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KMTEX

January 6, 2014

RECEIVE

CERTIFIED MAIL: 7012 3050 0002 0032 6542

JAN 13 2014

Air/Toxics & Inspection
Coordination Branch
6EN-A

Region VI Administrator
Environmental Protection Agency
1445 Ross Avenue, 6T-EC
Dallas, TX 75202-2733

AFS 4824500720
NO FRS?

Re: 40 CFR 61 Subpart V Semiannual Report
KMTEX, Ltd. – Port Arthur, Texas Facility
TCEQ Account No. JE-0318-G

2450 Gulfway Dr
Pt Arthur TX 77640

Dear Sir:

Per 40 CFR 61.247 requirements, KMTEX is submitting its semiannual report for fugitive emissions monitoring of Volatile Hazardous Air Pollutants (VHAPs) for the period June 2013 through December 2013. The report includes the unit being monitored, number of valves and pumps monitored, number found leaking during the reporting period, and the number not repaired during the 15 day time period. The report also includes an explanation for any repair delays, dates of any process unit shutdowns, and results of any performance testing. KMTEX does not operate any compressors in VHAP service at this time.

KMTEX previously notified EPA that it elected to comply with the provisions of 40 CFR 61.243-1 and 61.243-2, concerning alternate standards for valves in VHAP service. To align with our Subpart VV reporting, KMTEX will next report in Jul 2014, and then in Jan 2015. Our valve monitoring schedule, which assumes we'll meet the 2% leaker criteria, is attached.

If you have any questions or require additional information, please don't hesitate to contact me at (409)-984-1418

Sincerely,

David Jones

David Jones
HSSE Coordinator
Kmtex

Enclosure

cc: Manager, Air Program, Region 10
Texas Commission on Environmental Quality
3870 Eastex Fwy.
Beaumont, TX 77703-1892

2450 S. Gulfway Dr. • Port Arthur, Texas 77641
Mailing Address: P.O. Box 1421 • Port Arthur, Texas 77640

409/985-4200 • Fax 985-6350

KMTEX FUGITIVE COMPONENT COUNT

Jan 01, 2013 - December 31, 2013
LEAK DEFINITION 500 PPM

UNIT NO.	# OF PUMPS	# LEAKING	# NOT REPAIRED
All Pumps	88	1	0
TOTAL :	**88**	**1**	**0**

KMTEX FUGITIVE COMPONENT COUNT

Jan 01, 2013 -December 31, 2013
LEAK DEFINITION 500 PPM

UNIT NO.	# OF VALVES	# LEAKING	# NOT REPAIRED
501 Column	115	1	0
601 Column	118	0	0
701 Column	134	0	0
801 Column	111	0	0
901 Column	116	2	0
SV 100	98	0	0
Flare System	62	0	0
Vacuum System	86	0	0
Sodium Methylate	70	0	0
Transfer Lines	327	0	0
Vapor Recovery Dock Line	12	0	0
300 Dock Line	13	0	0
400 Dock Line	11	0	0
500 Dock Line	24	0	0
600 Dock Line	11	0	0
700 Dock Line	21	0	0
Olefin Dock Line	17	0	0
610 Dock Jumper	3	0	0
Tank 120	5	0	0
Tank 121	5	0	0
Tank 122	5	0	0
Tank 123	5	0	0
Tank 124	4	0	0
Tank 125	4	0	0
Tank 126	4	0	0
Tank 127	4	0	0
Tank 128	4	0	0
Tank 129	4	0	0
Tank 130	5	0	0
Tank 131	5	0	0
Tank 132	5	0	0
Tank 133	10	1	0
Tank 134	4	0	0
Tank 135	4	0	0
Tank 136	4	0	0
Tank 137	4	0	0
Tank 140	5	0	0
Tank 141	5	0	0
Tank 142	5	0	0
Tank 143	5	0	0
Tank 144	5	0	0
Tank 145	5	0	0
Tank 146	5	0	0
Tank 147	5	0	0

Tank 150	5	0	0
Tank 151	5	0	0
Tank 152	5	0	0
Tank 153	10	0	0
Tank 154	5	0	0
Tank 155	5	0	0
Tank 156	5	0	0
Tank 157	5	0	0
Tank 161	6	0	0
Tank 162	8	0	0
Tank 163	6	0	0
Tank 164	4	0	0
Tank 165	6	0	0
Tank 166	5	0	0
Tank 167	5	0	0
Tank 168	5	0	0
Tank 170	5	0	0
Tank 171	4	0	0
Tank 173	4	0	0
Tank 174	9	0	0
Tank 175	6	0	0
Tank 176	5	0	0
Tank 177	5	0	0
Tank 178	5	0	0
Tank 180	5	0	0
Tank 181	5	0	0
Tank 182	4	0	0
Tank 183	4	0	0
Tank 184	4	0	0
Tank 185	5	0	0
Tank 186 & Tank 187	12	0	0
Tank 188	5	0	0
Tank 191	5	0	0
Tank 192	4	0	0
Tank 193	4	0	0
Tank 194	4	0	0
Tank 195	5	0	0
Tank 196	5	0	0
Tank 200	5	0	0
Tank 201	6	0	0
Tank 202	5	0	0
Tank 203	6	0	0
Tank 210	6	0	0
Tank 211	5	0	0
Tank 212	6	0	0
Tank 213	6	0	0
Tank 220	7	0	0
Tank 221	5	0	0
Tank 222	5	0	0
Tank 223	6	0	0
Tank 230	5	0	0

Tank 231	5	0	0
Tank 232	5	0	0
Tank 233	7	0	0
Tank 300	7	0	0
Tank 301	7	0	0
Tank 302	7	0	0
Tank 303	8	0	0
Tank 310	9	0	0
Tank 311	9	0	0
Tank 312	9	0	0
Tank 313	8	0	0
Tank 399	10	0	0
Tank 400	9	0	0
Tank 401	10	0	0
Tank 402	10	0	0
Tank 403	9	0	0
Tank 498	7	0	0
Tank 499	6	0	0
Tank 500	5	0	0
Tank 501	5	0	0
Tank 502	5	0	0
Tank 503	5	0	0
Tank 504	6	0	0
Tank 505	6	0	0
Tank 506	6	0	0
Tank 603	7	0	0
Tank 603	7	0	0
TOTAL :	**1945**	**3**	**0**