Parker Wilson
Vice President – Regulatory Law

February 2, 2017

Via Federal Express

Nathaniel N. Moore
Assistant Regional Counsel
RCRA & Toxics Enforcement Branch
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202

Re: Valero Ardmore Refinery 2014 TRI Submittal

Dear Mr. Moore:

Thank you and your team again for meeting with Valero representatives on January 20, 2017. At the conclusion of our meeting you had requested additional information regarding the Valero Ardmore Refinery 2014 TRI submittal. Please see our responses below.

1. The ten (10) e-mails on June 30, 2015.

   Please see Exhibit A.

2. The confirmation e-mail received once the forms were transmitted and certified.

   Please see Exhibit B.

3. Any Microsoft, or other program, schedulers related to the TRI submittal.

   Please see Exhibit C.

4. Information regarding the compilation of TRI data.

   Please see Exhibit D which contains an index of emails relating to the preparation and submittal of the TRI report going back to early May. Due to the internal repetitiveness of some of the email chains and attachments, we are providing this index of emails as a streamlined way of evidencing the work that was conducted in preparing the TRI.

5. Any communications with Jami Murphy from ODEQ with dates and times.

   a. Lisa Hodges spoke with Jami Murphy at length today and requested similar information from her.

Valero Companies • One Valero Way • San Antonio, Texas 78249-1616
Post Office Box 696000 • San Antonio, Texas 78269-6000 • Telephone (210) 345-2000
Direct Dial: (210) 345-5894 • Parker.Wilson@valero.com

Please see Exhibit E, which is an email invitation to a DEQ TRI workshop from Ms. Murphy. Greg Elliott, the Ardmore Environmental Manager, believes Ms. Murphy called him on November 18, 2015, to inform him that she did not see the refinery's 2014 TRI report.

6. Any e-mails you may have received from TRIme or EPA regarding a TRI submittal for the 2015 reporting year.

   Please see Exhibit F.

7. Any procedures (SOPs) that were in place for submitting TRI information
   a. May include guidance Tracy Watson left.

   There are no formal SOPs for filing the TRI report. The refinery HSE department keeps a calendar posted on the wall of the department with the due dates for all of its reporting obligations, including the TRI. As we discussed, the error in the submittal of the 2014 TRI was not due to a lack of awareness of the deadline for the report but was rather due to confusion relating to the EPA reporting software. All TRI calculations were completed and uploaded to the EPA computers on June 30, 2015, however it appears the wrong button was clicked to finalize the process.

8. Any additional information that you believe will substantiate Valero-Ardmore's claims.

   Please see Exhibit G, which is a timeline of events relating to the preparation and submission of the 2014 TRI report.

Thank you again for taking the time to meet with us. If you require anything further, please do not hesitate to call me at (210) 345-5894 or by email at parker.wilson@valero.com. I look forward to hearing back from you.

Sincerely,

Parker Wilson
Vice President, Regulatory Law

Encl.

Exhibit A

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 6:22 AM
To: kevin.lassahn@valero.com
Subject: CDX Password Reset Instructions

A request to reset your EPA Central Data Exchange account password for CDX user account, KMLASSAHN, has been processed. If you believe you have received this message in error because you have not requested to reset your CDX password, please contact the Help Desk immediately.

To complete the password reset process click the link below:

https://cdx.epa.gov/PasswordReset/ResetPassword?code=a34dcb28-dbaf-47be-87dd-4dd56ef3ca75

You will be prompted to change your password. This link may only be used one time.

Please note that it is EPA policy that you change your CDX password on a regular basis. As a result, CDX will prompt you to change your CDX password every 90 days.

If you have questions concerning this message, you may contact CDX Help Desk by email at helpdesk@epacdx.net or by calling the CDX Technical Support Staff through our toll free telephone support on 888-890-1995 between Monday through Friday from 8:00 am to 6:00 pm EST/EDT. For International callers, the CDX Help Desk can also be reached at (970) 494-5500.

CDX Registration Homepage
https://cdx.epa.gov

United States Environmental Protection Agency - Central Data Exchange

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 6:23 AM
To: kevin.lassahn@valero.com
Subject: CDX Password Reset Confirmation

You have successfully reset your password for CDX user account, KMLASSAHN. If you believe you have received this message in error because you have not reset your CDX password, please contact the CDX Help Desk.

Please note that it is EPA policy that you change your CDX password on a regular basis. As a result, CDX will prompt you to change your CDX password every 90 days.

If you have questions concerning this message, you may contact CDX Help Desk by email at helpdesk@epacdx.net or by calling the CDX Technical Support Staff through our toll free telephone support on 888-890-1995 between Monday through Friday from 8:00 am to 6:00 pm EST/EDT. For International callers, the CDX Help Desk can also be reached at (970) 494-5500.

CDX Registration Homepage
https://cdx.epa.gov

United States Environmental Protection Agency - Central Data Exchange

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 6:26 AM
To: kevin.lassahn@valero.com
Subject: CDX Registration Status Change

You have successfully created an account with EPA Central Data Exchange (CDX). You will be notified by e-mail when the account has been activated.

CDX Registration Homepage
https://cdx.epa.gov

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 6:29 AM
To: kevin.lassahn@valero.com
Subject: CDX Registration Status Change

You have successfully created an account with EPA Central Data Exchange (CDX). You will be notified by e-mail when the account has been activated.

CDX Registration Homepage
https://cdx.epa.gov

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 9:26 AM
To: kevin.lassahn@valero.com
Subject: LexisNexis User Verification Reset

Per your request, the LexisNexis User verification attempts counter has been reset for CDX user account, KMLASSAHN. You are now able to retry verifying your identity information.
If you are not able to access the LexisNexis verification process, please contact the CDX Help Desk.

If you have questions concerning this message, you may contact CDX Help Desk by email at helpdesk@epacdx.net or by calling the CDX Technical Support Staff through our toll free telephone support on 888-890-1995 between Monday through Friday from 8:00 am to 6:00 pm EST/EDT. For International callers, the CDX Help Desk can also be reached at (970) 494-5500.

CDX Registration Homepage
https://cdx.epa.gov

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 9:27 AM
To: kevin.lassahn@valero.com
Subject: CDX Registration Status Change

You have successfully created an account with EPA Central Data Exchange (CDX). You will be notified by e-mail when the account has been activated.

CDX Registration Homepage
https://cdx.epa.gov

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 9:32 AM
To: kevin.lassahn@valero.com
Subject: CDX Registration Status Change

Your Central Data Exchange (CDX) CDX Role has been activated by EPA.

CDX Registration Homepage
https://cdx.epa.gov

From: helpdesk@epacdx.net
Sent: Tuesday, June 30, 2015 9:32 AM
To: kevin.lassahn@valero.com
Subject: You successfully signed a document

You have successfully signed your CDX submission using the CROMERR E-Signature process. To view the details of this CROMERR activity please click here.
This message is being sent to you as confirmation of your submission. If you did not perform this submission please contact the CDX Helpdesk at 888-890-1995.

From: Help Desk <cherokeeservicedesk@sysaidit.com>
Sent: Tuesday, June 30, 2015 9:38 AM
To: kevin.lassahn@valero.com
Subject: Your CDX Help Desk Ticket Has Been Closed

Dear Kevin Lassahn,

Thank you for contacting the CDX help desk. Your service record #22464 has been closed.

In an effort to continually improve the level of service that CDX provides, we are offering you an opportunity to comment on your recent experience in resolving a help request with the CDX Help Desk. We ask that you complete a short survey (6 questions and approximately 3 minutes to complete) by going to the following link:

https://www.surveymonkey.com/s/H9C36LC

If you are not able to click on the link, please copy and paste it into your browser.

While the survey is short, completing it will go a long way in helping us to continually improve on the services that the CDX Help Desk provides.

Sincerely,
The CDX Help Desk Team

OMB# 2090-0019
ICR 1711.05

From: Lassahn, Kevin M <Kevin.Lassahn@valero.com>
Sent: Tuesday, June 30, 2015 9:45 AM
To: Turner, Lyndon
Attachments: trifid_doc_1435675391784_KMLASSAHN.pdf

Toxics Release Inventory (TRI)
TRIFID Certifier Agreement Document

Date:	6/30/2015
Name:	Kevin Lassahn
CDX User ID:	KMLASSAHN
Email Address:	kevin.lassahn@valero.com
TRIFID:	73401TTLPTHIGHW

I, Kevin Lassahn
(Name of Certifying Official)

(1) Certify that I am the owner/operator, or a senior management official employed by the facility subject to EPCRA Section 313 toxic chemical release inventory reporting for all facilities (TRIFIDs) listed on this document. Senior management official means an official with management responsibility for the person or persons completing the report, or with management responsibility for the manager of environmental programs for the facility or establishments, or with management responsibility for the corporation owning or operating the facility or establishments responsible for certifying similar reports under the other environmental regulatory requirements (40 CFR Section 372.3).

(2) Understand and agree that I will be held as legally bound, obligated, or responsible by my use of my electronic signature as I would be using my hand-written signature;

Exhibit B

From: helpdesk@epacdx.net
Sent: Monday, November 23, 2015 9:28 AM
To: kevin.lassahn@valero.com
Subject: Action Required: Certify TRI Reporting Form(s) in TRI-MEweb

Dear Kevin Lassahn,

The chemical(s) listed for the facility described in the reference section near the bottom of this email are ready to be certified by a Certifying Official for the facility. The Certifying Official for this facility will need to log into EPA's Central Data Exchange (CDX) and open TRI-MEweb to certify or cancel TRI reporting forms for the facility.

Failing to adhere to the requirements of section 313 of EPCRA and its implementing regulations could result in an EPA enforcement action against your facility. Uncertified TRI forms do not satisfy these requirements.

Below you will find instructions on what the Certifying Official will need to do to certify TRI reporting forms in TRI-MEweb. Additionally, use the following link to access online tutorials on how to certify a submission in TRI-MEweb: http://www2.epa.gov/sites/production/files/2015-05/transmit_certify_cancel_tri_submissions_0.swf

To begin, go to https://cdx.epa.gov/ URL. Then, proceed with the following steps.

Log In to TRI-MEweb to Begin the Certification Process

1.Enter your credentials and click the "Log In" button.

2.On the "MyCDX" page, click the "TRI-MEweb" link within the "Role" column to open TRI-MEweb in a new browser window.

How to Certify Pending Submissions

1.Within TRI-MEweb, navigate to the "Certify" > "Pending Submissions" sub tab.

TRI-MEweb will present a list of pending submissions with three options for action: "Certify and Submit to EPA," "Cancel Certification to Allow Editing of Form," or "No Action on Form."

2.You also have several options to review your form(s) before submitting them to EPA:

a.Click the "Validation Report" PDF icon to review the TRI-MEweb Validation Summary, where any potential outstanding error(s) and data quality alert(s) are summarized for each chemical form.

b.Click the "View Submission" icon to view a copy of the Form R or A.

c.If you need to make a correction, go to step 1 of the "How to Make a Correction to a Transmitted TRI Form" section below.

3.Select the "Certify and Submit to EPA" radio button under the "Certify or Cancel" column header to indicate that you have reviewed the form(s) being submitted, and find the information accurate.

4.Click the "Next" button to navigate to the "Confirm Selected Submissions" page to view the legal disclaimer.

5.Click the "Next" button to open the e-signature widget that will verify your identity. Enter your CDX password, answer the secret question, and click the "Sign" button.

Please answer the security question carefully. If you answer incorrectly three times then CDX will lock your account. To unlock your account, please call the CDX Help Desk to reset your security questions.

6.A confirmation message will appear in a pop-up window, indicating that certification has been completed successfully.

Click the "OK" button on the pop-up window. You will also receive an automated email from CDX confirming what form(s) you certified.

7.The certified submission, along with its copy of record, now displays on the "Submission History" page.

How to Correct a Form before Certifying and Submitting It

1.Once a form has been prepared, it is "transmitted" for certification. Once transmitted, a form cannot be edited until it is "canceled and returned."

If you need to make a correction to a form, you may do so by canceling the transmitted form to return it to an editable format.

Select the "Cancel Certification to Allow Editing of Form" radio button and click the "Next" button.

Confirm that you intend to cancel this form by keeping the cancel checkbox checked by default and clicking the "Next" button.

2.A confirmation that the form was cancelled will appear on the "Submission History" page.

3.Navigate to the "Welcome" tab so the Preparer or the Certifying Official is able to edit the submission from the TRI-MEweb application.

4.Validate, transmit and certify the corrected TRI form to submit it to EPA.

---- REFERENCE INFORMATION ----
TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OK, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Ethylbenzene	2014	000100414	R	No	No
Ethylene	2014	000074851	R	No	No
Cyclohexane	2014	000110827	R	No	No
Dioxin and Dioxin-like Compounds	2014	N150	R	No	No
Xylene (mixed isomers)	2014	001330207	R	No	No
Hydrogen Sulfide	2014	007783064	R	No	No
Lead Compounds	2014	N420	R	No	No
Toluene	2014	000108883	R	No	No
Hydrochloric acid (1995 and after "Aci	2014	007647010	R	No	No
Vanadium Compounds	2014	N770	R	No	No
Hydrogen fluoride	2014	007664393	R	No	No
Tetrachloroethylene	2014	000127184	R	No	No
Sulfuric acid - (1994 and after "Acid	2014	007664939	R	No	No
Styrene	2014	000100425	R	No	No
Propylene	2014	000115071	R	No	No
Cumene	2014	000098828	R	No	No
Cresol (mixed isomers)	2014	001319773	R	No	No
Cobalt Compounds	2014	N096	R	No	No
Carbon disulfide	2014	000075150	R	No	No
Carbonyl sulfide	2014	000463581	R	No	No
n-Hexane	2014	000110543	R	No	No
Benzene	2014	000071432	R	No	No
Naphthalene	2014	000091203	R	No	No
Benzo(g,h,i)perylene	2014	000191242	R	No	No
Nickel Compounds	2014	N495	R	No	No
Ammonia	2014	007664417	R	No	No
Nitrate compounds	2014	N511	R	No	No
Anthracene	2014	000120127	R	No	No
Phenanthrene	2014	000085018	R	No	No
1,2,4-Trimethylbenzene	2014	000095636	R	No	No
Phenol	2014	000108952	R	No	No
1,3-Butadiene	2014	000106990	R	No	No

Polycyclic aromatic compounds	2014	N590	R	No	No
Mercury Compounds	2014	N458	R	No	No
Molybdenum trioxide	2014	001313275	R	No	No
Methanol	2014	000067561	R	No	No

Prepared By: kevin.lassahn@valero.com

Date the Form Became Ready for Certification: Nov 23, 2015 10:26:59 AM

---- CDX HELP DESK ----
Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

From: helpdesk@epacdx.net
Sent: Monday, November 23, 2015 9:31 AM
To: kevin.lassahn@valero.com
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of OKLAHOMA .

Please be aware that the state of OKLAHOMA is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to OKLAHOMA, satisfying your obligation to report to both EPA and the state in which the facility is located (OKLAHOMA).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the "Review" tab in TRI-MEweb and clicking the "Prepare State/Tribal forms" button in the "Certified Submission Summary" table and selecting your facility account. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----
TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OKLAHOMA, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Vanadium Compounds	2014	N770	R	No	No
Carbon disulfide	2014	75150	R	No	No
1,3-Butadiene	2014	106990	R	No	No
Toluene	2014	108883	R	No	No
Nickel Compounds	2014	N495	R	No	No
Carbonyl sulfide	2014	463581	R	No	No
Cresol (mixed isomers)	2014	1319773	R	No	No
Ethylene	2014	74851	R	No	No
Mercury Compounds	2014	N458	R	No	No
Cobalt Compounds	2014	N096	R	No	No
Xylene (mixed isomers)	2014	1330207	R	No	No
Tetrachloroethylene	2014	127184	R	No	No
Ethylbenzene	2014	100414	R	No	No
Lead Compounds	2014	N420	R	No	No
Phenol	2014	108952	R	No	No
Benzo(g,h,i)perylene	2014	191242	R	No	No
Hydrochloric acid (1995 and after "Aci	2014	7647010	R	No	No
Benzene	2014	71432	R	No	No
Styrene	2014	100425	R	No	No
Dioxin and Dioxin-like Compounds	2014	N150	R	No	No
Propylene	2014	115071	R	No	No
Hydrogen fluoride	2014	7664393	R	No	No
Polycyclic aromatic compounds	2014	N590	R	No	No
n-Hexane	2014	110543	R	No	No

Hydrogen Sulfide	2014	7783064	R	No	No
Methanol	2014	67561	R	No	No
Sulfuric acid - (1994 and after "Acid	2014	7664939	R	No	No
Cumene	2014	98828	R	No	No
Molybdenum trioxide	2014	1313275	R	No	No
Phenanthrene	2014	85018	R	No	No
Cyclohexane	2014	110827	R	No	No
1,2,4-Trimethylbenzene	2014	95636	R	No	No
Nitrate compounds	2014	N511	R	No	No
Anthracene	2014	120127	R	No	No
Ammonia	2014	7664417	R	No	No
Naphthalene	2014	91203	R	No	No

Prepared By: kevin.lassahn@valero.com
Date Transmitted for Certification: Nov 23, 2015 10:27:27 AM.
Certifying Official Name: Kevin Lassahn
Title: VP & General Manager
E-mail: kevin.lassahn@valero.com
Date Certified and Sent to EPA and State: Nov 23, 2015 10:30:44 AM.

---- CDX HELP DESK ----
Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

From: Lassahn, Kevin M <Kevin.Lassahn@valero.com>
Sent: Monday, November 23, 2015 9:32 AM
To: Elliott, Greg; Turner, Lyndon
Subject: FW: TRI-MEweb submission has been certified and sent to a TDX member state.

Kevin Lassahn
Vice President and General Manager
Valero Ardmore Refinery

-----Original Message-----
From: helpdesk@epacdx.net [mailto:helpdesk@epacdx.net]
Sent: Monday, November 23, 2015 9:31 AM
To: Lassahn, Kevin M
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

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Nickel Compounds	2014	N495	R	No	No
Carbonyl sulfide	2014	463581	R	No	No
Cresol (mixed isomers)	2014	1319773	R	No	No
Ethylene	2014	74851	R	No	No
Mercury Compounds	2014	N458	R	No	No
Cobalt Compounds	2014	N096	R	No	No

Xylene (mixed isomers)	2014	1330207	R	No	No
Tetrachloroethylene	2014	127184	R	No	No
Ethylbenzene	2014	100414	R	No	No
Lead Compounds	2014	N420	R	No	No
Phenol	2014	108952	R	No	No
Benzo(g,h,i)perylene	2014	191242	R	No	No
Hydrochloric acid (1995 and after "Aci	2014	7647010	R	No	No
Benzene	2014	71432	R	No	No
Styrene	2014	100425	R	No	No
Dioxin and Dioxin-like Compounds	2014	N150	R	No	No
Propylene	2014	115071	R	No	No
Hydrogen fluoride	2014	7664393	R	No	No
Polycyclic aromatic compounds	2014	N590	R	No	No
n-Hexane	2014	110543	R	No	No
Hydrogen Sulfide	2014	7783064	R	No	No
Methanol	2014	67561	R	No	No
Sulfuric acid - (1994 and after "Acid	2014	7664939	R	No	No
Cumene	2014	98828	R	No	No
Molybdenum trioxide	2014	1313275	R	No	No
Phenanthrene	2014	85018	R	No	No
Cyclohexane	2014	110827	R	No	No
1,2,4-Trimethylbenzene	2014	95636	R	No	No
Nitrate compounds	2014	N511	R	No	No
Anthracene	2014	120127	R	No	No
Ammonia	2014	7664417	R	No	No
Naphthalene	2014	91203	R	No	No

Prepared By: kevin.lassahn@valero.com
Date Transmitted for Certification: Nov 23, 2015 10:27:27 AM.
Certifying Official Name: Kevin Lassahn
Title: VP & General Manager
E-mail: kevin.lassahn@valero.com
Date Certified and Sent to EPA and State: Nov 23, 2015 10:30:44 AM.

---- CDX HELP DESK ----
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Access CDX Home: https://cdx.epa.gov/

Exhibit C

Elliott, Greg

Subject:	Overview and submittal of TRI
Location:	Kevin's Office
Start:	Tue 6/30/2015 8:15 AM
End:	Tue 6/30/2015 9:00 AM
Recurrence:	(none)
Meeting Status:	Meeting organizer
Organizer:	Elliott, Greg
Required Attendees:	Shriver, John; Turner, Lyndon
Optional Attendees:	Lassahn, Kevin M

We will review TRI comparison between 2013 and 2014. We will also submit the report after the review. Lyndon has previously emailed and provided copies of the differences.

Elliott, Greg

Subject:	TRI 2014 Submittal Issue
Location:	Kevin's Office
Start:	Mon 11/23/2015 9:00 AM
End:	Mon 11/23/2015 9:30 AM
Recurrence:	(none)
Meeting Status:	Accepted
Organizer:	Turner, Lyndon
Required Attendees:	Lassahn, Kevin M; Elliott, Greg

The government data base has no record of our submitting the 2014 TRI report. We need to complete the electronic submission.

Exhibit D

Index of Emails and Meeting Invitations Relating to Preparation of the

Valero Ardmore Refinery's 2014 TRI Report

No.	From	To	Date	Subject
1	Dan Wang	Outlook Meeting Invitation to Refinery HSE Staff	Wed May 6 2015 10:00 AM	Teleconference re TRI Threshold Determination Discussion
2	Dan Wang	Refinery HSE Staff	Thur May 7 2015 11:17 AM	TRI Calculations re reporting thresholds
3	Dan Wang	Lyndon Turner	Tue May 26 2015 9:52 AM	TRI Calculations re reporting thresholds
4	Dan Wang	Alyssa Baker[1]	Wed May 27 2015 9:16 AM	TRI Calculations
5	Alyssa Baker	Dan Wang	Wed May 27 2015 11:12 AM	TRI Calculations re Spent HT Catalyst Waste data
6	Alyssa Baker	Dan Wang	Thur May 28 2015 8:32 AM	TRI Calculations re Contaminated Debris
7	Dan Wang	Alyssa Baker	Thur May 28 2015 8:37 AM	TRI Calculations re RL and Results
8	Alyssa Baker	Dan Wang	Thur May 28 2015 10:11 AM	TRI Calculations
9	Alyssa Baker	Dan Wang	Thur May 28 2015 12:47 PM	TRI Calculations
10	Dan Wang	Karen Smith	Fri June 12 2015 6:28 PM	Travel to Ardmore to assist with 2014 TRI Report submittal
11	Dan Wang	Outlook Invitation to Refinery HSE Staff	Wed June 17 2015 10:00 AM	2014 TRI Data Review – online meeting
12	Dan Wang	Refinery HSE Staff	Wed June 17 2015 2:54 PM	Upcoming call re 2014 TRI Data Review
13	Lyndon Turner	Dan Wang	Thur June 17 2015 4:25 PM	Ardmore Refinery 2014 TRI Reports – will begin entering data in TRI-ME tomorrow
14	Lyndon Turner	Dan Wang	Thur June 18 2015 8:01 AM	2014 TRI Reports - beginning to upload data

[1] Alyssa Baker was an intern at the Ardmore Refinery in the summer of 2014. The following year, in 2015, she was an intern at Valero Corporate Headquarters. Because of her familiarity with the Ardmore Refinery, she assisted with data compilation and calculations for the Ardmore 2014 TRI filing.

No.	From	To	Date	Subject
15	Lyndon Turner	Marion Watson	Wed June 24 2015 5:34 PM	TRI Report 2014 re emissions calculations
16	Lyndon Turner	Dan Wang, Greg Elliott	Wed June 24 2015 11:04 PM	2014 TRI Calculations re emissions calculations
17	Lyndon Turner	Dan Wang, Greg Elliott	Thur June 25 2015 9:25 PM	2014 TRI Report Form R re proper codes
18	Dan Wang	Lyndon Turner, Greg Elliott	Fri June 26 2015 7:55 AM	TRI-ME Form R re response to issues
19	Lyndon Turner	Kevin Lassahn, John Shriver, Greg Elliott	Fri June 26 2015 1:50 PM	2014 TRI Emissions Reporting – "I am entering information into the electronic system that will require Kevin's approval by next Tuesday;" would like you to review and then let's meet on Monday.
20	Greg Elliott	Lyndon Turner, Kevin Lassahn, John Shriver	Fri June 26 2015 3:55 PM	2014 TRI Emissions Reporting – agrees to meet and discuss on Monday; asks Lyndon to schedule a time on Tuesday for the upload of the report
21	Kevin Lassahn	Greg Elliott, Lyndon Turner, John Shriver	Sat June 27 2015 7:40 AM	2014 TRI Emissions Reporting – "I am available Monday and Tuesday to get this done."
22	Marion Watson	Lyndon Turner	Sat June 27 2015 8:13 AM	TRI Report 2014 – emissions calculations and reconciliation
23	Lyndon Turner	Dan Wang, Greg Elliott	Sat June 27 2015 11:02 PM	TRI Issues - most of the data is entered; trouble with internet connection so I will finish tomorrow; have some questions/issues
24	Dan Wang	Lyndon Turner, Greg Elliott	Mon June 29, 2015 9:43 AM	TRI Issues – responds to Lyndon's questions; will call him to discuss more
25	helpdesk@epacdx	Kevin Lassahn	Mon June 29 2015 7:52 PM	Identified as a Certifying Official for a TRI Facility
26	helpdesk@epacdx	Kevin Lassahn	Mon June 29 2015 7:53 PM	Identified as a Certifying Official for a TRI Facility
27	Greg Elliott	Outlook Invitation to Meeting in Kevin Lassahn's Office	Tue June 30 2015 8:15 AM	Overview and Submittal of TRI
28	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 6:22 AM	CDX Password Reset Instructions
29	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 6:23 AM	CDX Password Reset Confirmation
30	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 6:26 AM	CDX Registration Status Change
31	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 6:29 AM	CDX Registration Status Change
32	helpdesk@epacdx	Lyndon Turner	Tue June 30 2015 8:59 AM	Identified as a Certifying Official for a TRI Facility

No.	From	To	Date	Subject
33	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 9:26 AM	LexisNexis User Verification Reset
34	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 9:27 AM	CDX Registration Status Change
35	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 9:32 AM	CDX Registration Status Change
36	helpdesk@epacdx	Kevin Lassahn	Tue June 30 2015 9:38 AM	CDX Help Desk Ticket Has Been Closed
37	Lyndon Turner	Outlook Invitation to Meeting in Kevin Lassahn's Office	Fri Nov 20 2015 1:07 PM	Set up meeting for Mon Nov 23 2015 9:00 AM re TRI 2014 Submittal Issue. Need to complete electronic submission.
38	helpdesk@epacdx	Kevin Lassahn	Mon Nov 23 2015 9:31 AM	TRI-Meweb submission has been certified and sent to a TDX member state

Exhibit E

From: Murphy, Jami <Jami.Murphy@deq.ok.gov>
Sent: Tuesday, March 03, 2015 4:54 PM
To: 'cwolfe@conleyfrp.com'; 'mpalmerton@thecruciblellc.com'; 'ksemper@eurecat.com'; 'theis.rice@trin.net'; 'darrell.d.ames.civ@mail.mil'; 'geri.hart@tinker.af.mil'; 'jlincoln@unitedengines.com'; 'jlincoln@uemanufacturing.com'; 'gary.dwyer@am.umicore.com'; 'bberry@unitedengines.com'; 'mhuss@usg.com'; 'terry.c.hale.mil@mail.mil'; 'greg.elliott@valero.com'; 'clifford.fleener@valmont.com'; 'gsackman@wwsteel.com'; 'pvincent@spstech.com'
Subject: TOXICS RELEASE INVENTORY ONE-DAY WORKSHOP at DEQ

Toxics Release Inventory, (EPCRA 313), reports for 2014 are due by July 1st. Below is the information on one-day TRI workshops presented by Abt Assocs. through EPA Region VI. Please take note of the class here at **DEQ** on **Tuesday, April 28th.** We're very fortunate Region VI continues to find funding for these classes so there is no charge. However, you must register for the class through the link below.

The courses cover the basics of TRI reporting, electronic filing (now mandatory), changes to the program, and more complicated aspects of reporting as well. If you have questions about the content of the classes, you're welcome to contact me.

Hope to see you here April 28th.

Jami Murphy
Oklahoma Dept. of Environmental Quality
SARA Title III Programs
405-702-1011

This email is being sent to TRI technical and public contacts as listed on the 2012 and 2013 reporting forms. If you are a consultant, you are welcome to attend but please forward this email to the facility or facilities for whom you report. We do not maintain a list of email addresses so there is no need to request removal from the mailing list.

U. S. Environmental Protection Agency Region 6

TOXICS RELEASE INVENTORY LIVE AND WEB WORKSHOPS

To register for all workshops (live and web), please visit http://eparegion6.tri-training.com/
If you have any issues when visiting this site, please be sure to refresh your browser.

Dates, Times and Registration – Live Trainings:

Fundamentals 8-Hour training at each location (includes Advanced training):
8:00 am to 4:00 pm CDT
Advanced 3-Hour training at each location: 1:00 pm to 4:00 pm CDT

Houston, Texas – March 31, 2015

Crowne Plaza Suites Houston Southwest
9090 Southwest Freeway, Houston, Texas 77004

Oklahoma City, Oklahoma – April 28, 2015
Oklahoma Department of Environmental Quality
1st Floor Multi-Purpose Conference Room
707 N. Robinson, Oklahoma City 73102

Dallas, Texas – April 29, 2015
US EPA Region 6 Office
Must sign in on 7th Floor (classrooms on the 12th floor) – photo ID required
1445 Ross Avenue, Dallas, Texas 75202

Houston, Texas – May 1, 2015
Hyatt Place – Bush Intercontinental Airport
91300 Ronan Park Place, Houston, TX 77060

Baton Rouge, Louisiana – May 14, 2015
Louisiana Department of Environmental Quality
Galvez Building – Conference Center
Oliver Pollack Conference Room
602 North 5th Street, Baton Rouge, Louisiana 70802

Exhibit F

From: helpdesk@epacdx.net
Sent: Monday, June 20, 2016 3:09 PM
To: lyndon.turner@valero.com; kevin.lassahn@valero.com
Subject: Action Required: Certify TRI Reporting Form(s) in TRI-MEweb

Dear Lyndon Turner, Kevin Lassahn,

The chemical(s) listed for the facility described in the reference section near the bottom of this email are ready to be certified by a Certifying Official for the facility. The Certifying Official for this facility will need to log into EPA's Central Data Exchange (CDX) and open TRI-MEweb to certify or cancel TRI reporting forms for the facility.

Uncertified TRI forms do not satisfy the requirements of the TRI Program. Failure to adhere to the requirements of section 313 of EPCRA and its implementing regulations could result in an EPA enforcement action against your facility.

Below you will find instructions on what the Certifying Official will need to do to certify TRI reporting forms in TRI-MEweb. Additionally, use the following link to access online tutorials on how to certify a submission in TRI-MEweb: http://www2.epa.gov/sites/production/files/2015-05/transmit_certify_cancel_tri_submissions_0.swf

To begin, go to https://cdx.epa.gov/ URL. Then, proceed with the following steps.

Log In to TRI-MEweb to Begin the Certification Process

1. Enter your credentials and click the **"Log In"** button.
2. On the **"MyCDX"** page, click the **"TRI-MEweb"** link within the "Role" column to open TRI-MEweb in a new browser window.

How to Certify Pending Submissions

1. Within TRI-MEweb, navigate to the **"Certify"** > **"Pending Submissions"** sub tab. TRI-MEweb will present a list of pending submissions with three options for action: **"Certify and Submit to EPA," "Cancel Certification to Allow Editing of Form,"** or **"No Action on Form."**
2. You also have several options to review your form(s) before submitting them to EPA:
    a. Click the "Validation Report" PDF icon to review the TRI-MEweb Validation Summary, where any potential outstanding error(s) and data quality alert(s) are summarized for each chemical form.
    b. Click the "View Submission" icon to view a copy of the Form R or A.
    c. If you need to make a correction, go to step 1 of the "How to Make a Correction to a Transmitted TRI Form" section below.
3. Select the **"Certify and Submit to EPA"** radio button under the **"Certify or Cancel"** column header to indicate that you have reviewed the form(s) being submitted, and find the information accurate.

4. Click the **"Next"** button to navigate to the **"Confirm Selected Submissions"** page to view the legal disclaimer.
5. Click the **"Next"** button to open the e-signature widget that will verify your identity. Enter your CDX password, answer the secret question, and click the **"Sign"** button. Please answer the security question carefully. If you answer incorrectly three times then CDX will lock your account. To unlock your account, please call the CDX Help Desk to reset your security questions.
6. A confirmation message will appear in a pop-up window, indicating that certification has been completed successfully. Click the **"OK"** button on the pop-up window. You will also receive an automated email from CDX confirming what form(s) you certified.
7. The certified submission, along with its copy of record, now displays on the **"Submission History"** page.

How to Correct a Form before Certifying and Submitting It

1. Once a form has been prepared, it is **"transmitted"** for certification. Once transmitted, a form cannot be edited until it is **"canceled and returned."** If you need to make a correction to a form, you may do so by canceling the transmitted form to return it to an editable format. Select the **"Cancel Certification to Allow Editing of Form"** radio button and click the **"Next"** button. Confirm that you intend to cancel this form by keeping the cancel checkbox checked by default and clicking the **"Next"** button.
2. A confirmation that the form was cancelled will appear on the **"Submission History"** page.
3. Navigate to the **"Welcome"** tab so the Preparer or the Certifying Official is able to edit the submission from the TRI-MEweb application.
4. Validate, transmit and certify the corrected TRI form to submit it to EPA.

---- REFERENCE INFORMATION ----

TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OK, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Sulfuric acid - (1994 and after "Acid Aerosols" only)	2015	007664939	R	No	No
1,3-Butadiene	2015	000106990	R	No	No
Naphthalene	2015	000091203	R	No	No
1,2,4-Trimethylbenzene	2015	000095636	R	No	No
Ammonia	2015	007664417	R	No	No
Anthracene	2015	000120127	R	No	No
Benzene	2015	000071432	R	No	No
Benzo(g,h,i)perylene	2015	000191242	R	No	No
Carbon disulfide	2015	000075150	R	No	No
Carbonyl sulfide	2015	000463581	R	No	No

Cobalt Compounds	2015	N096	R	No	No
Cresol (mixed isomers)	2015	001319773	R	No	No
Cumene	2015	000098828	R	No	No
Cyclohexane	2015	000110827	R	No	No
Dioxin and Dioxin-like Compounds	2015	N150	R	No	No
Ethylbenzene	2015	000100414	R	No	No
Ethylene	2015	000074851	R	No	No
Hydrochloric acid (1995 and after "Acid Aerosols" only)	2015	007647010	R	No	No
Hydrogen fluoride	2015	007664393	R	No	No
Hydrogen Sulfide	2015	007783064	R	No	No
Lead Compounds	2015	N420	R	No	No
Mercury Compounds	2015	N458	R	No	No
Methanol	2015	000067561	R	No	No
Molybdenum trioxide	2015	001313275	R	No	No
n-Hexane	2015	000110543	R	No	No
Nickel Compounds	2015	N495	R	No	No
Nitrate compounds	2015	N511	R	No	No
Phenanthrene	2015	000085018	R	No	No
Phenol	2015	000108952	R	No	No
Polycyclic aromatic compounds	2015	N590	R	No	No
Propylene	2015	000115071	R	No	No
Styrene	2015	000100425	R	No	No
Tetrachloroethylene	2015	000127184	R	No	No
Toluene	2015	000108883	R	No	No
Xylene (mixed isomers)	2015	001330207	R	No	No
Vanadium Compounds	2015	N770	R	No	No

Prepared By: lyndon.turner@valero.com

Date the Form Became Ready for Certification: Jun 20, 2016 4:07:29 PM

---- CDX HELP DESK ----

Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net

The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

From: helpdesk@epacdx.net
Sent: Monday, June 20, 2016 3:19 PM
To: kevin.lassahn@valero.com; lyndon.turner@valero.com
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of OKLAHOMA .

Please be aware that the state of OKLAHOMA is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to OKLAHOMA, satisfying your obligation to report to both EPA and the state in which the facility is located (OKLAHOMA).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the "**Review**" tab in TRI-MEweb and clicking the "**Prepare State/Tribal forms**" button in the "**Certified Submission Summary**" table and selecting your facility account. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OKLAHOMA, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Benzo(g,h,i)perylene	2015	191242	R	No	No
Benzene	2015	71432	R	No	No
Mercury Compounds	2015	N458	R	No	No
Propylene	2015	115071	R	No	No
Methanol	2015	67561	R	No	No
Polycyclic aromatic compounds	2015	N590	R	No	No
Nitrate compounds	2015	N511	R	No	No
n-Hexane	2015	110543	R	No	No
Nickel Compounds	2015	N495	R	No	No
Cumene	2015	98828	R	No	No
Naphthalene	2015	91203	R	No	No
Ethylene	2015	74851	R	No	No

Molybdenum trioxide	2015	1313275	R	No	No
Styrene	2015	100425	R	No	No
Cyclohexane	2015	110827	R	No	No
Hydrogen fluoride	2015	7664393	R	No	No
Tetrachloroethylene	2015	127184	R	No	No
Cobalt Compounds	2015	N096	R	No	No
Ammonia	2015	7664417	R	No	No
Carbonyl sulfide	2015	463581	R	No	No
Hydrochloric acid (1995 and after "Aci	2015	7647010	R	No	No
Cresol (mixed isomers)	2015	1319773	R	No	No
1,2,4-Trimethylbenzene	2015	95636	R	No	No
Sulfuric acid - (1994 and after "Acid	2015	7664939	R	No	No
Hydrogen Sulfide	2015	7783064	R	No	No
Phenanthrene	2015	85018	R	No	No
Toluene	2015	108883	R	No	No
Anthracene	2015	120127	R	No	No
Vanadium Compounds	2015	N770	R	No	No
Dioxin and Dioxin-like Compounds	2015	N150	R	No	No
Carbon disulfide	2015	75150	R	No	No
Lead Compounds	2015	N420	R	No	No
Phenol	2015	108952	R	No	No
1,3-Butadiene	2015	106990	R	No	No
Ethylbenzene	2015	100414	R	No	No
Xylene (mixed isomers)	2015	1330207	R	No	No

Prepared By: lyndon.turner@valero.com
Date Transmitted for Certification: Jun 20, 2016 4:09:04 PM.
Certifying Official Name: Kevin Lassahn
Title: VP & General Manager
E-mail: kevin.lassahn@valero.com
Date Certified and Sent to EPA and Tribe: Jun 20, 2016 4:18:33 PM.

---- CDX HELP DESK ----
Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

Exhibit G

Ardmore Refinery – 2014 TRI Reporting Timeline

Date	Action
May - June 2015	Valero Ardmore Refinery employee Lyndon Turner works on gathering data and putting together the annual TRI report, which is due to EPA and ODEQ by midnight June 30, using EPA's TRI reporting software. For each reporting year, Valero San Antonio assigns technical support staff and schedules multiple meetings to assist the refineries with accurately and timely preparing and submitting the TRI reports. There are multiple emails between Ardmore and San Antonio for the 2014 report year.
June 29, 2015	Lyndon Turner works on finalizing TRI submission. Two emails received from EPA help desk at 7:52pm and 7:53pm
June 30, 2015.	Once finalized, the TRI is reviewed by refinery staff and submitted to EPA through EPA's website. Simultaneously, Kevin Lassahn is set up for e-signature on EPA's website. Ten emails received from EPA that morning.
June 30, 2015	A confirmation email is received by Kevin Lassahn, which he and his staff believe to be confirmation from EPA that the TRI was successfully submitted.
July – November	
November 18, 2015	Jami Murphy with ODEQ calls the refinery to ask about the 2014 TRI report indicating she cannot find it on EPA's system. Refinery staff log onto the EPA reporting database and see the completed TRI - as finalized in June. Refinery realizes that the button used to finalize or complete the TRI report to EPA was not the correct button. The plant manager was traveling and would not be available to certify the report until Monday November 23.
November 23, 2015	Refinery clicks the correct button and the TRI is thus formally submitted to EPA. Confirmation email received at 9:31 am. *Note: The final and complete TRI had been on EPA's computers since June 30, unmodified.* Refinery institutes procedure to send EPA reporting confirmation email to the Environmental Manager for review and record keeping purposes.
March 16, 2016	Dr. Mort Wakeland sends an email to Lyndon Turner regarding potential compliance issues with its TRI reporting.
March – May, 2016	Numerous telephone and email communications ensue between Dr. Wakeland and the refinery regarding TRI reporting. Refinery EHS staff explains to Dr. Wakeland what happened and the confusion with the EPA software. Dr. Wakeland acknowledges good compliance record and no past TRI reporting problems from the Valero Ardmore Refinery.
May 17, 2015	Dr. Wakeland sends an email to Greg Elliott, EHS Manager, with a penalty demand of $730,820 for late reporting. Dr. Wakeland offers a time-limited penalty reduction to $365,000 if the refinery agrees to settle promptly; offers further reduction if plant agrees to stop using unspecified chemicals on-site.

Exhibit H

From: Lassahn, Kevin M <Kevin.Lassahn@valero.com>
Sent: Monday, November 23, 2015 9:32 AM
To: Elliott, Greg; Turner, Lyndon
Subject: FW: TRI-MEweb submission has been certified and sent to a TDX member state.

Kevin Lassahn
Vice President and General Manager
Valero Ardmore Refinery

-----Original Message-----
From: helpdesk@epacdx.net [mailto:helpdesk@epacdx.net]
Sent: Monday, November 23, 2015 9:31 AM
To: Lassahn, Kevin M
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of OKLAHOMA .

Please be aware that the state of OKLAHOMA is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to OKLAHOMA, satisfying your obligation to report to both EPA and the state in which the facility is located (OKLAHOMA).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the "Review" tab in TRI-MEweb and clicking the "Prepare State/Tribal forms" button in the "Certified Submission Summary" table and selecting your facility account. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----
TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OKLAHOMA, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Vanadium Compounds	2014	N770	R	No	No
Carbon disulfide	2014	75150	R	No	No
1,3-Butadiene	2014	106990	R	No	No
Toluene	2014	108883	R	No	No
Nickel Compounds	2014	N495	R	No	No
Carbonyl sulfide	2014	463581	R	No	No
Cresol (mixed isomers)	2014	1319773	R	No	No
Ethylene	2014	74851	R	No	No

Mercury Compounds	2014	N458	R	No	No
Cobalt Compounds	2014	N096	R	No	No
Xylene (mixed isomers)	2014	1330207	R	No	No
Tetrachloroethylene	2014	127184	R	No	No
Ethylbenzene	2014	100414	R	No	No
Lead Compounds	2014	N420	R	No	No
Phenol	2014	108952	R	No	No
Benzo(g,h,i)perylene	2014	191242	R	No	No
Hydrochloric acid (1995 and after "Aci	2014	7647010	R	No	No
Benzene	2014	71432	R	No	No
Styrene	2014	100425	R	No	No
Dioxin and Dioxin-like Compounds	2014	N150	R	No	No
Propylene	2014	115071	R	No	No
Hydrogen fluoride	2014	7664393	R	No	No
Polycyclic aromatic compounds	2014	N590	R	No	No
n-Hexane	2014	110543	R	No	No
Hydrogen Sulfide	2014	7783064	R	No	No
Methanol	2014	67561	R	No	No
Sulfuric acid - (1994 and after "Acid	2014	7664939	R	No	No
Cumene	2014	98828	R	No	No
Molybdenum trioxide	2014	1313275	R	No	No
Phenanthrene	2014	85018	R	No	No
Cyclohexane	2014	110827	R	No	No
1,2,4-Trimethylbenzene	2014	95636	R	No	No
Nitrate compounds	2014	N511	R	No	No
Anthracene	2014	120127	R	No	No
Ammonia	2014	7664417	R	No	No
Naphthalene	2014	91203	R	No	No

Prepared By: kevin.lassahn@valero.com
Date Transmitted for Certification: Nov 23, 2015 10:27:27 AM.
Certifying Official Name: Kevin Lassahn
Title: VP & General Manager
E-mail: kevin.lassahn@valero.com
Date Certified and Sent to EPA and State: Nov 23, 2015 10:30:44 AM.

---- CDX HELP DESK ----
Phone (toll-free): +1 (888) 890-1995
Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

From: Lassahn, Kevin M <Kevin.Lassahn@valero.com>
Sent: Monday, June 20, 2016 3:21 PM
To: Turner, Lyndon
Cc: Elliott, Greg; McCaslin, David
Subject: FW: TRI-MEweb submission has been certified and sent to a TDX member state.

Gentlemen,

The TRI report has been submitted, please reference the attached confirmation email for your records.

Thank you,

Kevin Lassahn
Vice President and General Manager
Valero Ardmore Refinery

From: helpdesk@epacdx.net [mailto:helpdesk@epacdx.net]
Sent: Monday, June 20, 2016 3:19 PM
To: Lassahn, Kevin M <Kevin.Lassahn@valero.com>; Turner, Lyndon <Lyndon.Turner@valero.com>
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of OKLAHOMA .

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You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the "**Review**" tab in TRI-MEweb and clicking the "**Prepare State/Tribal forms**" button in the "**Certified Submission Summary**" table and selecting your facility account. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OKLAHOMA, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Benzo(g,h,i)perylene	2015	191242	R	No	No
Benzene	2015	71432	R	No	No
Mercury Compounds	2015	N458	R	No	No
Propylene	2015	115071	R	No	No
Methanol	2015	67561	R	No	No
Polycyclic aromatic compounds	2015	N590	R	No	No
Nitrate compounds	2015	N511	R	No	No
n-Hexane	2015	110543	R	No	No
Nickel Compounds	2015	N495	R	No	No
Cumene	2015	98828	R	No	No
Naphthalene	2015	91203	R	No	No
Ethylene	2015	74851	R	No	No
Molybdenum trioxide	2015	1313275	R	No	No
Styrene	2015	100425	R	No	No
Cyclohexane	2015	110827	R	No	No
Hydrogen fluoride	2015	7664393	R	No	No
Tetrachloroethylene	2015	127184	R	No	No
Cobalt Compounds	2015	N096	R	No	No
Ammonia	2015	7664417	R	No	No
Carbonyl sulfide					

	2015 463581	R	No	No
Hydrochloric acid (1995 and after "Aci	2015 7647010	R	No	No
Cresol (mixed isomers)	2015 1319773	R	No	No
1,2,4-Trimethylbenzene	2015 95636	R	No	No
Sulfuric acid - (1994 and after "Acid	2015 7664939	R	No	No
Hydrogen Sulfide	2015 7783064	R	No	No
Phenanthrene	2015 85018	R	No	No
Toluene	2015 108883	R	No	No
Anthracene	2015 120127	R	No	No
Vanadium Compounds	2015 N770	R	No	No
Dioxin and Dioxin-like Compounds	2015 N150	R	No	No
Carbon disulfide	2015 75150	R	No	No
Lead Compounds	2015 N420	R	No	No
Phenol	2015 108952	R	No	No
1,3-Butadiene	2015 106990	R	No	No
Ethylbenzene	2015 100414	R	No	No
Xylene (mixed isomers)	2015 1330207	R	No	No

Prepared By: lyndon.turner@valero.com
Date Transmitted for Certification: Jun 20, 2016 4:09:04 PM.
Certifying Official Name: Kevin Lassahn
Title: VP & General Manager
E-mail: kevin.lassahn@valero.com
Date Certified and Sent to EPA and Tribe: Jun 20, 2016 4:18:33 PM.

---- CDX HELP DESK ----
Phone (toll-free): +1 (888) 890-1995

Phone (toll): (970) 494-5500
Email: helpdesk@epacdx.net
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: https://cdx.epa.gov/

From: Elliott, Greg <Greg.Elliott@valero.com>
Sent: Monday, June 20, 2016 4:05 PM
To: Lassahn, Kevin M
Cc: McCaslin, David; Turner, Lyndon; Covert, Patrick
Subject: RE: TRI-MEweb submission has been certified and sent to a TDX member state.

I have saved the email from EPA and we went into the database and verified that it was submitted.

Thanks...GEE

From: Lassahn, Kevin M
Sent: Monday, June 20, 2016 3:21 PM
To: Turner, Lyndon <Lyndon.Turner@valero.com>
Cc: Elliott, Greg <Greg.Elliott@valero.com>; McCaslin, David <David.Mccaslin@valero.com>
Subject: FW: TRI-MEweb submission has been certified and sent to a TDX member state.

Gentlemen,

The TRI report has been submitted, please reference the attached confirmation email for your records.

Thank you,

Kevin Lassahn
Vice President and General Manager
Valero Ardmore Refinery

From: helpdesk@epacdx.net [mailto:helpdesk@epacdx.net]
Sent: Monday, June 20, 2016 3:19 PM
To: Lassahn, Kevin M <Kevin.Lassahn@valero.com>; Turner, Lyndon <Lyndon.Turner@valero.com>
Subject: TRI-MEweb submission has been certified and sent to a TDX member state.

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to EPA. You have reported that your facility is located in the state of OKLAHOMA .

Please be aware that the state of OKLAHOMA is participating in EPA's TRI Data Exchange. This certified submission will be electronically forwarded to OKLAHOMA, satisfying your obligation to report to both EPA and the state in which the facility is located (OKLAHOMA).

You may wish to print a copy of this receipt and keep it for your records. You may also print a copy of your state submission by navigating to the "**Review**" tab in TRI-MEweb and clicking the "**Prepare State/Tribal forms**" button in the "**Certified Submission Summary**" table and selecting your facility account. Do not send this receipt to EPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

---- REFERENCE INFORMATION ----

TRI Facility ID: 73401TTLPTHIGHW
Facility: VALERO REFINING CO -OKLAHOMA VALERO ARDMORE REFINERY
ONE VALERO WAY
ARDMORE OKLAHOMA, 73401

Chemical Name	RY	CAS	Form	Revision	Withdrawal
Benzo(g,h,i)perylene	2015	191242	R	No	No
Benzene	2015	71432	R	No	No
Mercury Compounds	2015	N458	R	No	No
Propylene	2015	115071	R	No	No
Methanol	2015	67561	R	No	No
Polycyclic aromatic compounds	2015	N590	R	No	No
Nitrate compounds	2015	N511	R	No	No
n-Hexane	2015	110543	R	No	No
Nickel Compounds	2015	N495	R	No	No
Cumene	2015	98828	R	No	No
Naphthalene	2015	91203	R	No	No
Ethylene	2015	74851	R	No	No
Molybdenum trioxide	2015	1313275	R	No	No
Styrene	2015	100425	R	No	No
Cyclohexane	2015	110827	R	No	No

Hydrogen fluoride	2015 7664393	R	No	No
Tetrachloroethylene	2015 127184	R	No	No
Cobalt Compounds	2015 N096	R	No	No
Ammonia	2015 7664417	R	No	No
Carbonyl sulfide	2015 463581	R	No	No
Hydrochloric acid (1995 and after "Aci	2015 7647010	R	No	No
Cresol (mixed isomers)	2015 1319773	R	No	No
1,2,4-Trimethylbenzene	2015 95636	R	No	No
Sulfuric acid - (1994 and after "Acid	2015 7664939	R	No	No
Hydrogen Sulfide	2015 7783064	R	No	No
Phenanthrene	2015 85018	R	No	No
Toluene	2015 108883	R	No	No
Anthracene	2015 120127	R	No	No
Vanadium Compounds	2015 N770	R	No	No
Dioxin and Dioxin-like Compounds	2015 N150	R	No	No
Carbon disulfide	2015 75150	R	No	No
Lead Compounds	2015 N420	R	No	No
Phenol	2015 108952	R	No	No
1,3-Butadiene	2015 106990	R	No	No
Ethylbenzene	2015 100414	R	No	No

Xylene (mixed isomers)	2015 1330207 R	No	No

Prepared By: lyndon.turner@valero.com
Date Transmitted for Certification: Jun 20, 2016 4:09:04 PM.
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Title: VP & General Manager
E-mail: kevin.lassahn@valero.com
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