



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TX 75202-2733

October 13, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7011 0110 0001 3590 6155

Mr. Michael P. Roussel
Compliance Contact
Total Petroleum USA, Inc.
6325 Highway 75
Carville, LA 70721

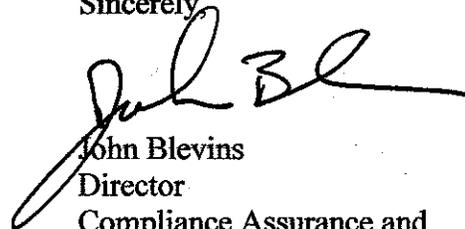
Re: Clean Air Act Section 114 Information Request
Total Petroleum USA, Inc. - Styrene Monomer Plant, Carville, LA

Dear Mr. Roussel:

Enclosed is an Information Request (Request) issued to Total Petroleum USA, Inc. (Total Petroleum) under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information necessary to determine whether subject facility is in compliance with the provisions of the CAA.

Please provide the information requested by the dates indicated in the enclosure to Ms. Dorothy Crawford, Enforcement Officer, at the above address. For technical questions regarding the request, please contact Ms. Crawford at (214) 665-2771. For all other questions, to request an extension, or to schedule a meeting to discuss this Request, please contact Mr. Jacob A. Gallegos, Assistant Regional Counsel, at (214) 665-9798.

Sincerely



John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

cc: Celena Cage (LDEQ)
Raymond Guillaume (LDEQ)

ENCLOSURE 1

CLEAN AIR ACT SECTION 114 INFORMATION REQUEST TOTAL PETROLEUM USA, INC.

This Clean Air Act ("CAA") Section 114 Information Request (Request) seeks information to determine if Total Petroleum USA, Inc. Styrene Monomer Plant ("Total") is complying with the requirements of the New Source Performance Standards (NSPS), and the Maximum Achievable Control Technology (MACT) requirements, specifically 40 C.F.R. 60.18, and 40 C.F.R. 63.11. Additionally, the request seeks information to determine compliance with the Leak Detection and Repair regulations, specifically 40 C.F.R. 63 Subpart H and 40 C.F.R. 61 Subpart FF.

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information (Request) to Total Petroleum USA Inc., pursuant to Section 114(a) of the Clean Air Act (CAA) 42 U.S.C. § 7414(a), 42 U.S.C. §114(a)(1)(D), 42 U.S.C. §114(a)(1)(E), and 42 U.S.C. §114(a)(1)(G). Section 114(a) authorizes the Administrator of EPA to require the submission of information. Section 114(a)(1)(D) authorizes the Administrator to require sampling of emissions. Section 114(a)(1)(E) authorizes the Administrator to require facilities to keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical. Finally Section 114(a)(1)(G) requires a facility to provide such other information as the Administrator may reasonably require. The Administrator has delegated this authority to the Director of the Compliance Assurance and Enforcement Division, EPA Region 6. This information request pertains to the Total Petroleum USA, Inc. Styrene Monomer Plant, located in Carville, Louisiana.

The information requested must be submitted whether or not you regard part or all of it a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim on all or part of the information submitted. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. §1905. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the Act, and the emissions data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

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We request that a duly authorized officer or agent of the Facility certify your response by signing the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

Except for the information specifically requested to be in a Lotus or Excel spreadsheet format, the Facility has a choice of either submitting all the documents in pdf format, or submitting all the documents as hard copy documents. For pdf submittals, please ensure that confidential business information and non-confidential information are submitted on separate disks. Please also mark each page that is confidential business information as such.

If information responsive to this request was previously provided to EPA, EPA does not require that such information be submitted again. In lieu of resubmitting such information, please indicate which information was already provided, the date that the information was submitted to EPA and to whom it was provided.

We may use any information submitted in response to this Request in an administrative, civil, or criminal action.

This Request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific entities as part of an administrative action or investigation.

All information responsive to this Request should be sent to the following:

Ms. Dorothy Crawford
Toxics Enforcement Section (6EN-AT)
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Please be advised that under Section 113(a) of the Act, failure to provide the information required by this letter in a timely manner may result in an order requiring compliance, an order assessing an administrative penalty, or a civil action for appropriate relief. In addition, Section 113(c) of the Act provides criminal penalties for knowingly making any false statements or omission in any response required under the Act. EPA may also seek criminal penalties from any person who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of EPA or in relation to or

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contemplation of any such matter or case. *See* 18 U.S.C. § 1519 (2004). The information provided by you may be used by the United States in administrative, civil, or criminal proceedings.

I. INSTRUCTIONS

1. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.
2. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds. Please submit all information for each question in a logically sequenced, bound format.
3. Please provide a separate response to each question and subpart of a question set forth in this Information Request and precede each answer with the number of question to which it corresponds.
4. For each question, identify each person responding to any question contained in this Information Request on your behalf, as well as each person consulted in the preparation of a response.
5. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question. Indicate on each document produced in response to this Information Request the number of the question to which it corresponds.
6. If the Facility has no responsive information or documents for a particular question, submit a statement certifying this, along with a detailed explanation. If a document is responsive to more than one question, this must be so indicated, and only one copy of the document need be provided.

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II. DEFINITIONS

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, draft or final, whether or not wholly or partially in handwriting, including documentation solely in electronic form, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, email, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
2. The term Total Petroleum USA, Inc. includes any officer, director, agent, or employee of Total Petroleum, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
3. The terms "person" or "persons" shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.
4. The terms "you" or "yours", as used in each of the questions set forth in the attached Section 114 letter, refers to, and shall mean, the company or corporation with which each addressee of the attached Section 114 letter is affiliated, including its subsidiaries, division, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.

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5. All terms used in the Information Request will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. § 7401 *et seq.*, the implementing regulations, and 40 C.F.R. Part 68.
6. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

III. QUESTIONS

Regarding Flaring - Submit the following information about Total Petroleum USA, Inc. Styrene Monomer Plant located in Carville, LA, **within 150 days of receipt of this Information Request:**

1. Provide a list of each flare that operates at your facility during the time period starting within 30 days from the receipt of this Information Request and ending 120 days after the starting date (e.g., period of about 3 months).¹
2. During the aforementioned time period, list the times (date, start time, and end time) that combustible material was routed to each flare (i.e., "venting periods").
3. For each venting period listed in response to Question 2, provide the average mass flow rate of all material at the flare tip, combustible and non-combustible, in lb/hr, that was vented to each flare. The averaging time shall be no more than one hour.
4. For each venting period listed in response to Question 2, provide the average steam-to-vent gas (lbs steam/lbs vent gas) for each flare. The averaging time shall be no more than one hour.
5. For each venting period listed in response to Question 2, provide the average rate at which steam was added to each flare, in lbs/hr. flare (i.e., the average of the sum of seal, upper, lower, center, and any other location within the flare that steam may have been added).
6. For the information provided in response to Question 3, provide a narrative explanation and example calculations describing how you arrived at your response.

¹ For the purpose of this Information Request, "flare should be broadly defined as any open combustion unit (i.e., lacking an enclosed combustion chamber) whose combustion air is provided by uncontrolled ambient air around the flame, and that is used as a control or safety device. A flare may be equipped with a radiant heat shield (with or without a refractory lining), but is not equipped with a flame air control damping system to control the air/fuel mixture. In addition, a flare may also use auxiliary fuel. The combustion flame may be elevated or at ground level.

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7. For the information provided in response to Question 5, provide a narrative explanation and example calculations, describing how you arrived at your response.
8. Provide the pilot gas flow rate in lbs/hr, for each flare.

Regarding Leak Detection and Repair (LDAR) - Submit the following information about Total Petroleum USA, Inc., Styrene Monomer Plant located in Carville, LA **within 30 days of receipt of this Information Request:**

1. Provide in a native electronic format, on compact disc or other electronic storage media, a copy of the back-up file generated by the facility's fugitive emissions monitoring records database. The file should contain data from January 1, 2009, to the date of this Information Request. Please include in your response the name and version of the fugitive monitoring records database program currently being used by the facility.
2. Provide in editable electronic format, on compact disc or other electronic storage media, for each technician who performed LDAR monitoring at the site data from January 1, 2009, to the date of this Information Request, a listing of the technician's name and any technician's identification number used by the facility.
3. If the fugitive emissions monitoring is conducted by a contractor, please provide the name of each contractor used from January 1, 2009, to the date of this Information Request.
4. For each process unit, provide in electronic format, on compact disc or other electronic storage media, a data table, current as of the date of this Information Request, with the following information for all components included in any leak detection and repair program (including any programs performed under requirements of the Resource Conservation and Recovery Act) at the facility:
 - a. Unit name
 - b. Type of component (i.e., valve, connector, pump, etc.)
 - c. Class of service (i.e., gas/vapor, light liquid, heavy liquid, etc.)
 - d. Number of each type of component
 - e. Regulatory applicability (including any special permit conditions)
 - f. Current monitoring method for each component type (i.e., Method 21, AVO, seal check, etc.)
 - g. Current leak definition for each component type
 - h. Current monitoring frequency for each component type
 - i. Any additional information regarding requirements or voluntary programs
5. Please provide copies of any work orders or other documents (as defined above) generated in calendar year 2010, used to request, document, or otherwise handle component repairs.

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6. Using the electronic records provided in response to LDAR question 1 above, provide the results of queries designed to demonstrate compliance with the following regulatory requirements:
 - a. Make a first attempt at repair within five days
 - b. Make a final repair within fifteen days
 - c. Monitor components designated as "difficult-to-monitor" once per year
 - d. Re-monitor valves for two successive months after a repair
(for components subject to state or Federal regulations that require monthly monitoring until a leak is not detected for two successive months)
 - e. Re-monitor valves in the first three months after a repair (for components subject to state or Federal regulations that require that a repaired component be monitored at least once within the first three months after its repair)

Provide the converted database and the queries (query designs) used to demonstrate the compliance requirements above, preferably in an MS Access file (or something that can be opened using MS Access). Provide the output or results from these queries in an editable spreadsheet in electronic format, on compact disc or other electronic storage media, (i.e., MS Excel). A list of the required output fields is included in Enclosure 2.

ENCLOSURE 2

List of Output Fields for LDAR Compliance Queries

A. Make a first attempt at repair within five days

1. Unit/Production Area - This should correspond to a unit identification on your periodic fugitive emissions report (ie., HON semi-annual)
2. Tag number - This should be a unique identifier of that component
3. Equipment category - Such as valve, pump, connector, agitator, compressor, flange, etc.
4. Subject regulation - Indicate the driving regulation for that component such as HON, VV, FF, V, state SIP, permit, etc.
5. Monitoring date - This is the date the component was monitored and identified to have a screening value greater than the regulatory leak definition
6. Screening value - The monitored value on the date it was determined to be leaking (ie., leak reading)
7. Date of first attempt at repair
8. Final repair date - Per regulation, this date is the date the repair was confirmed with monitoring, not necessarily the date the component was physically repaired

B. Make a final repair within fifteen days

1. Unit/Production Area
2. Tag number
3. Equipment category
4. Subject regulation
5. Monitoring date
6. Screening value
7. Date of first attempt at repair
8. Final repair date

C. Monitor components designated as "difficult-to-monitor" once per year

1. Unit/Production Area
2. Tag number
3. Equipment category
4. Subject regulation
5. Date placed into service - Date the component was first placed into service
6. Date of initial monitoring - Date the component was first monitored after being placed into service
7. Dates of annual monitoring for 2007-2011

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D. Re-monitor valves for two successive months after a repair (for components subject to state or Federal regulations that require monthly monitoring until a leak is not detected for two successive months)

1. Unit/Production Area
2. Tag number
3. Equipment category
4. Subject regulation
5. Monitoring date
6. Screening value
7. Date of first attempt
8. Final repair date
9. Final screening value
10. First re-monitoring date
11. First re-monitoring screening value
12. Second re-monitoring date
13. Second screening value

E. Re-monitor valves in the first three months after a repair (for components subject to state or Federal regulations that require that a repaired component be monitored at least once within the first three months after its repair)

1. Unit/Production Area
2. Tag number
3. Equipment category
4. Subject regulation
5. Monitoring date
6. Screening value
7. Date of first attempt
8. Final repair date
9. Final screening value
10. First re-monitoring date
11. First re-monitoring screening value