



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/08/2024	
Media Program:	Air	
Regulatory Program(s)	Title V, NESHAP	
Company Name:	Valero Energy Corp	
Facility Name:	Valero Port Arthur Refinery	
Facility Physical Location:	1801 South Gulfway Drive (Lat 29.868333, Long -93.968333)	
(city, state, zip code)	Port Arthur, TX 77640	
Mailing address:	1801 South Gulfway Drive	
(city, state, zip code)	Port Arthur, TX 77640	
County/Parish:	Jefferson County	
Facility Phone Number	(409) 985-1000	
Facility Contact:	Luke Holloway	Environmental Manager
	Luke.holloway@valero.com	
FRS Number:	110000464006	
Identification/Permit Number:	RN102584026 / Title V – O1498; Title V – O3992	
Media Identifier Number:	AFS 48-245-00004	
NAICS:	324110 – Petroleum Refineries	
SIC:	2911– Petroleum Refining	
Personnel participating in inspection:		
Kenneth R. McPherson	EPA Region 6 ECDAT	Life Scientist
Ben Donaldson	EPA Region 6 ECDAT	Environmental Engineer
Dan Hoyt	EPA OECA AED	Environmental Engineer
Nathan Hicks	EPA OECA AED	Physical Scientist
Phil Myers, PhD	EPA NEIC	Mechanical Engineer
Richard Helmich, PhD	EPA NEIC	Senior Chemist
Luke Holloway	Valero Port Arthur	Environmental Manager
Kristin Wescoat	Valero Port Arthur	Environmental Superintendent, Air
Darrell Buckner	Valero Port Arthur	Environmental Superintendent, Waste
Clint Mitchell	Valero Port Arthur	Environmental Safety Director
EPA Lead Inspector Signature/Date		
EPA Lead Inspector Signature/Date		Date
	Kenneth R. McPherson	
Supervisor Signature/Date		
Supervisor Signature/Date		Date
	James Leathers	

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA inspectors Kenneth McPherson (EPA Region 6, “Region 6”), Ben Donaldson (Region 6), Dan Hoyt and Nathan Hicks (EPA Office of Enforcement and Compliance Assurance, “OECA”) accompanied by Philip Myers and Richard Helmich (National Enforcement Investigations Center, “NEIC”) arrived at the Valero Port Arthur Refinery (“Facility”) in Port Arthur, Texas at 14:12 on February 8, 2024, for an unannounced inspection. The EPA inspectors held an opening conference with Facility representatives Luke Holloway, Environmental Manager; Kristin Wescoat, Environmental Superintendent; and Darrell Buckner, Environmental Superintendent. Inspector Hoyt presented his credentials to Luke Holloway while Inspector McPherson informed him that we were conducting an EPA inspection of the Facility’s marine dock area located near the West Basin of the Taylor Bayou to evaluate potential sources of excess emissions using EPA’s Geospatial Measurement of Air Pollution (“GMAP”) vehicle and to evaluate compliance with the Facility’s Title V Air Permit and the Clean Air Act (“CAA”). Inspector McPherson informed Mr. Holloway that the unannounced inspection was the result of the GMAP detecting a benzene plume outside the Facility’s fence line northwest of the Facility docks. Mr. Holloway stated that there was an automated environmental Gas Chromatograph (“eGC”) near Berth 1 at the Facility dock that recorded a single 10 parts per billion (“ppb”) alert for benzene (C₆H₆) sometime in the morning hours. The scope of the inspection was a partial compliance evaluation (“PCE”). This inspection occurred as part of a multi-scale monitoring project in the Beaumont-Port Arthur, Texas area. The sign-in sheet for the opening conference is attached as Appendix 1.

FACILITY DESCRIPTION

The Facility is a petroleum refinery that operates as a major source for emissions under CAA Title V Permit Number O1498 (Petroleum Refineries) issued on January 02, 2018; and CAA Title V Permit Number O3992 (DCU-844 Coker Complex) issued on August 21, 2019. Valero Energy Corp (Valero) operates a gasoline, diesel and jet fuel production complex located on a 4,000-acre site along the Port Arthur Ship Channel south of Port Arthur, Texas. Valero acquired the Facility in 2005. The Facility has a 425,000 barrels per day throughput capacity. Valero has 800 employees, including contractors, and operates the Facility 8,760 hours per year. The primary feedstock for the Facility is crude oil which it receives by rail, marine docks, and pipelines. Product is distributed to various customers by pipelines, ships, and barges.

Section II – OBSERVATIONS

At 14:55 on February 8, 2024, we entered the Facility through Gate 19 to conduct GMAP surveillance and to identify and observe emission sources. The NEIC GMAP vehicle was driven by Inspector Helmich, and the instruments were operated by Inspector Myers. Facility representatives Luke Holloway and Darrell Buckner were present in a lead company vehicle, guiding the GMAP vehicle. The meteorological conditions during the inspection consisted of a partly cloudy sky, winds from the south/southeast at

10.5 miles per hour (mph), temperature of 72° F, and a relative humidity of 77%. Inspectors Hoyt and Hicks followed the GMAP in a Data Acquisition in Real Time (“DART”) mobile air monitoring system equipped vehicle. Inspector Donaldson and I followed the DART equipped vehicle in a support vehicle. The GMAP vehicle, followed by the DART equipped vehicle and support vehicle, drove on all available Facility roads near the Facility marine docks measuring air pollutant concentrations downwind of each of the process areas, if possible. A full report from the GMAP will be issued by NEIC on a later date.

The GMAP survey of the Facility ended at 16:20 on February 8, 2024, and we returned to the Facility conference room. No significant levels of ambient pollution were detected.

Section III – AREAS OF CONCERN

Inspectors McPherson, Donaldson, Hoyt, Hicks, Helmich, and Myers conducted an inspection closing conference at the Facility conference room at 16:20 on February 8, 2024. Inspectors McPherson and Myers summarized the facility survey and presented their emissions observations, including the following Area of Concern (“AOC”). Facility representative Clint Mitchell stated the eGC next to Berth 1 at the north end of the Facility’s marine dock recorded an 11.61 ppb for benzene at 08:26 on February 8, 2024. No other recordings were generated by the eGC for that date. The facility made no claims of confidential business information regarding the videos or documents provided. We departed the Facility at 16:51, February 8, 2024.

AOC 1) EPA inspectors recorded volatile organic compounds (VOC), including benzene in the ambient air outside the Facility’s fence line downwind of the Facility’s marine docks while loading and off-loading operations were occurring at the Facility. This indicated that benzene and other VOCs were emitted from either the Facility’s process units at or near the marine docks, or from marine vessels moored at the Facility’s marine docks. 40 CFR 63.6(e)(1)(i) requires air pollution control equipment to be operated in a manner consistent with safety and good air pollution control practices for minimizing emissions. 30 TAC 116.115(b)(2)(G) states that permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations.

Section IV – FOLLOW UP

No additional records or information was requested from the Facility.

Section V – LIST OF APPENDICES

Appendix 1 – Opening and closing conference sign-in sheets.

Appendix 2 – Federal Operating Permit Number: O1498 (Signature Page).

Appendix – 1
OPENING AND CLOSING CONFERENCE SIGN-IN SHEETS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Opening and Closing Conference Sign-in Sheets

Location: Valero Energy Corp / Valero Port Arthur Refinery		
City: Port Arthur	County: Jefferson County	State: Texas

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Inspection Notes:

Making entry 2:11 14:11

Explaining we want to be down by Tyler Deaton
and Dicks to Luke Holloway Env. man.

14:28 START OPENING CONFERENCE

Kenneth R. McPherson, Life Scientist, EPA R6, 214-665-6754

Kristin Wescoat, Environmental Superintendent, 409-225-2317

Luke Holloway, Environmental Manager, 870-759-0306

Nate Hicks Phy. Scientist EPA, 865-898-0343

Daniel Host Env. Eng. EPA 202-564-7898

Philip Myers Mech. Engineer EPA (303) 462-9301

Ben Donaldson Env. Eng. EPA R06 214-665-7426

Purnard Helmich Chemist EPA 303-762-9149

Darrell Schreier Env. Superintendent ULO 409-790-0994

Ben driving 1451 - Arrived at docks 1511

Tom Lloyd head dock operator

No hits at dock moving closer to road 1538

Return to front office 16:20

Closing Conference

End 1651

Initials / Date:

BD, 7/8/24



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Opening and Closing Conference Sign-in Sheets

Location: Valero Energy Corp / Valero Port Arthur Refinery		
City: Port Arthur	County: Jefferson County	State: Texas

BPAGMAP2024

Facility Name/FRS Valero

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Inspection Notes:

Closing conference sign in

<u>Name</u>	<u>Title</u>	<u>Company</u>	<u>Contact</u>
<u>Ben Davidson</u>	<u>Env Eng</u>	<u>EPA</u>	<u>214 665 7426</u>
<u>Phil Myers</u>	<u>Mech. Eng.</u>	<u>EPA</u>	<u>(303) 462-9301</u>
<u>Daniel Hoyt</u>	<u>Env Eng</u>	<u>EPA</u>	<u>702 564 7898</u>
<u>Nathan Hicks</u>	<u>Phy scientist</u>	<u>EPA</u>	<u>865-898-0343</u>
<u>Richard Helmich</u>	<u>Chemist</u>	<u>EPA</u>	<u>303-462-9149</u>
<u>Luke Holloway</u>	<u>Env. Manager</u>	<u>VLO</u>	<u>870-759-0306</u>
<u>CLINT MITCHELL</u>	<u>ENVIRONMENTAL/SAFETY DIRECTOR</u>	<u>VLO</u>	<u>979 218 9489</u>
<u>Darrell Buckner</u>	<u>Environmental Superintendent</u>	<u>VLO</u>	<u>409-790-0994</u>

Initials / Date:

BD, 2/8/24

Appendix – 2
FEDERAL OPERATING PERMIT NUMBER: O1498
Date 01/02/2018
(Signature Page)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Federal Operating Permit Number: O1498

Location: Valero Port Arthur Refinery / Petroleum Refineries		
City: Port Arthur	County: Jefferson County	State: Texas

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
The Premcor Refining Group Inc.

AUTHORIZING THE OPERATION OF
Valero Port Arthur Refinery
Petroleum Refineries

LOCATED AT
Jefferson County, Texas
Latitude 29° 51' 14" Longitude 93° 57' 57"
Regulated Entity Number: RN102584026

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O1498 Issuance Date: January 2, 2018

Erin E. Chamallor

For the Commission

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