VALERO
PORT ARTHUR REFINERY
Post Office Box 909 • Port Arthur, Texas 77641-0909 • Telephone (409) 985-1000

February 22, 2011

Certified Mail No. 7008 0500 0001 9599 4395
Return Receipt Requested

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254 A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: 2010 Annual Hazardous Waste Export Report
The Premcor Refining Group, Inc. - Valero Port Arthur Refinery
Industrial Solid Waste Registration No. 30004
EPA ID No. TXD008090409
Regulated No. RN 102584026
Customer No. CN 601420748

Dear Administrator,

The Premcor Refining Group, Inc. is submitting this Annual Report for the 2010 calendar year for hazardous waste that was exported to a foreign country for metals reclamation from our Port Arthur Refinery.

This report has been prepared in accordance with the requirements of **40 CFR 262.87**.

(a)(1) The EPA identification number, name, and mailing and site address of the exporter:
TXD008090409, The Premcor Refining Group, Inc. – Valero Port Arthur Refinery, PO Box 909, Port Arthur, TX 77641 and site address 1801 South Gulfway Drive, Port Arthur, TX 77640

(a)(2) The calendar year covered by the report: 2010

(a)(3) The name and site address of final recovery facility:
Union Corporation, #548, Okmyoung-Ri, Daesong-Myon, Nam-Gu, Pohang-City, Kyungsanbuk-Do, South Korea

(a)(4) By final recovery facility for hazardous waste exported, a description of the hazardous waste, the EPA hazardous waste number (from 40 CFR part 261, subpart C or D), waste type from OECD waste list and applicable waste code from the OECD lists, DOT hazard class, the name and US EPA ID number (where applicable) for each transporter used, the total amount of waste shipped and number of shipments pursuant to each notification:
Union Corporation South Korea, Spent Hydrotreating Catalyst, K171, Metal Bearing Waste, B1120, DOT Hazard Class 4.2, transporter Jetco Delivery (transporter EPA ID# TXR000077976), 196.61 tons, 2 shipments.

(a)(5) Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41, in even numbered years:
(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated; and
The *Source Reduction Waste Minimization Plan 2007-2011* Executive Summary can be found in Attachment II.

received
SON 2/28/11

VALERO
PORT ARTHUR REFINERY
Post Office Box 909 • Port Arthur, Texas 77641-0909

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Enforcement & Compliance Assurance
Office of Federal Activities
International Compliance Assurance (2254A)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

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To: Enforcement ar

Mailstop: 2254A

Department:

Mailcode:

PKG Condition

US POSTAL

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(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:
Valero Port Arthur Refinery continues to implement provisions of the *Source Reduction Waste Minimization Plan 2007-2011*. As required by that plan and associated reporting requirements, the annual progress report on source reduction and waste minimization activities will be submitted by July 1, 2011 to the Texas Commission on Environmental Quality, and will be available upon request.

(a)(6) A certification signed by the primary exporter: see Attachment I

Should you have any questions or require additional information, please contact Tim Ernst at (409) 985-1632 or via e-mail at tim.ernst@valero.com.

Sincerely,

J. Greg Gentry
Vice President and General Manager

Attachments

cc: TCEQ Region 10

ATTACHMENT I

PRIMARY EXPORTER CERTIFICATION

Certification by Primary Exporter

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

J. Greg Gentry, Vice President and General Manager

2/17/11

Date

ATTACHMENT II

SOURCE REDUCTION WASTE MINIMIZATION PLAN 2007-2011

EXECUTIVE SUMMARY

TEXAS POLLUTION PREVENTION & WASTE MINIMIZATION PLAN

VALERO PORT ARTHUR REFINERY
PREMCOR REFINING GROUP

December 2006

OWNER'S CERTIFICATION

I certify that this Pollution Prevention Plan has been prepared according to and meets the specified requirements of Senate Bill 1099 of the 72nd Texas Legislature, the Solid Waste Disposal Act, and 30 TAC §335.471 -- 335.480, and that the information provided herein is true, correct, and complete.

I also certify that I have the authority to commit the corporate resources necessary to implement this Plan.

_____ Date Dec 20, 2006

for Jim Gillingham, Valero Energy Corporation
Port Arthur Refinery
Regional Operations Vice President

EXECUTIVE SUMMARY FOR PLAN YEARS 2007 to 2011

Description of the Facility

The Port Arthur refinery is an integrated oil refinery with a petroleum-processing capacity of approximately 330,000 barrels per day. Primary petroleum products include motor gasoline, jet fuel, kerosene, and diesel fuel.

1. Name of the Facility

   Valero Energy Corporation - Port Arthur Refinery
   Premcor Refining Group

2. Address

   Mailing Address:
   P. O. Box 909
   Port Arthur, Texas 77641-0909

   Physical Address:
   1801 South Gulfway Drive
   Port Arthur, Texas 77640

3. Contact

   Jason Haynes, Sr. Environmental Engineer
   Phone: 409/ 985-1199
   Email: jason.haynes@valero.com

4. General Description of the Facility

   The Port Arthur refinery is an integrated oil refinery established in the early 1900's on a site which covers 3875 acres. Currently the refinery's throughput is approximately 330,000 barrels/day. Primary petroleum products include gasoline, jet fuel, kerosene, and diesel fuel. The refinery is operated and maintained by approximately 800 Valero employees.

5. TCEQ Air Account Number, NOR #, TPDES Permit Number, EPA/RCRA #, Underground Injection Well Code ID #

• TCEQ air account	JE0042B
• TCEQ solid waste registration	30004
• TPDES permit	00309
• EPA identification	TXD008090409
• NPDES permit	*not applicable*
• Underground Injection Wells	*not applicable*

Hazardous Waste and TRI Releases 2004 & 2005

Hazardous Waste Generated (lbs)

Waste Code	Waste Name	Quantity Generated/ Disposed 2004 (LBS)	Quantity Generated/ Disposed 2005 (LBS)	Difference
0001001H	Lab Packs of Chemicals	0	70	70
0005003H	Mixed Lab Packs, Hazardous	30	0	-30
0100102H	Process wastewater from HFAU	0	512,200	512200
0150103H	Spent Acid w/ Metals, (COD vials generated in lab)	220	450	230
0251105H	Other Spent Acid Solution	1,600	0	-1600
0452109H	Other Spent Caustic	1,100	2,700	1600
0850117H	Waste Liquid Mercury from Instrumentation Instruments	3	7	4
1100202H	Halogenated Solvents	20	0	-20
1550211H	Spent Paint Thinner or Petroleum Distillates	0	300	300
1701296H	Ethylene Glycol based antifreeze	80	0	-80
1900301H	Soils contaminated w/ hazardous waste	652,780	3,201,140	2548360
2700319H	Sump pit or sewer box solids	237,840	1,356,088	1118248
2701319H	Treated Tank Bottoms Sludge	61,160	0	-61160
2704319H	Debris contaminated w/ listed wastes or characteristically hazardous	1,960,700	2,228,910	268210
2706319H	Hazardous sandblasting wastes	0	1,000	1000
2721319H	Calcium Fluoride off spec product from HFAU 443	125,220	284,100	158880
2725319H	Sandblasting waste w/K051 - from inside API	0	11,580	11580
3000393H	Spent Catalyst	1,770,385	2,657,079	886694
3802488H	Cooling Tower Wood from demolition	126,956	0	-126956
6002801H	Compressed gas cylinders	1,820	1,000	-820
Total		**4,939,914**	**10,256,624**	**5,316,710**

Hazardous Waste and TRI Releases 2004 & 2005 Continued

TRI Releases (lbs)

Chemical	2004	2005	Difference
Ammonia	4,756	5,012	256
Anthracene	116	91	-24
Benzene	12,433	9,698	-2,735
Benzo(ghi)perylene	0	1	1
1,3-Butadiene	1,808	1,353	-454
Carbon Disulfide	0	1,682	1,682
Carbonyl Sulfide	0	6,896	6,896
Chlorine	5,584	2,465	-3,119
Chromium	0	596	596
Cobalt Compounds	0	18	18
Cresols	115	91	-24
Cumene	8,671	4,310	-4,361
Cyanide Compounds	824	138	-686
Cyclohexane	23,495	27,511	4,016
2,4-Dimethyl Phenol	133	109	-25
Dioxin & DLCs (GRAMS)	0	0	0
Ethylbenzene	3,312	4,070	758
Ethylene	6,159	5,819	-340
n-Hexane	9,834	32,743	22,909
Hydrochloric Acid	18,374	5,222	-13,153
Hydrogen Cyanide	755	84	-671
Hydrogen Fluoride	1,213	1,018	-195
Lead Compounds	2,858	4,925	2,067
Manganese Compounds	0	890	890
Mercury Compounds	5	22	17
Molybdenum Trioxide	802	0	-802
Naphthalene	8,025	7,774	-251
Nickel Compounds	2,696	1,492	-1,204
Nitrate Compounds	27,583	21,721	-5,861
Phenanthrene	115	95	-19
Phenol	119	343	224
Polycyclic Aromatic Compounds	0	206	206
Propylene	50,694	24,455	-26,238
Sodium Nitrite	92	72	-20
Styrene	41	10	-31
Sulfuric Acid	125,225	52,984	-72,240
1,2,4-Trimethylbenzene	997	4,256	3,259
Toluene	14,156	24,791	10,636
Xylene (mixed isomers)	14,429	12,383	-2,046
Zinc	0	758	758
Total	**345,417**	**266,104**	**-79,313**

List of Pollutants and Contaminants to be Reduced

TRI Chemicals

1,2,4 Trimethylbebzene	Xylene (Mixed Isomers)
Benzene	1,3 Butadiene
Ehyltbenzene	Ethylene
Styrene	Propylene
Toluene	n-Hexane
Ammonia	Nitrate
Cyanide	Nickel
Chromium	2,4 Dimethyl Phenol
Lead	Anthracene
Silver	Cresols
Mercury	Phenanthrene
Phenol	Selenium
Manganese	Zinc

Hazardous Waste

Sump Pit or Sewer Box Solids	2700319H
Mercury Contaminated Waste	2705319H

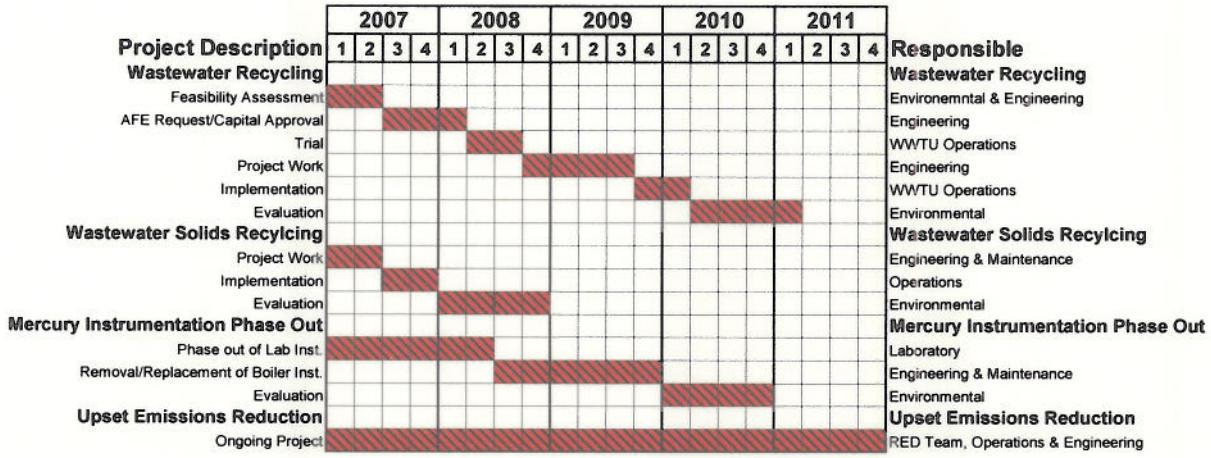
Reduction Goals

The goal of Valero Port Arthur refinery is to continually reduce hazardous waste generation and TRI releases through process improvement and recycling. It is anticipated that hazardous waste can be reduced to less than 4670 tons and TRI releases can be reduced to less than 255,716 lbs by 2011.

Environmental and Human Health Risks Considered

All projects at the Valero Port Arthur Refinery are reviewed by a team of environmental, engineering, operations, maintenance and management to determine validity of the project. One of the main purposes of the review is to determine if there will be any adverse affects on employees and the surrounding community. Other aspects of the review also include potential environmental impacts including whether or not the project will increase the amount of an existing pollutant or cause a new pollutant to be released (new waste stream). The system in place is designed to take into account all of these aspects to determine if a project is viable or not. By doing this Valero assures that if a project moves forward then the issue of hazardous waste and TRI releases are addressed before hand, appropriate measures are taken to address any issues and every effort is made to minimize potential impacts therefore leading to reduced impacts on human health and the environment.

Implementation Schedule



Media Transfers

Wastewater Recycling

Re-using wastewater as process water could potentially result in a transfer of pollutants to other media. One example of this could be if the water is re-used in a scrubber some of the pollutants may be released as air emissions. Another example of this would be if the water is used as wash-up water then minor amounts of pollutants could be released to surface drains and therefore be released to storm water. Finally if the water is used in steam generation then the potential for additional emissions via steam venting would exist. Valero believes that any amount of emissions transferred would be minimal and the overall benefit would greatly outweigh any negative impacts of media transfer.

Wastewater Solids Recycling

Valero does not anticipate any transfer of pollutants to other media as a result of this project.

Mercury Instrumentation Phase Out

The phase out of mercury instrumentation may initially result in an increase of mercury containing waste shipments off-site. However, once the initial removal is complete then the possibility of mercury waste transferred offsite will be minimal.

Program to Reduce Upset Maintenance Emissions

Valero does not anticipate any transfer of pollutants to other media as a result of this project.