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KMTEX

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RECEIVE

JUL 20 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

July 17, 2012

CERTIFIED MAIL: 7011 2000 0001 6553 8317

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

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

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 December 2011 through May 2012. 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 Jan 2013, and then in July 2013. 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)-985-4200

Sincerely,

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

Summary of Benzene Pumps

	Number of Pumps	Number of Pumps Leaking	Number of Pumps Repaired
All Pumps	72	0	0

Summary of Benzene Valves

	Number of Valves	Number of Valves Leaking	Number of Valves Repaired
501 Column	88	0	0
601 Column	69	0	0
701 Column	76	0	0
901 Column	116	0	0
Flare System	77	0	0
Vacuum System	86	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
Tank 200	5	0	0
Tank 201	6	0	0
Tank 202	5	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 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 600	3	0	0
Tank 601	3	0	0
Tank 602	13	0	0
Tank 603	7	0	0

Tank 604	7	0	0
Tank 605	11	0	0
Tank 606	12	0	0
Tank 607	12	0	0
Tank 743	9	0	0
Tank 744	9	0	0
Tank 745	9	0	0

Total **1,260**

Benzene Pumps

Valve Number	Description	OVA Meter Reading (ppm)	Date Maint. Performed / Person Performing Maint.	Date of Recheck / OVA Meter Reading After Repairs (ppm) / Person Rechecking	
OP501-A	WEST PROCESS OVERHEAD PUMP 501-A				1
OP501-B	EAST PROCESS OVERHEAD PUMP 501-B				2
BP801-A	PROCESS BOTTOMS PUMP- 801				3
BP801-B	PROCESS BOTTOMS PUMP-801				4
BP801-C	PROCESS BOTTOMS BOOSTER PUMP - 801				5
OP803-A	PROCESS SIDE DRAW PUMP - 801A				6
OP803-B	PROCESS OVERHEAD PUMP - 801B				7
SP802-A	PROCESS SIDE DRAW PUMP - 801A				8
SP802-B	PROCESS SIDE DRAW PUMP - 801B				9
SP501-B	SOUTH PROCESS SIDE DRAW PUMP 501-B				10
SP501-A	NORTH PROCESS SIDE DRAW PUMP 501-A				11
BP501B	SOUTH PROCESS BOTTOMS PUMP 501				12
BP501A	NORTH PROCESS BOTTOMS PUMP 501				13
BP501-C	PROCESS BOTTOMS BOOSTER PUMP 501-C				14
P901-A	PROCESS BOTTOMS PUMP - 901A				15
P901-B	PROCESS BOTTOMS PUMP - 901B				16
P901-C	PROCESS BOTTOMS BOOSTER PUMP - 901				17
P902-A	PROCESS SIDE DRAW PUMP - 902A				18
P902-B	PROCESS SIDE DRAW PUMP - 902B				19
P903-A	PROCESS OVERHEAD PUMP - 903A				20
P903-B	PROCESS OVERHEAD PUMP - 903B				21
SP602-B	PROCESS SIDE DRAW PUMP - 602B				22
SP602-A	PROCESS SIDE DRAW PUMP - 602A				23
OP603-B	PROCESS OVERHEAD PUMP - 603B				24
OP603-A	PROCESS OVERHEAD PUMP - 603A				25
OP703-B	PROCESS OVERHEAD PUMP - 703B				26
OP703-A	PROCESS OVERHEAD PUMP - 703A				27
SP702-B	PROCESS SIDE DRAW PUMP - 702B				28
SP702-A	PROCESS SIDE DRAW PUMP - 702A				29
BP701-C	PROCESS BOTTOMS BOOSTER PUMP - 701C				30
BP701-B	PROCESS BOTTOMS PUMP - 701B				31
BP701-A	PROCESS BOTTOMS PUMP - 701A				32
BP601-A	PROCESS BOTTOMS PUMP - 601A				33
BP601-B	PROCESS BOTTOMS PUMP - 601B				34
BP601-C	PROCESS BOTTOMS BOOSTER PUMP - 601C				35
KOP-05	KNOCKOUT POT / WASTE VACUUM OIL PUMP				36
Go To Stainless Steel Loading Area					
TPMP-32	PROCESS TRANSFER PUMP - 32				37
TPMP-26	PROCESS TRANSFER PUMP - 26				38
PFDP-25	PROCESS FEED PUMP - 25				39
TPMP-24	PROCESS TRANSFER PUMP - 24				40
TPMP-23	CAUSTIC PUMP				41
TPMP-33	PROCESS TRANSFER PUMP - 33				42
TPMP-31	PROCESS TRANSFER PUMP - 31- Tank 161/163				43
AFP-103	FRESH ACID PUMP				44
TPMP-15	PROCESS TRANSFER PUMP - 15				45
TPMP-10	PROCESS TRANSFER PUMP - 10				46
PFDF-06	PROCESS FEED PUMP - 06				47
TPMP-19	PROCESS TRANSFER PUMP - 19				48
PFDP-07	PROCESS FEED PUMP - 7				49
TPMP-11	PROCESS TRANSFER PUMP - 1 POS				50
PFDP-30	PROCESS FEED PUMP - 30				51
PFDP-08	PROCESS FEED PUMP - 8				52
TPMP-16	PROCESS TRANSFER PUMP - 16				53
TPMP-12	PROCESS TRANSFER PUMP - 12				54
TPMP-13	PROCESS TRANSFER PUMP - 13				55

TPMP-17	PROCESS TRANSFER PUMP - 17				56
PFDP-09	PROCESS FEED PUMP - 9				57
TPMP-14	PROCESS TRANSFER PUMP - 14				58
TPMP-18	PROCESS TRANSFER PUMP - 18				59
Go To 1000 Loading Area					
P1001	PROCESS PUMP - 1001				60
P1002	PROCESS PUMP - 1002				61
Go To Dock Area					
BRG-22	BARGE TRANSFER PUMP				62
Go To 500 Loading Area					
P501	PROCESS PUMP - 501 (Blackmer)				63
P502	PROCESS PUMP - 502 (Big Centrifugal)				64
P505	PROCESS PUMP - 505				65
P503	PROCESS PUMP - 503 (Small Centrifugal)				66
P504	PROCESS PUMP - 504 (Small Centrifugal)				67
Go To 700 Loading Area					
BRG-700	700 TANK FARM BARGE PUMP				68
P602	600 DROP (TK498&TK499) PUMP-DURCO 3X2X13				69
P601	PROCESS PUMP - 601				70
P701	PROCESS PUMP - 701				71
P702	PROCESS PUMP - 702				72