



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

June 19, 2012

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7010 2780 0002 4356 5099

Mr. Dave Hutton  
Olefins Unit Manager  
Shell Chemical LP, Norco Chemical Plant East Site  
P.O. Box 10  
Norco, LA 70079-0010

Re: Clean Air Act Section 114 Information Request  
Shell Chemical LP, Norco Chemical Plant East Site

Dear Mr. Hutton:

Enclosed is an Information Request (Request) issued to Shell Chemical LP, Norco Chemical Plant East Site (Shell Norco East) 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 Shell Norco East is in compliance with the provisions of the CAA.

Please provide the information requested within thirty (30) days of your receipt of this letter to Ms. Dorothy Crawford, at the above address. If you have any questions, please contact Ms. Crawford at (214) 665-2771.

Sincerely,

A handwritten signature in black ink, appearing to read "John Blevins".

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure (1)

cc: Celena Cage  
Louisiana Department of Environmental Quality

## ENCLOSURE

### INFORMATION REQUEST

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this Information Request (Request) to Shell Chemical LP, Norco Chemical Plant – East Site (Shell Norco – East), pursuant to Section 114(a) of the Clean Air Act (CAA) 42 U.S.C. § 7414(a) for the purpose of determining compliance with the CAA. Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Compliance Assurance and Enforcement Division, EPA Region 6. This Request pertains to Shell Norco – East, located in Norco, 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.

You must submit all information under an authorized signature with 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.

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 individuals or entities as part of an administrative action or investigation.

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

Ms. Dorothy Crawford  
Toxics Enforcement Section (6EN-AT)  
Compliance Assurance and Enforcement Division  
U.S. EPA – Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

**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 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 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 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 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 Request the number of the question to which it corresponds.
6. Please provide all information, where possible, in editable electronic format, on compact disc or other electronic storage media.

## 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, 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, analysis, comparison, graph, chart, interoffice or intra office communications, photo stat 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 Shell Norco – East includes any officer, director, agent, or employee of Shell Chemical LP, 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 this 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**

Shell Norco – East shall submit the following information about its facility located in Norco, Louisiana within 30 days:

1. Provide a list of each flare<sup>1</sup> operating at your facility during the time period from September 1, 2007, until receipt of this letter.
2. For each flare listed in question 1, list the periods of time (date, start time, and end time) that combustible material was routed to each flare (i.e., “venting periods”). This Request and all requests below seek information regarding all facility devices meeting the definition of flare in footnote 1.
3. For each venting period listed in response to question 2, provide the net heating value of the gas being combusted (waste gas, sweep gas, supplemental natural gas, etc.. excluding pilot gas and steam or air) in Btu/scf of the stream that was vented to each flare. The averaging time shall be no more than one hour.
4. For the Btu/scf information in response to question 3, provide an explanation and example calculation describing how you arrived at the response.
5. 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 lbs/hr that was vented to each flare. The averaging time shall be no more than one hour.
6. For the mass flow rate in response to question 5, provide an explanation and example calculation describing how you arrived at the response.
7. For each venting period listed in response to question 2, provide the average rate at which steam and/or air was being added to each flare, in lbs/hr for steam

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<sup>1</sup> 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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and/or scf/hr for air, at all locations on the flare (i.e., the sum of seal, upper, lower, center, winterizing, etc.) during each venting period. The averaging time shall be no more than one hour. Include in your answer minimum steam rates that are controlled by orifice plates.

8. For the average rate at which steam and/or air was being added in question 7, provide a narrative explanation and example calculation, describing how you arrived at your response.
9. For each venting period listed in response to question 2, provide the average steam-to-vent gas or air-to-vent gas ratio (lb of steam/lb of vent gas, or scf of air/lb of vent gas) during any release to each flare. The averaging time shall be no more than one hour.
10. For the average steam-to-vent gas or air-to-vent gas ratio response to question 9, provide an explanation and example calculation, if appropriate, describing how you arrived at the response.
11. Provide an hourly average of the concentration of each constituent, with their respective molecular weights and Btu/scf ratings, in each vent stream during venting periods for the dates beginning one month prior to receipt of this letter.
12. Provide the pilot gas flow rate in lbs/hr for each flare.
13. Provide a list of the primary constituents in the vent stream released to each flare for venting periods since September 1, 2007, and an estimated range of each constituent's concentration. Except for the period specified in question 11, you need not determine the exact concentration of all compounds for each period of time, but only the most prominent compounds and an approximate range of concentration.
14. For each flare, provide the minimum steam or air addition rate, in lb/hr for steam and/or scf/hr for air, at all locations on the flare (seal, upper, lower, center), and, if steam rate is controlled by an orifice plate, show the location and flow rate of the plate. To the extent that the minimum steam or air addition rate changes on a seasonal basis, state the minimum rate for each season and the time periods during which each season's minimum rate applies.
15. Provide copies of any and all flaring related documents in your possession, custody, or control that describe how to properly operate the flare, and/or prescribe or recommend the amount of steam or air to be added to each facility flare, including but not limited to: all documents which indicate how the flare is constructed and operated (performance tests, piping and instrumentation diagrams [P&IDs], operations and/or design manuals, compliance reports, equipment repair orders, Method 22 reports, etc). Provide the copy of the entire document if within the document it states the maximum steam or air rate,

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minimum steam or air rate, steam or air addition rate associated with a vent scenario, general steam-to-organic gas/vent ratio, gas or air-to-organic gas/vent gas ratio, or any other reference to steam or air addition.

16. For each flare, state with specificity which, if any, federal and state regulations regulate or apply (regulatory applicability tables).
17. If any flare is listed in a permit issued under Federal or state regulations, provide an electronic copy, preferably in "PDF" format, of each currently effective permit.
18. For each facility flare, state whether the flare is configured to receive gases/vapors from a pressure relief device, which is a safety device used to prevent operating pressures from exceeding the maximum allowable working pressure of the process equipment. Also, state whether the flare and its associated closed vent system is used as the method of compliance with any Federal leak detection and repair (LDAR) provision, including but not limited to 40 C.F.R. § 60.482-4(c), or 40 C.F.R. § 63.165(c).
19. Provide the periods of time (date, start time, and end time) when material from off-site sources was vented to each flare. For the purposes of this letter, the term 'material from off-site sources' means material from the Motiva Norco Refinery facility (state identification AI 1406). The term is not intended to include material purchased from independent commercial vendors (e.g., natural gas, nitrogen).
20. Provide a list of identifiers (e.g., name, number) for material from off-site sources vented to each flare, the off-site source unit or plant name, and a description of off-site process which generated the material.
21. Provide the average mass flow rate in lbs/hr of material that was vented to each flare where the material was from off-site sources. The average time shall be no more than one hour. The information shall be correlated to material identifier.
22. Provide a list of the primary constituents, and an estimated range of each constituent's concentration, for material from off-site sources vented to each flare.
23. Provide hourly average monitoring or metered data for any characteristics, content, or constituents of material from off-site sources vented to each flare. The information shall be correlated to material identifier and periods of time in response to question 19.

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24. For the information provided in response to question 23, provide an explanation of the monitor or meter location (e.g., immediately upstream of flare knockout drum; as material enters plant prior to mixing with on-site material) and purpose or use of monitor or meter data.
25. For each period of off-site material flaring in response to question 19, provide an explanation of procedures or processes used for communication or notification from or to off-site source operators or systems regarding the material. The explanation shall include an example of standard communication content and purpose of the communication or notification.
26. For each period of off-site material flaring in response to question 19, indicate if material from off-site sources was stored, processed, treated, or used by your facility between the time it entered your facility and venting to flare. For the purposes of this question, the terms stored, processed, treated or used are not intended to include simple conveyance from off-site source to your flare system or flare header.
27. Various reporting and permitting support records indicate you are evaluating NSPS Subpart J applicability for your flares and working with the Louisiana Department of Environmental Quality (the state) to develop a path forward regarding the question of 'non-refinery combustion sources as potentially subject to' NSPS Subpart J. Describe the status of any dialogue between you and the state regarding this matter. Provide copies of all communications between you and the state, which occurred between January 1, 2007, and receipt of this letter, concerning this matter.
28. During the time period from September 1, 2007, until receipt of this letter, provide the periods of time (date, start time, and end time) when material from the Fuel Gas Blend Drum located in the Utilities Unit was sent to an off-site flare located at the Motiva Norco Refinery facility (state identification AI 1406).
29. For each period listed in response to question 28, provide a list of identifiers (e.g., name, number) for material sent and a description of processes which generated the material.
30. For each period listed in response to question 28, provide an identifier (e.g., name, number) of the off-site flare which the material was sent to.
31. For each period listed in response to question 28, provide the average mass flow rate in lbs/hr of material. The average time shall not be more than one hour. The information shall be correlated to material identifier.

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32. For each period listed in response to question 28, provide a list of the primary constituents, and an estimated range of each constituent's concentration, for the material.
33. For each period listed in response to question 28, provide hourly average monitored or metered data for any characteristics, content, or constituents of the material (e.g., specific gravity, calculated equivalent heating value, H<sub>2</sub>S concentration). The information shall be correlated to material identifier.
34. For the information provided in response to question 33, provide an explanation of the monitor or meter location and purpose or use of monitor or meter data.
35. For each period listed in response to question 28, provide an explanation of procedures or processes used for communication or notification to or from off-site source operators or systems regarding the material. The explanation shall include example content and purpose of the communication or notification.