

MOTIVA

ENTERPRISES LLC

October 2, 2008

VIA FAX

Louisiana Department of Environmental Quality
 Post Office Box 4312
 Baton Rouge, Louisiana 70821-4312
 ATTENTION - EMERGENCY AND RADIOLOGICAL SERVICES DIVISION - SPOC
 "UNAUTHORIZED DISCHARGE NOTIFICATION REPORT"
 Fax: 225-219-4044

SUBJECT: 40 CFR PART 70 GENERAL CONDITION N NOTIFICATION
Excess Emissions from Tail Gas Treating Unit #2 (TGTU-2, EPN 76H-101)
MOTIVA ENTERPRISES LLC - CONVENT REFINERY (MOTIVA)
AGENCY INTEREST NO. 2719

To Whom It May Concern:

In accordance with 40 CFR PART 70 GENERAL CONDITION N (Revision 10, 03/11/04) in Motiva's Title V (Part 70) Operating Permit No. 2560-00001-V5, Motiva is providing a written notification of an apparent exceedence of the 35 lbs/hr 3-hour average sulfur dioxide (SO₂) emission rate limit in Part 70 Specific Condition No. 6 for Tail Gas Treating Unit #2 (TGTU-2, EPN 76H-101) on September 19, 2008. Motiva discovered the potential violation of the 35-lb/hr 3-hour SO₂ average at approximately 4:30 p.m., on September 29, 2008. This notification also serves to reserve an affirmative defense claim due to the occurrence of an *upset* as defined in LAC 33:III.507.J.1.

The potential exceedence listed above did not cause an *emergency condition* as defined in LAC 33:I.3905 (last revised November 2000).

On September 19, 2008, at approximately 9:52 a.m., there was an apparent exceedence of the 35-lbs/hr 3-hour average sulfur dioxide (SO₂) emission rate limit. Motiva believes the cause of the incident was due to insufficient oxygen (O₂) supply to the Sulfur Recovery Unit (SRU) when additional feed was being added to the unit. Without a sufficient amount of O₂ in the SRU, a full conversion of H₂S to SO₂ and water (H₂O) could not take place. The H₂S that did not convert, was carried to the Tail Gas Treating Unit (TGTU) No. 2 (TGTU-2) and combusted with air to form SO₂. This resulted in SO₂ emissions in excess of permitted limits.

Also on September 19, 2008, at approximately 9:42 p.m., there was an apparent exceedence of the 35-lbs/hr 3-hour average sulfur dioxide (SO₂) emission rate limit. Motiva believes the cause of the incident was due a low level of sulfur in the Sulfur Recovery Unit (SRU) sulfur pit. A low level of sulfur in the pit and normal heat delivery from the pit steam coils resulted in vaporization and immediate condensation of the liquid sulfur. Some of these sulfur droplets were educted to the TGTU incinerator and combusted to form SO₂.

Due to the circumstances noted above, Motiva is reserving a claim of an affirmative defense because this incident may have been due to the occurrence of an *upset* as defined in

Hwy 70, Rt. 44

P.O. Box 37

Convent, LA 70723

Phone: (225) 562-7681

File Code: 2E04

LAC 33:III.507.J.1. Note that Motiva is still investigating this incident. In the applicable deviation report required by 40 CFR Part 70 General Condition R.3 (Revision 10, last revised 3/11/04), Motiva will continue to reserve a claim of an affirmative defense for this exceedence, or report this exceedence without reserving a claim of an affirmative defense if the investigation concludes the exceedence was not due to the occurrence of an upset.

At the time the upset occurred and throughout the incident, the facility was operated properly. This letter meets the notification requirements of General Condition N. Please note this incident did not result in a Reportable Quantity (RQ) exceedence and did not cause an *emergency condition* as defined in LAC 33:I.3905.

If you have any questions regarding this matter, please contact Ms. Janna Bouvier at (225) 562-6725.

Sincerely,



Mark J. Koslicki
Environmental Manager

MJK:jab

MOTIVA
ENTERPRISES LLC

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DATE: October 2, 2008 COVER + 2 PAGES

MESSAGE TO: Emergency and Radiological Services Division - SPOC

COMPANY OR DEPARTMENT: Louisiana DEQ

LOCATION: Office of Environmental Compliance

FAX MACHINE NO.: 225-219-4044 PHONE NO: 225-219-3710

MESSAGE FROM: Janna Bouvier PHONE NO: 225-562-6725

COMMENTS

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