42-045-00070

Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
(610) 364-8000

FEDEX: 7712 8142 5267

September 29, 2014

James Rebarchak
Program Manager
Pennsylvania Dept. of Environmental Protection
Southeast Regional Office – Air Quality Program
2 East Main Street
Norristown, PA 19401-4915

RE: Semi-Annual Title V Deviation Report
Monroe Energy, LLC – Trainer Refinery
Permit No. 23-00003
Reporting Period: 01/01/2014 – 06/30/2014

Dear Mr. Rebarchak:

In accordance with Title V Permit number TVOP 23-00003, Condition C.015 and Condition B.023, the Trainer Refinery hereby submits a Title V Semi-Annual Deviation Report for the period January 1, 2014 – June 30, 2014. Please note that the Department issued a new version of the Refinery's TVOP on June 25, 2014, five days prior to the end of the reporting period. Because the new permit was issued so close to the end of the reporting period, the Department agreed to allow the Refinery to prepare the enclosed report using the TVOP issued in July 2013 as its basis. The annual compliance certification and deviation report due in April 2015 will be prepared using the most recent version of the Refinery's TVOP.

Should you have any questions or comments regarding the enclosed report, please call me at (610) 364-8528, or call Matt Torell, Environmental Leader, at (610) 364-8399.

Sincerely,
MONROE ENERGY, LLC

David M. Chetkowski, P.E.
Air Program Lead

Enclosure

cc: Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
FEDEX: 7712 8145 1460

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Air Protection Division
(3AP10)

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Facility Name:	Monroe Energy Trainer Refinery	**Owner/Operator:**	Monroe Energy, LLC
Tax ID/Plant:	73-0400345-1	**DEP Facility ID:**	293037
Contact Person:	Matt Torell	**Title:**	Environmental Leader
Operating Permit #:	23-00003	**Phone Number:**	(610) 364-8399

For the period 01/01/2014 to 06/30/2014, MONROE ENERGY/TRAINER REFINERY has been in continuous compliance with all applicable requirements of permit # 23-00003, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances, and excursions:

Citation	Permit Section	Type of Requirement	Permit Condition	Terms & Conditions Contained in the Permit	Source	Noncompliance	Monitoring Method(s)	Date	Duration	Corrective Action(s)
[25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]	GEN	Reporting Requirements	(B)(GEN)(023)(a)	(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.	Facility Wide	The BWON 1Q2014 report was submitted late.	Facility policies, procedures, and work practices are in place to ensure compliance.	4/1/2014	N/A	The report was submitted on 07/15/2014, and internal procedures have been improved to help ensure that all future compliance reports are submitted on time.
[25 Pa. Code §121.7]	Site	Emission Restriction	(C)(SITE)(001)	No person may permit air pollution, as that term is defined in the Air Pollution Control Act (35 PS Section 4003), except as specifically authorized elsewhere in this permit	Facility Wide	A malfuction of tubing in the Alky Unit released propane and HF to atmosphere.	Facility policies, procedures, and operating practices are in place to ensure compliance.	3/20/2014	30 minutes	The tubing was isolated, stopping the leak, and subsequently repaired prior to placing the tubing back into service.
25 Pa. Code §123.1]	Site	Emission Restriction	(C)(SITE)(002)	No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source, except as specifically authorized elsewhere in this permit, other than the following: (a) Construction or demolition of buildings or structures. (b) Grading, paving and maintenance of roads and streets. (c) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets. (d) Clearing of land. (e) Stockpiling of materials. (f) Sources and classes of sources other than those identified in paragraphs (a)-(e), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements: (1) The emissions are of minor significance with respect to causing air pollution; and (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.	Facility Wide	A malfuction of tubing in the Alky Unit released propane and HF to atmosphere.	Facility policies, procedures, and operating practices are in place to ensure compliance.	3/20/2014	30 minutes	The tubing was isolated, stopping the leak, and subsequently repaired prior to placing the tubing back into service.
10 CFR Part 63 IESHAPS for ource ategories §40 FR 63.654]	Site	Reporting Requirements	(C)(SITE)(021)	[Additional authority for this permit condition is also derived from Pa. Code § 127.441.] Each permittee of a source subject to 40 CFR § 63.654 shall submit the reports listed in (a) and (b), below, except as provided in 40 CFR § 63.654(h)(5), and shall keep records as described in 40 CFR § 63.654(i). (a) Periodic Reports as described in 40 CFR § 63.654(g). (b) Other reports described in 40 CFR § 63.654(h).	Facility Wide	The refinery failed to provide a specific date of repair on a semi-annual report and instead noted that the repair would be made during the next time the unit was taken offline or during the next unit turnaround, whichever occurred first.	Facility policies, procedures, and operating practices are in place to ensure compliance.	3/14/2014	N/A	PADEP asserted that the Refinery was not allowed to revise their compliance report and issued an NOV. A calendar date was provided to PADEP in a response to the NOV. The date provided represents the refinery's best guess at the specific date of repair.
5 Pa. Code 127.441]	034 - #9 Boiler	Emission Restriction	(D)(034)(001)(a)(1)	(a) Stack emissions from this boiler shall not exceed any of the following: (1) SOx - 3.43 lbs/hr and 15.0 tons/12 consecutive month period;	034 - Boiler 9	Exceedance of 3.43 lbs SOx per hour	Continuous Emissions Monitoring System (CEMS)	1/8/2014 1/14/2014 2/27/2014 5/29/2014	2 hours 1 hour 1 hour 1 hour	Fuel gas H2S did not exceed the 162 ppm 3-hr avg limit. Short-term spikes in fuel gas H2S returned to normal.
5 Pa. Code 127.441]	034 - #9 Boiler	Emission Restriction	(D)(034)(001)(a)(2)	(2) NOx - 2.7 lbs/hr and 11.8 tons/12 consecutive month period;	034 - Boiler 9	Exceedance of 2.7 lbs NOx per hour	Continuous Emissions Monitoring System (CEMS)	3/11/2014	2 hours	The boiler upset was corrected.

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Contact Person:	Matt Torell	**Title:**	Environmental Leader
Operating Permit #:	23-00003	**Phone Number:**	(610) 364-8399

For the period 01/01/2014 to 06/30/2014, MONROE ENERGY/TRAINER REFINERY has been in continuous compliance with all applicable requirements of permit # 23-00003, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances, and excursions:

Citation	Permit Section	Type of Requirement	Permit Condition	Terms & Conditions Contained in the Permit	Source	Noncompliance	Monitoring Method(s)	Date	Duration	Corrective Action(s)
[25 Pa. Code §127.441]	034 - #9 Boiler	Emission Restriction	(D)(034)(001)(a)(4)	(4) CO - 6.85 lbs/hr and 30.0 tons/12 consecutive month period;	034 - Boiler 9	Exceedance of 6.85 lbs CO per hour	Continuous Emissions Monitoring System (CEMS)	3/12/2014 6/16/2014	2 hours 1 hour	The boiler upset was corrected.
[25 Pa. Code §127.441]	035 - #10 Boiler	Emission Restriction	(D)(035)(001)(a)(1)	(a) Stack emissions from this boiler shall not exceed any of the following: (1) SOx - 3.43 lbs/hr and 15.0 tons/12 consecutive month	035 - Boiler 10	Exceedance of 3.43 lbs SOx per hour	Continuous Emissions Monitoring System (CEMS)	1/4/2014 2/27/2014 5/29/2014	1 hour 1 hour 1 hour	The boiler upset was corrected.
[25 Pa. Code §127.441]	035 - #10 Boiler	Emission Restriction	(D)(035)(001)(a)(2)	(2) NOx - 2.7 lbs/hr and 11.8 tons/12 consecutive month period;	035 - Boiler 10	Exceedance of 2.7 lbs NOx per hour	Continuous Emissions Monitoring System (CEMS)	1/8/2014 3/12/2014	1 hour 1 hour	The boiler upset was corrected.
[25 Pa. Code §127.441]	035 - #10 Boiler	Emission Restriction	(D)(035)(001)(a)(4)	(4) CO - 6.85 lbs/hr and 30.0 tons/12 consecutive month period;	035 - Boiler 10	Exceedance of 6.85 lbs CO per hour	Continuous Emissions Monitoring System (CEMS)	3/13/2014 6/17/2014	2 hours 2 hours	The boiler upset was corrected.
[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11]	103 - Main Flare	Emission Restriction	(D)(103)(003)	The flare shall be operated with no visible emissions, except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hour period. [Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]	103 - Main Flare	Visible emissions were observed from the main flare.	Facility policies, procedures, and operating practices are in place to ensure compliance.	1/8/2014 1/22/2014	1.75 hours (intermittent) 22 minutes	In each case, visible emissions occurred during process upsets. Visible emissions ceased when the upset was corrected.
[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1566]	103 - Main Flare	Emission Restriction	(D)(103)(004)	Visible emissions from the flare shall not exceed a total of 5 minutes during any 2-hour operating period.	103 - Main Flare	Visible emissions were observed from the main flare.	Facility policies, procedures, and operating practices are in place to ensure compliance.	1/8/2014 1/22/2014	1.75 hours (intermittent) 22 minutes	In each case, visible emissions occurred during process upsets. Visible emissions ceased when the upset was corrected.
[25 Pa. Code §127.441]	119 - Plat Regen	Work Practice Requirements	(D)(119)(013)	(b) The permittee shall limit the chloride level of the sorbent exiting the gas adsorption to 1.8%, or less, calculated as a weekly average.	119 - Platformer Regenerator	Catalyst chloride level >1.8% (weekly avg)	Facility work practices and procedures; Recordkeeping and Calculations	5/25/14-5/31/2014 6/15/14 - 6/21/2014	1 week 1 week	Injections of catalyst chloriding agent were stopped as soon as one laboratory result came back >1.8%. Chloride levels took several days to return to normal, resulting in the weekly avg being above 1.8%.
[40 CFR Part 61 NESHAPs §40 CFR 61.357]	133 - BWON	Reporting Requirements	(D)(133)(008)(b)	(b) Beginning three (3) months after the date that the equipment necessary to comply with these standards had been certified in accordance with (a)(1), above, the permittee shall submit quarterly to the Administrator a certification that all of the required inspections have been carried out in accordance with the requirements of 40 CFR, subpart FF.	133 - BWON	The BWON 1Q2014 report was submitted late.	Facility policies, procedures, and operating practices are in place to ensure compliance.	4/1/2014	N/A	The report was submitted on 07/15/2014, and internal procedures have been improved to help ensure that all compliance reports are submitted on time.
40 CFR Part 61 NESHAPs §40 CFR 61.357]	133 - BWON	Reporting Requirements	(D)(133)(008)(c)	(c) Beginning three (3) months after the date that the equipment necessary to comply with these standards has been certified, the permittee shall submit a quarterly report to the Administrator that includes if the treatment process is monitored in accordance with 40 CFR § 61.354(a)(1), then each period of operation during which the concentration of benzene in the monitored waste stream exiting the unit is equal to or greater than 10 ppmw.	133 - BWON	The BWON 1Q2014 report was submitted late.	Facility policies, procedures, and operating practices are in place to ensure compliance.	4/1/2014	N/A	The report was submitted on 07/15/2014, and internal procedures have been improved to help ensure that all compliance reports are submitted on time.

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION			
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Contact Person:	Matt Torell	Title:	Environmental Leader
Operating Permit #:	23-00003	Phone Number:	(610) 364-8399

For the period 01/01/2014 to 06/30/2014, MONROE ENERGY/TRAINER REFINERY has been in continuous compliance with all applicable requirements of permit # 23-00003, determined by the method(s) of compliance specified in said permit, except for the following deviations, exceedances, and excursions:

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[25 Pa. Code §127.441]	194 - #160 Int. Float	Fuel Restriction	(D)(194)(002)	Only Jet A kerosene having a maximum true vapor pressure of 0.015 psia shall be stored in this source.	194 - #160 Internal Floating Roof Tank	The estimated TVP was above 0.015 psia for June. Jet A is the only product stored in the tank.	Facility policies, procedures, and operating practices are in place to ensure compliance.	6/1/2014	1 month	Jet rundown temperatures are monitored; however, the temperature of the tank contents are influenced by ambient temperatures. The refinery believes that the limit on vapor pressure for this tank is superfluous since the 12-month rolling emission limit will not be exceeded even though the TVP for June was estimate to be 0.016 psia. An application to remove the vapor pressure limit from the TVOP will be submitted.
[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.646]	T002 - MACT GR 1, Ext. Float Roof Tanks	Work Practice Standards	(D)(T002)(008)(e)	(e) Automatic bleeder vents are to be closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the roof leg supports.	T002 - MACT Group 1, External Floating Roof Tanks	The vacuum breakers on Tank 151 (DEP Source No. 136) were observed to be open.	Facility policies, procedures, and operating practices are in place to ensure compliance.	5/21/2014	1 day	The vacuum breakers were closed on 5/22/2014 and the height reset at a higher level to ensure that they will not open when the tank roof is floating.

- The Trainer Refinery is part of a Consent Decree (United States, Commonwealth of Pennsylvania et al v. ConocoPhillips Company, Civil Action H-05-0258 lodged January 27, 2005, Southern District of Texas) that has various environmental requirements for the Trainer Refinery. During the course of conducting audits or implementing other activities required by the Consent Decree, the refinery may identify deviations related to its VOC monitoring (LDAR), Benzene Waste NESHAPS, Subpart J and other regulations addressed by the Consent Decree. To the extent that the refinery timely identifies and corrects such deviations, the refinery, the United States, and the Commonwealth of Pennsylvania have agreed that the refinery is released from liability. It is the refinery's intent to identify such deviations in future Title V certification reports and to indicate whether the deviation is one for which a liability release was previously negotiated.
- In accordance with the Consent Decree requirements, Monroe Energy continually evaluates refinery flares and any flaring events with the goal of reducing flaring. Trainer Refinery has certified the Acid Gas Flare and the Old Yard Flare. The Sour Gas Flare and Main Flare became subject to Subpart J requirements on July 1, 2013 as required by the Consent Decree, and continues to work with EPA and PADEP on certifying these flares.

- The Consent Decree signed by ConocoPhillips (the previous refinery owner), EPA, and the PADEP, civil action No. H-05-258, paragraph 248 requires the Trainer Refinery to perform "drill and tap" (or equivalent) repair methods on certain valves that are leaking at or above 10,000 ppm that would otherwise be placed on the facility "Delay of Repair" list within 15 calendar days. Under the Consent Decree, the refinery has 30 days from the date the leak, at or above 10,000 ppm, was detected to perform the required drill and tap repair attempts. If the repair attempts are successful in reducing the leak rate to less than 10,000 ppm, the valve is considered repaired in accordance with the applicable regulation. If two successive drill and tap repair attempts are not successful in reducing the leak rate to less than 10,000 ppm, then the valve can be placed on the Delay of Repair list in accordance with the aforementioned paragraph. As a result of these Consent Decree requirements there were some leaking valves that were not repaired within the 15 day deadline and were not yet eligible for the Delay of Repair list. The refinery is also conducting a continuous improvement program for reviewing components that are monitored as part of the LDAR program. Thus, changes in the number of components may be made to the LDAR program as a result of this review.
- In addition to the deviations listed above, deviations associated with certified analyzers (continuous emission monitors) will be reported to PADEP as part of the quarterly reports submitted to PADEP following certification of the analyzers under Revision 8 of PADEP's Continuous Source Monitoring Manual.
- The Title V permit lists a compliance schedule to address compliance issues associated with the NSPS subpart QQQ requirements. All activities under the plan were completed.
- In addition to the semi-annual deviation report, Trainer Refinery may have also submitted the following reports that may have identified additional deviations for the this reporting period. These reports are certified as being true, complete and accurate by the facility's RO or designate as part of this compliance certification form.

- Pennsylvania Quarterly Monitoring LDAR Reports
- Refinery MACT and NSPS Semi-Annual Monitoring LDAR Reports
- NSPS QQQ Semi-Annual Reports
- Benzene NESHAPS Quarterly Monitoring and Annual TAB reports
- Stack Test Reports for tests conducted pursuant to Title V Requirements
- Tank Seal Gap Measurement Letters
- Quarterly PADEP CEMS Reports
- Quarterly NOx SIP Call Reports (EDRs)
- Annual RATAs CEMS Reports
- Incident Follow-up 10 day reports
- Tank Inspection and Refill Notifications
- Annual AIMS Emissions Report
- Refinery MACT I Periodic Report
- Refinery MACT II/NSPS J Periodic Report
- Semi-Annual Air Compliance History Report
- CEMS Phase I Applications & CEMS Certification Test Reports
- Consent Decree Semiannual Progress Report
- NSPS Db Semi-Annual Reports

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Certification of Truth, Accuracy, and Completeness

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.

Name:	Jefferey K. Warmann	**Title:**	CEO and President
Signed:		**Date:**	9/29/2014

This certification must be signed by a responsible official. Any certification submitted without a valid signature will be returned.
The owner/operator shall identify any other material information needed in this certification to also comply with section 113(c)(2) of the Clean Air Act. If more spaces are needed, complete additional pages using the format shown in Addendum 1. This certification does not replace requirements pertaining to the submission of malfunction and CEM reports. DO NOT include that information on this form.