: N/A		
The information contained below satisfie	es the requirements of the NSPS Subpart Ja 60.10	8a(c)(6).		
Source Information:				
Refinery:	Valero (Meraux)			
Incident Type:	Flaring	— Date of Events	2/20/2016	
Emissions Source(s):	North Flare (EPN 20-72, EQT 0035)	Date of Event:		
Linissions source(s).	South Flare (EPN 3-77, EQT 0035)	Date Analysis Completed:	N/A	
	30util Flare (EFN 3-77, EQ1 0045)			
(1.)			(60.108a(c)(6)(i))	
A description of the Discharge:				
	e of gases produced during a Benzene Reduction nosed primarily of Hydrogen and Nitrogen. Addi riefly.			
(2.)		(60.108a(c)(6)(ii))	and (60.108a(c)(6)(ix))	
Date and Time the disc	charge was first identified 2/29/16 14:0	02		
Date/Time	the discharge had ceased 3/4/16 14:0	03		
Duration	of Discharge (Calculated) 96	.0 hrs		
	500 77 SO			
(3.) The steps taken to limit the emissions du Valero followed its Flare Minimization Pla	ring the discharge: an and Operations Procedures to minimize the vo	olume of this discharge.	(60.108a(c)(6)(viii))	
(4.)			(60.108a(c)(6)(xi))	
Necessity of RC/CAA: Determine and sta Note: If the discharge was a result of a pla was followed.	te whether a RC/CAA is necessary: nned startup or shutdown, a RC/CAA analysis is n	ot required if the flare manage	ement plan	
Did the discharge result from a planned s	tartun or shutdown?	Yes	(Vos/No)	
the same of the sa			(Yes/No)	
Was the flare management plan followed		Yes	(Yes/No/N/A)	
Is the event exempt from a RC/CCA based - If yes, skip section 5-7.	o on the answers above?	Yes	(Yes/No)	
(5.)			(60.108a(c)(6)(ix))	
Root Cause Analysis: Describe in detail th	ne Root Cause(s) of the Incident, to the extent de	eterminable:		
Did this discharge result from root causes N/A	s identified in a previous analysis?	No	(Yes/No)	
(6.) Corrective Action Analysis: Include a des Is corrective action required? N/A	cription of the recommended corrective action(s  No (Yes/No)	) or an explanation of why co	(60.108a(c)(6)(ix)) rrective action is not	
(7.)			/CO 100-/-VCV \\	
	ective actions already completed within the first mentation, including proposed commencement a		(60.108a(c)(6)(x)) ge. For those not	

(8.)
The measured or calculated cumulative quantity of gas discharged over the discharge duration.
Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
2/28/2016 14:00	2/29/2016 13:00	4	66	0.4	0.0
2/28/2016 15:00	2/29/2016 14:00	12,428	69	0.5	0.0
2/28/2016 16:00	2/29/2016 15:00	31,116	73	0.5	0.0
2/28/2016 17:00	2/29/2016 16:00	38,337	76	0.6	0.0
2/28/2016 18:00	2/29/2016 17:00	38,344	256	0.8	0.0
2/28/2016 19:00	2/29/2016 18:00	45,685	259	1.0	0.0
2/28/2016 20:00	2/29/2016 19:00	60,632	262	1.1	0.0
2/28/2016 21:00	2/29/2016 20:00	79,326	265	1.4	0.0
2/28/2016 22:00	2/29/2016 21:00	94,947	267	1.5	0.0
2/28/2016 23:00	2/29/2016 22:00	116,650	270	1.7	0.0
2/29/2016 0:00	2/29/2016 23:00	193,326	270	1.8	0.0
2/29/2016 1:00	3/1/2016 0:00	301,367	271	1.8	0.0
2/29/2016 2:00	3/1/2016 1:00	422,900	271	1.8	0.0
2/29/2016 3:00	3/1/2016 2:00	555,285	271	2.0	0.0
2/29/2016 4:00	3/1/2016 3:00	689,333	271	2.2	0.0
2/29/2016 5:00	3/1/2016 4:00	830,117	271	2.3	0.0
2/29/2016 6:00	3/1/2016 5:00	972,295	272	2.4	0.0
2/29/2016 7:00	3/1/2016 6:00	1,114,690	272	2.5	0.0
2/29/2016 8:00	3/1/2016 7:00	1,257,703	272	2.6	0.0
2/29/2016 9:00	3/1/2016 8:00	1,401,720	272	2.7	0.0
2/29/2016 10:00	3/1/2016 9:00	1,547,814	272	2.9	0.0
2/29/2016 11:00	3/1/2016 10:00	1,694,312	273	3.0	0.0
2/29/2016 12:00	3/1/2016 11:00	1,841,202	273	3.1	0.0
2/29/2016 13:00	3/1/2016 12:00	1,987,824	273	3.1	0.0
2/29/2016 14:00	3/1/2016 13:00	2,132,068	207	3.0	0.0
2/29/2016 15:00	3/1/2016 14:00	2,263,315	204	3.2	0.0
2/29/2016 16:00	3/1/2016 15:00	2,389,101	201	3.3	0.0
2/29/2016 17:00	3/1/2016 16:00	2,531,819	198	3.4	0.0
2/29/2016 18:00	3/1/2016 17:00	2,680,561	19	3.4	0.0
2/29/2016 19:00	3/1/2016 18:00	2,822,031	16	6.9	0.0
2/29/2016 20:00	3/1/2016 19:00	2,956,606	13	7.1	0.0
2/29/2016 21:00	3/1/2016 20:00	3,088,811	16	7.0	0.0
2/29/2016 22:00	3/1/2016 21:00	3,222,397	15	7.0	0.0
2/29/2016 23:00	3/1/2016 22:00	3,348,746	12	7.1	
3/1/2016 0:00	3/1/2016 23:00	3,420,687	12	7.1	0.0
3/1/2016 1:00	3/2/2016 0:00	3,461,907	12	7.3	0.0
3/1/2016 2:00	3/2/2016 1:00	3,491,831	12	7.4	0.0
3/1/2016 3:00	3/2/2016 2:00	3,509,741	12	7.5	0.0
3/1/2016 4:00	3/2/2016 3:00	3,524,955	13	7.6	
3/1/2016 5:00	3/2/2016 4:00	3,532,160	13	7.6	0.0
3/1/2016 6:00	3/2/2016 5:00	3,537,684	13	7.7	0.0
3/1/2016 7:00	3/2/2016 6:00	3,543,930	13	7.7	0.0
3/1/2016 8:00	3/2/2016 7:00	3,549,793	13	7.7	0.0
3/1/2016 9:00	3/2/2016 8:00	3,555,596	13		0.0
3/1/2016 10:00	3/2/2016 9:00	3,556,693	13	7.7	0.0
3/1/2016 11:00	3/2/2016 10:00	3,557,485	13		0.0
3/1/2016 12:00	3/2/2016 11:00	3,560,581	13	7.8	0.0
3/1/2016 13:00	3/2/2016 12:00	3,559,816	13	7.8	0.0
3/1/2016 14:00	3/2/2016 13:00	3,558,630		7.8	0.0
3/1/2016 15:00	3/2/2016 14:00	3,556,111	13 13	7.8	0.0
3/1/2016 16:00	3/2/2016 15:00	3,552,976	13	7.8	0.0
3/1/2016 17:00	3/2/2016 15:00	3,552,905	13	7.8	0.0

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
3/1/2016 18:00	3/2/2016 17:00	3,552,992	13	7.6	0.0
3/1/2016 19:00	3/2/2016 18:00	3,551,758	13	3.9	0.0
3/1/2016 20:00	3/2/2016 19:00	3,474,093	13	3.6	0.0
3/1/2016 21:00	3/2/2016 20:00	3,363,985	7	3.4	0.0
3/1/2016 22:00	3/2/2016 21:00	3,255,570	6	3.3	0.0
3/1/2016 23:00	3/2/2016 22:00	3,147,937	6	3.1	0.0
3/2/2016 0:00	3/2/2016 23:00	3,039,756	6	2.9	0.0
3/2/2016 1:00	3/3/2016 0:00	2,922,971	5	2.7	0.0
3/2/2016 2:00	3/3/2016 1:00	2,787,467	5	2.6	0.0
3/2/2016 3:00	3/3/2016 2:00	2,653,518	5	2.3	0.0
3/2/2016 4:00	3/3/2016 3:00	2,517,330	4	2.0	0.0
3/2/2016 5:00	3/3/2016 4:00	2,369,341	4	1.8	0.0
3/2/2016 6:00	3/3/2016 5:00	2,221,639	3	1.7	0.0
3/2/2016 7:00	3/3/2016 6:00	2,072,998	3	1.6	0.0
3/2/2016 8:00	3/3/2016 7:00	1,924,122	3	1.4	0.0
3/2/2016 9:00	3/3/2016 8:00	1,774,302	3	1.3	0.0
3/2/2016 10:00	3/3/2016 9:00	1,627,112	3	1.2	0.0
3/2/2016 11:00	3/3/2016 10:00	1,520,404	2	1.1	0.0
3/2/2016 12:00	3/3/2016 11:00	1,422,986	2	0.9	0.0
3/2/2016 13:00	3/3/2016 12:00	1,344,413	2	0.7	0.0
3/2/2016 14:00	3/3/2016 13:00	1,276,417	2	0.5	0.0
3/2/2016 15:00	3/3/2016 14:00	1,192,903	1	0.4	0.0
3/2/2016 16:00	3/3/2016 15:00	1,092,737	1	0.1	0.0
3/2/2016 17:00	3/3/2016 16:00	994,162	1	0.0	0.0
3/2/2016 18:00	3/3/2016 17:00	900,044	0	0.0	0.0
3/2/2016 19:00	3/3/2016 18:00	768,639	0	0.0	0.0
3/2/2016 20:00	3/3/2016 19:00	696,782	0	0.0	0.0
3/2/2016 21:00	3/3/2016 20:00	655,991	0	0.0	0.0
3/2/2016 22:00	3/3/2016 21:00	615,200	0	0.0	0.0
3/2/2016 23:00	3/3/2016 22:00	574,781	0	0.0	0.0
3/3/2016 0:00	3/3/2016 23:00	534,344	0	0.0	0.0
3/3/2016 1:00	3/4/2016 0:00	501,868	0	0.0	0.0
3/3/2016 2:00	3/4/2016 1:00	485,916	0	0.0	0.0

Subpart Ja Root Cause / Corrective Action Analysis		Impact Incident Num	ber: N/A
The information contained below s	atisfies the requirements of the NSPS Subpar	t Ja 60.108a(c)(6).	
Source Information:			
Refinery:	Valero (Meraux)		
Incident Type:	Flaring	Date of Ev	ent: 3/7/2016
Emissions Source(s):	North Flare (EPN 20-72, EQT 0035)	Date Analysis Complete	ed: <b>N/A</b>
(1.)			(60.108a(c)(6)(i)
A description of the Discharge:			
	release of gases produced during the Naphth wed by the NHT start up and BRU catalyst act		
(2.)		(60.108a(c)(6)(	(ii)) and (60.108a(c)(6)(ix))
Date and Time th	ne discharge was first identified 3	/7/16 0:09	
Date/	Time the discharge had ceased 3/	13/16 3:30	
Dur	ration of Discharge (Calculated)	<b>147.4</b> hrs	
(3.)			(60.108a(c)(6)(viii))
The steps taken to limit the emission	ons during the discharge: ion Plan and Operations Procedures to minim	ize the volume of this discharge.	(00.1088(0)(0)(4111))
(4.)			(60.108a(c)(6)(xi))
	nd state whether a RC/CAA is necessary: f a planned startup or shutdown, a RC/CAA and	alysis is not required if the flare ma	nagement plan
Did the discharge result from a plar	nned startup or shutdown?	Yes	(Yes/No)
Was the flare management plan fol	llowed?	Yes	(Yes/No/N/A)
Is the event exempt from a RC/CCA - If yes, skip section 5-7.	based on the answers above?	Yes	(Yes/No)
(5.)			(60.108a(c)(6)(ix))
Root Cause Analysis: Describe in de	etail the Root Cause(s) of the Incident, to the	extent determinable:	
Did this discharge result from root	causes identified in a previous analysis?	No	(Yes/No)
N/A			
(6.)			(60.108a(c)(6)(ix))
Corrective Action Analysis: Include Is corrective action required?  N/A	a description of the recommended corrective No (Yes/No)	e action(s) or an explanation of wh	
(7.)			(60.108a(c)(6)(x))
Corrective Action Schedule: Include	e corrective actions already completed withir mplementation, including proposed commer		

(8.)

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

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
3/6/2016 0:00	3/6/2016 23:00	1,142	563	1.1	0.0
3/6/2016 1:00	3/7/2016 0:00	1,168	594	1.3	0.0
3/6/2016 2:00	3/7/2016 1:00	10,443	610	1.4	0.0
3/6/2016 3:00	3/7/2016 2:00	13,977	625	1.4	0.0
3/6/2016 4:00	3/7/2016 3:00	18,283	528	1.7	0.0
3/6/2016 5:00	3/7/2016 4:00	26,030	426	2.4	0.0
3/6/2016 6:00	3/7/2016 5:00	37,447	432	2.8	0.0
3/6/2016 7:00	3/7/2016 6:00	39,465	413	3.0	0.0
3/6/2016 8:00	3/7/2016 7:00	63,140	417	3.2	0.0
3/6/2016 9:00	3/7/2016 8:00	84,086	420	3.8	0.0
3/6/2016 10:00	3/7/2016 9:00	97,064	424	4.4	0.0
3/6/2016 11:00	3/7/2016 10:00	138,974	427	4.8	0.0
3/6/2016 12:00	3/7/2016 11:00	231,095	429	5.2	0.0
3/6/2016 13:00	3/7/2016 12:00	347,773	430	5.6	0.0
3/6/2016 14:00	3/7/2016 13:00	496,507	430	5.9	0.0
3/6/2016 15:00	3/7/2016 14:00	670,869	312	6.1	0.0
3/6/2016 16:00	3/7/2016 15:00	848,749	312	6.5	0.0
3/6/2016 17:00	3/7/2016 16:00	952,536	313	6.8	0.0
3/6/2016 18:00	3/7/2016 17:00	1,046,420	314	7.1	0.0
3/6/2016 19:00	3/7/2016 18:00	1,222,575	314	7.3	0.0
3/6/2016 20:00	3/7/2016 19:00	1,412,979	314	7.6	0.0
3/6/2016 21:00	3/7/2016 20:00	1,522,430	315	7.9	0.0
3/6/2016 22:00	3/7/2016 21:00	1,573,855	316	8.1	0.0
3/6/2016 23:00	3/7/2016 22:00	1,624,655	318	8.3	0.0
3/7/2016 0:00	3/7/2016 23:00	1,675,729	319	7.9	0.0
3/7/2016 1:00	3/8/2016 0:00	1,727,455	175	7.8	0.0
3/7/2016 2:00	3/8/2016 1:00	1,756,635	160	7.6	0.0
3/7/2016 3:00	3/8/2016 2:00	1,767,215	147	7.4	0.0
3/7/2016 4:00	3/8/2016 3:00	1,764,982	138	7.1	0.0
3/7/2016 5:00	3/8/2016 4:00	1,756,694	130	6.3	0.0
3/7/2016 6:00	3/8/2016 5:00	1,745,276	124	6.0	0.0
3/7/2016 7:00	3/8/2016 6:00	1,743,144	33	5.7	0.0
3/7/2016 8:00	3/8/2016 7:00	1,719,468	29	5.5	0.0
3/7/2016 9:00	3/8/2016 8:00	1,698,522	26	5.0	0.0
3/7/2016 10:00	3/8/2016 9:00	1,685,545	22	4.4	0.0
3/7/2016 11:00	3/8/2016 10:00	1,643,634	19	3.9	0.0
3/7/2016 12:00	3/8/2016 11:00	1,551,513	17	3.5	0.0
3/7/2016 13:00	3/8/2016 12:00	1,434,835	16	3.2	0.0
3/7/2016 14:00	3/8/2016 13:00	1,286,101	16	2.9	0.0
3/7/2016 15:00 3/7/2016 16:00	3/8/2016 14:00	1,111,684	15	2.6	0.0
	3/8/2016 15:00	933,805	15	2.2	0.0
3/7/2016 17:00	3/8/2016 16:00	830,017	14	1.9	0.0
3/7/2016 18:00 3/7/2016 19:00	3/8/2016 17:00 3/8/2016 18:00	736,133	13	2.0	0.0
		559,978	12	1.9	0.0
3/7/2016 20:00	3/8/2016 19:00	392,786	16	1.8	0.0
3/7/2016 21:00	3/8/2016 20:00	327,157	16	1.6	0.0
3/7/2016 22:00	3/8/2016 21:00	335,799	15	1.5	0.0
3/7/2016 23:00	3/8/2016 22:00	349,491	15	1.3	0.0
3/8/2016 0:00	3/8/2016 23:00	346,982	14	1.2	0.0
3/8/2016 1:00	3/9/2016 0:00	342,154	13	1.2	0.0
3/8/2016 2:00	3/9/2016 1:00	373,871	12	1.3	0.0

(8.)
The measured or calculated cumulative quantity of gas discharged over the discharge duration.
Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))	
P!		24-hr cumulative	TRS or H2S ppm	\$2565 Q 40 CAS SOCIETA	24-hr cumulative	
	Last hour of 24-hr	volume of flared gas	(24-hr average, flow-	24-hr cumulative SO2	reduced sulfur	
Period	Period	above Baseline	weighted)		reduced Sulluf	
		SCF	ppmv	lbs	lbs as H2S	
3/8/2016 3:00	3/9/2016 2:00	420,728	10	1.4	0.0	
3/8/2016 4:00	3/9/2016 3:00	462,439	8	1.4	0.0	
3/8/2016 5:00	3/9/2016 4:00	511,358	9	1.4	0.0	
3/8/2016 6:00	3/9/2016 5:00	579,968	9	1.4	0.0	
3/8/2016 7:00	3/9/2016 6:00	625,020	9	1.4	0.0	
3/8/2016 8:00	3/9/2016 7:00	641,183	9	1.4	0.0	
3/8/2016 9:00	3/9/2016 8:00	683,312	9	1.4	0.0	
3/8/2016 10:00	3/9/2016 9:00	754,563	9	1.4	0.0	
3/8/2016 11:00	3/9/2016 10:00	821,951	9	1.4	0.0	
3/8/2016 12:00	3/9/2016 11:00	880,923	9	1.4	0.0	
3/8/2016 13:00	3/9/2016 12:00	916,276	9	1.4	0.0	
3/8/2016 14:00	3/9/2016 13:00	939,889	9	1.4	0.0	
3/8/2016 15:00	3/9/2016 14:00	958,709	9	1.4	0.0	
3/8/2016 16:00	3/9/2016 15:00	962,710	9	1.4	0.0	
3/8/2016 17:00	3/9/2016 16:00	982,762	9	1.4	0.0	
3/8/2016 18:00	3/9/2016 17:00	1,004,893	9	1.1	0.0	
3/8/2016 19:00	3/9/2016 18:00	1,027,205	9	0.9	0.0	
3/8/2016 20:00	3/9/2016 19:00	1,021,154	5	0.8	0.0	
3/8/2016 21:00	3/9/2016 20:00	978,257	4	0.7	0.0	
3/8/2016 22:00	3/9/2016 21:00	918,189	4	0.6	0.0	
3/8/2016 23:00	3/9/2016 22:00	853,698	3	0.5	0.0	
3/9/2016 0:00	3/9/2016 23:00	809,137	3	0.4	0.0	
3/9/2016 1:00	3/10/2016 0:00	817,991	2	0.3	0.0	
3/9/2016 2:00 3/9/2016 3:00	3/10/2016 1:00	869,558	2	0.2	0.0	
3/9/2016 3:00	3/10/2016 2:00	930,625	1	0.0	0.0	
3/9/2016 4:00	3/10/2016 3:00	1,009,757	1	0.0	0.0	
3/9/2016 5:00	3/10/2016 4:00	1,084,366	0	0.0	0.0	
3/9/2016 6:00	3/10/2016 5:00 3/10/2016 6:00	1,138,686	0	0.0	0.0	
3/9/2016 7:00		1,216,404	0	0.0	0.0	
3/9/2016 8:00	3/10/2016 7:00 3/10/2016 8:00	1,324,683	0	0.0	0.0	
3/9/2016 9:00	3/10/2016 8:00	1,429,936	0	0.0	0.0	
3/9/2016 10:00	3/10/2016 9:00	1,386,874 1,356,012	0	0.0	0.0	
3/9/2016 12:00	3/10/2016 11:00	1,314,120	0	0.0	0.0	
3/9/2016 13:00	3/10/2016 12:00	1,295,294	0	0.0	0.0	
3/9/2016 14:00	3/10/2016 13:00	1,288,009	0	0.0	0.0	
3/9/2016 15:00	3/10/2016 14:00	1,282,035	0	0.0	0.0	
3/9/2016 16:00	3/10/2016 15:00	1,278,034	0	0.0	0.0	
3/9/2016 17:00	3/10/2016 16:00	1,257,982	0	0.0	0.0	
3/9/2016 17:00	3/10/2016 17:00	1,235,851	0	0.0	0.0	
3/9/2016 19:00	3/10/2016 17:00	1,213,539	0	0.0	0.0	
3/9/2016 19:00	3/10/2016 19:00	1,196,379	0	0.0	0.0	
3/9/2016 21:00	3/10/2016 20:00	1,215,712	0	0.0	0.0	
3/9/2016 22:00	3/10/2016 21:00	1,405,320	0	0.0	0.0	
3/9/2016 23:00	3/10/2016 22:00	1,538,409	0	0.0	0.0	
3/10/2016 0:00	3/10/2016 22:00	1,668,074	0	0.0	0.0	
3/10/2016 1:00	3/11/2016 0:00	1,770,287	0	0.0	0.0	
3/10/2016 2:00	3/11/2016 1:00	1,795,571	0	0.0	0.0	
3/10/2016 3:00	3/11/2016 2:00	1,825,963	0	0.0	0.0	
3/10/2016 4:00	3/11/2016 3:00	1,867,173	0	0.0	0.0	
3/10/2016 5:00	3/11/2016 4:00	1,911,715	0	0.0	0.0	

(8.)
The measured or calculated cumulative quantity of gas discharged over the discharge duration.
Note: Measured sulfur concentrations are shown as flow-weighted averages if multiple measurement devices were used.

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))	
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur	
		SCF	0 ,			
3/10/2016 6:00	3/11/2016 5:00	1,955,859	0	0.0	0.0	
3/10/2016 7:00	3/11/2016 6:00	2,001,848	0	0.0	0.0	
3/10/2016 8:00	3/11/2016 7:00	2,029,747	0	0.0	0.0	
3/10/2016 9:00	3/11/2016 8:00	2,025,695	0	0.0	0.0	
3/10/2016 10:00	3/11/2016 9:00	2,142,504	0	0.0		
3/9/2016 13:00	3/10/2016 12:00	1,295,294	0	0.0	0.0	
3/10/2016 12:00	3/11/2016 11:00	2,376,280	0	0.0	0.0	
3/10/2016 13:00	3/11/2016 12:00	2,511,586	0	0.0	0.0	
3/10/2016 14:00	3/11/2016 13:00	2,655,570	0	0.0		
3/10/2016 15:00	3/11/2016 14:00	2,824,641	0	0.0	0.0	
3/10/2016 16:00	3/11/2016 15:00	3,009,365	0	0.0	0.0	
3/10/2016 17:00	3/11/2016 16:00	3,195,027	0		0.0	
3/10/2016 18:00	3/11/2016 17:00	3,377,124	0	0.0	0.0	
3/10/2016 19:00	3/11/2016 17:00	3,559,391	0	0.0	0.0	
3/10/2016 20:00	3/11/2016 19:00	3,740,752		0.0	0.0	
3/10/2016 21:00	3/11/2016 19:00	3,902,071	0	0.0	0.0	
3/10/2016 22:00	3/11/2016 20:00			0.0	0.0	
3/10/2016 23:00	3/11/2016 21:00	3,893,627	0	0.0	0.0	
3/11/2016 0:00	3/11/2016 22:00	3,939,967	0	0.0	0.0	
3/11/2016 0:00	3/11/2016 23:00	3,983,740	0	0.0	0.0	
3/11/2016 1:00		4,003,040	0	0.0	0.0	
3/11/2016 2:00	3/12/2016 1:00	4,033,942	0	0.0	0.0	
3/11/2016 4:00	3/12/2016 2:00	4,057,249	0	0.0	0.0	
	3/12/2016 3:00	4,069,131	0	0.0	0.0	
3/11/2016 5:00	3/12/2016 4:00	4,078,210	0	0.0	0.0	
3/11/2016 6:00	3/12/2016 5:00	4,088,324	0	0.0	0.0	
3/11/2016 7:00	3/12/2016 6:00	4,088,235	0	0.0	0.0	
3/11/2016 8:00	3/12/2016 7:00	4,095,844	0	0.0	0.0	
3/11/2016 9:00	3/12/2016 8:00	4,111,949	0	0.0	0.0	
3/11/2016 10:00	3/12/2016 9:00	4,126,799	0	0.0	0.0	
3/11/2016 11:00	3/12/2016 10:00	4,141,426	0	0.0	0.0	
3/11/2016 12:00	3/12/2016 11:00	4,157,585	0	0.0	0.0	
3/11/2016 13:00	3/12/2016 12:00	4,164,614	0	0.0	0.0	
3/11/2016 14:00	3/12/2016 13:00	4,162,262	0	0.0	0.0	
3/11/2016 15:00	3/12/2016 14:00	4,139,479	0	0.0	0.0	
3/11/2016 16:00	3/12/2016 15:00	4,142,849	0	0.0	0.0	
3/11/2016 17:00	3/12/2016 16:00	4,129,236	0	0.0	0.0	
3/11/2016 18:00	3/12/2016 17:00	4,106,441	0	0.0	0.0	
3/11/2016 19:00	3/12/2016 18:00	4,082,343	0	0.0	0.0	
3/11/2016 20:00	3/12/2016 19:00	4,066,535	0	0.0	0.0	
3/11/2016 21:00	3/12/2016 20:00	4,015,486	0	0.0	0.0	
3/11/2016 22:00	3/12/2016 21:00	3,878,192	0	0.0	0.0	
3/11/2016 23:00	3/12/2016 22:00	3,726,527	0	0.0	0.0	
3/12/2016 0:00	3/12/2016 23:00	3,562,782	0	0.0	0.0	
3/12/2016 1:00	3/13/2016 0:00	3,397,315	0	0.0	0.0	
3/12/2016 2:00	3/13/2016 1:00	3,232,158	0	0.0	0.0	
3/12/2016 3:00	3/13/2016 3:00	3,060,884	0	0.0	0.0	
3/12/2016 4:00	3/13/2016 4:00	2,884,552	0	0.0	0.0	
3/12/2016 5:00	3/13/2016 5:00	2,707,402	0	0.0	0.0	
3/12/2016 6:00	3/13/2016 6:00	2,530,214	0	0.0	0.0	
3/12/2016 7:00	3/13/2016 7:00	2,361,544	0	0.0	0.0	
3/11/2016 10:00	3/12/2016 9:00	4,126,799	0	0.0	0.0	

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

		(60.108a(c)(6)(iii))	(60.108a(c)(6)(iv))	(60.108a(c)(6)(vii))	(60.108a(c)(6)(vii))
First hour of 24-hr Period	Last hour of 24-hr Period	24-hr cumulative volume of flared gas above Baseline	TRS or H2S ppm (24-hr average, flow- weighted)	24-hr cumulative SO2	24-hr cumulative reduced sulfur
		SCF	ppmv	lbs	lbs as H2S
3/12/2016 9:00	3/13/2016 9:00	2,042,159	0	0.0	0.0
3/12/2016 10:00	3/13/2016 10:00	1,882,312	0	0.0	0.0
3/12/2016 11:00	3/13/2016 11:00	1,723,448	0	0.0	0.0
3/12/2016 12:00	3/13/2016 12:00	1,564,142	0	0.0	0.0
3/12/2016 13:00	3/13/2016 13:00	1,405,281	0	0.0	0.0
3/12/2016 14:00	3/13/2016 14:00	1,247,322	0	0.0	0.0
3/12/2016 15:00	3/13/2016 15:00	1,088,187	0	0.0	0.0
3/12/2016 16:00	3/13/2016 16:00	900,094	0	0.0	0.0
3/12/2016 17:00	3/13/2016 17:00	728,044	0	0.0	0.0
3/12/2016 18:00	3/13/2016 18:00	568,742	0	0.0	0.0
3/12/2016 19:00	3/13/2016 19:00	410,573	0	0.0	0.0