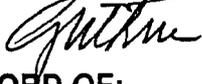


COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

JULY 17, 2001

TO: WILLIAM. DEBOISBLANC, DIRECTOR, PERMIT SERVICES
FROM: DIRECTOR OF ENFORCEMENT 
SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

VALERO PLANT #901

In keeping with standard practice, the Compliance and Enforcement Division has conducted a review of the compliance record of:

Valero Asphalt Refinery

This memorandum is intended to provide you with the results of the review, and to advise of further action, if any, that will be initiated by the Director of Enforcement.

Background

It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of the initial renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure on going compliance.

Finding

The Enforcement Division staff has commenced a review of the records for the Valero Asphalt Refinery from June 15, 2000 to June 15, 2001. This review was initiated as part of the District evaluation of an application by Valero Refinery for a Title V Permit. During the period subject to review, Valero's activities known to the District include:

Two Notice of Violations were issued during this review period for violation of Regulation 2, Rule 1, permit condition violations for H₂S in the fuel gas.

The District received a total of five alleged complaints of none of which were confirmed. Four were odor and one was visible emissions.

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There were two indicated excesses reported, which resulted in the above Notice of Violations. There were no breakdowns reported.

Valero is not under a variance or an Order of Abatement by the District.

There were no Office Conferences held during this reporting period.

Conclusions

The Director of Enforcement finds that reasonable intermittent compliance can be assured at this facility for the review period.

Recommendations

The Director of Enforcement believes that the proposed application for a Title V Permit is adequate and recommends that the Director of the Permit Services Division approve this application.

JRG, JB, TG, JGG

cc: Brenda Cabral

HUNTWAY
VGC