

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/14/2022 – 11/18/2022	
Media Program:	Air	
Regulatory Program(s)	RMP	
Company Name:	Valero Houston Refinery	
Facility Name:	Valero Refining – Texas, LP.	
Facility Physical Location:	9701 Manchester Street	
(city, state, zip code)	Houston, Texas, 77012	
Mailing address:	9701 Manchester Street	
(city, state, zip code)	Houston, Texas, 77012	
County/Parish:	Harris County	
Facility Phone Number	(713) 923-3300	
Facility Contact:	Matt Lindquist	Manager, Safety
	Matt.lindquist@valero.com	
FRS Number:	110000460885	
Identification/Permit Number:	Air Operating Permit ID: O1381	
Media Identifier Number:	RMP: 100000084605	
NAICS:	32411 – Petroleum Refining	
SIC:	2911 – Petroleum Refining	
Personnel participating in inspection:		
Matthew Sundquist	Valero Houston Refinery	Manager, Safety
Lon Brenner	Valero Houston Refinery	Refinery Manager
Luke Dickerson	Valero Houston Refinery	Technical Manager
Kati Uminski	Valero Houston Refinery	HR Manager
Sara Montelengo-Oyervidez	Valero Houston Refinery	Manager Public Affairs
Matt Gauley	Valero Houston Refinery	Maintenance Manager
Christine James	Valero Houston Refinery	Operations Director
John Quigley	Valero Houston Refinery	HSE Director
Winnie Dodson	Valero Houston Refinery	Environmental Manager
Chris Hendrix	Valero Houston Refinery	Environmental Department
Madison Logan	Valero Houston Refinery	Operations Excellence Superintendent
John Corella	Valero Houston Refinery	Inspection Manager
Edward Heard	Valero Houston Refinery	PCMS Admin
Tom Nysetvold	Valero Houston Refinery	Reliability Manager
EPA Lead Inspector		
Signature/Date	Kayla Buchanan	Date
Supervisor		
Signature/Date	Samuel Tates	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. Environmental Protection Agency (EPA) Region 6 inspectors Kayla Buchanan and Howard Cole arrived at the Valero Houston Refinery (Valero Houston) at 9:00 AM on November 14, 2022, for an announced inspection. EPA convened an opening conference and met with several representatives from the facility (**notated on page 1**). Kayla Buchanan presented her credentials to the opening conference attendees and informed them that this was an EPA inspection to determine Valero Houston's compliance with the Clean Air Act Section 112r (1) and (7), the General Duty Clause and 40 C.F.R. Part 68 requirements, respectively.

FACILITY DESCRIPTION

Valero Houston Refinery (Valero Houston) is a manned facility located at 9701 Manchester Street, Houston, Texas, 75012. Valero Houston is a petroleum refinery which produces gasoline, ultra-low sulfur diesel, and streams for use as chemical feedstocks, using a variety of processing operations. The facility uses, processes, handles, or stores a variety of flammable mixtures that contain RMP regulated flammable substances. There are 11 RMP Program Level 3 processes at Valero. Approximately 340 full-time employees work at the facility. There is no union present at the facility.

Section II – OBSERVATIONS

On November 17, 2022. EPA participated in a tour of Valero Houston. Valero Houston's Safety Manager, Matt Lindquist, and HSE Director, John Quigley, accompanied us. EPA observed the covered processes, equipment, operations, control rooms, and emergency equipment. EPA interviewed operators and asked questions about their training, the Management of Change (MOC) and Process Hazard Analysis (PHA) processes, and the facility's regular operating and emergency procedures.

SUBPART A – General

40 C.F.R. § 68.10 Applicability – Valero Houston is the owner/operator of a stationary source that has more than the threshold quantities of multiple flammable regulated substances in its processes; therefore, the RMP regulations are applicable. Valero Houston has a Clean Air Act (CAA) Title V permit and an Air Operating Permit and is classified under the North American Industrial Classification System (NAICS) Code 32411 (Petroleum Refining). In addition, Valero Houston is subject to the Occupational Safety and Health Administration's (OSHA) Process Safety Management (PSM) Standard (29 C.F.R. § 1910.119) and is therefore categorized by the RMP rule as a Program Level 3 facility. Valero Houston last submitted a RMP registration update to EPA on April 26, 2019, which describes the eleven processes containing the regulated substances at more than threshold quantities.

40 C.F.R. § 68.12 General requirements – The owner or operator of a stationary source subject to this regulation shall submit a single RMP, as provided in 40 CFR §§ 68.150 to 68.185. The RMP shall include a registration that reflects all covered processes. EPA reviewed the re-submission of Valero Houston's RMP. It listed the flammable regulated chemicals and the eleven associated Program 3 processes.

40 C.F.R. § 68.15 Management – Valero Houston developed a management system to oversee the implementation of the risk management program elements. It assigned a qualified person or position that has overall responsibility for the development, implementation, and integration of the risk

management program elements. Responsibility for implementing individual requirements of this part was assigned to persons other than the person identified, so the names or positions of these people were documented, and the lines of authority were defined through an organization chart or similar document.

SUBPART B – Hazard Assessment - 40 C.F.R. § 68.20 - 40 C.F.R. § 68.42

EPA did not note any areas of concerns for any of the elements in this subpart.

SUBPART D – Program 3 Prevention Program - 40 C.F.R. § 68.65 - 40 C.F.R. § 68.87

EPA noted areas of concern for the following elements within this subpart:

40 C.F.R. § 68.67 Process Hazard Analysis (PHA) – EPA reviewed several PHAs conducted by Valero Houston. Valero Houston uses the Hazard and Operability Study (HAZOP) methodology to determine and evaluate the hazards of the process being analyzed. The PHAs conducted should be appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process; however, Valero Houston’s Facility Siting PHAs were not appropriate to the complexity of the process and did not identify, evaluate, and control the hazards involved in the process **[AOC #1 – 40 C.F.R. § 68.67(a)]**

The Facility Siting PHAs conducted in 2016 and 2022 did not consider the interconnectivity of the process and therefore did not adequately address the toxic release potential of chemicals including hydrogen sulfide, benzene, 1,3 butadiene, ammonia, etc., and the impact on buildings and employees and the potential for injury or death resulting from a release of toxic chemicals. The July 13, 2016 (revision 2) Facility Siting Study states “that all occupied buildings are within toxic endpoints should vapors be released during an event.” The January 2022 Facility Siting Study PHA states “Toxic dispersion modeling was not performed as it was assumed that all occupied buildings were within the endpoints of a toxic material (STEL, IDLH, PEL, TLV, etc.) Valero failed to perform toxic evaluations of permanently occupied buildings considered to be emergency operations shelter (EOS) also known as a Safe Haven, or temporary shelter-in-place. Valero Houston failed to revise the Safe Haven procedure to define which buildings may be used as Safe Havens along with applicable requirements and concerns which address toxic release scenarios including:

- Steps to shut down outside air intakes and place HVAC system in recirculation mode.
- Monitoring of air quality inside the building.
- Required calibration of detection and alarm equipment in air intakes

Valero Houston failed to identify and include in their emergency response plan, the permanently occupied buildings designated as either emergency operations shelter or temporary shelter-in-place, where personnel await pending further instruction by the incident manager organization.

Valero Houston is required to establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions **[AOC #2 – 40 C.F.R. § 68.67(e)]**

Valero failed to assure that the recommendation (10.1 HO-FS-2014-01, *Review and Update the Refinery Safe Haven Program and Procedures*) contained in the July 2016 Facility Siting Study was resolved in a timely manner. Valero did not document what actions were to be taken, develop a written schedule of when these actions are to be taken, complete the actions as soon as possible, or document that the recommendations were ever resolved. Recommendation 10.1 HO-FS-2014-01 contained in 2016 Facility Siting report was repeated as a recommendation in the 2022 Facility Siting Study.

40 C.F.R. 68.73 – Mechanical Integrity - EPA reviewed the written procedures Valero Houston established to maintain the ongoing integrity of process equipment. Review was conducted both on site and in further detail after leaving the facility post-inspection. EPA examined the inspections and tests Valero Houston performed on its equipment to ensure that the frequency of inspections and tests of process equipment are consistent with applicable manufacturers’ recommendations and good engineering practices.

The following deficiencies in Valero Houston’s Mechanical Integrity program are summarized as follows:

Written procedures: The owner or operator shall establish and implement written procedures to maintain the on-going integrity of process equipment [AOC #3 – 40 C.F.R. § 68.73(b)].

- Valero Houston failed to inspect its deep-well pump cans every 15 years as is required by their mechanical integrity procedure 3.03.

Pump Can	Chemical	In-service Date	Last Inspection	Violation
22PU2045	Isobutene	xxxx	1/1/2019	2018
22PU1724	Butadiene	1979	2/4/2020	2018-1/4/2020
22PU1725	Butadiene	1979	10/23/2019	9/18-9/23/2019
22PU2142	Sour Water	1992	6/26/2019	2018-5/26/2019
90PU2275	Propylene	1996	3/10/2021	2018-2/10/2021
90PU2023	Cat feed	1990	11/5/2019	2018-10/2019
90PU2075	Cat feed	2008	Due date 1/2023	12/2018-12/2022
90PU2146	Crude oil	1993	4/9/2021	2018-3/2021
90PU140	Propane	1992	12/1/2005	Due date 12/1/2020

- Valero Houston failed to inspect the soil-to-air inspections for buried piping as is required by their mechanical integrity procedure 3.04. The company indicated they have a plan to conduct buried pipe inspection since 2018. A plan is not an inspection and, it appears from the schedule provided by the facility that Valero Houston inspected less than 50% of the buried piping. Several of the soil to air interface inspections were performed after the conclusion of this RMP inspection.
- Valero Houston failed to monitor condition monitoring locations (CML) every 12-months (*by April 12, 2022*) on Desalter #-23FA605 as required by the inspection and test plan developed for this vessel.
- Valero Houston failed to monitor/test Nozzle 14 at CML 011 on Debutanizer Tower-23DA102, monthly or quarterly due to corrosion as required by the monitoring and inspection and test plan developed. The worst-case retirement date for this nozzle was first calculated to be

October 22, 2022, and then was decreased to September 9, 2022. There is no indication that the nozzle has been repaired or replaced.

Inspection and testing: Inspections and tests shall be performed on process equipment [AOC #4 – 40 C.F.R. § 68.73(d)(1)].

- Valero failed to develop inspection plans and perform external inspections during the specified timeframe for the following piping circuits in accordance with API 570 Section 6.3.3 and API 574:
 1. Stream 001-01-MPF, Storage to 23 PU1536 Suction Flare/FLR-03-VD:
 - *Failure to develop an Inspection and Test Plan from August 2018 to August 2019*
 2. Flare Flare/FLR-03-VD
 - *Failure to develop an Inspection and Test Plan from December 2018-August 2022.*
 3. Stream 235-02-MPF, 235-03-MPF, 235-04-DL, 238-001-DL:
 - *Failure to develop an Inspection and Test Plan from January 2018-July 2022*
 4. Stream 235 DA102 to OVHD Reflux:
 - *Failure to develop an Inspection and Test Plan from January 2018-May 2022*
 5. Stream 120 DA201 Top P/A Reflux section
 - *Failure to develop an Inspection and Test Plan December 2018- present.*
 6. Stream 132 CMS from DA202A
 - *Failure to develop an Inspection and Test Plan from December 2018-December 2020*
 7. Stream 104 Atmospheric Column Off-gas
 - *Failure to develop an Inspection and Test Plan from August 2018-May 2022.*
 8. Stream 238 Debutanizer OVHD to FCCU
 - *Failure to perform an external inspection between December 2018 -December 2020.*
 9. Stream 232 FA102 to OVHD Vapor
 - *Failure to perform an external inspection between December 2018 -November 2019.*
 - *Failure to develop an Inspection and Test Plan from January 2018-December 2020*
 10. Stream Flare system
 - *Failure to perform an external inspection between September 2018 -September 2021.*
 - *Failure to develop an Inspection and Test Plan from September 2018-August 2022*
 11. Stream 207A-02-DL
 - *Failure to perform an external Inspection performed from December 2018 to December 2021*
 - *Failure to develop an Inspection and Test Plan from September 2018-August 2022*
 12. Stream 215-01-MPF
 - *Failure to develop an Inspection and Test Plan from January 2018-May 2022*
- Valero failed to perform a complete an API 510 external inspection of Desalter #1-23FA605 in September 2019 because there was no access to the top portion of the drum due to the severe

condition of the upper platform and the Flare-KO drum-23FA103 because there was no access to the top 25% portion of the drum due to the fact there were no ladders or platforms.

Inspection and testing: Inspection and testing procedures shall follow recognized and generally accepted good engineering practices [AOC #5 – 40 C.F.R. § 68.73(d)(2)].

- Valero failed to calculate a short-term and long-term rate, next inspection date or a retirement date CMLs on the piping circuits listed below in accordance with API 570 and API 574 such as, but not limited to Section 6.3.3 and 6.5.

API 570 Section 6.3.3 Setting Inspection Intervals Without the Use of RBI states If RBI is not being used, the interval between piping inspections shall be established and maintained by using the following criteria: the corrosion rate and remaining life calculations.

For Class 1, 2, and 3 piping, the period between thickness measurements for CMLs or circuits should not exceed one-half the remaining-life, or the maximum intervals recommended in Table 1, whichever is less. Whenever the remaining life is less than four years, the inspection interval may be the full remaining life up to a maximum of two years.

Valero Houston uses the Risk Based Inspection (RBI) Program (API 580) but EPA does not feel that is appropriate in this instance.

Table 1—Recommended Maximum Inspection Intervals

Type of Circuit	Thickness Measurements	Visual External
Class 1	5 years	5 years
Class 2	10 years	5 years

6.5 Extent of Thickness Measurement Inspection and Data Analysis details 6.5.1 CML Monitoring which states CML re-inspection shall not be extended beyond the date projected to reach the established minimum required thickness. Absolute limits should be considered for re-inspection of CMLs based on the likelihood of failure (e.g., time or thickness limit). As a minimum, the worst-case CMLs within the circuit shall be inspected at the next established inspection interval.

- Stream 235-02-DL DA102 to 23EA108: CMLs 660 (pipe) (.117) and CML 665 (pipe) (.112)-retirement date (.093)
UT Inspection-7/15/2021
- Stream 132-01-MPF to 23EA206: CML 640 (pipe) (.104) is now below retirement thickness (.100)
UT Inspection-11/25/2020
- Stream 132-02-DL to CMS from DA202A: CML 1050 elbow (.106) is now at/below retirement thickness (.093)
UT Inspection-11/25/2020
- Stream 132-02-DL to CMS from DA202A: CML 1055 pipe (.110) is now at/below retirement thickness (.093)
UT Inspection-11/25/2020
- Stream 132-02-DL to CMS from DA202A: CMLs 1030DL, 1035DL, 1045DL (pipe) as required by the Valero Mechanical Integrity Program.

Stream 104-03-VD- 23FA201 to 23FA360: CML (reducer) 560DL (.084) has a retirement thickness of (.070)

UT Inspection-10/12/2022

6. Stream 104-03-VD- 23FA201 to 23FA360: CML (vent drain) 280VD (.093) is now below its retirement thickness of (.105)

UT Inspection-10/12/2022

7. Stream 238-02DL: CML 905 pipe (.132) is below the calculated retirement thickness (.140) UT Inspection-8/26/2021

8. Stream 238-02DL: CML 910 pipe (.105) is below the calculated retirement thickness (.140) UT Inspection-8/26/2021

9. Stream 232 FA102 to OVHD Vapor/232-02DL: CML 185DL pipe (.119) is now at/below retirement thickness. (.093)

UT Inspection-12/28/2020

10. Stream 232 FA102 to OVHD Vapor/232-02DL: CML 190DL (.108) is now at/below retirement thickness (.093)

UT Inspection-12/28/2020

11. Stream FLR-01-MPF: CML 370 pipe (.107) is now at/below retirement thickness (.093) UT Inspection-9/16/2021

12. Stream FLR-01-MPF: CML 385 pipe (.100) is now at/below calculated retirement thickness (.093) UT Inspection-9/16/2021

13. Stream FLR-01-MPF: CML 635 pipe (.023) is now below retirement thickness .093 UT Inspection-12/9/2021

- Valero failed to ensure that soil-to-air inspections for buried piping were conducted in accordance with recognized and generally accepted good engineering practices such as API 570 Piping Inspection Code: In-service Inspection, Rating, Repair, and Alteration of Piping Systems, Section 9-Inspection of Buried Piping.
- Valero failed to perform an internal inspection of Debutanizer Reflux Condenser-Heat Exchanger-23EA108 and Flare KO drum-23FA103 in accordance with recognized and generally accepted good engineering practices such as API 510, which requires an internal inspection every ten-years. The last internal inspection for both vessels was February 2011. The inspection and test plan for Debutanizer Reflux Condenser-Heat Exchanger-23EA108 indicates the subsequent inspection for this vessel was February 2021. The inspection and test plan was updated in January 2022, 11 months after the inspection was due, to reflect a new inspection due date. Flare-KO Drum-23FA103 does not have an inspection and test plan.

68.73(e) The owner or operator shall correct deficiencies in equipment that are outside acceptable limits (defined by the process safety information in §68.65) before further use or in a safe and timely manner when necessary means are taken to assure safe operation [AOC #6 – 40 C.F.R. § 68.73(e)].

- Valero did not correct deficiencies in the following piping circuits that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation. Ultrasonic testing/x-ray measurements indicated that the following piping circuits were operating below their calculated retirement thickness

1. Stream 132 CMS from DA202A: CML 640 (.104) is below the calculated retirement thickness (.100).

UT Inspection-11/25/2020

2. Flare System FLR-01-MPF: CML 635 pipe (.031) was below the calculated retirement thickness (.093) on September 16, 2021, and again (.023) on December 9, 2021.
 3. Stream 104-03-VD- 23FA201 to 23FA360: CML 280VD (.093) is now below its retirement thickness of (.105)
UT Inspection-10/12/2022
 4. Stream 238-02DL: CML 905 pipe (.132) was below the calculated retirement thickness (.140)
UT Inspection-8/26/2021
 5. Stream 238-02DL: CML 910 pipe (.105) was below the calculated retirement thickness .140
UT Inspection-8/26/2021
- Valero did not correct deficiencies in the facilities fire monitors identified in their April 2022 and October 2022 inspections before further use or in a safe and timely manner. The fire monitors were found to have the following issues: Physical damage (1), All parts not in working order (5), Monitors with corrosion (74), Evidence of leaks (32), Nozzle not properly operational (1), Monitor does not oscillate properly (3). Fire monitors with mechanical problems (51) were identified in April 2021 inspection but have not been repaired. Six fire monitors identified on the April 2021 inspection with mechanical problems were not repaired for a period of 18 months. One fire monitor identified on the April 2021 inspection with mechanical problems was not repaired for a period of 10 months. Four fire monitors identified on the April 2021 inspection with mechanical problems were not repaired for a period of 6 months.
 - Valero did not correct deficiencies in Atmospheric Tower 23DA201 identified during an external inspection conducted in September 2020. Some of these issues were identified during the 2015 external inspection. The following deficiencies were identified:
 - Random areas of missing insulation and jacketing were observed, and loose banding was observed throughout the tower. Insulation under jacketing is crumbled or missing in many areas.
 - The support legs had areas on the northeast side with concrete deterioration and exposed re-bar. The base also had scattered cracking throughout. This did not appear to have changed much from the previous inspection.
 - Two out of the sixteen anchor bolts have failed on the southeast side. The others exhibit active light/moderate crevice corrosion.
 - Valero did not correct deficiencies in Debutanizer Reflux Condenser-Heat Exchanger-23EA108 identified during the 2011 internal inspection. A recommendation was made to replace tube bundle at next scheduled outage due to severe corrosion of the tubes and transverse flow baffles.

Note: No information was provided by Valero Houston to support that the needed corrections were performed.

- Valero Houston failed to correct deficiencies for pressure relief valves 23RV1200 and 23RV1203 from March 2018 to March 2023 which were undersized for multiple relief cases and required piping modifications.

40 C.F.R. 68.79 - Compliance Audit - EPA reviewed Valero Houston's two most recent compliance audits. Both compliance audits were conducted by at least one person knowledgeable in the process. Valero

Houston certified compliance with the provisions of this subpart at least every three years to verify that procedures and practices developed under this subpart are adequate and are being followed; Valero Houston's 2018 compliance audit was conducted between February 26-March 2, 2018. However, Valero did not promptly determine and document a response to two compliance audit findings until September 2019. One compliance audit finding identified Valero Houston's need to complete inspections of 35 deep well pump cans and another identified Valero Houston's need to complete soil-to-air piping inspections. Over a year later, in September 2019, Valero created a schedule for the completion of the deep well pump cans and soil to interface inspections; however, Valero Houston has yet to complete the inspections. A 2020 compliance audit conducted between September 24-October 9, 2020, indicated that all the findings from the 2018 compliance were closed. However, Valero failed to properly complete these two findings from the 2018 compliance audit. Setting a schedule for completion of the compliance audit findings does not fulfill the requirement to correct these deficiencies [**AOC #7 – 40 C.F.R. § 68.79(d)**].

SUBPART E – Emergency Response 40 - C.F.R. § 68.90 - 40 C.F.R. § 68.96

EPA did not note any areas of concerns for any of the applicable elements in this subpart.

Section III – AREAS OF CONCERN

EPA Region 6 inspectors Kayla Buchanan and Howard Cole conducted a closing conference with Valero Refining – Texas, LP/Valero Houston Refinery at 4:00 PM on November 18, 2023, for the inspection. During the closing conference, Kayla Buchanan and Howard Cole reviewed AOC #6 (fire water monitor deficiencies) and AOC #7 noted during the inspection. All other AOCs were determined after the conclusion of the inspection and were not included in the closing conference. Valero Houston will have the opportunity to further clarify/address the areas of concern found after closing conference.

AOC #1, #2: Process Hazard Analysis – 40 C.F.R. §§ 68.67(a), 68.67(e) require Valero Houston to conduct process hazard analysis that are appropriate to the complexity of the process and shall identify, evaluate, and control the hazards involved in the process and to establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.

Valero Houston's Facility Siting PHAs were not appropriate to the complexity of the process and did not identify, evaluate, and control the hazards involved in the process. Valero failed to assure that the recommendation (10.1 HO-FS-2014-01, Review and Update the Refinery Safe Haven Program and Procedures) contained in the July 2016 Facility Siting Study was resolved in a timely manner. Valero did not document what actions were to be taken, develop a written schedule of when these actions are to be taken, complete the actions as soon as possible, or document that the recommendations were ever resolved. Recommendation 10.1 HO-FS-2014-01 contained in 2016 Facility Siting report was repeated as a recommendation in the 2022 Facility Siting Study.

AOC #3-#6: Mechanical Integrity – 40 C.F.R. §§ 68.73(b), (d)(1), (d)(2), and (e) require Valero Houston to establish and implement written procedures to maintain the on-going integrity of process equipment, to perform inspections and test on process equipment, to ensure the inspections and testing procedures

follow recognized and general accepted good practices, to ensure frequency of inspections and tests of process equipment are consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience, and to correct deficiencies in equipment that are outside acceptable limits before further use or in a safe and timely manner when necessary means are taken to assure safe operation.

Valero Houston failed to establish and implement written procedures to maintain the on-going integrity of process equipment, perform inspections and test on process equipment, ensure the inspections and testing procedures follow recognized and general accepted good practices and that deficiencies in equipment that are outside acceptable limits are corrected before further use or in a safe and timely manner when necessary means are taken to assure safe operation, as outlined in the mechanical integrity narrative of this report.

AOC #7: Compliance Audit - 40 C.F.R. 68.79(d) requires Valero Houston to promptly determine and document an appropriate response to each of the findings of the compliance audit, and document that deficiencies have been corrected.

The 2018 compliance audit was conducted between February 26-March 2, 2018. However, Valero did not promptly determine and document a response to two compliance audit findings until September 2019. One compliance audit finding identified that Valero Houston needs to complete inspections of 35 deep well pump cans and another identified that Valero Houston needs to complete soil-to-air piping inspections. Over a year later, in September 2019, Valero created a schedule for the completion of the deep well pump cans and soil to interface inspections; however, Valero Houston has yet to complete the inspections. A 2020 compliance audit conducted between September 24-October 9, 2020, indicated that all the findings from the 2018 compliance were closed. However, Valero failed to properly complete these two findings from the 2018 compliance audit. Setting a schedule for completion of the compliance audit findings does not fulfill the requirement to correct these deficiencies.

Section IV – FOLLOW UP

EPA received mechanical integrity inspection data from Valero Houston on November 30, 2022, after exiting the Facility on November 18, 2022.