



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

September 18, 2020

VIA EMAIL: jerry.stumbo@valero.com

Mr. Jerry D. Stumbo
Valero Refining – New Orleans, LLC
P.O. Box 518
Norco, Louisiana 70079

RE: Emission Inventory Permit Consistency Review
St. Charles Refinery, Valero Refining – New Orleans, LLC (AI# 26003)

Dear Mr. Stumbo:

The U.S. Environmental Protection Agency (EPA) Region 6 is working with the Louisiana Department of Environmental Quality (LDEQ) and has reviewed your facility's 2018 emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals, as reported to LDEQ. Based upon this review, EPA has determined that your reported emissions for some Emission Points exceeded your permit authorization limits. EPA had also reviewed your Title V reports for 2018 and did not find that these permit exceedances were reported.

A detail by Emission Point of the differences between the reported emissions and permitted limits is included in the attachment to this letter. EPA is providing you the opportunity to clarify or explain these differences, especially if any of the following conditions are present:

- Sources and associated emissions included in the emission inventories that are not represented in permits (e.g. de minimis sources);
- Criteria pollutants or individual HAPs reported in the facility's emission inventories that are not represented in LDEQ permits or authorizations;
- Reported or unreported upset or other excess emission events (e.g. startup/shutdown).

If Valero Refining - New Orleans, LLC is interested in discussing or providing information about this matter, you have ten (10) working days from receipt of this letter to inform EPA by e-mail by contacting:

Kevin Kim
Enforcement Officer (ECDAT)
Air Toxics Enforcement Section
U.S. EPA, Region 6
email: kim.kevin@epa.gov

Subsequent to the above-referenced due date, Kevin Kim will arrange to meet with Valero Refining - New Orleans, LLC via conference call. At that time, Valero Refining - New Orleans, LLC may provide additional information to address the potential violations and present evidence that

contravenes EPA's evidence. The primary goal is to ensure compliance with the applicable environmental laws and regulations; however, settlements will be available where appropriate.

Please direct questions to Kevin Kim of the Air Enforcement Branch at 214-665-8554 or at kim.kevin@epa.gov. Thank you for your attention to this matter.

The EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us regarding any specific issues you need to discuss.

Sincerely,

STEVEN
THOMPSON

Steve Thompson
Chief
Air Enforcement Branch

 Digitally signed by STEVEN THOMPSON
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=STEVEN THOMPSON,
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Date: 2020.09.18 13:26:02 -05'00'

Attachment

ECC: Celena Cage, Louisiana Department of Environmental Quality, celena.cage@la.gov

Attachment A**Valero Refining - New Orleans, LLC - St. Charles Refinery**

AI #	Facility Name	Permit	Subject Item	Subject Item Type	Subject Item Desc	Emission Type	Parameter Desc	Permitted Limit (tpy)	ERIC Reported Emissions (tpy)	Reported Emissions Over Permitted Limit (tpy)
26003	Valero Refining Co - New Orleans LLC - St Charles Refinery	2520-00027-V17	EQT00000000250	Other	2005-58 - Coker No. 1 Steam Vent	Routine	Toluene	0.3	2.96	2.66
26003	Valero Refining Co - New Orleans LLC - St Charles Refinery	2520-00027-V17	EQT00000000250	Other	2005-58 - Coker No. 1 Steam Vent	Routine	VOC, Total	4.29	30.12	25.83