212 42-045-00070
JAN 28 2020

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

January 27, 2020

Via FedEx 777609469340

James Rebarchak
Regional Air Program Manager
PA Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Subject: Benzene Waste Operations NESHAPS
Quarterly Report: October 1, 2019 to December 31, 2019
EPA ID No. PAR 000015768

Mr. Rebarchak:

Monroe Energy, LLC, Trainer Refinery, submits this letter to fulfill the quarterly reporting requirements pursuant to 40 CFR Part 61, Subpart FF, §61.357(d).

During this reporting period, the Crude Oil Desalter Brine Treatment Unit (BTU) was monitored as required by 40 CFR §61.354(a)(1). Monthly samples were collected in October, November, and December. Measured benzene concentration in the BTU effluent remained less than 10 ppmw (10 mg/L) Flow Weighted Annual Average during the reporting period.

In addition to the above, all other required monitoring and inspections have been completed in accordance with the requirements of the aforementioned section.

If you have any questions about this report, please call myself at (610) 364-8399, or Ian Moyer at (610) 364-8116.

Thank you,

Matthew Torell, P.E.
Environmental Leader

Cc: Office of Air Enforcement & Compliance Assistance
U.S. EPA, Region 3
Mail Code 3AP20
1650 Arch Street
Philadelphia, PA 19103-2029
Via FedEx 77609516110

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

Responsible Official Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

1/27/20

Mark Schuck,
VP, Refinery Operations

ALS Environmental

301 Fulling Mill Road - Middletown, PA 17057 - Phone: 717-944-5541 - Fax: 717-944-1430 - www.alsglobal.com

NELAP Certifications: NJ PA010, NY 11759, PA 22-293 DoD ELAP: PJ LA 74618
State Certifications: FL E871113, WA C999, MD 128, VA 460157, WV DW 9961-C, WV 343

ANALYTICAL RESULTS

Workorder: 3074260 N083262

Lab ID: **3074260005** Date Collected: 12/3/2019 09:55 Matrix: Ground Water

Sample ID: **N083262-05** Date Received: 12/6/2019 21:00

Parameters	Results	Flag	Units	RDL	Method	Prepared	By	Analyzed	By	Cntr
VOLATILE ORGANICS										
Acetone	ND	1.2	ug/L	10000	SW846 8260C			12/11/19 05:26	VLM	A
Benzene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Bromochloromethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Bromodichloromethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Bromoform	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Bromomethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
2-Butanone	ND		ug/L	10000	SW846 8260C			12/11/19 05:26	VLM	A
Carbon Disulfide	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Carbon Tetrachloride	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Chlorobenzene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Chlorodibromomethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Chloroethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Chloroform	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Chloromethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Cyclohexane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,2-Dibromo-3-chloropropane	ND		ug/L	7000	SW846 8260C			12/11/19 05:26	VLM	A
1,2-Dibromoethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,2-Dichlorobenzene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,3-Dichlorobenzene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,4-Dichlorobenzene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Dichlorodifluoromethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,1-Dichloroethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,2-Dichloroethane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,1-Dichloroethene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
cis-1,2-Dichloroethene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
trans-1,2-Dichloroethene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
1,2-Dichloropropane	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
cis-1,3-Dichloropropene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
trans-1,3-Dichloropropene	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Ethylbenzene	11800		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Freon 113	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
2-Hexanone	ND		ug/L	5000	SW846 8260C			12/11/19 05:26	VLM	A
Isopropylbenzene	7750		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Methyl acetate	ND		ug/L	2000	SW846 8260C			12/11/19 05:26	VLM	A
Methyl cyclohexane	1620		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A
Methyl t-Butyl Ether	ND		ug/L	1000	SW846 8260C			12/11/19 05:26	VLM	A

NELAC NJ11005
EPA NJ01186
PADEP 68-05417
NYDOH NY12046
CTDPH PH-0143

New Jersey Analytical Laboratories
NJAL

380 Scotch Road
Ewing, NJ 08628
609-737-3477 (p)
www.njal.com

Lab ID: N081623-05

Matrix: Wastewater

Date Collected: 10/01/19 11:50

Sample ID: Ship Dock Pan

Date Received: 10/02/19 11:00

Volatile Organic Compounds by SW846 Method 8260C

Analyte	Results	Flag	Units	MDL	RDL	Method	Analyzed	Prepared	Dilution
Acrolein	ND	U, D	ug/L	9300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Acrylonitrile	ND	U, D	ug/L	18300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Allyl chloride	ND	U, D	ug/L	7800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Benzene	ND	U, D	ug/L	6100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Bromobenzene	ND	U, D	ug/L	13000	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Bromochloromethane	ND	U, D	ug/L	9300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Bromodichloromethane	ND	U, D	ug/L	14900	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Bromoform	ND	U, D	ug/L	14000	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Bromomethane	ND	U, D	ug/L	11100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
n-Butylbenzene	ND	U, D	ug/L	6100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
sec-Butyl Benzene	ND	U, D	ug/L	2300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
tert-Butylbenzene	ND	U, D	ug/L	4100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
n-Butyl Benzene	ND	U, D	ug/L	4400	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Carbon disulfide	ND	U, D	ug/L	17900	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Carbon Tetrachloride	ND	U, D	ug/L	9200	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Chlorobenzene	ND	U, D	ug/L	8400	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
2-Chloroethylvinyl ether	ND	U, D	ug/L	9200	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Chloroethane	ND	U, D	ug/L	4800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Chloroform	ND	U, D	ug/L	10800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Chloromethane	ND	U, D	ug/L	5600	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
4-Chlorotoluene	ND	U, D	ug/L	5700	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
2-Chlorotoluene	ND	U, D	ug/L	7300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Cyclohexane	ND	U, D	ug/L	2800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
2-Chlorovinyl ether	ND	U, D	ug/L	5200	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Dibromochloromethane	ND	U, D	ug/L	15700	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,2-Dibromoethane	ND	U, D	ug/L	15100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Dibromomethane	ND	U, D	ug/L	14300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
trans-1,4-Dichloro-2-butene	ND	U, D	ug/L	5200	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,3-Dichlorobenzene	ND	U, D	ug/L	8800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,4-Dichlorobenzene	ND	U, D	ug/L	11400	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,2-Dichlorobenzene	ND	U, D	ug/L	10900	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
Dichlorodifluoromethane	ND	U, D	ug/L	11300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,1-Dichloroethane	ND	U, D	ug/L	9600	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,2-Dichloroethane	ND	U, D	ug/L	17800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
cis-1,2-Dichloroethene	ND	U, D	ug/L	3800	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,1-Dichloroethene	ND	U, D	ug/L	7100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
trans-1,2-Dichloroethene	ND	U, D	ug/L	6300	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,2-Dichloropropane	ND	U, D	ug/L	7700	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,3-Dichloropropane	ND	U, D	ug/L	17100	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
2,2-Dichloropropane	ND	U, D	ug/L	7500	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
cis-1,3-Dichloropropene	ND	U, D	ug/L	12400	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000
1,1-Dichloropropene	ND	U, D	ug/L	4200	25000	EPA 8260C	10/13/19 08:02	10/11/19 18:30	10000

New Jersey Analytical Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Allen Thomas, Lead Technical Director