UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

OCT 0 5 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7011 0110 0001 3590 6070

Mr. Greg Gentry
Environmental Manager
Valero Refining Texas LP – Port Arthur
1801 South Gulfway Drive
Port Arthur, TX 77640

Re: Clean Air Act Section 114 Information Request
Valero Refining Texas LP – Port Arthur, Port Arthur, Texas

Dear Mr. Gentry:

Enclosed is an Information Request (Request) issued to Valero Refining Texas LP – Port Arthur (Valero) 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 Valero, located in Port Arthur, Texas, is in compliance with the provisions of the CAA.

Please provide the information requested within 30 days of receipt of this document, to Mr. Ryan Rosser, at the above address. If you have any questions, please contact Mr. Rosser at (214) 665-2247.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

cc: Bryan Sinclair
Texas Commission on Environmental Quality

INFORMATION REQUEST

VALERO REFINING TEXAS LP – PORT ARTHUR

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this Information Request (Request) to Valero Refining Texas LP – Port Arthur 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 the Valero Refining Texas LP – Port Arthur (facility) located in Port Arthur, Texas.

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.

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

Mr. Ryan Rosser
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, all data tables from the facility's flaring records management database. Provide the data in a format such that all information can be readily viewed in Microsoft Access (Microsoft Excel is not an acceptable format for data tables containing greater than 65,000 records).

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 Valero includes any officer, director, agent, or employee of Valero Texas Refining LP – Port Arthur, 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.

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., and the implementing regulations.

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

Valero shall submit the following information about its Port Arthur Refinery located in Port Arthur, Texas within 30 days:

Regarding flaring:

1. Provide a list of each flare[1] 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 above; list the periods of time (date, start time, and end time) that combustible material was routed to each facility flare (i.e., "venting periods"). This Request and all requests below seek information regarding all facility devices meeting the definition of flare set forth in footnote 1.

3. For each venting period listed in response to Question 2 above, 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 facility flare. The averaging time shall not be greater than one hour.

4. For the Btu/scf information in Question 3 above, provide a narrative explanation and example calculations describing how you arrived at your response.

5. For each venting period listed in response to Question 2 above, 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 facility flare. The averaging time shall be no more than one hour.

6. For the average mass flow rate of all material in Question 5 above, provide a narrative explanation and example calculations describing how you arrived at your response.

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[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.

7. For each venting period listed in response to Question 2 above, provide the average rate at which steam and/or air was being added to each facility flare, in lb/hr for steam 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 above, provide a narrative explanation and example calculations, describing how you arrived at your response.

9. For each venting period listed in response to Question 2 above, provide the average steam-to-vent gas or air-to-vent gas ratio (lb steam/lb vent gas or scf of air/lb of vent gas) during any release to each facility 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 (lb steam/lb vent gas or scf of air/lb of vent gas) during any release in Question 9 above, provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your 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 your receipt of this Request.

12. Provide the pilot gas flow rate in lbs/hr.

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 facility 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, 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 facility flare, state with specificity which, if any, Federal and/or state regulations regulate/apply to each flare (regulatory applicability tables). In addition, if any facility flare is listed in a permit issued under Federal and/or state regulations, provide an electronic copy, preferably in "PDF", of each currently effective permit.

17. 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).