42-045-00070

Monroe Energy

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

July 30, 2014

FedEx 7706 9224 4913

Mr. James Rebarchak
Commonwealth of Pennsylvania
Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RECEIVED
JUL 31 2014
3AP20

Re: Monroe Energy, LLC – Trainer Refinery
40 CFR 63, Subpart UUU: Semi-Annual Periodic Report
40 CFR 60, NSPS J: Semi-Annual Report
Reporting Period: January 1 – June 30, 2014

Dear Mr. Rebarchak:

In accordance with 40 CFR 63 Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units and Sulfur Recovery Plants, Monroe Energy, LLC's Trainer Refinery hereby submits this semi-annual compliance report (per §63.1575(b)(2)) for the period beginning January 1, 2014 and ending June 30, 2014. This report is also being submitted in compliance with 40 CFR 60.107(d), (e) and (f) and 40 CFR 60.7 (c) for the continuous monitoring systems required by the New Source Performance Standards (NSPS) for the North Side and South Side refinery fuel gas systems that are continuously monitored for H_2S, Sulfur Recovery Unit (SRU) for SO_2, and the Fluid Catalytic Cracking Unit (FCCU) for PM, CO, and SO_2.

Please note that the Refinery's Main Flare and Sour Gas Flare accepted NSPS J applicability on July 1, 2013, pursuant to the Refinery's Consent Decree (Civil Action H-05-0258). On October 1, 2013, the Refinery submitted data to the Pennsylvania Department of Environmental Protection (PADEP) certifying the performance of the H_2S CEMS associated with these flares.

MONROE ENERGY, LLC
TRAINER REFINERY

SEMIANNUAL PERIODIC REPORT
Reporting Period: January 1, 2014 – June 30, 2014

The Refinery MACT 2 emission standards (40 CFR 63 Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units and Sulfur Recovery Plants) regulate the following refinery affected sources:

1. Fluidized Catalytic Cracking Unit (FCCU – Source ID 101)
2. Catalytic Reforming Unit (Platformer Unit – Source ID 119)
3. Sulfur Recovery Unit (SRU – Source ID 102)
4. Each Bypass line serving the above units that could divert an affected vent stream away from a control device used to comply with the requirements of this subpart.

This semi-annual report for the period beginning January 1, 2014 and ending June 30, 2014 addresses the status of facility compliance with Subpart UUU.

COMPLIANCE STATUS: 40 CFR 63 SUBPART UUU

1. FCCU: **[§63. 1564-1565]**

The refinery operates one FCCU. On November 22, 2005 the facility received approval from U.S. EPA for an Alternative Monitoring Plan (AMP) in lieu of the requirement to install and operate a Continuous Opacity Monitoring (COM) System on the FCCU wet gas scrubber (WGS) stack. The AMP requires the refinery to monitor WGS liquid-to-gas ratio to continuously demonstrate compliance with the limits established during performance testing conducted in 2006 and 2007.

The average liquid-to-gas ratio was calculated for each operating hour during the period from January 1 to June 30, 2014. The L-to-G ratio was above the minimum ratio of 0.08 gal/scf established during the 2007 performance test for all hours during the reporting period except one. From 23:00 – 23:59 on 05/02/2014, the L-to-G ratio dipped below 0.08. At the time, the FCCU was not operating; however, the CO Boiler and the WGS were operating.

For the reporting period (January 1 to June 30, 2014), the FCCU was in compliance with the Refinery MACT 2.

(e)(6) A breakdown of the total duration of the deviations during the reporting period and into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes:

- Startup, shutdown: 0 hours
- Control equipment problems: 0 hours
- Process problems: 0 hours
- Other known causes: 1 hours
- Other unknown causes: 0 hours

(e)(7) A summary of the total duration of downtime for the continuous opacity monitoring system or continuous emission monitoring system during the reporting period (recorded in minutes for opacity and hours for gases and in the averaging time specified in the regulation for other types of standards), and the total duration of downtime for the continuous opacity monitoring system or continuous emission monitoring system as a percent of the total source operating time during that reporting period: See attached Table 1.

(e)(8) A breakdown of the total duration of downtime for the continuous opacity monitoring system or continuous emission monitoring system during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes: See attached Table 1.

(e)(9) An identification of each HAP that was monitored at the affected source: CO is monitored as a surrogate for organic HAPs.

(e)(10) A brief description of the process units:

The Fluidized Catalytic Cracking Unit (FCCU) is a refinery process unit used for the production of gasoline. Heavy oil, which is used as the feedstock, is catalytically cracked in a fluidized catalyst bed to produce C3 olefins, C4 olefins and isobutanes. In the cracking reactor, heavy carbonaceous materials (coke) become deposited on the catalyst, requiring continuous regeneration. The catalyst is circulated to a fluidized bed regenerator where these deposits are combusted. Most of the catalyst particles entrained in the regenerator flue gas are then removed in two stages of cyclones within the regenerator vessel and then are returned to the fluidized bed reactor.

At the Trainer Refinery, the FCCU control devices include a CO Boiler for CO reduction, an Enhanced Selective Non-Catalytic Reduction (eSNCR) unit for NO_x reduction, an electrostatic precipitator for PM reduction and a wet gas scrubber for PM and SO_2 reduction.

(e)(11) The monitoring equipment manufacturer(s) and model number(s): SO_2 Analyzer – Ametek Process Instruments, Model 921 Single Gas Analyzer; NOx Analyzer – Ametek

4. Bypass Lines **[§63.1569]**

The FCCU does not have any bypass lines. The Platformer Chlorsorb Unit was not bypassed during this reporting period. The Sulfur Recovery Unit was not bypassed during this reporting period.

5. Start-up, Shutdown, and Malfunction Plans (SSMP) **[§63.10(d)(5)]**

Any startup, shutdown, and malfunction at the Facility which occurred during the reporting period were managed consistent with the facility's SSMP. A record of the malfunction events and copies of the event notification letters, if any, to PADEP are provided in Attachment A.

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: SRUSTACK
Parameter: SO2PPMC
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	01/08/2014 08:00	01/08/2014 08:59	1.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
2	02/07/2014 12:00	02/07/2014 14:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
3	02/17/2014 08:00	02/17/2014 11:59	4.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
4	02/19/2014 08:00	02/19/2014 09:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
5	02/23/2014 11:00	02/23/2014 12:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
6	03/11/2014 10:00	03/11/2014 13:59	4.00	08 - NORMAL OPERATION 20 - CORRECTIVE MAINTENANCE
Comments:	Corrective Maintenance in response to "Maintenance Limit" calibration warning. Successful recalibration completed after corrective maintenance (if any) was completed.			
7	03/13/2014 07:00	03/13/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
8	03/13/2014 13:00	03/13/2014 14:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
9	03/15/2014 07:00	03/15/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
10	03/19/2014 10:00	03/19/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
11	03/25/2014 09:00	03/25/2014 12:59	4.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
12	03/27/2014 10:00	03/27/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments:	1Q2014 - O2 (%) Linearity Test			
13	03/27/2014 12:00	03/27/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments:	1Q2014 - SO2 (%) Linearity Test			
14	03/31/2014 07:00	03/31/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
15	03/31/2014 11:00	03/31/2014 12:59	2.00	08 - NORMAL OPERATION 20 - CORRECTIVE MAINTENANCE
Comments:	1Q2014 - SO2 (%) Linearity Test (2) completed after Corrective Maintenance			
16	04/09/2014 06:00	04/09/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
17	04/10/2014 06:00	04/10/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
18	04/16/2014 07:00	04/16/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
19	04/20/2014 06:00	04/20/2014 09:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
20	04/21/2014 06:00	04/21/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
21	04/29/2014 07:00	04/29/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
22	05/02/2014 07:00	05/02/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FCCSTACK
Parameter: COPPMC
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	01/04/2014 08:00	01/04/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
2	01/04/2014 12:00	01/04/2014 13:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
3	01/06/2014 09:00	01/06/2014 11:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
4	01/07/2014 08:00	01/07/2014 08:59	1.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
5	01/12/2014 14:00	01/12/2014 14:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
6	01/18/2014 10:00	01/18/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
7	01/22/2014 08:00	01/22/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
8	01/22/2014 10:00	01/22/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
9	01/23/2014 08:00	01/23/2014 09:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
10	01/27/2014 08:00	01/27/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
11	01/28/2014 07:00	01/28/2014 09:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
12	01/29/2014 08:00	01/29/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
13	02/05/2014 08:00	02/05/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
14	02/07/2014 09:00	02/07/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
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17	02/27/2014 08:00	02/27/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
18	02/28/2014 08:00	02/28/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
19	03/02/2014 13:00	03/02/2014 13:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
20	03/05/2014 08:00	03/05/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
21	03/10/2014 07:00	03/10/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
22	03/17/2014 07:00	03/17/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
23	03/20/2014 12:00	03/20/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
24	03/27/2014 08:00	03/27/2014 10:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION

Comments: 1Q2014 - NOx (ppm) & SO2 (ppm) Linearity Test

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FCCSTACK
Parameter: NOXPPMC
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	01/04/2014 08:00	01/04/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
2	01/04/2014 12:00	01/04/2014 13:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
3	01/05/2014 07:00	01/05/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
4	01/06/2014 09:00	01/06/2014 11:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
5	01/07/2014 08:00	01/07/2014 08:59	1.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
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10	01/23/2014 08:00	01/23/2014 09:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
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12	01/28/2014 07:00	01/28/2014 09:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
13	01/29/2014 08:00	01/29/2014 08:59	1.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
14	02/05/2014 08:00	02/05/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
15	02/07/2014 09:00	02/07/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
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18	02/27/2014 08:00	02/27/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
19	02/28/2014 08:00	02/28/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
20	03/02/2014 13:00	03/02/2014 13:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
21	03/05/2014 08:00	03/05/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
22	03/10/2014 07:00	03/10/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
23	03/17/2014 07:00	03/17/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
24	03/20/2014 12:00	03/20/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FCCSTACK
Parameter: SO2PPMC
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	01/04/2014 07:00	01/04/2014 13:59	7.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
2	01/05/2014 07:00	01/06/2014 11:59	29.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
3	01/07/2014 08:00	01/07/2014 08:59	1.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
4	01/08/2014 07:00	01/08/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
5	01/12/2014 14:00	01/12/2014 14:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
6	01/18/2014 07:00	01/18/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
7	01/22/2014 07:00	01/22/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
8	01/23/2014 07:00	01/23/2014 09:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
9	01/27/2014 08:00	01/27/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
10	01/28/2014 07:00	01/28/2014 09:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
11	01/29/2014 08:00	01/29/2014 08:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
12	02/05/2014 08:00	02/05/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
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19	03/02/2014 13:00	03/02/2014 13:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
20	03/05/2014 08:00	03/05/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
21	03/10/2014 07:00	03/10/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
22	03/17/2014 07:00	03/17/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
23	03/20/2014 12:00	03/20/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
24	03/27/2014 08:00	03/27/2014 10:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION

Comments: 1Q2014 - NOx (ppm) & SO2 (ppm) Linearity Test

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: N_H2S
Parameter: N_H2S
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	01/08/2014 07:00	01/08/2014 09:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
2	01/26/2014 07:00	01/26/2014 12:59	6.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
3	01/27/2014 07:00	01/27/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
4	01/30/2014 06:00	01/30/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
5	02/09/2014 07:00	02/09/2014 09:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
6	02/12/2014 07:00	02/12/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
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9	03/02/2014 07:00	03/02/2014 14:59	8.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
10	03/13/2014 07:00	03/13/2014 08:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 1Q2014 - H2S (ppm) Linearity Test				
11	03/21/2014 06:00	03/21/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
12	05/02/2014 08:00	05/02/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
13	05/06/2014 06:00	05/06/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
14	05/21/2014 06:00	05/21/2014 10:59	5.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
15	05/24/2014 06:00	05/24/2014 06:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
16	05/27/2014 06:00	05/27/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
17	05/29/2014 09:00	05/29/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
18	06/03/2014 07:00	06/03/2014 08:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 2Q2014 - H2S (ppm) Linearity Test				
19	06/13/2014 07:00	06/13/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
20	06/13/2014 09:00	06/13/2014 15:59	7.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
21	06/14/2014 06:00	06/14/2014 06:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
22	06/15/2014 06:00	06/15/2014 06:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
23	06/16/2014 06:00	06/16/2014 06:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: S_H2S
Parameter: S_H2S
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	01/03/2014 07:00	01/03/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
2	01/04/2014 07:00	01/04/2014 14:59	8.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
3	01/05/2014 07:00	01/05/2014 11:59	5.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
4	01/06/2014 07:00	01/06/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
5	01/11/2014 07:00	01/11/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
6	01/23/2014 08:00	01/23/2014 13:59	6.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
7	01/24/2014 07:00	01/24/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
8	01/25/2014 07:00	01/25/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
9	01/28/2014 07:00	01/28/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
10	02/01/2014 07:00	02/01/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
11	02/02/2014 07:00	02/02/2014 09:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
12	02/09/2014 06:00	02/09/2014 13:59	8.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
13	02/09/2014 17:00	02/09/2014 17:59	1.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
Comments: Liquid in sampling system resulted in errant H2S concentration.				
14	02/09/2014 21:00	02/09/2014 23:59	3.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
Comments: Liquid in sampling system resulted in errant H2S concentration.				
15	02/10/2014 07:00	02/10/2014 09:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
16	02/15/2014 07:00	02/15/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
17	02/15/2014 13:00	02/16/2014 22:59	34.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
18	02/18/2014 07:00	02/18/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
19	02/20/2014 23:00	02/21/2014 03:59	5.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
Comments: Liquid in sampling system resulted in errant H2S concentration.				
20	02/21/2014 07:00	02/21/2014 10:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
21	02/21/2014 20:00	02/22/2014 00:59	5.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
Comments: Liquid in sampling system resulted in errant H2S concentration.				
22	02/22/2014 03:00	02/22/2014 05:59	3.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
Comments: Liquid in sampling system resulted in errant H2S concentration.				

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: S_H2S
Parameter: S_H2S
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
46	06/18/2014 06:00	06/18/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
47	06/23/2014 06:00	06/23/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
48	06/26/2014 06:00	06/26/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER

Number of Events: 48
Total Duration: 236.00 hours

CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	220
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	**222**
3. [Total CMS Downtime] x (100) / [Total source operating time]	**5.11%**

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FLARE

Parameter: H2SCONC

Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description

CMS Performance Summary [a]

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	64
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	12
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	**76**
3. [Total CMS Downtime] x (100) / [Total source operating time]	**1.7%**

[a] Downtime occurring prior to CEMS certification not included in Performance Summary.

TABLE 1
Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 01/01/2014 00:00 Through 06/30/2014 23:59

Time Online Criteria: 1 minute(s)

Source: SRUFLARE
Parameter: H2SCONC
Interval: 001H

Operating Hours: 4,344.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
24	06/09/2014 04:00	06/09/2014 04:59	1.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
25	06/10/2014 04:00	06/10/2014 04:59	1.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
26	06/11/2014 04:00	06/11/2014 04:59	1.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
27	07/07/2014 19:00	07/08/2014 03:59	9.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
28	07/08/2014 05:00	07/08/2014 18:59	14.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER

Number of Events: 28
Total Duration: 164.00 hours

CMS Performance Summary [a]

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	132
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	32
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	**164**
3. [Total CMS Downtime] x (100) / [Total source operating time]	**3.8%**

[a] Downtime occurring prior to CEMS certification not included in Performance Summary.

Attachment A
Excess Emissions Summary for the Reporting Period

Monroe Energy, LLC – Trainer Refinery

Semianual Reporting Period Excess Emission Summary

Reporting Period: January 01, 2014 - June 30, 2014

Source	Operating Time (hrs)	Pollutant	Emission Standard				Excess Emissions		Comments
			Limit	Units	Averaging Period	Average Type	Duration (hrs)	Percentage of Operating Time (%)	
Claus Sulfur Recovery Plant (SRU) [Source ID 102]	4,344.00	SO_2	250	ppmvd @ 0% O_2	12-hour	Rolling	0.00	0.00%	
North Side Fuel Gas System (RFG) [Source FM002]	4,344.00	H_2S	162	ppmvd @ 0% O2	3-hour	Rolling	0.00	0.00%	
Southside Fuel Gas System: Amine Fuel Gas System [SourceID FM006] Naphtha Fuel Gas System [Source ID FM003] ISO LPS Fuel Gas System [Source ID FM004]	4,344.00	H_2S	162	ppmvd @ 0% O2	3-hour	Rolling	0.00	0.00%	
FCCU Unit [Source ID 101]	4,344.00	NO_X	500	ppmvd @ 0% O_2	3-hour	Rolling	0.00	0.00%	
			155.3	ppmvd @ 0% O_2	7-day	Rolling	0.00	0.00%	This limit applies at all times when the FCCU and/or CO boiler are operating, except during periods of startup, shutdown, or malfunction.
			121.1	ppmvd @ 0% O_2	365-day	Rolling	0.00	0.00%	This limit applies at all times when the FCCU and/or CO boiler are operating.
			654.5	tons/year	12-month	Rolling Sum	0.00	0.00%	
		CO	500	ppmvd @ 0% O_2	1-hour	Block	0.00	0.00%	
			434.1	tons/year	12-month	Rolling Sum	0.00	0.00%	
		SO_2	50	ppmvd @ 0% O_2	7-day	Rolling	0.00	0.00%	
			25	ppmvd @ 0% O_2	365-day	Rolling	0.00	0.00%	
			165.8	tons/year	12-month	Rolling Sum	0.00	0.00%	
		Opacity	0.08	L/G Ratio Unitless	1-hour	Block	1.00	0.02%	The refinery monitors opacity in accordance with an approved Alternate Monitoring Plan which requires the refinery to monitor the liquid-to-gas ratio (L/G) of the FCC wet gas scrubber.
Source Gas Flare [Source ID 121]	4,344.00	H_2S	162	ppmvd @ 0% O2	3-hour	Rolling	0.00	0.00%	
Main Flare [Source ID 103]	4,344.00	SO_2	500	lb/day	24-hr	Rolling	50.00	1.15%	The refinery experienced three upset incidents during the period.