



May 22, 2019

**BY CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

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Dear Sirs:

We write on behalf of the Port Arthur Community Action Network (“PA-CAN”), Environment America d/b/a Environment Texas (“Environment Texas”), and Sierra Club (collectively, “the Groups”), and their individual members. We request the opportunity to meet with you within 45 days to discuss resolution of the matters raised in this Clean Air Act notice letter.

Valero Energy Corporation and The Premcor Refining Group, Inc. (collectively “Valero”) own and operate the Valero Port Arthur Refinery (“the Refinery”), located at 1801 South Gulfway Drive, Port Arthur, TX 77640. Based on available information, the Groups believe that Valero has repeatedly violated, is violating, and will continue to violate the federal Clean Air Act (“CAA”), the Texas State Implementation Plan, and Valero’s CAA permits by,

among other things, emitting air pollutants at rates and in amounts not authorized by any permits or by state or federal regulations.

This letter is being provided pursuant to Section 304(b) of the Clean Air Act, 42 U.S.C. § 7604(b), and 40 C.F.R. 54.3(b). The Groups intend to secure appropriate relief for the violations described in this notice letter occurring within the five years immediately preceding the sending of this letter, and for any similar violations that occur after the date of this notice letter.

### **APPLICABLE CLEAN AIR ACT REQUIREMENTS**

The Refinery is subject to applicable provisions of the Texas State Implementation Plan (“SIP”), which is a set of state laws and regulations designed to protect air quality in Texas and, more specifically, to achieve compliance with federally promulgated national ambient air quality standards (“NAAQS”). SIPs are required by Section 110 of the CAA, 42 U.S.C. § 7410, and must be approved by the U.S. Environmental Protection Agency (“EPA”).

The Refinery contains a number of fixed sources of air pollution that are classified as “stationary sources” under the Clean Air Act. The Texas SIP requires Valero to report certain “emission events” – certain unauthorized emissions of air pollutants from these stationary sources – to the Texas Commission on Environmental Quality (“TCEQ”) within 24 hours of their discovery, through the State of Texas Environmental Electronic Reporting System (“STEERS”). 30 Tex. Admin. Code §§ 101.201(a) and 101.211(a). Thereafter, Valero has two weeks to issue a “final” STEERS report concerning such emission events; if no final report is submitted, the initial report is considered final. 30 Tex. Admin. Code §§ 101.201(b) and (c) and 101.211(b) and (c).

These emission event reports submitted by Valero to TCEQ are required to include, among other information: the date, time, and duration of the event; the nature and cause of the event; any corrective action taken; the unit and the specific emission point from which pollutants were emitted to the atmosphere; the permit or regulation applicable to the unit and emission point; the emission standard or limitation that has been exceeded; and the type and estimated quantities of air pollutants emitted.

Emissions of air pollutants from the Refinery are governed by, among other requirements, the following permits issued by the TCEQ pursuant to the Texas SIP (30 Tex. Admin. Code Ch. 116) and the Clean Air Act’s Prevention of Significant Deterioration (“PSD”) and New Source Review (“NSR”) programs: Permit Nos. 6825A and 80812.

Special Condition 1 of Permit No. 6825A and of Permit No. 80812 provides that emissions are authorized only for specified pollutants and only from those sources listed in each permit’s Emission Caps and Individual Emissions Limitations Table (“ECIELT”) and Maximum Allowable Emission Rate Table (“MAERT”), respectively, and only if such emissions comply with the emission rate limits and other conditions applicable to each source. Any other emission is a violation of Special Condition 1 and General Conditions 8 and 14 of each permit. Compliance with the numerical emission limits in the ECIELT and MAERT is mandatory. Texas Health & Safety Code § 382.085(b); 30 Tex. Admin. Code § 116.115(b)(2)(F). A

violation of ECIELT or MAERT conditions is a violation of Special Condition 1 and General Conditions 8 and 14 of the applicable permit and a violation of the Texas SIP.

The Refinery is also subject to applicable provisions of the Clean Air Act's New Source Performance Standards ("NSPS"), which are national, technology-based emission standards and limitations promulgated pursuant to CAA Section 111, 42 U.S.C. § 7411. CAA Section 111(e), 42 U.S.C. § 7411(e), prohibits the operation of any new source in violation of an NSPS applicable to such source, and a violation of an NSPS is thus a violation of Section 111(e) of the Clean Air Act.

The Refinery is also subject to applicable provisions of the Clean Air Act's National Emissions Standards for Hazardous Air Pollutants ("NESHAPS"), which are national, technology-based emission standards and limitations promulgated pursuant to CAA Section 112, 42 U.S.C. § 7412. CAA Section 112(i)(3)(A), 42 U.S.C. § 7412(i)(3)(A), prohibits the operation of any source subject to NESHAPs in violation of a NESHAP standard, limitation, or regulation, and a violation of any NESHAP thus is a violation of Section 112(i)(3)(A) of the Clean Air Act.

The Refinery contains sulfur recovery units ("SRUs") designated in Permit 6825A as SRU 543, 544, 545, and 546, with corresponding emission point numbers ("EPNs") E-01-SCOT, E-02-SCOT, E-03-SCOT, and E-04-SCOT, respectively. These units are subject to emission limitations and other NSPS requirements under 40 CFR Part 60, Subpart Ja ("Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007") and 40 CFR Part 63, Subpart UUU ("National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units").

The Refinery also contains flares that are subject to 40 CFR Part 60, Subpart A (NSPS "General Provisions") and 40 CFR Part 63, Subpart A (NESHAPS "General Provisions").

Valero's PSD and NSR Permits and all of the emission standards and limitations contained therein, as well as the Texas SIP provisions and NSPS and NESHAPS provisions described above, are incorporated into Valero's federal operating permits, Nos. O1498, O2229, and O3423 ("federal operating permits" or "Title V permits"), which were issued to Valero by the TCEQ pursuant to Title V of the Clean Air Act, 42 U.S.C. §§ 7661-7661f.

Any violation of the terms and conditions of Valero's Title V permits is also a violation of the Texas SIP and the federal Clean Air Act, 42 U.S.C. § 7661a(a) ("[I]t shall be unlawful for any person to violate any requirement of a permit issued under this subchapter, or to operate ... a major source ... except in compliance with a permit issued by a permitting authority under this subchapter."). The Texas SIP requires Valero to submit to the TCEQ: (a) annual permit Compliance Certifications; and (b) semi-annual "Deviation Reports" detailing any deviations from Title V permit requirements occurring within the previous six months. 30 Tex. Admin. Code §§ 122.145-46.

The Clean Air Act authorizes citizen suits to enforce "emission standards or limitations," which include: (1) the terms and conditions of permits (including New Source Review,

Prevention of Significant Deterioration, and Title V permits), (2) provisions of State Implementation Plans, (3) New Source Performance Standards, and (4) National Emissions Standards for Hazardous Air Pollutants. 42 U.S.C. §7604(a) and (f).

## **VALERO'S CLEAN AIR ACT VIOLATIONS**

The paragraphs below describe Valero's violations of emission standards or limitations in its PSD and NSR permits and in federal Clean Air Act regulations, as documented in Valero's STEERS reports and in its Title V Deviation Reports and Compliance Certifications. As these emission standards and limitations are all incorporated into Valero's Title V permits, each of the violations described below is also a violation of the specified provision of one of Valero's Title V permits. The information presented below is sufficient to enable Valero to ascertain the nature of each alleged violation and when and where it occurred.

### **1. Hourly ECIELT and MAERT Limit Violations**

The Valero Port Arthur Refinery is required to comply with the hourly emission rate limits, expressed in pounds per hour, set forth in the Permit 6825A ECIELT and the Permit 80812 MAERT. These limits are applicable either to individual emission points at the Refinery or to specified groups of emissions points.

During the five years prior to the date of this letter, the Refinery repeatedly violated numerous hourly emission limits in its CAA permits. The publicly-available STEERS reports indicate that Valero violated: site-wide emission caps, emission sub-caps for groups of sources, and emission limits for individual sources, all as set forth in NSR Permits 6825A and 80812. These include violations of the emission limits for: carbon monoxide (CO), hydrogen sulfide (H<sub>2</sub>S), nitrogen oxides (NO<sub>x</sub>), opacity, particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), and volatile organic compounds (VOCs).

#### **(a) PERMIT 6825A – VIOLATIONS OF HOURLY LIMITS LISTED IN ECIELT**

Table 1 describes emissions from various sources that exceeded the hourly emission rates listed in Permit 6825A.<sup>1</sup> These violations occurred during events reported through STEERS. For each such emission, Table 1 lists:

- the tracking number of the STEERS event during which the emission occurred;
- the start date and time, and the duration, of the emission;
- the information Valero put in the "Authorization" column of the STEERS report;
- the EPN of the source of the emission;
- the type of pollutant emitted<sup>2</sup>;

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<sup>1</sup> Even though for many of the emissions described in Table 1 Valero stated on its STEERS reports that the applicable emission limit was "0.0" lbs/hr, each of those emissions also exceeded the limit for the individual source, or group of sources, set forth in the ECIELT.

- the applicable hourly emission limit listed in the ECIELT;
- the amount of the pollutant emitted from the listed source;
- if the applicable hourly limit covers only the listed source, the hourly emission rate for the pollutant from that source is provided (the emission rate is calculated by dividing the pounds emitted by the duration in hours of the emission);
- if the applicable hourly limit covers a group of sources (*i.e.*, if it is a sub-cap), the total amount of that pollutant emitted from all sources in that sub-cap,<sup>3</sup> during the same time period, is provided;
- if the applicable hourly limit covers a group of sources (a sub-cap), the hourly emission rate for that pollutant from all sources in that sub-cap is provided (the sub-cap emission rate is calculated by dividing the pounds emitted by all sources in the sub-cap by the duration in hours of the emission); and
- a “notes” column provides additional information for certain emissions, including instances in which more than one applicable limit was violated.

Tables 2A, 2B and 2C list additional dates on which the following sources exceeded hourly emission limits in Permit 6825A during emission events: SRU 543, 544, 545, and 546 (EPNs E-01-SCOT, E-02-SCOT, E-03-SCOT, and E-04-SCOT, respectively); Flares 5, 13, 15, 18, 19, 20, 22, 23, 26, and 103; and heaters with EPNs E-01-147 and E-02-147.

The violations listed in Tables 2A, 2B and 2C occurred during so-called “recordable” emission events – that is, emission events in which one or more unauthorized releases of a pollutant occurred, but in amounts that did not exceed the public reporting threshold for STEERS. The limited information available regarding these events was obtained from Valero’s deviation reports for Title V Permit No. O-1498 (Table 2A), Permit No. O-3423 (Table 2B), and Permit No. O-2229 (Table 2C).

These tables list the start date, location (by emission point number), and pollutant(s) released during the event. For each of these dates, the amounts of at least one of the listed pollutants emitted from the listed emission point exceeded the applicable limits for that emission point as set forth in the referenced permit.

(b) **PERMIT 6825A – VIOLATIONS OF “0.0” LBS/HR LIMIT REPORTED BY VALERO**

In a number of instances, Valero stated in its STEERS reports that the applicable emission limit for a given pollutant was “0.0” pounds per hour. In many of these instances Valero made the following entry under the “Authorization” column of the STEERS report for the pollutant in question: “Allowable entry is based on most recent guidance from TCEQ staff.” If

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<sup>2</sup> Opacity is also listed in this column.

<sup>3</sup> The Groups currently have access only to emissions data from Valero’s STEERS reports. As a result, the “total amount released in sub-cap” is likely an underestimate in most cases, since there may also have been emissions of the same pollutant from other sources within the cap that were not involved in the reported emission event or listed on the STEERS report.

Valero believes the reported 0.0 lbs/hr limit is, in fact, *not* applicable to these reported emissions, the Groups request an explanation as to why Valero reported this as the applicable limit.

Table 3 describes emissions from various sources that did not exceed the hourly emission rates listed in Permit 6825A but did exceed the “0.0” rate that Valero reported as the applicable emission limit. For each such emission, Table 3 follows the same format as Table 1 with one exception: there is an added column for the emission limit that Valero reported on its STEERS report as being applicable (0.0 lbs/hr); this column precedes the column for the emission limit found in the Permit 6825A ECIELT for the source in question.

(c) **PERMIT 80812 – VIOLATIONS OF HOURLY LIMITS LISTED IN MAERT**

Table 4 describes emissions from various sources during maintenance, startup, or shutdown events that exceeded the hourly emission rate cap for CO or SO<sub>2</sub> listed in Permit 80812. For each such emission, Table 4 lists:

- the tracking number of the STEERS event during which the emission occurred;
- the start date and time, and duration, of the emission;
- the type of event (maintenance, startup, or shutdown);
- the information Valero put in the “Authorization” column of the STEERS report;
- the EPN of the source of the emission;
- the type of pollutant emitted;
- the hourly emission limit listed in the MAERT for sources subject to the emissions cap;
- the amount of that pollutant emitted from the listed source; and
- the hourly emission rate for that pollutant from all sources involved in the event that are covered by the emissions cap.

2. **Annual MAERT Limit Violations**

The Valero Port Arthur Refinery must comply with the annual emission limits, expressed in tons per year, set forth in the Permit 80812 MAERT. These limits are applicable to groups of emissions points at the Refinery, and compliance with the limits is determined each month based on a rolling 12-month period.

Based on information obtained from Valero’s STEERS reports, during the five years prior to the date of this letter the Refinery repeatedly violated the annual emission limits for CO, NO<sub>x</sub>, and SO<sub>2</sub> in Permit 80812. The 12-month rolling totals, and the dates on which these totals exceeded the applicable annual limit, are listed in Tables 5A (violations of the CO annual limit), 5B (violations of the NO<sub>x</sub> annual limit), and 5C (violations of the SO<sub>2</sub> annual limit). For each such violation, Tables 5A, 5B, and 5C list:

- the month and year for which emissions of each pollutant have been calculated; and

- for each month: the emissions of each pollutant during that month, as reported in Valero’s STEERS reports; the rolling 12-month total for that pollutant (in pounds and in tons); the applicable annual emission limit for that pollutant (in pounds/year and in tons/year); and an indication as to whether the rolling 12-month total exceeded the permit limit during that month.

**3. Additional SO2 Violations**

On the following dates and at the following emission sources, Valero violated the 250 ppmv (parts per million per volume) emission limit for SO2 set forth at 40 CFR 60.102a(f)(1)(i) and 60.106a(b)(1) (under the NSPS program), which is incorporated into its Title V permits:

<u>PERMIT</u>	<u>START DATE</u>	<u>EPN</u>
O-1498	9/21/16	E-01-SCOT, E-02-SCOT, E-04-SCOT
O-1498	11/4/16	E-01-SCOT
O-1498	5/17/17	E-01-SCOT
O-2229	10/12/16	E-03-SCOT
O-2229	3/2/17	E-03-SCOT

**4. Additional H2S Violations**

On the following dates and at the following emission sources, Valero violated the 5.0 ppmvd (corrected to 3% oxygen) limit on hydrogen sulfide (H2S) emissions from tail gas incinerators set forth in Special Condition 23 of Permit 6825A, and incorporated into its Title V permits:

<u>PERMIT</u>	<u>START DATE</u>	<u>EPN</u>
O-1498	11/13/16	E-01-SCOT
O-1498	11/22/16	E-02-SCOT
O-1498	6/30/17	E-04-SCOT

**5. NSPS and NESHAPS Flaring Violations**

Valero has repeatedly operated its flares in violation of federal NSPS and NESHAPS regulations and its Title V permits. Specifically, Valero has violated the following regulatory requirements:

- 40 CFR 60.18(c)(2) & 40 CFR 63.11(b)(5), by operating flares without a pilot flame;
- 40 CFR 60.18(c)(3)(ii) & 40 CFR 63.11(b)(6)(ii) by operating flares while failing to meet the required minimum net heating value; and

- 40 CFR 60.107a(f)(1)(iii), by failing to perform flare gas flow monitoring and correction.

The dates, flare numbers, and nature of each such violation are listed in Tables 6A, 6B, and 6C. This information was obtained from Valero's deviation reports for Title V Permit No. O-1498 (Table 6A, covering Flares 13, 15, 18, 19, 20, 22, and 103), Permit No. O-3423 (Table 6B, covering Flare 26), and Permit No. O-2229 (Table 6C, covering Flare 23). For each violation, Table 6 lists:

- the applicable Title V permit number;
- the start date of the violation;
- the EPN of the flare(s) involved in the violation;
- the applicable Title V permit term and condition;
- the applicable federal regulatory requirement; and
- a verbal description of the nature of the violation.

## **CONCLUSION**

Additional information that the Groups have not yet been able to obtain, including information in the possession of Valero and in the most recent deviation reports, may reveal additional details about the violations described above and may reveal additional similar violations of the emission standards and limitations described above at the Valero Port Arthur Refinery. This letter covers all such violations.

If you believe any of the above information is in error, if you take steps to permanently correct any of the described violations, if you believe you are currently in compliance with the Clean Air Act, or if you have any questions concerning this letter or the described violations, please contact me as soon as possible at (617) 747-4333 or [josh.kratka@nelconline.org](mailto:josh.kratka@nelconline.org) or at the address listed above. As mentioned above, we would like to meet with you to discuss resolution of the matters raised in this letter.

Sincerely,



Josh Kratka

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**TABLE 1: PERMIT 6825A - VIOLATIONS OF HOURLY LIMITS - STEERS EVENTS**

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
304485	3/12/2019 0:41	36.53	NSR 6825A Refinery Cap	E-23-FLARE	Benzene	2.77	220.00	6.02			
306176	4/7/2019 21:49	3.38	NSR 6825A MAERT	F-1334	Benzene	2.77	169.60	50.13			
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	CO	2.27	498.63	433.59			
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-26-FLARE	CO	2.27	9.90	9.90			
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-26-FLARE	CO	2.27	3.70	3.70			
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-26-FLARE	CO	2.27	450.50	35.20			
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-26-FLARE	CO	2.27	14.40	14.40			
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	CO	2.27	28.60	28.60			
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-26-FLARE	CO	2.27	32.00	30.97			
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-26-FLARE	CO	2.27	161.67	93.27			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
247644	11/25/2016 16:50	18.83	NSR Permit 6825A Flare Subcap	E-26-FLARE	CO	2.27	2,991.33	158.83			
249951	1/6/2017 14:11	0.88	NSR Permit 6825A Flare Subcap	E-26-FLARE	CO	2.27	40.83	40.83			
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-26-FLARE	CO	2.27	95.00	85.07			
250132	1/7/2017 1:07	0.40	NSR Permit 6825A Flare Subcap	E-26-FLARE	CO	2.27	51.07	51.07			
273558	11/30/2017 22:10	0.43	6825 Flare MAERT Subcap	E-26-FLARE	CO	2.27	2.84	2.84			
303049	2/19/2019 17:50	0.52	NSR 6825A HCU943 Flare MAERT	E-26-FLARE	CO	2.27	127.70	127.70			
304485	3/12/2019 0:41	36.53	NSR 6825A HCU943 Flare MAERT	E-26-FLARE	CO	2.27	680.07	18.62			
			Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	CO		10.40				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
202132	8/11/2014 4:56	0.92	Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	CO	302.8	335.00		477.20	477.20	
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	CO		131.80				
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-23-FLARE	CO	302.8	479.80		479.80	479.80	
207996	1/2/2015 12:59	5.43	NSR 6825A MAERT Flare Subcap	E-103-FLARE	CO	302.8	392.00		2,398.00	441.35	
			NSR 6825A MAERT Flare Subcap	E-19-FLARE	CO		81.00				
			NSR 6825A MAERT Flare Subcap	E-22-FLARE	CO		1,925.00				
			Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	CO		148.20				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
229737	3/25/2016 9:33	1.55	Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	CO	302.8	38.22		489.24	315.64	
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	CO		302.82				
254881	3/28/2017 3:00	6.40	NSR Permit 6825A Flare Subcap	F-103-FLARE	CO	302.8	349.24		2,322.71	362.92	
			NSR Permit 6825A Flare Subcap	F-19-Flare	CO		102.09				
			NSR Permit 6825A Flare Subcap	F-22-FLARE	CO		1,871.38				
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	302.8	455.76		455.76	307.25	
223014	11/15/2015 7:30	106.00	NSR Permit 6825A MAERT Total VOC	E-01-WGS	CO	498.8	104,090.00	981.98			
268139	9/19/17 11:50 AM	1.33	NSR Permit 6825A Site Wide CAP	T-108	CO	1174	60,120.00		60,120.00	45,203.01	Limit may be 1207 lbs/hr depending on status of projects described in footnote 6
			NSR 6825A Flare MAERT Subcap	F-103-FLARE	H2S		28.56				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
297957	11/28/2018 7:47	4.60	NSR 6825A Flare MAERT Subcap	E-18-FLARE	H2S	0.26	0.07		33.72	7.33	Also exceeded Site-wide Cap of 4.64 lbs/hr
			NSR 6825A Flare MAERT Subcap	E-19-FLARE	H2S		0.09				
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	H2S		5.00				
303049	2/19/2019 17:50	0.52	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	0.26	21.45	21.45			Also exceeded Site-wide Cap of 4.64 lbs/hr
304485	3/12/2019 0:41	36.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	0.26	2,411.65	66.01			Also exceeded Site-wide Cap of 4.64 lbs/hr
199593	6/10/2014 0:37	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103-FLARE	H2S	4.64	4.81		6.19	5.90	
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	H2S		0.82				
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	H2S		0.56				
			Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	H2S		0.01				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	H2S	4.64	104.30		106.26	31.72	
			Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	H2S		1.95				
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	H2S	4.64	0.78		37.21	32.36	
			Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	H2S		36.43				
207580	12/16/2014 14:11	0.92	NSR 6825A Flare MAERT Subcap	E-103-FLARE	H2S	4.64	73.90		80.40	80.40	
			NSR 6825A Flare MAERT Subcap	E-15-FLARE	H2S		0.70				
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	H2S		0.20				
			NSR 6825A Flare MAERT Subcap	E-19-FLARE	H2S		5.10				
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	H2S		0.10				
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	H2S		0.40				
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-23-FLARE	H2S	4.64	221.00		225.80	225.80	
			NSR 6825A Flare Subcap	E-26-FLARE	H2S		4.80				



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
207996	1/2/2015 12:59	5.43	NSR 6825A MAERT Flare Subcap	E-103-FLARE	H2S	4.64	15.00		94.20	17.34	
			NSR 6825A MAERT Flare Subcap	E-19-FLARE	H2S		3.20				
			NSR 6825A MAERT Flare Subcap	E-22-FLARE	H2S		76.00				
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-23-FLARE	H2S	4.64	66.28		67.48	15.00	
			NSR Permit 6825A MAERT Limit	E-26-FLARE	H2S		1.20				
208135	1/5/2015 19:00	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	H2S	4.64	84.00		84.00	6.56	
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-23-FLARE	H2S	4.64	134.00		134.00	134.00	
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	H2S	4.64	0.80		74.60	5.83	
			NSR 6825A MAERT Flare Subcap	E-26-FLARE	H2S		73.80				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
209380	1/27/2015 12:39	1.25	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	9.00		9.00	7.20	
211979	3/29/2015 20:53	3.93	SR 6825A Flare MAERT Subcap	E-15-FLARE	H2S	4.64	4.00		55.40	14.08	
			SR 6825A Flare MAERT Subcap	E-20-FLARE	H2S		0.40				
			SR 6825A Flare MAERT Subcap	F-18-FLARE	H2S		51.00				
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	H2S	4.64	6.50		6.60	6.60	
			Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	H2S		1.10				
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	3.00		8.00	7.74	
			NSR 6825A Flare MAERT Subcap	E-26-FLARE	H2S		5.00				
219537	8/30/2015 10:28	18.05	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	268.00		268.00	14.85	
219883	9/8/2015 10:54	0.40	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	161.00		161.00	161.00	
222878	11/10/2015 11:00	24.35	NSR 6825A Flare MAERT Subcap	E-15-FLARE	H2S	4.64	27.30		220.57	9.06	
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	H2S		27.30				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	H2S		81.00				
			NSR 6825A MAERT Fugitive Subcap	F-241	H2S		84.97				
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	20.40		22.20	9.94	
			NSR 6825A Flare MAERT Subcap	E-26-FLARE	H2S		1.80				
227868	2/18/2016 1:56	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103B-FLARE	H2S		13.80				
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	H2S	4.64	1.00		18.00	17.14	
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	H2S		3.20				
229737	3/25/2016 9:33	1.55	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	H2S		5.04				
			Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	H2S	4.64	0.00		13.74	8.86	
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	H2S		8.70				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			Allowable entry is based on most recent guidance from TCEQ staff	F-243	H2S		0.00				
233436	5/17/2016 23:26	24.00	6825A Flare MAERT Subcap	E-103B-FLARE	H2S	4.64	170.00		505.00	21.04	
			6825A Flare MAERT Subcap	E-15-FLARE	H2S		110.00				
			6825A Flare MAERT Subcap	E-18-FLARE	H2S		110.00				
			6825A Flare MAERT Subcap	E-20-FLARE	H2S		115.00				
240598	8/2/2016 13:05	2.07	6825A Flare MAERT Subcap	E-103-FLARE	H2S	4.64	33.05		46.99	22.74	
			6825A Flare MAERT Subcap	E-19-FLARE	H2S		5.95				
			6825A Flare MAERT Subcap	E-20-FLARE	H2S		0.51				
			6825A Flare MAERT Subcap	E-22-FLARE	H2S		7.48				
246089	10/26/2016 2:32	9.35	6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	117.10		117.10	12.52	
249951	1/6/2017 14:11	0.88	NSR Permit 6825A Flare Subcap	E-23-FLARE	H2S	4.64	82.51		82.51	82.51	
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	233.52		233.54	10.10	
			6825A Flare MAERT Subcap	E-26-FLARE	H2S		0.02				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
251528	1/31/2017 1:19	2.42	6825A Flare MAERT Subcap	F-19-Flare	H2S	4.64	38.13		38.62	15.98	
			6825A Flare MAERT Subcap	F-22-FLARE	H2S		0.49				
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	283.97		283.98	191.45	
			NSR 6825A Flare MAERT Subcap	E-26-FLARE	H2S		0.01				
255560	4/3/2017 15:55	6.77	NSR Permit 6825A MAERT	E-03-SCOT	H2S	4.64	76.50		76.50	11.31	
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	4.64	121.72		121.75	76.09	
			NSR 6825A Flare MAERT Subcap	E-26-FLARE	H2S		0.03				
258271	5/19/2017 13:04	1.45	NSR Permit 6825A Flare subcap	F-103-FLARE	H2S	4.64	20.71		39.28	27.09	
			NSR Permit 6825A Flare subcap	F-19-FLARE	H2S		12.56				
			NSR Permit 6825A Flare subcap	F-22-FLARE	H2S		6.01				
268139	9/19/2017 11:50	1.33	6825A Site Wide CAP	T-108	H2S	4.64	57.00		57	42.75	
273558	11/30/2017 22:10	0.43	6825A Site Wide CAP	E-23-FLARE	H2S	4.64	196.87		196.91	196.91	
			6825A Site Wide CAP	E-26-FLARE	H2S		0.04				
			6825A Site Wide CAP	E-103-FLARE	H2S		89.10				
			6825A Site Wide CAP	E-15-FLARE	H2S		1.67				

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276746	1/19/2018 8:15	6.22	6825A Site Wide CAP	E-18-FLARE	H2S	4.64	0.01		121.66	19.57	
			6825A Site Wide CAP	E-19-FLARE	H2S		0.42				
			6825A Site Wide CAP	E-20-FLARE	H2S		0.44				
			6825A Site Wide CAP	E-22-FLARE	H2S		30.02				
280434	3/13/2018 16:38	0.32	6825A Site Wide CAP	E-23-FLARE	H2S	4.64	8.51		8.51	8.51	
202132	8/11/2014 4:56	0.92	6825A Flexible Permit Representation	F-443	HF	0.33	141.00		141.00	141.00	
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	NOx	0.31	69.04	60.03			
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-26-FLARE	NOx	0.31	1.40	1.40			
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-26-FLARE	NOx	0.31	0.50	0.50			
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-26-FLARE	NOx	0.31	62.40	4.88			
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-26-FLARE	NOx	0.31	2.00	2.00			
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	NOx	0.31	4.00	5.58			
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-26-FLARE	NOx	0.31	5.00	4.84			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-26-FLARE	NOx	0.31	31.73	18.31			
247644	11/25/2016 16:50	18.83	NSR Permit 6825A Flare Subcap	E-26-FLARE	NOx	0.31	587.04	31.17			
249951	1/6/2017 14:11	0.88	NSR Permit 6825A Flare Subcap	E-26-FLARE	NOx	0.31	5.93	5.93			
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-26-FLARE	NOx	0.31	16.29	14.59			
250132	1/7/2017 1:07	0.40	NSR Permit 6825A Flare Subcap	E-26-FLARE	NOx	0.31	10.02	10.02			
273558	11/30/2017 22:10	0.43	6825 Flare MAERT Subcap	E-26-FLARE	NOx	0.31	0.56	0.56			
303049	2/19/2019 17:50	0.52	NSR 6825A HCU943 Flare MAERT	E-26-FLARE	NOx	0.31	17.68	17.68			
304485	3/12/2019 0:41	36.53	NSR 6825A HCU943 Flare MAERT	E-26-FLARE	NOx	0.31	110.53	3.03			
250882	1/22/2017 3:10	26.83	6825A Flare MAERT Subcap	F-15-FLARE	NOx	0.87	1.18		122.98	4.58	
			6825A Flare MAERT Subcap	F-18-FLARE			1.69				
			6825A Flare MAERT Subcap	F-23-FLARE			118.04				
			6825A Flare MAERT Subcap	F-20-FLARE			2.07				

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208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-02-147	NOx	7.8	43.40	9.64			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-01-147	NOx	13.86	130.10	28.91			
202132	8/11/2014 4:56	0.92	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	NOx	43.93	1.40		65.60	65.60	
			Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	NOx		46.00				
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	NOx		18.20				
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-23-FLARE	NOx	43.93	66.40		66.40	66.40	
207996	1/2/2015 12:59	5.43	NSR 6825A MAERT Flare Subcap	E-103-FLARE	NOx	43.93	54.00		331.00	60.92	
			NSR 6825A MAERT Flare Subcap	E-19-FLARE	NOx		11.00				



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			NSR 6825A MAERT Flare Subcap	E-22-FLARE	NOx		266.00				
254881	3/28/2017 3:00	6.40	NSR Permit 6825A Flare Subcap	F-103-FLARE	NOx	43.93	52.78		330.89	51.70	
			NSR Permit 6825A Flare Subcap	F-19-Flare	NOx		19.01				
			NSR Permit 6825A Flare Subcap	F-22-FLARE	NOx		259.10				
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	43.93	89.44		89.44	60.30	
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	43.93	75.76		75.76	47.35	
273558	11/30/2017 22:10	0.43	6825 Flare MAERT Subcap	E-23-FLARE	NOx	43.93	48.07		48.07	48.07	
268139	9/19/17 11:50 AM	1.33	NSR Permit 6825A Site Wide CAP	T-108	NOx	859.9	6,744.00		6,744.00	5,070.68	Limit may be 885.8 lbs/hr depending on status of projects described in footnote 6 of Permit
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	F-942	Opacity	15%	100%				
202027	8/7/2014 15:29	10.55	NSR Permit 6825A MAERT	E-04-SCOT	Opacity	15%	100%				

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202260	8/12/2014 13:19	4.05	NSR Permit 6825A MAERT	E-01-SCOT	Opacity	15%	100%				
202260	8/12/2014 13:19	4.05	NSR Permit 6825A MAERT	E-02-SCOT	Opacity	15%	100%				
232372	4/28/2016 13:22	21.78	6825A Flare MAERT Subcap	F-13-FLARE	Opacity		100%				
233436	5/17/2016 23:26	24.00	6825A Special Condition 6.C	E-20-FLARE	Opacity		100%				
240598	8/2/2016 13:05	2.07	30 TAC 111.111(a)(4)	E-103-FLARE	Opacity		100%				
240598	8/2/2016 13:05	2.07	30 TAC 111.111(a)(4)	E-15-FLARE	Opacity		100%				
240598	8/2/2016 13:05	2.07	30 TAC 111.111(a)(4)	E-18-FLARE	Opacity		100%				
240598	8/2/2016 13:05	2.07	30 TAC 111.111(a)(4)	E-19-FLARE	Opacity		100%				
240598	8/2/2016 13:05	2.07	30 TAC 111.111(a)(4)	E-20-FLARE	Opacity		100%				
240598	8/2/2016 13:05	2.07	30 TAC 111.111(a)(4)	E-22-FLARE	Opacity		100%				
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-02-147	PM	1.28	13.00	2.89			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-01-843	PM	1.87	9.00	2.00			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-01-147	PM	2.77	29.80	6.62			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
268139	9/19/17 11:50 AM	1.33	NSR Permit 6825A Site Wide CAP	T-108	PM	120.8	286,284.00		286,284.00	214,713.00	Limit may be 132.6 lbs/hr depending on status of projects described in footnote 6 of Permit
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	SO2	0.01	179.79	53.67			
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	SO2	0.01	3,357.55	2,919.61			Also exceeded Site-wide Cap of 771.9 lbs/hr
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-26-FLARE	SO2	0.01	447.80	447.80			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-26-FLARE	SO2	0.01	112.90	25.09			
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-26-FLARE	SO2	0.01	0.20	0.20			
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-26-FLARE	SO2	0.01	6,946.00	542.66			
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-26-FLARE	SO2	0.01	363.20	363.20			

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216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	SO2	0.01	99.30	99.30			
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	166.50	74.55			
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-26-FLARE	SO2	0.01	1,158.32	668.26			
247644	11/25/2016 16:50	18.83	NSR Permit 6825A Flare Subcap	E-26-FLARE	SO2	0.01	342.50	18.19			
249951	1/6/2017 14:11	0.88	NSR 6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	4.42	4.42			
250130	1/7/2017 22:34	1.12	NSR 6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	37.99	34.02			
250132	1/7/2017 1:07	0.40	NSR Permit 6825A Flare Subcap	E-26-FLARE	SO2	0.01	433.53	433.53			
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	2.95	0.13			
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	1.03	0.69			
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	2.81	1.76			
273558	11/30/2017 22:10	0.43	6825 Flare MAERT Subcap	E-26-FLARE	SO2	0.01	4.08	4.08			
276593	1/16/2018 18:35	32.42	6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	56.61	1.75			
280434	3/13/2018 16:38	0.32	6825A Flare MAERT Subcap	E-26-FLARE	SO2	0.01	0.40	0.40			
303049	2/19/2019 17:50	0.52	NSR 6825A HCU943 Flare MAERT	E-26-FLARE	SO2	0.01	413.49	413.49			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
304485	3/12/2019 0:41	36.53	NSR 6825A HCU943 Flare MAERT	E-26-FLARE	SO2	0.01	1,641.12	44.92			
250882	1/22/2017 3:10	26.83	NSR Permit 6825A MAERT	E-01-241	SO2	2.23	84.36	3.14			
267842	9/13/2017 23:04	6.57	NSR Permit 6825A MAERT	E-01-443	SO2	3.34	34.45	5.25			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-02-147	SO2	4.1	110.50	24.56			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-01-843	SO2	6.79	87.90	19.53			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-03-843	SO2	6.79	72.80	16.18			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-01-147	SO2	10.59	264.50	58.78			
			Allowable entry is based on most recent guidance from TCEQ staff	E-103-FLARE	SO2		444.02				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes	
199593	6/10/2014 0:37	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	SO2	24.87	75.37		571.33	544.12		
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	SO2		51.94					
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	SO2	24.87	1.30		9,611.90	2,869.22	Also exceeded Site-wide Cap of 771.9 lbs/hr	
			Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	SO2		9,610.60					
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, flare included in Refinery Flare Subcap.	E-05-FLARE	SO2	24.87	1,053.00		1,053.00	260.00		
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	SO2	24.87	72.22		72.22	62.80		
207580	12/16/2014 14:11	0.92	NSR 6825A Flare MAERT Subcap	E-103-FLARE	SO2	24.87	6,956.80		7,759.80	7,759.80	Also exceeded Site-wide Cap of 771.9 lbs/hr	
			NSR 6825A Flare MAERT Subcap	E-15-FLARE	SO2		68.60					
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	SO2		18.60					
			NSR 6825A Flare MAERT Subcap	E-19-FLARE	SO2		479.50					

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	SO2		6.30				
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	SO2		230.00				
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-23-FLARE	SO2	24.87	20,753.00		20,753.00	20,753.00	Also exceeded Site-wide Cap of 771.9 lbs/hr
207996	1/2/2015 12:59	5.43	NSR 6825A MAERT Flare Subcap	E-103-FLARE	SO2	24.87	1,449.00		8,857.00	1,630.12	Also exceeded Site-wide Cap of 771.9 lbs/hr
			NSR 6825A MAERT Flare Subcap	E-19-FLARE	SO2		298.00				
			NSR 6825A MAERT Flare Subcap	E-22-FLARE	SO2		7,110.00				
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-23-FLARE	SO2	24.87	6,238.00		6,238.00	1,386.22	Also exceeded Site-wide Cap of 771.9 lbs/hr
208135	1/5/2015 19:00	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	SO2	24.87	7,909.00		7,909.00	617.89	
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-23-FLARE	SO2	24.87	12,597.00		12,597.00	12,597.00	Also exceeded Site-wide Cap of 771.9 lbs/hr
209380	1/27/2015 12:39	1.25	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	844.00		844.00	675.20	

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
211979	3/29/2015 20:53	3.93	NSR 6825A Flare MAERT Subcap	E-15-FLARE	SO2	24.87	295.00		5,084.00	1,292.54	Also exceeded Site-wide Cap of 771.9 lbs/hr
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	SO2		30.00				
			NSR 6825A Flare MAERT Subcap	F-18-FLARE	SO2		4,759.00				
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	SO2	24.87	614.00		614.00	614.00	
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	296.00		296.00	286.45	
219537	8/30/2015 10:28	18.05	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	25,223.00		25,223.00	1,397.40	Also exceeded Site-wide Cap of 771.9 lbs/hr
219883	9/8/2015 10:54	0.40	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	15,107.00		15,107.00	15,107.00	Also exceeded Site-wide Cap of 771.9 lbs/hr
220359	9/19/2015 16:29	1.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	573.00		573.00	373.70	
222878	11/10/2015 11:00	24.35	NSR 6825A Flare MAERT Subcap	E-15-FLARE	SO2	24.87	2,571.30		13,016.00	534.54	
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	SO2		2,820.00				
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	SO2		7,624.70				
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	1,921.90		1,921.90	860.55	Also exceeded Site-wide Cap of 771.9 lbs/hr



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
227868	2/18/2016 1:56	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103B-FLARE	SO2	24.87	1,294.20		1,649.40	1,570.86	Also exceeded Site-wide Cap of 771.9 lbs/hr
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	SO2		53.00				
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	SO2		302.20				
229737	3/25/2016 9:33	1.55	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	SO2	24.87	473.99		1,293.10	834.26	Also exceeded Site-wide Cap of 771.9 lbs/hr
			Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	SO2		0.25				
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	SO2		818.86				
233436	5/17/2016 23:26	24.00	6825A Flare MAERT Subcap	E-103B-FLARE	SO2	24.87	12,500.00		15,200.00	633.33	
			6825A Flare MAERT Subcap	E-15-FLARE	SO2		550.00				
			6825A Flare MAERT Subcap	E-18-FLARE	SO2		550.00				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			6825A Flare MAERT Subcap	E-20-FLARE	SO2		1,600.00				
240598	8/2/2016 13:05	2.07	6825A Flare MAERT Subcap	E-103-FLARE	SO2	24.87	3,155.60		3,982.99	1,927.25	Also exceeded Site-wide Cap of 771.9 lbs/hr
			6825A Flare MAERT Subcap	E-15-FLARE	SO2		0.03				
			6825A Flare MAERT Subcap	E-18-FLARE	SO2		0.08				
			6825A Flare MAERT Subcap	E-19-FLARE	SO2		395.70				
			6825A Flare MAERT Subcap	E-20-FLARE	SO2		48.41				
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	SO2		383.17				
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-23-FLARE	SO2	24.87	274.91		274.91	158.60	
244860	9/30/2016 15:50	26.17	6825A Flare MAERT Subcap	F-22-FLARE	SO2	24.87	2,926.63		2,926.63	111.85	
245746	10/19/2016 10:10	26.08	6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	1,542.08		1,542.08	59.12	
246089	10/26/2016 2:32	9.35	6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	10,785.83		10,785.83	1,153.56	Also exceeded Site-wide Cap of 771.9 lbs/hr
246280	10/29/2016 22:35	9.50	6825A Flare MAERT Subcap	F-103-FLARE	SO2	24.87	295.71		2,111.42	222.25	
			6825A Flare MAERT Subcap	F-22-FLARE	SO2		1,815.33				
247504	11/21/2016 11:16	42.87	6825A Flare MAERT Subcap	F-103-FLARE	SO2	24.87	2,329.72		5,747.71	134.08	
			6825A Flare MAERT Subcap	F-19-FLARE	SO2		2,790.68				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			6825A Flare MAERT Subcap	F-22-FLARE	SO2		627.31				
249951	1/6/2017 14:11	0.88	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	7,600.05		7,600.05	7,600.05	Also exceeded Site-wide Cap of 771.9 lbs/hr
250130	1/7/2017 22:34	1.12	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	7,619.76		7,619.76	6,823.67	Also exceeded Site-wide Cap of 771.9 lbs/hr
250434	1/16/2017 8:09	0.37	6825A Flare MAERT Subcap	E-05-FLARE	SO2	24.87	233.17		233.17	233.17	
250882	1/22/2017 3:10	26.83	6825A Flare MAERT Subcap	E-15-FLARE	SO2	24.87	3.33		2,516.99	93.80	
			6825A Flare MAERT Subcap	E-23-FLARE	SO2		2,459.41				
			6825A Flare MAERT Subcap	F-18-FLARE	SO2		45.06				
			6825A Flare MAERT Subcap	F-20-FLARE	SO2		9.19				
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	21,866.88		21,866.88	945.94	Also exceeded Site-wide Cap of 771.9 lbs/hr
251528	1/31/2017 1:19	2.42	6825A Flare MAERT Subcap	F-103-FLARE	SO2	24.87	0.09		3,557.82	1,472.20	Also exceeded Site-wide Cap of 771.9 lbs/hr
			6825A Flare MAERT Subcap	F-19-Flare	SO2		3,512.42				
			6825A Flare MAERT Subcap	F-22-FLARE	SO2		45.31				
254881	3/28/2017 3:00	6.40	NSR Permit 6825A Flare Subcap	F-103-FLARE	SO2	24.87	17.74		1,961.79	306.53	
			NSR Permit 6825A Flare Subcap	F-19-Flare	SO2		56.79				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			NSR Permit 6825A Flare Subcap	F-22-FLARE	SO2		1,887.26				
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	26,156.43		26,156.43	17,633.55	Also exceeded Site-wide Cap of 771.9 lbs/hr
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	11,211.43		11,211.43	7,007.14	Also exceeded Site-wide Cap of 771.9 lbs/hr
258271	5/19/2017 13:04	1.45	NSR Permit 6825A Flare Subcap	F-103-FLARE	SO2	24.87	1,907.31		3,617.05	2,494.52	Also exceeded Site-wide Cap of 771.9 lbs/hr
			NSR Permit 6825A Flare Subcap	F-19-FLARE	SO2		1,156.46				
			NSR Permit 6825A Flare Subcap	F-22-FLARE	SO2		553.28				
273558	11/30/2017 22:10	0.43	6825 Flare MAERT Subcap	E-23-FLARE	SO2	24.87	18,133.50		18,133.50	18,133.50	Also exceeded Site-wide Cap of 771.9 lbs/hr
276593	1/16/2018 18:35	32.42	6825A Flare MAERT Subcap	E-103B-FLARE	SO2	24.87	85.33		2,953.51	91.11	
			6825A Flare MAERT Subcap	E-19-FLARE	SO2		41.50				
			6825A Flare MAERT Subcap	E-23-FLARE	SO2		2,826.68				
			6825A Flare MAERT Subcap	E-103-FLARE	SO2		8,206.83				
			6825A Flare MAERT Subcap	E-15-FLARE	SO2		154.22				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
276746	1/19/2018 8:15	6.22	6825A Flare MAERT Subcap	E-18-FLARE	SO2	24.87	1.20		11,207.38	1,802.80	Also exceeded Site-wide Cap of 771.9 lbs/hr
			6825A Flare MAERT Subcap	E-19-FLARE	SO2		38.97				
			6825A Flare MAERT Subcap	E-20-FLARE	SO2		40.87				
			6825A Flare MAERT Subcap	E-22-FLARE	SO2		2,765.29				
280434	3/13/2018 16:38	0.32	6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	784.01		784.01	784.01	Also exceeded Site-wide Cap of 771.9 lbs/hr
297957	11/28/2018 7:47	4.60	NSR 6825A Flare MAERT Subcap	F-103-FLARE	SO2	24.87	2,631.08		3,105.98	675.21	
			NSR 6825A Flare MAERT Subcap	E-15-FLARE	SO2		0.37				
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	SO2		6.10				
			NSR 6825A Flare MAERT Subcap	E-19-FLARE	SO2		8.11				
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	SO2		460.32				
303049	2/19/2019 17:50	0.52	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	1,975.49	1,975.49			Also exceeded Site-wide Cap of 771.9 lbs/hr
304485	3/12/2019 0:41	36.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	SO2	24.87	222,139.85	6,080.47			Also exceeded Site-wide Cap of 771.9 lbs/hr
202260	8/12/2014 13:19	4.05	NSR Permit 6825A MAERT	E-01-SCOT	SO2	57.9	533.16	131.64			
216783	7/3/2015 12:23	29.00	Allowable entry is based on most recent guidance from TCEQ staff	E-01-SCOT	SO2	57.9	2,776.00	95.72			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
202260	8/12/2014 13:19	4.05	NSR Permit 6825A MAERT	E-02-SCOT	SO2	82.77	424.78	104.88			
202027	8/7/2014 15:29	10.55	NSR Permit 6825A MAERT	E-04-SCOT	SO2	137.89	4,283.00	405.97		405.97	Also exceeded SRU Subcap emission limit of 345.83 lbs/hr
204436	9/29/2014 21:44	27.27	NSR Permit 6825A MAERT	E-03-SCOT	SO2	137.89	5,049.00	185.17			
221746	10/17/2015 11:56	9.00	NSR Permit 6825A MAERT Limit	E-04-SCOT	SO2	137.89	2,701.98	300.22			
222618	11/3/2015 6:00	6.00	NSR Permit 6825A MAERT	E-03-SCOT	SO2	137.89	1,709.00	284.83			
255560	4/3/2017 15:55	6.77	NSR Permit 6825A MAERT	E-03-SCOT	SO2	137.89	1,475.70	218.08			
267400	9/9/2017 16:53	2.63	6825A MAERT Subcap	E-03-SCOT	SO2	137.89	1,583.80	601.44		601.44	Also exceeded SRU Subcap emission limit of 345.83 lbs/hr
267842	9/13/2017 23:04	6.57	6825A MAERT Subcap	E-03-SCOT	SO2	137.89	74,616.60	11,362.93		11,362.93	Also exceeded SRU Subcap emission limit of 345.83 lbs/hr, and Site-wide Cap of 771.9 lbs/hr
304199	3/8/2019 2:00	14.00	NSR 6825A SRU-545 MAERT	E-03-SCOT	SO2	137.89	2,090.65	149.33			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
268139	9/19/17 11:50 AM	1.33	NSR Permit 6825A Site Wide CAP	T-108	SO2	771.9	52,304.00	39,228.00			
235693	6/14/2016 13:30	141.12	NSR Permit 6825A MAERT total VOC limit is 2.1 lb/hr	F-366CT	VOCs (total)	2.1	12,949.30	91.76			
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	VOCs (total)	37.92	204.53		204.53	177.85	
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	VOCs (total)	37.92	63.40		63.40	63.40	
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-26-FLARE	VOCs (total)	37.92	472.00		472.00	456.77	
303049	2/19/2019 17:50	0.52	NSR 6825A COEXII VOC Cap	E-26-FLARE	VOCs (total)	37.92	60.41	60.41			
202132	8/11/2014 4:56	0.92	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	VOCs (total)	65.74	28.70		2,930.70	2,930.70	Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr
			Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	VOCs (total)		2,544.00				
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	VOCs (total)		358.00				
			NSR 6825A Flare MAERT Subcap	E-103-FLARE	VOCs (total)		140.60				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
207580	12/16/2014 14:11	0.92	NSR 6825A Flare MAERT Subcap	E-15-FLARE	VOCs (total)	65.74	1.40		142.50	142.50	
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	VOCs (total)		0.40				
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	VOCs (total)		0.10				
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-23-FLARE	VOCs (total)	65.74	282.77		282.77	282.77	
207996	1/2/2015 12:59	5.43	NSR 6825A MAERT Flare Subcap	E-103-FLARE	VOCs (total)	65.74	890.70		5,698.71	1,048.84	Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr
			NSR 6825A MAERT Flare Subcap	E-19-FLARE	VOCs (total)		192.61				
			NSR 6825A MAERT Flare Subcap	E-22-FLARE	VOCs (total)		4,615.40				
219883	9/8/2015 10:54	0.40	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	65.74	104.00		104.00	104.00	
227868	2/18/2016 1:56	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103B-FLARE	VOCs (total)	65.74	290.80		382.10	363.91	
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	VOCs (total)		27.00				



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	VOCs (total)		64.30				
232372	4/28/2016 13:22	21.78	6825A Flare MAERT Subcap	F-13-FLARE	VOCs (total)	65.74	5,419.89		5,419.89	248.81	
233436	5/17/2016 23:26	24.00	6825A Flare MAERT Subcap	E-103B-FLARE	VOCs (total)	65.74	800.00		1,775.00	73.96	
			6825A Flare MAERT Subcap	E-15-FLARE	VOCs (total)		250.00				
			6825A Flare MAERT Subcap	E-18-FLARE	VOCs (total)		150.00				
			6825A Flare MAERT Subcap	E-20-FLARE	VOCs (total)		575.00				
240598	8/2/2016 13:05	2.07	6825A Flare MAERT Subcap	E-103-FLARE	VOCs (total)	65.74	185.30		266.08	128.75	
			6825A Flare MAERT Subcap	E-19-FLARE	VOCs (total)		28.21				
			6825A Flare MAERT Subcap	E-20-FLARE	VOCs (total)		0.35				
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	VOCs (total)		52.22				
246280	10/29/2016 22:35	9.50	6825A Flare MAERT Subcap	F-103-FLARE	VOCs (total)	65.74	10.75		938.33	98.77	
			6825A Flare MAERT Subcap	F-22-FLARE	VOCs (total)		927.58				
249951	1/6/2017 14:11	0.88	NSR Permit 6825A Flare Subcap	E-23-FLARE	VOCs (total)	65.74	133.68		133.68	133.68	

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
254881	3/28/2017 3:00	6.40	NSR Permit 6825A Flare Subcap	F-103-FLARE	VOCs (total)	65.74	368.30		4,754.94	742.96	Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr
			NSR Permit 6825A Flare Subcap	F-19-Flare	VOCs (total)		66.16				
			NSR Permit 6825A Flare Subcap	F-22-FLARE	VOCs (total)		4,320.48				
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	65.74	169.73		169.73	114.42	
258271	5/19/2017 13:04	1.45	NSR Permit 6825A Flare subcap	F-103-FLARE	VOCs (total)	65.74	185.84		327.30	225.72	
			NSR Permit 6825A Flare subcap	F-19-FLARE	VOCs (total)		88.57				
			NSR Permit 6825A Flare subcap	F-22-FLARE	VOCs (total)		52.89				
276746	1/19/2018 8:15	6.22	6825A Flare MAERT Subcap	E-103-FLARE	VOCs (total)	65.74	382.52		638.47	102.70	
			6825A Flare MAERT Subcap	E-15-FLARE	VOCs (total)		28.13				
			6825A Flare MAERT Subcap	E-18-FLARE	VOCs (total)		1.05				
			6825A Flare MAERT Subcap	E-19-FLARE	VOCs (total)		49.76				
			6825A Flare MAERT Subcap	E-20-FLARE	VOCs (total)		6.20				
			6825A Flare MAERT Subcap	E-22-FLARE	VOCs (total)		170.81				

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)	Notes
303049	2/19/2019 17:50	0.52	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	65.74	77.24	77.24			
304485	3/12/2019 0:41	36.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	65.74	6,016.45	164.68			
202136	8/11/2014 15:47	2.33	6825A Flexible Permit Representation	F-SRTF	VOCs (total)	218.6	1,614.00		1,614.00	691.71	Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr
268139	9/19/2017 11:50	1.33	NSR Permit 6825A Site Wide CAP	T-108	VOCs (total)	218.7	25,766.00		25,766.00	19,324.50	Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr
283558	5/10/2018 6:10	1.00	6825A Fugitive Subcap	F-SRTF	VOCs (total)	219.88	9,243.40		9,243.40	9,243.40	Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr
306176	4/7/2019 21:49	3.38	NSR 6825A REFINERY FUGITIVE VOC SUBCAP	F-1334	VOCs (total)	259.57	3,560.60	1,052.39			Also exceeded Site-wide Cap of 562.2 or 564 lbs/hr

**TABLE 2A: PERMIT O-1498 - RECORDABLE EVENTS**

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
1498	9/12/2015	E-01-SCOT	VOC, CO, H2S, NOx, PM, SO2
1498	12/15/2015	E-01-SCOT	VOC, CO, H2S, NOx, SO2
1498	12/16/2015	E-01-SCOT	SO2
1498	2/15/2016	E-01-SCOT	H2S
1498	2/23/2016	E-01-SCOT	VOC, CO, H2S, NOx, PM, SO2
1498	3/15/2016	E-01-SCOT	SO2
1498	3/31/2016	E-01-SCOT	SO2
1498	10/24/2016	E-01-SCOT	VOC, NOx, PM, SO2, CO, H2S
1498	12/7/2016	E-01-SCOT	VOC, CO, H2S, NOx, PM, SO2
1498	12/14/2016	E-01-SCOT	VOC, CO, NOx, PM, SO2
1498	12/15/2016	E-01-SCOT	VOC, CO, NOx, PM, SO2
1498	1/20/2017	E-01-SCOT	VOC, CO, NOx, PM, SO2, H2S, CS2
1498	3/7/2017	E-01-SCOT	VOC, CO, NOx, PM, SO2
1498	5/3/2017	E-01-SCOT	VOC, CO, NOx, PM, SO2
1498	11/27/2015	E-02-SCOT	VOC, CO, NOx, PM, SO2
1498	4/13/2016	E-02-SCOT	VOC, CO, H2S, NOx, PM, SO2
1498	4/29/2016	E-02-SCOT	VOC, CO, NOx, PM, SO2
1498	11/26/2016	E-02-SCOT	VOC, CO, NOx, PM, SO2
1498	11/10/2015	E-02-SCOT, E-01-SCOT	VOC, CO, H2S, NOx, SO2
1498	9/13/2015	E-04-SCOT	CO, H2S, NOx, SO2
1498	9/30/2015	E-04-SCOT	VOC, CO, H2S, NOx, PM, SO2
1498	10/31/2015	E-04-SCOT	H2S
1498	11/18/2015	E-04-SCOT	VOC, CO, NOx, PM, SO2
1498	3/28/2017	E-04-SCOT	VOC, H2S, NOx, PM, SO2
1498	6/13/2014	Flare-19, Flare-22, Flare-103	VOC, NOx, CO, SO2, H2S
1498	7/10/2014	Flare-15, Flare-18	VOC, NOx, CO, SO2
1498	8/20/2014	Flare-13	VOC, NOx, CO
1498	9/1/2014	Flare-13	VOC, NOx, CO
1498	9/3/2014	Flare-13	VOC, NOx, CO
1498	9/28/2014	Flare-19, Flare-22, Flare-103	VOC, NOx, CO, SO2
1498	10/15/2014	Flare-19, Flare-22, Flare-103	VOC, NOx, CO
1498	10/17/2014	Flare-19, Flare-22, Flare-103	VOC, NOx, CO, SO2, H2S
1498	11/12/3014	Flare-13	VOC, NOx, CO

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
1498	11/15/2014	Flare-18	VOC, NO <sub>x</sub> , CO
1498	12/8/2014	Flare-19, Flare-22, Flare-103	VOC, NO <sub>x</sub> , CO, SO <sub>2</sub> , H <sub>2</sub> S
1498	1/30/2015	Flare-15, Flare-18	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
1498	2/4/2015	Flare-19, Flare-22, Flare-103	VOC, SO <sub>2</sub> , H <sub>2</sub> S, NO <sub>x</sub> , CO
1498	2/19/2015	Flare-19, Flare-22, Flare-103	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
1498	3/11/2015	Flare-13	VOC, NO <sub>x</sub> , CO
1498	4/11/2015	Flare-13	VOC
1498	4/12/2015	Flare-15, Flare-18	VOC
1498	4/16/2015	Flare-19, Flare-22, Flare-103	NO <sub>x</sub> , CO, VOC, SO <sub>2</sub>
1498	5/26/2015	Flare-19, Flare-22, Flare-103	VOC, H <sub>2</sub> S, SO <sub>2</sub> , NO <sub>x</sub> , CO
1498	6/21/2015	Flare-13	VOC
1498	6/21/2015	Flare-19, Flare-22, Flare-103	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
1498	6/23/2015	Flare-19, Flare-22, Flare-103	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
1498	6/29/2015	Flare-13	VOC, SO <sub>2</sub> , NO <sub>x</sub> , CO
1498	7/4/2015	Flare-103, Flare-19, Flare-22	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
1498	7/8/2015	Flare-103, Flare-19, Flare-22	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , PM, SO <sub>2</sub>
1498	7/14/2015	Flare-19, Flare-22, Flare-103	VOC, CO, NO <sub>x</sub>
1498	7/16/2015	Flare-13	VOC, CO, NO <sub>x</sub>
1498	7/25/2015	Flare-13	VOC, CO, NO <sub>x</sub>
1498	8/13/2015	Flare-15, Flare-18, Flare-20	VOC, CO, NO <sub>x</sub>
1498	8/19/2015	Flare-103, Flare-22, Flare-19	VOC, CO, NO <sub>x</sub> , SO <sub>2</sub>
1498	8/20/2015	Flare-18, Flare-15, Flare-20	VOC, CO, NO <sub>x</sub> , SO <sub>2</sub>
1498	8/28/2015	Flare-13	VOC, CO, NO <sub>x</sub>

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
1498	9/8/2015	Flare-18, Flare-15, Flare-20	VOC, CO, NOx
1498	9/26/2015	Flare-13	VOC, CO, NOx
1498	10/20/2015	Flare-13	VOC, CO, NOx
1498	10/22/2015	Flare-13	VOC, CO, NOx
1498	10/22/2015	Flare-13	VOC, CO, NOx
1498	11/12/2015	Flare-22, Flare-103, Flare-19	VOC, CO, H2S, NOx, SO2
1498	11/13/2015	Flare-13	VOC, CO, NOx
1498	11/14/2015	Flare-13	VOC, CO, NOx
1498	11/23/2015	Flare-19, Flare-103, Flare-22	VOC, CO, H2S, NOx, SO2
1498	12/5/2015	Flare-13	VOC, CO, NOx
1498	12/16/2015	Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	12/30/2015	Flare-15, Flare-18, Flare-20	VOC, CO, H2S, NOx, SO2
1498	1/1/2016	Flare-18	VOC, H2S
1498	1/18/2016	Flare-13	VOC, CO, NOx
1498	2/10/2016	Flare-18, Flare-15, Flare-20	VOC, CO, H2S, NOx, SO2
1498	2/24/2016	Flare-15	VOC, CO, H2S, NOx, SO2
1498	3/1/2016	Flare-15	VOC, CO, H2S, NOx, SO2
1498	3/16/2016	Flare-15	VOC, CO, H2S, NOx, SO2
1498	4/12/2016	Flare-13	VOC, CO, NOx
1498	4/15/2016	Flare-13	VOC
1498	4/23/2016	Flare-13	VOC, CO, NOx
1498	4/27/2016	Flare-13	VOC, CO, NOx
1498	4/30/2016	Flare-13	VOC, CO, NOx
1498	5/25/2016	Flare-13	VOC, CO, NOx
1498	6/5/2016	Flare-13	VOC, CO, H2S, NOx, SO2
1498	6/5/2016	Flare-18	VOC, CO, H2S, NOx, SO2
1498	6/6/2016	Flare-18, Flare-15, Flare-20	VOC, CO, H2S, NOx, SO2
1498	6/8/2016	Flare-13	VOC, CO, H2S, NOx, SO2
1498	6/10/2016	Flare-18	VOC, CO, H2S, NOx, SO2
1498	6/11/2016	Flare-18	VOC, CO, H2S, NOx, SO2
1498	6/15/2016	Flare-13	VOC
1498	6/26/2016	Flare-18	VOC, CO, H2S, NOx, SO2
1498	6/27/2016	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
1498	7/1/2016	Flare-18	CO, NOx, SO2
1498	7/2/2016	Flare-13	VOC, CO, NOx
1498	7/3/2016	Flare-13	VOC
1498	7/6/2016	Flare-5, Flare-18, Flare-20	VOC, CO, H2S, NOx, SO2
1498	7/8/2016	Flare-13	VOC, CO, NOx
1498	7/9/2016	Flare-13	VOC
1498	7/12/2016	Flare-13	VOC, CO, NOx
1498	7/15/2016	Flare-15, Flare-18	VOC, CO, H2S, NOx, SO2
1498	7/31/2016	Flare-15, Flare-18, Flare-20	VOC, CO, H2S, NOx, SO2
1498	8/8/2016	Flare-13	VOC, CO, NOx
1498	8/9/2016	Flare-18	VOC, CO, NOx, SO2
1498	8/10/2016	Flare-13	VOC, CO, NOx
1498	8/15/2016	Flare-13	VOC, CO, NOx
1498	8/24/2016	Flare-103, Flare-22	VOC, CO, NOx, SO2
1498	8/27/2016	Flare-15, Flare-18	VOC, CO, H2S, NOx, SO2
1498	9/1/2016	Flare-18	VOC, CO, H2S, NOx, SO2
1498	9/4/2016	Flare-13	VOC, CO, NOx
1498	9/6/2016	Flare-13	VOC, CO, NOx
1498	9/9/2016	Flare-15, Flare-18	VOC, CO, H2S, NOx, SO2
1498	9/19/2016	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	9/23/2016	Flare-103	VOC, H2S
1498	10/19/2016	Flare-20	VOC
1498	10/22/2016	Flare-20	VOC
1498	10/26/2016	Flare-15, Flare-20, Flare-22	NOx, CO, SO2, VOC, H2S
1498	10/28/2016	Flare-13	NOx, CO, VOC
1498	11/1/2016	Flare-13	NOx, CO, VOC
1498	11/5/2016	Flare-18	VOC, CO, NOx, SO2
1498	11/8/2016	Flare-15, Flare-18	VOC, CO, NOx, SO2, H2S
1498	11/9/2016	Flare-05	H2S, SO2
1498	11/10/2016	Flare-18	VOC, CO, NOx, SO2, H2S
1498	12/5/2016	Flare-15	VOC, CO, NOx, SO2
1498	12/13/2016	Flare-05	H2S, SO2

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
1498	12/14/2016	Flare-15, Flare-18, Flare-20, E-01-147, E-02-147, CRU-1344H2	VOC, CO, H2S, NOx, SO2
1498	1/5/2017	Flare-15, Flare-18, Flare-20	VOC, CO, H2S, NOx, SO2
1498	1/7/2017	Flare-15, Flare-18, Flare-20	VOC, CO, H2S, NOx, SO2
1498	1/16/2017	Flare-05	H2S, SO2
1498	1/18/2017	Flare-15, Flare-18, Flare-20	VOC, CO, H2S, NOx, PM, SO2
1498	2/7/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	2/9/2017	Flare-05	H2S, SO2
1498	3/26/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	4/1/2017	Flare-13	VOC, CO, NOx
1498	4/7/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	4/7/2017	Flare-20	VOC, CO, H2S, NOx, SO2
1498	4/13/2017	Flare-15, Flare-18, Flare-20, Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	4/27/2017	Flare-13	VOC, CO, NOx
1498	5/5/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	5/5/2017	Flare-19, Flare-22, Flare-103, Flare-13, Flare-15, Flare-18, Flare-20	VOC, CO, H2S, NOx, SO2
1498	5/18/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	5/22/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	5/23/2017	Flare-19, Flare-22, Flare-103	VOC, CO, H2S, NOx, SO2
1498	6/15/2017	Flare-15	CO
1498	6/21/2017	Flare-13	VOC, CO, NOx
1498	6/22/2017	Flare-13	VOC, CO, NOx



**TABLE 2B: PERMIT O-3423 - RECORDABLE EVENTS**

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
3423	5/23/2014	Flare-26	VOC, NOx, CO, SO2, H2S
3423	11/23/2014	Flare-26	VOC, SO2, NOx, CO
3423	11/24/2014	Flare-26	VOC, SO2, NOx, CO
3423	11/26/2014	Flare-26	VOC, SO2, NOx, CO
3423	11/28/2014	Flare-26	VOC, SO2, NOx, CO
3423	12/1/2014	Flare-26	VOC, SO2, NOx, CO
3423	12/3/2014	Flare-26	VOC, SO2, NOx, CO
3423	12/7/2014	Flare-26	VOC, SO2, NOx, CO
3423	1/13/2015	Flare-26	VOC, SO2, NOx, CO
3423	1/19/2015	Flare-26	VOC, SO2, H2S, NOx, CO
3423	2/28/2015	Flare-26	VOC, SO2, NOx, CO
3423	3/9/2015	Flare-26	NOx
3423	3/11/2015	Flare-26	VOC, SO2, NOx, CO
3423	3/13/2015	Flare-26	VOC, SO2, NOx, CO
3423	3/20/2015	Flare-26	VOC, SO2, NOx, CO
3423	5/27/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	6/10/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	6/22/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	7/16/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	9/13/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	9/16/2015	Flare-26	VOC, CO, H2S, NOx, SO2
3423	9/21/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	10/6/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	11/6/2015	Flare-26	VOC, CO, NOx, SO2, H2S
3423	11/23/2015	Flare-26	VOC, CO, H2S, NOx, SO2
3423	12/3/2015	Flare-26	VOC, CO, H2S, NOx, SO2
3423	12/12/2015	Flare-26	VOC, CO, H2S, NOx, SO2
3423	2/4/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	2/14/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	2/14/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	3/16/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	6/14/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	7/29/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	9/12/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	9/24/2016	Flare-26	VOC, CO, H2S, NOx, SO2
3423	12/20/2016	Flare-26	VOC, CO, NOx, SO2
3423	12/20/2016	Flare-26	VOC, CO, NOx, SO2
3423	1/7/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	1/7/2017	Flare-26	VOC, CO, H2S, NOx, SO2

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
3423	1/7/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	1/7/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	1/7/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	1/7/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	1/18/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	1/18/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	3/25/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	3/25/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	4/15/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	4/15/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	4/18/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	4/18/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	5/5/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	5/5/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	5/26/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	7/27/2017	Flare-26	VOC, CO, H2S, NOx, SO2
3423	12/20/2017	Flare-26	VOC, CO, NOx, SO2

**TABLE 2C: PERMIT O-2229 - RECORDABLE EVENTS**

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
2229	4/1/2016	E-03-SCOT	VOC, CO, H2S, NOx, PM, SO2
2229	6/23/2016	E-03-SCOT	VOC, H2S, NOx, PM, SO2
2229	6/25/2016	E-03-SCOT	VOC, H2S, NOx, PM, SO2
2229	10/12/2016	E-03-SCOT	VOC, CO, H2S, NOx, PM, SO2
2229	2/21/2017	E-03-SCOT	VOC, CO, NOx, PM, SO2
2229	5/23/2014	Flare-23	VOC, NOx, CO, SO2, H2S
2229	5/26/2014	Flare-23	VOC, NOx, CO, SO2, H2S
2229	9/15/2014	Flare-23	VOC, NOx, CO, SO2
2229	9/29/2014	Flare-23	VOC, NOx, CO, SO2
2229	11/24/2014	Flare-23	VOC, NOx, CO, SO2
2229	11/28/2014	Flare-23	VOC, NOx, CO, SO2
2229	12/21/2014	Flare-23	VOC, NOx, CO, SO2, H2S
2229	1/11/2015	Flare-23	VOC, SO2, H2S, NOx, CO
2229	1/19/2015	Flare-23	VOC, SO2, H2S, NOx, CO
2229	2/28/2015	Flare-23	VOC, SO2, NOx, CO
2229	3/2/2015	Flare-23	VOC, NOx
2229	3/9/2015	Flare-23	NOx
2229	3/11/2015	Flare-23	VOC, SO2, NOx, CO
2229	3/13/2015	Flare-23	VOC, SO2, NOx, CO
2229	3/20/2015	Flare-23	VOC, SO2, NOx, CO
2229	5/27/2015	Flare-23	NOx
2229	6/10/2015	Flare-23	NOx
2229	6/22/2015	Flare-23	NOx
2229	7/16/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	8/26/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	9/4/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	9/10/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	9/13/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	9/16/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	9/21/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	10/6/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	11/6/2015	Flare-23	CO, H2S, NOx, PM, SO2
2229	11/11/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	11/23/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	12/12/2015	Flare-23	VOC, CO, H2S, NOx, SO2
2229	2/14/2016	Flare-23	VOC, CO, H2S, NOx, SO2
2229	3/16/2016	Flare-23	VOC, CO, H2S, NOx, SO2
2229	5/6/2016	Flare-23	VOC, CO, H2S, NOx, SO2
2229	6/14/2016	Flare-23	VOC, CO, H2S, NOx, SO2

<b>Title V Permit #</b>	<b>Start Date of Recordable Event</b>	<b>EPN</b>	<b>Pollutant(s) Released During Event</b>
2229	7/6/2016	Flare-23	CO, NO <sub>x</sub> , SO <sub>2</sub> , VOC
2229	7/29/2016	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	9/7/2016	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	9/13/2016	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	12/20/2016	Flare-23	VOC, CO, NO <sub>x</sub>
2229	2/16/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	3/25/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	4/15/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	4/18/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	5/5/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	5/25/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>
2229	5/26/2017	Flare-23	VOC, CO, H <sub>2</sub> S, NO <sub>x</sub> , SO <sub>2</sub>

**TABLE 3: PERMIT 6825A - VIOLATIONS OF "0.0" HOURLY LIMITS REPORTED BY VALERO - STEERS EVENTS**

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	CO	0.00	2.27	3.80	1.13		
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-26-FLARE	CO	0.00	2.27	9.50	2.11		
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-26-FLARE	CO	0.00	2.27	3.80	1.70		
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-26-FLARE	CO	0.00	2.27	5.34	0.23		
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-26-FLARE	CO	0.00	2.27	0.26	0.18		
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-26-FLARE	CO	0.00	2.27	0.24	0.15		
202027	8/7/2014 15:29	10.55	NSR Permit 6825A SRU Subcap	E-04-SCOT	CO	0.00	192.2	4.00		4.00	0.38
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, included in Refinery SRU Subcap	E-01-SCOT	CO	0.00	192.2	291.00		302.00	74.57
			NSR Permit 6825A, included in Refinery SRU Subcap.	E-02-SCOT	CO			11.00			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
204436	9/29/2014 21:44	27.27	NSR Permit 6825A SRU Subcap	E-03-SCOT	CO	0.00	192.2	156.00		156.00	5.72
208834	1/17/2015 9:00	15.00	NSR 6825A MAERT SRU Subcap	E-04-SCOT	CO	0.00	192.2	5.11		5.11	0.34
216783	7/3/2015 12:23	29.00	Allowable entry is based on most recent guidance from TCEQ staff	E-01-SCOT	CO	0.00	192.2	1,613.00		1,613.00	55.62
221746	10/17/2015 11:56	9.00	NSR Permit 6825A MAERT Subcap	E-04-SCOT	CO	0.00	192.2	229.69		229.69	25.52
222618	11/3/2015 6:00	6.00	NSR Permit 6825A MAERT Subcap	E-03-SCOT	CO	0.00	192.2	120.00		120.00	20.00
229032	3/11/2016 13:13	15.50	6825A SRU MAERT Subcap	E-04-SCOT	CO	0.00	192.2	20.74		20.74	1.34
199593	6/10/2014 0:37	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103-FLARE	CO	0.00	302.8	73.94		95.14	90.61
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	CO			12.55			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	CO			8.65			
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	CO	0.00	302.8	0.03		203.33	60.70
			Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	CO			203.30			
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, flare included in Refinery Flare Subcap.	E-05-FLARE	CO	0.00	302.8	2.00		2.00	0.49
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	CO	0.00	302.8	10.72		10.72	9.32
207580	12/16/2014 14:11	0.92	NSR 6825A Flare MAERT Subcap	E-103-FLARE	CO	0.00	302.8	123.50		138.60	138.60
			NSR 6825A Flare MAERT Subcap	E-15-FLARE	CO			1.20			
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	CO			0.30			
			NSR 6825A Flare MAERT Subcap	E-19-FLARE	CO			8.50			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	CO			0.10			
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	CO			5.00			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-23-FLARE	CO	0.00	302.8	524.10		524.10	116.47
208135	1/5/2015 19:00	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	CO	0.00	302.8	50.00		50.00	3.91
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	CO	0.00	302.8	1.70		1.70	0.13
209380	1/27/2015 12:39	1.25	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	16.00		16.00	12.80
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-23-FLARE	CO	0.00	302.8	0.90		0.90	0.90
211979	3/29/2015 20:53	3.93	SR 6825A Flare MAERT Subcap	E-15-FLARE	CO	0.00	302.8	21.00		353.00	89.75
			SR 6825A Flare MAERT Subcap	E-20-FLARE	CO			2.00			
			SR 6825A Flare MAERT Subcap	F-18-FLARE	CO			330.00			
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	CO	0.00	302.8	9.70		9.70	9.70



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	21.00		21.00	20.32
219537	8/30/2015 10:28	18.05	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	548.50		548.50	30.39
220359	9/19/2015 16:29	1.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	34.00		34.00	22.17
222878	11/10/2015 11:00	24.35	NSR 6825A Flare MAERT Subcap	E-15-FLARE	CO	0.00	302.8	45.60		231.10	9.49
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	CO			50.10			
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	CO			135.40			
223014	11/15/2015 7:30	106.00	6825A Flare MAERT Subcap	E-22-FLARE	CO	0.00	302.8	385.30		385.30	3.63
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	129.40		129.40	57.94
227868	2/18/2016 1:56	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103B-FLARE	CO	0.00	302.8	112.00		146.80	139.81
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	CO			10.00			
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	CO			24.80			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
232372	4/28/2016 13:22	21.78	6825A Flare MAERT Subcap	F-13-FLARE	CO	0.00	302.8	529.87		529.87	24.32
240598	8/2/2016 13:05	2.07	6825A Flare MAERT Subcap	E-103-FLARE	CO	0.00	302.8	215.75		302.85	146.54
			6825A Flare MAERT Subcap	E-15-FLARE	CO			9.42			
			6825A Flare MAERT Subcap	E-18-FLARE	CO			1.15			
			6825A Flare MAERT Subcap	E-19-FLARE	CO			31.64			
			6825A Flare MAERT Subcap	E-20-FLARE	CO			11.71			
			6825A Flare MAERT Subcap	E-22-FLARE	CO			33.18			
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-23-FLARE	CO	0.00	302.8	16.62		16.62	9.59
244860	9/30/2016 15:50	26.17	6825A Flare MAERT Subcap	F-22-FLARE	CO	0.00	302.8	1,762.49		1,762.49	67.36
245746	10/19/2016 10:10	26.08	6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	384.71		384.71	14.75
246089	10/26/2016 2:32	9.35	6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	173.92		173.92	18.60
246280	10/29/2016 22:35	9.50	6825A Flare MAERT Subcap	F-103-FLARE	CO	0.00	302.8	39.74		827.66	87.12
			6825A Flare MAERT Subcap	F-22-FLARE	CO			787.92			
			6825A Flare MAERT Subcap	F-103-FLARE	CO			277.47			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
247504	11/21/2016 11:16	42.87	6825A Flare MAERT Subcap	F-19-FLARE	CO	0.00	302.8	270.78		620.03	14.46
			6825A Flare MAERT Subcap	F-22-FLARE	CO			71.78			
247644	11/25/2016 16:50	18.83	NSR Permit 6825A Flare Subcap	E-23-FLARE	CO	0.00	302.8	1.32		1.32	0.07
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-23-FLARE	CO	0.00	302.8	208.99		208.99	187.16
250882	1/22/2017 3:10	26.83	6825A Flare MAERT Subcap	E-15-FLARE	CO	0.00	302.8	6.03		626.64	23.35
			6825A Flare MAERT Subcap	E-23-FLARE	CO			601.46			
			6825A Flare MAERT Subcap	F-18-FLARE	CO			8.60			
			6825A Flare MAERT Subcap	F-20-FLARE	CO			10.55			
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	1,192.15		1,192.15	51.57
251528	1/31/2017 1:19	2.42	6825A Flare MAERT Subcap	F-103-FLARE	CO	0.00	302.8	2.29		76.20	31.53
			6825A Flare MAERT Subcap	F-19-Flare	CO			53.14			
			6825A Flare MAERT Subcap	F-22-FLARE	CO			20.77			
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-23-FLARE	CO	0.00	302.8	386.02		386.02	241.26

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
258271	5/19/2017 13:04	1.45	NSR Permit 6825A Flare subcap	F-103-FLARE	CO	0.00	302.8	126.22		221.97	153.08
			NSR Permit 6825A Flare subcap	F-19-FLARE	CO			60.51			
			NSR Permit 6825A Flare subcap	F-22-FLARE	CO			35.24			
254881	3/28/2017 3:00	6.40	NSR Permit 6825A MAERT	E-01-WGS	CO	0.00	498.8	1,864.99	291.40		
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, flare included in Refinery Flare Subcap.	E-05-FLARE	H2S	0.00	4.64	12.00		12.00	2.96
204436	9/29/2014 21:44	27.27	NSR Permit 6825A SRU Subcap	E-03-SCOT	H2S	0.00	4.64	0.40		0.40	0.01
208834	1/17/2015 9:00	15.00	NSR 6825A MAERT SRU Subcap	E-04-SCOT	H2S	0.00	4.64	0.10		0.10	0.01
216783	7/3/2015 12:23	29.00	Allowable entry is based on most recent guidance from TCEQ staff	E-01-SCOT	H2S	0.00	4.64	1.40		1.40	0.05
219842	9/7/2015 8:30	8.00	NSR Permit 6825A MAERT Fugitive Subcap	F-147	H2S	0.00	4.64	0.04		0.04	0.005

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
220359	9/19/2015 16:29	1.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	H2S	0.00	4.64	6.00		6.00	3.91
222618	11/3/2015 6:00	6.00	NSR Permit 6825A MAERT Subcap	E-03-SCOT	H2S	0.00	4.64	1.00		1.00	0.17
223014	11/15/2015 7:30	106.00	6825A Flare MAERT Subcap	E-22-FLARE	H2S	0.00	4.64	4.90		5.05	0.05
			NSR Permit 6825A MAERT Fugitive Subcap	F-1241	H2S			0.15			
229032	3/11/2016 13:13	15.50	6825A SRU MAERT Subcap	E-04-SCOT	H2S	0.00	4.64	0.98		0.98	0.06
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-23-FLARE	H2S	0.00	4.64	0.39		2.02	1.17
			NSR Permit 6825A Flare Subcap	E-26-FLARE	H2S			1.63			
244860	9/30/2016 15:50	26.17	6825A Flare MAERT Subcap	F-22-FLARE	H2S	0.00	4.64	4.02		4.02	0.15
245746	10/19/2016 10:10	26.08	6825A Flare MAERT Subcap	E-23-FLARE	H2S	0.00	4.64	1.37		1.37	0.05
246280	10/29/2016 22:35	9.50	6825A Flare MAERT Subcap	F-103-FLARE	H2S	0.00	4.64	3.21		22.92	2.41
			6825A Flare MAERT Subcap	F-22-FLARE	H2S			19.71			
			6825A Flare MAERT Subcap	F-103-FLARE	H2S			25.26			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
247504	11/21/2016 11:16	42.87	6825A Flare MAERT Subcap	F-19-FLARE	H2S	0.00	4.64	30.30		62.37	1.45
			6825A Flare MAERT Subcap	F-22-FLARE	H2S			6.81			
247644	11/25/2016 16:50	18.83	NSR Permit 6825A Flare Subcap	E-26-FLARE	H2S	0.00	4.64	1.99		1.99	0.11
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-23-FLARE	H2S	0.00	4.64	0.26		0.28	0.25
			NSR Permit 6825A Flare Subcap	E-26-FLARE	H2S			0.02			
250132	1/7/2017 1:07	0.40	NSR Permit 6825A Flare Subcap	E-26-FLARE	H2S	0.00	4.64	0.16		0.16	0.16
250882	1/22/2017 3:10	26.83	6825A Flare MAERT Subcap	E-15-FLARE	H2S	0.00	4.64	0.02		2.77	0.10
			6825A Flare MAERT Subcap	E-23-FLARE	H2S			2.69			
			6825A Flare MAERT Subcap	F-18-FLARE	H2S			0.02			
			6825A Flare MAERT Subcap	F-20-FLARE	H2S			0.04			
			NSR Permit 6825A Flare Subcap	F-103-FLARE	H2S			0.13			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
254881	3/28/2017 3:00	6.40	NSR Permit 6825A Flare Subcap	F-19-Flare	H2S	0.00	4.64	0.25		2.94	0.46
			NSR Permit 6825A Flare Subcap	F-22-FLARE	H2S			2.56			
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	NOx	0.00	0.31	0.53	0.16		
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-26-FLARE	NOx	0.00	0.31	1.30	0.29		
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-26-FLARE	NOx	0.00	0.31	0.50	0.22		
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-26-FLARE	NOx	0.00	0.31	1.05	0.05		
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-26-FLARE	NOx	0.00	0.31	0.05	0.03		
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-26-FLARE	NOx	0.00	0.31	0.05	0.03		
199593	6/10/2014 0:37	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103-FLARE	NOx	0.00	43.93	10.24		13.18	12.55
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	NOx			0.00	1.74		

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	NOx	0.00		1.20			
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	NOx	0.00	43.93	0.00		28.20	8.42
			Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	NOx			28.20			
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, flare included in Refinery Flare Subcap.	E-05-FLARE	NOx	0.00	43.93	0.20		0.20	0.05
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	NOx	0.00	43.93	1.48		1.48	1.29
207580	12/16/2014 14:11	0.92	NSR 6825A Flare MAERT Subcap	E-103-FLARE	NOx	0.00	43.93	17.10		26.51	26.51
			NSR 6825A Flare MAERT Subcap	E-15-FLARE	NOx			0.20			
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	NOx			0.01			
			NSR 6825A Flare MAERT Subcap	E-19-FLARE	NOx			8.50			



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	NOx			0.10			
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	NOx			0.60			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-23-FLARE	NOx	0.00	43.93	72.60		72.60	16.13
208135	1/5/2015 19:00	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	NOx	0.00	43.93	6.90		6.90	0.54
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	NOx	0.00	43.93	0.20		43.93	3.43
209380	1/27/2015 12:39	1.25	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	2.00		2.00	1.60
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-23-FLARE	NOx	0.00	43.93	0.10		0.10	0.10
211979	3/29/2015 20:53	3.93	SR 6825A Flare MAERT Subcap	E-15-FLARE	NOx	0.00	43.93	3.00		48.30	12.28
			SR 6825A Flare MAERT Subcap	E-20-FLARE	NOx			0.30			
			SR 6825A Flare MAERT Subcap	F-18-FLARE	NOx			45.00			
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	NOx	0.00	43.93	1.30		1.30	1.30

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	3.00		3.00	2.90
219537	8/30/2015 10:28	18.05	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	75.90		75.90	4.20
220359	9/19/2015 16:29	1.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	5.00		5.00	3.26
222878	11/10/2015 11:00	24.35	NSR 6825A Flare MAERT Subcap	E-15-FLARE	NOx	0.00	43.93	6.30		31.90	1.31
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	NOx			6.90			
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	NOx			18.70			
223014	11/15/2015 7:30	106.00	6825A Flare MAERT Subcap	E-22-FLARE	NOx	0.00	43.93	53.40		53.40	0.50
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	17.90		17.90	8.01
227868	2/18/2016 1:56	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103B-FLARE	NOx	0.00	43.93	15.50		20.90	19.90
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	NOx			2.00			
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	NOx			3.40			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
229737	3/25/2016 9:33	1.55	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	NOx	0.00	43.93	20.52		67.74	43.70
			Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	NOx			5.29			
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	NOx			41.93			
232372	4/28/2016 13:22	21.78	6825A Flare MAERT Subcap	F-13-FLARE	NOx	0.00	43.93	73.36		73.36	3.37
240598	8/2/2016 13:05	2.07	6825A Flare MAERT Subcap	E-103-FLARE	NOx	0.00	43.93	30.80		44.40	21.48
			6825A Flare MAERT Subcap	E-15-FLARE	NOx			1.85			
			6825A Flare MAERT Subcap	E-18-FLARE	NOx			0.23			
			6825A Flare MAERT Subcap	E-19-FLARE	NOx			4.45			
			6825A Flare MAERT Subcap	E-20-FLARE	NOx			2.30			
			6825A Flare MAERT Subcap	E-22-FLARE	NOx			4.77			
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-23-FLARE	NOx	0.00	43.93	3.26		3.26	1.88

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244860	9/30/2016 15:50	26.17	6825A Flare MAERT Subcap	F-22-FLARE	NOx	0.00	43.93	264.48		264.48	10.11
245746	10/19/2016 10:10	26.08	6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	75.50		75.50	2.89
246089	10/26/2016 2:32	9.35	6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	34.13		34.13	3.65
246280	10/29/2016 22:35	9.50	6825A Flare MAERT Subcap	F-103-FLARE	NOx	0.00	43.93	5.83		117.40	12.36
			6825A Flare MAERT Subcap	F-22-FLARE	NOx			111.57			
247504	11/21/2016 11:16	42.87	6825A Flare MAERT Subcap	F-103-FLARE	NOx	0.00	43.93	41.70		93.70	2.19
			6825A Flare MAERT Subcap	F-19-FLARE	NOx			41.64			
			6825A Flare MAERT Subcap	F-22-FLARE	NOx			10.36			
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-23-FLARE	NOx	0.00	43.93	31.94		31.94	28.60
250882	1/22/2017 3:10	26.83	6825A Flare MAERT Subcap	E-15-FLARE	NOx	0.00	43.93	1.18		122.98	4.58
			6825A Flare MAERT Subcap	E-23-FLARE	NOx			118.04			
			6825A Flare MAERT Subcap	F-18-FLARE	NOx			1.69			
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-23-FLARE	NOx	0.00	43.93	233.96		233.96	10.12
			6825A Flare MAERT Subcap	F-103-FLARE	NOx			0.45			

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251528	1/31/2017 1:19	2.42	6825A Flare MAERT Subcap	F-19-Flare	NOx	0.00	43.93	7.46		11.84	4.90
			6825A Flare MAERT Subcap	F-22-FLARE	NOx			3.93			
258271	5/19/2017 13:04	1.45	NSR Permit 6825A Flare subcap	F-103-FLARE	NOx	0.00	43.93	19.12		33.17	22.88
			NSR Permit 6825A Flare subcap	F-19-FLARE	NOx			8.97			
			NSR Permit 6825A Flare subcap	F-22-FLARE	NOx			5.08			
202027	8/7/2014 15:29	10.55	NSR Permit 6825A SRU Subcap	E-04-SCOT	NOx	0.00	49.68	48.00		48.00	4.55
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, included in Refinery SRU Subcap	E-01-SCOT	NOx	0.00	49.68	0.85		1.62	0.40
			NSR Permit 6825A, included in Refinery SRU Subcap.	E-02-SCOT	NOx			0.77			
204436	9/29/2014 21:44	27.27	NSR Permit 6825A SRU Subcap	E-03-SCOT	NOx	0.00	49.68	99.00		99.00	3.63

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208834	1/17/2015 9:00	15.00	NSR 6825A MAERT SRU Subcap	E-04-SCOT	NOx	0.00	49.68	17.83		17.83	1.19
216783	7/3/2015 12:23	29.00	Allowable entry is based on most recent guidance from TCEQ staff	E-01-SCOT	NOx	0.00	49.68	16.00		16.00	0.55
221746	10/17/2015 11:56	9.00	NSR Permit 6825A MAERT Subcap	E-04-SCOT	NOx	0.00	49.68	36.36		36.36	4.04
222618	11/3/2015 6:00	6.00	NSR Permit 6825A MAERT Subcap	E-03-SCOT	NOx	0.00	49.68	23.00		23.00	3.83
229032	3/11/2016 13:13	15.50	6825A SRU MAERT Subcap	E-04-SCOT	NOx	0.00	49.68	8.94		8.94	0.58
254881	3/28/2017 3:00	6.40	NSR Permit 6825A MAERT	E-01-WGS	NOx	0.00	327.7	148.43	23.19		
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	F-942	NOx	0.00	859.9 or 885.8	5.50		5.50	1.64

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202260	8/12/2014 13:19	4.05	NSR Permit 6825A, included in Refinery SRU Subcap	E-01-SCOT	PM	0.00	24.58	0.19		0.27	0.07
			NSR Permit 6825A, included in Refinery SRU Subcap.	E-02-SCOT	PM			0.08			
204436	9/29/2014 21:44	27.27	NSR Permit 6825A SRU Subcap	E-03-SCOT	PM	0.00	24.58	5.00		5.00	0.18
208834	1/17/2015 9:00	15.00	NSR 6825A MAERT SRU Subcap	E-04-SCOT	PM	0.00	24.58	0.87		0.87	0.06
216783	7/3/2015 12:23	29.00	Allowable entry is based on most recent guidance from TCEQ staff	E-01-SCOT	PM	0.00	24.58	5.30		5.30	0.18
229032	3/11/2016 13:13	15.50	6825A SRU MAERT Subcap	E-04-SCOT	PM	0.00	24.58	1.20		1.20	0.08
254881	3/28/2017 3:00	6.40	NSR Permit 6825A MAERT	E-01-WGS	PM	0.00	63.5	42.69	6.67		
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	SO2	0.00	24.87	75.10		24.87	1.94
223014	11/15/2015 7:30	106.00	6825A Flare MAERT Subcap	E-22-FLARE	SO2	0.00	24.87	461.00		461.00	4.35

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
254881	3/28/2017 3:00	6.40	NSR Permit 6825A MAERT	E-01-WGS	SO2	0.00	114.1	13.64	2.13		
208834	1/17/2015 9:00	15.00	500 lbs/day above the mass emission rate allowed by 60.102a(f)(1), NSPS Ja (250 ppm, flow-weighted average for all 4 sulfur recovery plants). The separate NSR 6825A limit (137.89 lbs/hr) is less stringent.	E-04-SCOT	SO2	0.00	137.89	1,626.00	108.40		
208834	1/17/2015 9:00	15.00	NSR 6825A MAERT SRU Subcap	E-04-SCOT	VOC	0.00	64.24	0.63		0.63	0.04
254881	3/28/2017 3:00	6.40	NSR Permit 6825A MAERT	E-01-WGS	VOCs (total)	0.00	15.7	3.09	0.48		
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-26-FLARE	VOCs (total)	0.00	37.92	2.51		2.51	0.75
207600	12/17/2014 9:01	1.00	NSR 6825A Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	6.20		6.20	6.20
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-26-FLARE	VOCs (total)	0.00	37.92	2.15		2.15	0.48



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	1.60		1.60	1.60
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	141.30		141.30	11.04
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	5.90		5.90	5.90
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	1.20		1.20	0.54
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	24.45		24.45	14.11
247644	11/25/2016 16:50	18.83	NSR Permit 6825A Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	117.89		117.89	6.26
249951	1/6/2017 14:11	0.88	NSR Permit 6825A Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	6.45		6.45	6.45
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	13.90		13.90	12.45
250132	1/7/2017 1:07	0.40	NSR Permit 6825A Flare Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	7.36		7.56	7.56
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	0.26		0.26	0.01

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
255090	3/29/2017 14:53	1.48	NSR 6825A Flare MAERT Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	0.02		0.02	0.01
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-26-FLARE	VOCs (total)	0.00	37.92	0.01		0.01	0.01
202027	8/7/2014 15:29	10.55	NSR Permit 6825A SRU Subcap	E-04-SCOT	VOCs (total)	0.00	64.24	2.00		2.00	0.19
202260	8/12/2014 13:19	4.05	NSR Permit 6825A, included in Refinery SRU Subcap	E-01-SCOT	VOCs (total)	0.00	64.24	0.14		0.20	0.05
			NSR Permit 6825A, included in Refinery SRU Subcap.	E-02-SCOT	VOCs (total)			0.06			
204436	9/29/2014 21:44	27.27	NSR Permit 6825A SRU Subcap	E-03-SCOT	VOCs (total)	0.00	64.24	3.00		3.00	0.11
216783	7/3/2015 12:23	29.00	Allowable entry is based on most recent guidance from TCEQ staff	E-01-SCOT	VOCs (total)	0.00	64.24	3.80		3.80	0.13
221746	10/17/2015 11:56	9.00	NSR Permit 6825A MAERT Subcap	E-04-SCOT	VOCs (total)	0.00	64.24	3.02		3.02	0.34
222618	11/3/2015 6:00	6.00	NSR Permit 6825A MAERT Subcap	E-03-SCOT	VOCs (total)	0.00	64.24	2.00		2.00	0.33

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
229032	3/11/2016 13:13	15.50	6825A SRU MAERT Subcap	E-04-SCOT	VOCs (total)	0.00	64.24	0.87		0.87	0.06
199593	6/10/2014 0:37	1.05	Allowable entry is based on most recent guidance from TCEQ staff	E-103-FLARE	VOCs (total)	0.00	65.74	17.68		22.76	21.68
			Allowable entry is based on most recent guidance from TCEQ staff	E-19-FLARE	VOCs (total)			3.01			
			Allowable entry is based on most recent guidance from TCEQ staff	E-22-FLARE	VOCs (total)			2.07			
201018	7/15/2014 5:48	3.35	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	VOCs (total)	0.00	65.74	0.03		134.58	40.17
			Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	VOCs (total)			134.55			
204874	10/7/2014 15:35	1.15	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	VOCs (total)	0.00	65.74	4.38		4.38	3.81

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
207580	12/16/2014 14:11	0.92	NSR 6825A Flare MAERT Subcap	E-19-FLARE	VOCs (total)	0.00	65.74	9.70		13.70	13.70
			NSR 6825A Flare MAERT Subcap	E-22-FLARE	VOCs (total)			4.00			
208007	1/2/2015 19:20	4.50	NSR Permit 6825A MAERT Limit	E-23-FLARE	VOCs (total)	0.00	65.74	175.26		175.26	38.95
208135	1/5/2015 19:00	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	30.96		30.96	2.42
208163	1/6/2015 13:09	0.08	NSR 6825A MAERT Flare Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	39.60		39.60	39.60
208331	1/10/2015 6:06	12.80	NSR 6825A MAERT Flare Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	0.70		65.74	5.14
209380	1/27/2015 12:39	1.25	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	34.00		34.00	27.20
210765	2/28/2015 17:25	0.70	NSR 6825A MAERT Flare Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	0.40		0.40	0.40
211979	3/29/2015 20:53	3.93	SR 6825A Flare MAERT Subcap	E-15-FLARE	VOCs (total)	0.00	65.74	6.00		99.60	25.32
			SR 6825A Flare MAERT Subcap	E-20-FLARE	VOCs (total)			0.60			
			SR 6825A Flare MAERT Subcap	F-18-FLARE	VOCs (total)			93.00			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
216096	6/19/2015 22:55	0.72	Allowable entry is based on most recent guidance from TCEQ staff	E-23-FLARE	VOCs (total)	0.00	65.74	20.10		20.10	20.10
218356	8/5/2015 11:30	1.03	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	29.00		29.00	28.06
219537	8/30/2015 10:28	18.05	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	172.00		172.00	9.53
220359	9/19/2015 16:29	1.53	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	19.00		19.00	12.39
222878	11/10/2015 11:00	24.35	NSR 6825A Flare MAERT Subcap	E-15-FLARE	VOCs (total)	0.00	65.74	48.70		282.80	11.61
			NSR 6825A Flare MAERT Subcap	E-18-FLARE	VOCs (total)			76.40			
			NSR 6825A Flare MAERT Subcap	E-20-FLARE	VOCs (total)			157.70			
223014	11/15/2015 7:30	106.00	6825A Flare MAERT Subcap	E-22-FLARE	VOCs (total)	0.00	65.74	113.30		113.30	1.07
224282	12/11/2015 20:29	2.23	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	33.00		33.00	14.78
229737	3/25/2016 9:33	1.55	Allowable entry is based on most recent guidance from TCEQ staff	E-15-FLARE	VOCs (total)	0.00	65.74	34.05		91.45	59.00
			Allowable entry is based on most recent guidance from TCEQ staff	E-18-FLARE	VOCs (total)			28.70			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
			Allowable entry is based on most recent guidance from TCEQ staff	E-20-FLARE	VOCs (total)			28.70			
240948	8/7/2016 12:27	1.73	NSR Permit 6825A Flare Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	1.82		1.82	1.05
244860	9/30/2016 15:50	26.17	6825A Flare MAERT Subcap	F-22-FLARE	VOCs (total)	0.00	65.74	1,162.36		1,162.36	44.42
245746	10/19/2016 10:10	26.08	6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	8.52		8.52	0.33
246089	10/26/2016 2:32	9.35	6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	13.52		13.52	1.45
247504	11/21/2016 11:16	42.87	6825A Flare MAERT Subcap	F-103-FLARE	VOCs (total)	0.00	65.74	368.96		740.33	17.27
			6825A Flare MAERT Subcap	F-19-FLARE	VOCs (total)			264.85			
			6825A Flare MAERT Subcap	F-22-FLARE	VOCs (total)			106.52			
250130	1/7/2017 22:34	1.12	NSR Permit 6825A Flare Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	60.32		60.32	54.02
250882	1/22/2017 3:10	26.83	6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	37.85		49.53	1.85
			6825A Flare MAERT Subcap	F-18-FLARE	VOCs (total)			4.46			
			6825A Flare MAERT Subcap	F-20-FLARE	VOCs (total)			4.98			

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Authorization	EPN	Pollutant	Limit Reported to STEERS (lbs/hr)	Limit in Permit 6825A (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Total Amount Released in Subcap (lbs)	Subcap Emission Rate (lbs/hr)
251149	1/26/2017 5:34	23.12	6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	321.53		321.53	13.91
251528	1/31/2017 1:19	2.42	6825A Flare MAERT Subcap	F-103-FLARE	VOCs (total)	0.00	65.74	0.44		49.43	20.45
			6825A Flare MAERT Subcap	F-19-Flare	VOCs (total)			46.50			
			6825A Flare MAERT Subcap	F-22-FLARE	VOCs (total)			2.49			
256270	4/11/2017 14:42	1.60	NSR 6825A Flare MAERT Subcap	E-23-FLARE	VOCs (total)	0.00	65.74	55.86		55.86	34.91
219842	9/7/2015 8:30	8.00	NSR Permit 6825A MAERT Fugitive Subcap	F-147	VOCs (total)	0.00	219.88	315.70		315.70	39.46
222878	11/10/2015 11:00	24.35	NSR 6825A MAERT Fugitive Subcap	F-241	VOCs (total)	0.00	219.88	85.27		85.27	3.50
223014	11/15/2015 7:30	106.00	NSR Permit 6825A MAERT Fugitive Subcap	F-1241	VOCs (total)	0.00	219.88	25.30		25.30	0.24
229737	3/25/2016 9:33	1.55	Allowable entry is based on most recent guidance from TCEQ staff	F-243	VOCs (total)	0.00	219.88	112.33		112.30	72.45

**TABLE 4: PERMIT 80812 - VIOLATIONS OF HOURLY LIMITS**

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Type of event	Authorization	EPN	Pollutant	Limit in Permit 80812 (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Notes
210084	2/13/2015 14:00	48.00	maintenance	SE-61, 68, and 88	E-TO-01	Benzene	0.00	35.00	0.73	
215677	6/18/2015 1:00	83.00	air startup	MSS NSR Permit 80812	E-01-WGS	CO	699.57	47,541.31	746.55	
				MSS NSR Permit 80812	E-22-FLARE	CO		14,422.01		
216795	7/8/2015 13:00	14.00	air startup	MSS NSR Permit 80812	E-01-WGS	CO	699.57	20,215.00	1,443.93	Also exceeded Site-wide Cap in Permit 6825A of 1174 or 1207 lbs/hr
254409	3/22/2017 1:00	38.00	maintenance	NSR Permit 80812 MSS subcap	E-01-WGS	CO	699.57	30,620.19	805.79	
				NSR Permit 80812 MAERT Subcap	E-01-146	SO2		28.39		
				NSR Permit 80812 MAERT Subcap	E-01-241	SO2		15.88		



STEERS Tracking Number	Start Date and Time	Duration (Hours)	Type of event	Authorization	EPN	Pollutant	Limit in Permit 80812 (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Notes
266764	8/29/2017 16:45	43.00	air shutdown	NSR Permit 80812 MAERT Subcap	E-01-242	SO2	641.19	7.97	1,371.56	Also exceeded Site-wide Cap in Permit 6825A of 771.9 lbs/hr
				NSR Permit 80812 MAERT Subcap	E-01-443	SO2		19.29		
				NSR Permit 80812 MAERT Subcap	E-01-WGS	SO2		211.97		
				NSR Permit 80812 MAERT Subcap	E-02-146	SO2		14.04		
				NSR Permit 80812 MAERT Subcap	E-103-FLARE	SO2		4,007.33		
				NSR Permit 80812 MAERT Subcap	E-15-FLARE	SO2		133.59		
				NSR Permit 80812 MAERT Subcap	E-18-FLARE	SO2		73.74		

STEERS Tracking Number	Start Date and Time	Duration (Hours)	Type of event	Authorization	EPN	Pollutant	Limit in Permit 80812 (lbs/hr)	Amount Released (lbs)	Emission Rate (lbs/hr)	Notes
				NSR Permit 80812 MAERT Subcap	E-19-FLARE	SO2		477.43		
				NSR Permit 80812 MAERT Subcap	E-20-FLARE	SO2		10.71		
				NSR Permit 80812 MAERT Subcap	E-22-FLARE	SO2		988.57		
				NSR Permit 80812 MAERT Subcap	E-23-FLARE	SO2		51,906.72		
				NSR Permit 80812 MAERT Subcap	E-26-FLARE	SO2		1,075.59		
				NSR Permit 80812 MAERT Subcap	H-02-1344	SO2		5.78		
266817	9/3/2017 22:00	4.00	air startup	NSR Permit 80812 Site Wide CAP	E-23-FLARE	SO2	641.19	5,248.34	1,312.08	Also exceeded Site-wide Cap in Permit 6825A of 771.9 lbs/hr

**TABLE 5A: PERMIT 80812 - VIOLATIONS OF ANNUAL CO LIMITS**

<b>Month-Year</b>	<b>Emissions Each Month (lbs)</b>	<b>12-Month Rolling Total (lbs)</b>	<b>Limit (lbs/year)</b>	<b>12 Month Rolling Total (tons)</b>	<b>Limit (TPY)</b>	<b>Violation (y/n)</b>
<b>Jun-15</b>	61,963.32	61,963.32	30,540.00	30.98	15.27	y
<b>Jul-15</b>	20,215.00	82,178.32	30,540.00	41.09	15.27	y
<b>Aug-15</b>	0.00	82,178.32	30,540.00	41.09	15.27	y
<b>Sep-15</b>	1.00	82,179.32	30,540.00	41.09	15.27	y
<b>Oct-15</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Nov-15</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Dec-15</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Jan-16</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Feb-16</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Mar-16</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Apr-16</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>May-16</b>	0.00	82,179.32	30,540.00	41.09	15.27	y
<b>Jun-16</b>	0.00	20,216.00	30,540.00	10.11	15.27	n
<b>Jul-16</b>	0.00	1.00	30,540.00	0.00	15.27	n
<b>Aug-16</b>	605.11	606.11	30,540.00	0.30	15.27	n
<b>Sep-16</b>	57,220.54	57,825.65	30,540.00	28.91	15.27	y
<b>Oct-16</b>	47.54	57,873.19	30,540.00	28.94	15.27	y
<b>Nov-16</b>	0.00	57,873.19	30,540.00	28.94	15.27	y
<b>Dec-16</b>	0.00	57,873.19	30,540.00	28.94	15.27	y
<b>Jan-17</b>	0.00	57,873.19	30,540.00	28.94	15.27	y
<b>Feb-17</b>	0.00	57,873.19	30,540.00	28.94	15.27	y
<b>Mar-17</b>	62,621.64	120,494.83	30,540.00	60.25	15.27	y
<b>Apr-17</b>	0.00	120,494.83	30,540.00	60.25	15.27	y
<b>May-17</b>	67,383.33	187,878.16	30,540.00	93.94	15.27	y
<b>Jun-17</b>	0.00	187,878.16	30,540.00	93.94	15.27	y
<b>Jul-17</b>	0.00	187,878.16	30,540.00	93.94	15.27	y
<b>Aug-17</b>	11,767.60	199,040.65	30,540.00	99.52	15.27	y
<b>Sep-17</b>	58,609.67	200,429.78	30,540.00	100.21	15.27	y
<b>Oct-17</b>	3,086.58	203,468.82	30,540.00	101.73	15.27	y
<b>Nov-17</b>	0.00	203,468.82	30,540.00	101.73	15.27	y
<b>Dec-17</b>	0.00	203,468.82	30,540.00	101.73	15.27	y
<b>Jan-18</b>	0.00	203,468.82	30,540.00	101.73	15.27	y
<b>Feb-18</b>	0.00	203,468.82	30,540.00	101.73	15.27	y
<b>Mar-18</b>	0.00	140,847.18	30,540.00	70.42	15.27	y
<b>Apr-18</b>	0.00	140,847.18	30,540.00	70.42	15.27	y
<b>May-18</b>	0.00	73,463.85	30,540.00	36.73	15.27	y
<b>Jun-18</b>	0.00	73,463.85	30,540.00	36.73	15.27	y
<b>Jul-18</b>	0.00	73,463.85	30,540.00	36.73	15.27	y
<b>Aug-18</b>	0.00	61,696.25	30,540.00	30.85	15.27	y
<b>Sep-18</b>	0.00	3,086.58	30,540.00	1.54	15.27	n
<b>Oct-18</b>	0.00	0.00	30,540.00	0.00	15.27	n
<b>Nov-18</b>	0.00	0.00	30,540.00	0.00	15.27	n
<b>Dec-18</b>	0.00	0.00	30,540.00	0.00	15.27	n

<b>Month-Year</b>	<b>Emissions Each Month (lbs)</b>	<b>12-Month Rolling Total (lbs)</b>	<b>Limit (lbs/year)</b>	<b>12 Month Rolling Total (tons)</b>	<b>Limit (TPY)</b>	<b>Violation (y/n)</b>
<b>Jan-19</b>	0.00	0.00	30,540.00	0.00	15.27	n
<b>Feb-19</b>	0.00	0.00	30,540.00	0.00	15.27	n
<b>Mar-19</b>	0.00	0.00	30,540.00	0.00	15.27	n
<b>Apr-19</b>	0.00	0.00	30,540.00	0.00	15.27	n

**TABLE 5B: PERMIT 80812 - VIOLATIONS OF ANNUAL NO<sub>x</sub> LIMITS**

<b>Month-Year</b>	<b>Emissions Each Month (lbs)</b>	<b>12-Month Rolling Total (lbs)</b>	<b>Limit (lbs/year)</b>	<b>12 Month Rolling Total (tons)</b>	<b>Limit (TPY)</b>	<b>Violation (y/n)</b>
<b>Jun-15</b>	3,056.87	3,056.87	7,020.00	1.53	3.51	n
<b>Jul-15</b>	171.00	3,227.87	7,020.00	1.61	3.51	n
<b>Aug-15</b>	0.00	3,227.87	7,020.00	1.61	3.51	n
<b>Sep-15</b>	10.00	3,237.87	7,020.00	1.62	3.51	n
<b>Oct-15</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Nov-15</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Dec-15</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Jan-16</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Feb-16</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Mar-16</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Apr-16</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>May-16</b>	0.00	3,237.87	7,020.00	1.62	3.51	n
<b>Jun-16</b>	0.00	181.00	7,020.00	0.09	3.51	n
<b>Jul-16</b>	0.00	10.00	7,020.00	0.01	3.51	n
<b>Aug-16</b>	30.32	40.32	7,020.00	0.02	3.51	n
<b>Sep-16</b>	11,232.20	11,262.52	7,020.00	5.63	3.51	y
<b>Oct-16</b>	116.76	11,379.28	7,020.00	5.69	3.51	y
<b>Nov-16</b>	0.00	11,379.28	7,020.00	5.69	3.51	y
<b>Dec-16</b>	0.00	11,379.28	7,020.00	5.69	3.51	y
<b>Jan-17</b>	0.00	11,379.28	7,020.00	5.69	3.51	y
<b>Feb-17</b>	0.00	11,379.28	7,020.00	5.69	3.51	y
<b>Mar-17</b>	717.07	12,096.35	7,020.00	6.05	3.51	y
<b>Apr-17</b>	0.00	12,096.35	7,020.00	6.05	3.51	y
<b>May-17</b>	431.14	12,527.49	7,020.00	6.26	3.51	y
<b>Jun-17</b>	0.00	12,527.49	7,020.00	6.26	3.51	y
<b>Jul-17</b>	0.00	12,527.49	7,020.00	6.26	3.51	y
<b>Aug-17</b>	1,517.63	14,014.80	7,020.00	7.01	3.51	y
<b>Sep-17</b>	2,308.26	5,090.86	7,020.00	2.55	3.51	n
<b>Oct-17</b>	605.73	5,579.83	7,020.00	2.79	3.51	n
<b>Nov-17</b>	0.00	5,579.83	7,020.00	2.79	3.51	n
<b>Dec-17</b>	0.00	5,579.83	7,020.00	2.79	3.51	n
<b>Jan-18</b>	0.00	5,579.83	7,020.00	2.79	3.51	n
<b>Feb-18</b>	0.00	5,579.83	7,020.00	2.79	3.51	n
<b>Mar-18</b>	0.00	4,862.76	7,020.00	2.43	3.51	n
<b>Apr-18</b>	0.00	4,862.76	7,020.00	2.43	3.51	n
<b>May-18</b>	0.00	4,431.62	7,020.00	2.22	3.51	n
<b>Jun-18</b>	0.00	4,431.62	7,020.00	2.22	3.51	n
<b>Jul-18</b>	0.00	4,431.62	7,020.00	2.22	3.51	n
<b>Aug-18</b>	0.00	2,913.99	7,020.00	1.46	3.51	n
<b>Sep-18</b>	0.00	605.73	7,020.00	0.30	3.51	n
<b>Oct-18</b>	0.00	0.00	7,020.00	0.00	3.51	n

<b>Month-Year</b>	<b>Emissions Each Month (lbs)</b>	<b>12-Month Rolling Total (lbs)</b>	<b>Limit (lbs/year)</b>	<b>12 Month Rolling Total (tons)</b>	<b>Limit (TPY)</b>	<b>Violation (y/n)</b>
<b>Nov-18</b>	0.00	0.00	7,020.00	0.00	3.51	n
<b>Dec-18</b>	0.00	0.00	7,020.00	0.00	3.51	n
<b>Jan-19</b>	0.00	0.00	7,020.00	0.00	3.51	n
<b>Feb-19</b>	0.00	0.00	7,020.00	0.00	3.51	n
<b>Mar-19</b>	0.00	0.00	7,020.00	0.00	3.51	n
<b>Apr-19</b>	0.00	0.00	7,020.00	0.00	3.51	n

**TABLE 5C: PERMIT 80812 - VIOLATIONS OF ANNUAL SO2 LIMITS**

<b>Month-Year</b>	<b>Emissions Each Month (lbs)</b>	<b>12-Month Rolling Total (lbs)</b>	<b>Limit (lbs/year)</b>	<b>12-Month Rolling Total (tons)</b>	<b>Limit (TPY)</b>	<b>Violation (y/n)</b>
<b>Jun-15</b>	38,703.44	38,703.44	35,960.00	19.35	17.98	y
<b>Jul-15</b>	85.00	38,788.44	35,960.00	19.39	17.98	y
<b>Aug-15</b>	0.00	38,788.44	35,960.00	19.39	17.98	y
<b>Sep-15</b>	171.00	38,959.44	35,960.00	19.48	17.98	y
<b>Oct-15</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Nov-15</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Dec-15</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Jan-16</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Feb-16</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Mar-16</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Apr-16</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>May-16</b>	0.00	38,959.44	35,960.00	19.48	17.98	y
<b>Jun-16</b>	0.00	256.00	35,960.00	0.13	17.98	n
<b>Jul-16</b>	0.00	171.00	35,960.00	0.09	17.98	n
<b>Aug-16</b>	163.57	334.57	35,960.00	0.17	17.98	n
<b>Sep-16</b>	21,844.46	22,008.03	35,960.00	11.00	17.98	n
<b>Oct-16</b>	737.32	22,745.35	35,960.00	11.37	17.98	n
<b>Nov-16</b>	0.00	22,745.35	35,960.00	11.37	17.98	n
<b>Dec-16</b>	0.00	22,745.35	35,960.00	11.37	17.98	n
<b>Jan-17</b>	0.00	22,745.35	35,960.00	11.37	17.98	n
<b>Feb-17</b>	0.00	22,745.35	35,960.00	11.37	17.98	n
<b>Mar-17</b>	1,753.60	24,498.95	35,960.00	12.25	17.98	n
<b>Apr-17</b>	0.00	24,498.95	35,960.00	12.25	17.98	n
<b>May-17</b>	706.34	25,205.29	35,960.00	12.60	17.98	n
<b>Jun-17</b>	0.00	25,205.29	35,960.00	12.60	17.98	n
<b>Jul-17</b>	0.00	25,205.29	35,960.00	12.60	17.98	n
<b>Aug-17</b>	58,977.00	84,018.72	35,960.00	42.01	17.98	y
<b>Sep-17</b>	32,862.39	95,036.65	35,960.00	47.52	17.98	y
<b>Oct-17</b>	2,779.93	97,079.26	35,960.00	48.54	17.98	y
<b>Nov-17</b>	0.00	97,079.26	35,960.00	48.54	17.98	y
<b>Dec-17</b>	0.00	97,079.26	35,960.00	48.54	17.98	y
<b>Jan-18</b>	0.00	97,079.26	35,960.00	48.54	17.98	y
<b>Feb-18</b>	0.00	97,079.26	35,960.00	48.54	17.98	y
<b>Mar-18</b>	0.00	95,325.66	35,960.00	47.66	17.98	y
<b>Apr-18</b>	0.00	95,325.66	35,960.00	47.66	17.98	y
<b>May-18</b>	0.00	94,619.32	35,960.00	47.31	17.98	y
<b>Jun-18</b>	0.00	94,619.32	35,960.00	47.31	17.98	y
<b>Jul-18</b>	0.00	94,619.32	35,960.00	47.31	17.98	y
<b>Aug-18</b>	0.00	35,642.32	35,960.00	17.82	17.98	n
<b>Sep-18</b>	0.00	2,779.93	35,960.00	1.39	17.98	n
<b>Oct-18</b>	0.00	0.00	35,960.00	0.00	17.98	n

<b>Month-Year</b>	<b>Emissions Each Month (lbs)</b>	<b>12-Month Rolling Total (lbs)</b>	<b>Limit (lbs/year)</b>	<b>12-Month Rolling Total (tons)</b>	<b>Limit (TPY)</b>	<b>Violation (y/n)</b>
<b>Nov-18</b>	0.00	0.00	35,960.00	0.00	17.98	n
<b>Dec-18</b>	0.00	0.00	35,960.00	0.00	17.98	n
<b>Jan-19</b>	0.00	0.00	35,960.00	0.00	17.98	n
<b>Feb-19</b>	0.00	0.00	35,960.00	0.00	17.98	n
<b>Mar-19</b>	0.00	0.00	35,960.00	0.00	17.98	n
<b>Apr-19</b>	0.00	0.00	35,960.00	0.00	17.98	n



**TABLE 6A: PERMIT O-1498 - FLARING VIOLATIONS**

<b>Title V Permit #</b>	<b>Start Date</b>	<b>EPN</b>	<b>Title V Permit Term and Condition Number</b>	<b>Regulatory Requirement</b>	<b>Cause of Deviation</b>
1498	7/1/2014	Flare-18	SC 1A, 18	40 CFR 60.18(c)(2)	Flare went out several times over course of several months.
1498	1/10/2015	Flare-13	SC 1, 18	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	1/13/2015	Flare-18	SC 1, 18	40 CFR 60.18(c)(2); 40 CFR 63.11(b)(5)	Flare went out several times over course of several months.
1498	6/3/2015	Flare-103	SC 1, 18	40 CFR 60.18(c)(2); 40 CFR 63.11(b)(5)	Flare went out due to wind.
1498	11/10/2015	Flare-18	SC 1A, 18	40 CFR 60.18(c)(2); 40 CFR 63.11(b)(5)	Flare was blown out by wind on several occasions in November
1498	2/23/2016	Flare-15		40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	4/5/2016	Flare-20		40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	5/25/2016	Flare-20		40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	7/1/2016	Flare-18, Flare-19, Flare-20	SC 1A, 18	40 CFR 60.107a(f)(1)(iii)	Flare vent gas was not temperature/ pressure corrected as required by subpart Ja over course of several months
1498	7/31/2016	Flare-20	SC 1A, 18	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	8/25/2016	Flare-20	SC 1A, 18	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	10/18/2016	Flare-18	SC 1A, 18	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit

Title V Permit #	Start Date	EPN	Title V Permit Term and Condition Number	Regulatory Requirement	Cause of Deviation
1498	10/25/2016	Flare-13	SC 1A, 18	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit
1498	1/1/2017	Flare-18, Flare-19, Flare-20	SC 1A, 18	40 CFR 60.107a(f)(1)(iii)	Flare vent gas was not temperature/ pressure corrected as required by subpart Ja.
1498	6/3/2017	Flare-19	SC 1A, 18	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below regulatory limit

**TABLE 6B: PERMIT O-3423 - FLARING VIOLATIONS**

<b>Title V Permit #</b>	<b>Start Date</b>	<b>EPN</b>	<b>Title V Permit Term and Condition Number</b>	<b>Regulatory Requirement</b>	<b>Cause of Deviation</b>
3423	10/10/2014	Flare-26	SC 1A, 13	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Flare gas dropped below the minimum btu limit for 4 hours
3423	2/17/2016	Flare-26	SC 1, 13	NSR 6825A, N65 & PSDTX49 SC 1, 6.A; 40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below the regulatory limit
3423	8/1/2016	Flare-26	SC 1, 13		H2S and TRS analyzers for flare-26 exceeded allowable analyzer downtime of 5% on a 12-month rolling average
3423	11/16/2016	Flare-26	SC 1, 13	40 CFR 60.107a(f)(1)(iii)	Flare vent gas was not temperature/pressure corrected as required by subpart Ja
3423	11/16/2016	Flare-26	SC 1, 13	40 CFR 60.107a(f)(1)(iii)	Flare vent gas was not temperature/pressure corrected as required by subpart Ja over several months
3423	11/29/2016	Flare-26		40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below the regulatory limit
3423	11/29/2016	Flare-26	SC 1, 13	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below the regulatory limit

**TABLE 6C: PERMIT O-2229 - FLARING VIOLATIONS**

<b>Title V Permit #</b>	<b>Start Date</b>	<b>EPN</b>	<b>Title V Permit Term and Condition Number</b>	<b>Regulatory Requirement</b>	<b>Cause of Deviation</b>
2229	7/1/2016	Flare-23	SC 1A, 15	40 CFR 60.107a(f)(1)(iii)	Flare vent gas was not temperature/ pressure corrected as required by subpart Ja
2229	8/25/2016	Flare-23	SC 1A, 15		GC used in the determination of the net heating value of the flare vent stream was inoperable during streaming activities from various process units
2229	9/28/2016	Flare-23	SC 1A, 15	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below the regulatory limit
2229	10/7/2016	Flare-23	SC 1A, 15	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below the regulatory limit
2229	10/22/2016	Flare-23	SC 1A, 15	40 CFR 60.18(c)(3)(ii); 40 CFR 63.11(b)(6)(ii)	Net heating value dropped below the regulatory limit
2229	1/1/2017	Flare-23	SC 1A, 15	40 CFR 60.107a(f)(1)(iii)	Flare vent gas was not temperature/ pressure corrected as required by subpart Ja