

1406



May 5, 2005

Shawn Deane/SENO  
505-1423  
T78747

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Department of Public Safety and Corrections  
Office of State Police  
TESS - Right-to-Know Unit  
P. O. Box 66614  
Baton Rouge, LA 70896

**SUBJECT: PRELIMINARY RELEASE REPORT: MAY 3, 2005  
STATE POLICE CASE # 05-02910  
NRC # 757-579  
LDEQ AGENCY INTEREST #1406  
MOTIVA ENTERPRISES, LLC - NORCO REFINERY  
HYDROCRACKER, COKER, CR-1 AND NHT UNITS**

In accordance with the authorities listed below, Motiva Enterprises, LLC - Norco Refinery is providing a preliminary follow-up report to our verbal notification on May 3, 2005 at 1410 hours of a release of nitrogen oxides and sulfur dioxide. Data gathering to perform calculations and determine root causes is ongoing. A final written follow-up report will be issued after this work has been completed.

Authorities:

LAC 33:V.10111  
LAC 33:I.3925.A  
40 CFR 355.40(b)(3)  
Title V Permit No. 2510-V1, Part 70 General Condition XI  
Title V Permit No. 2510-V1, Louisiana General Condition R

If you have any questions regarding this matter, please contact Lori Downs at (504) 465-6186.

Sincerely,

Soy Tir  
Manager - Environmental

LSD/mse

RECEIVED

MAY 11 2005

DEQ  
Single Point of Contact

RECEIVED

MAY 10 2005

OFFICE OF  
ENVIRONMENTAL COMPLIANCE  
ENFORCEMENT DIVISION

cc:

W/Attachment

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tab Troxler  
St. Charles Parish Emergency Planning Committee  
P. O. Box 302  
Hahnville, LA 70057

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Louisiana Department of Environmental Quality  
P.O. Box 4312  
Baton Rouge, LA 70821-4312  
ATTN: SURVEILLANCE DIVISION – S.P.O.C.  
“UNAUTHORIZED DISCHARGE NOTIFICATION REPORT”

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Peggy Hatch, Administrator  
Office of Environmental Compliance  
Louisiana Department of Environmental Quality  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

CERTIFIED MAIL - RETURN RECEIPT

Louisiana Department of Environmental Quality  
Southeast Regional Office  
201 Evans Road, Bldg. 4, Suite 420  
New Orleans, LA 70123-5230

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

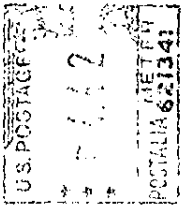
ERNS Coordinator (6E-EP)  
U. S. Environmental Protection Agency, Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

**CERTIFIED MAIL**



7004 2510 0006 2819 9132

*SPAC*



**MOTIVA**

ENTERPR SES LLC

15536 River Road P.O. Box 10 Norco, LA 70079

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Peggy M. Hatch, Administrator  
Louisiana Department of Environmental Quality  
Office of Environmental Compliance-Enforcement Division  
P. O. Box 4312  
Baton Rouge, LA 70821-4312

70821+4312 37

June 16, 2005

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TESS - Right-to-Know Unit  
P. O. Box 66614  
Baton Rouge, LA 70896

*Shawn Deane/SEN  
505-1423  
T 78747*

**RECEIVED**

JUN 20 2005

OFFICE OF  
ENVIRONMENTAL COMPLIANCE  
ENFORCEMENT DIVISION

**SUBJECT: FINAL RELEASE REPORT: MAY 3, 2005  
STATE POLICE CASE # 05-02910  
NRC # 757-579  
LDEQ AGENCY INTEREST #1406  
MOTIVA ENTERPRISES, LLC - NORCO REFINERY  
HYDROCRACKER, COKER, CR-1 AND NHT UNITS**

In accordance with the authorities listed below, Motiva Enterprises, LLC - Norco Refinery is providing the final follow-up report to our verbal notification on May 3, 2005 at 1410 hours of a release of nitrogen oxides and sulfur dioxide due to a loss of instrument air and resulting shutdown of several operating units. A preliminary report was submitted on May 5, 2005, stating that a final report would be issued after data gathering was complete.

Authorities:

LAC 33:V.10111  
LAC 33:I.3925.A  
40 CFR 355.40(b)(3)  
Title V Permit No. 2510-V1, Part 70 General Condition XI  
Title V Permit No. 2510-V1, Louisiana General Condition R

Final calculations confirm that the permitted limit at the HCU Flare (EPN 4-84) for sulfur dioxide was exceeded. Also, calculations confirm that the permitted limit for VOCs was exceeded at the Coker Flare (EPN 2-84). No reportable quantities were exceeded. Notification and release information are detailed in the attached.

If you have any questions regarding this matter, please contact Lori Downs at (504) 465-6186.

Sincerely,



Soy Tir  
Manager - Environmental

LSD/mse

**RECEIVED**

JUN 21 2005

DEQ  
Single Point of Contact

*1406 SPOC*

cc:

W/Attachment

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ERNS Coordinator (6E-EP)  
U. S. Environmental Protection Agency, Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

**MOTIVA ENTERPRISES, LLC  
RELEASE NOTIFICATION FORM**

I.

**Company Name** MOTIVA ENTERPRISES, LLC – NORCO REFINERY  
**Physical Location** 15536 River Road, St. Charles Parish  
**Street or P. O. Box** P.O. Box 10  
**City, State, Zip** Norco, Louisiana 70079  
**Telephone** (504) 465-6274 (Soy Tir)

II. **Date and Time of Verbal Notifications:**

Initial Verbal Contact				
Agency	Contact	Date/Time	Shell/Caller	Case #
State Police	Angie	05/03/2005 @ 1410	EA Robinson	05-02910
LDEQ (via State Police)	Angie	05/03/2005 @ 1410	EA Robinson	N/A
EOC	Brandon	05/03/2005 @ 1357	EA Robinson	N/A
NRC	Threatt	05/03/2005 @ 1416	EA Robinson	757-579

Follow-up Verbal Contact				
Agency	Contact	Date/Time	Shell/Caller	Case #
State Police	Angie	05/04/2005 @ 1331	JP LeSaicherre	05-02910
LDEQ (via State Police)	Angie	05/04/2005 @ 1331	JP LeSaicherre	N/A
EOC	Brandon	05/04/2005 @ 1330	JP LeSaicherre	N/A
State Police	Tara	05/05/2005 @ 1413	JP LeSaicherre	05-02910
LDEQ (via State Police)	Tara	05/05/2005 @ 1413	JP LeSaicherre	N/A
EOC	Brandon	05/05/2005 @ 1412	JP LeSaicherre	N/A
State Police	Walter	05/06/2005 @ 1450	WP Gauthreaux	05-02910
LDEQ (via State Police)	Walter	05/06/2005 @ 1450	WP Gauthreaux	N/A
EOC	Arron	05/06/2005 @ 1455	WP Gauthreaux	N/A
State Police	Lashanda	05/07/2005 @ 1520	WP Gauthreaux	05-02910
LDEQ (via State Police)	Lashanda	05/07/2005 @ 1520	WP Gauthreaux	N/A
EOC	Brandon	05/07/2005 @ 1521	WP Gauthreaux	N/A
State Police	Catherine	05/08/2005 @ 1545	WP Gauthreaux	05-02910
LDEQ (via State Police)	Catherine	05/08/2005 @ 1545	WP Gauthreaux	N/A
EOC	Brandon	05/08/2005 @ 1546	WP Gauthreaux	N/A
State Police	Angie	05/09/2005 @ 1520	WP Gauthreaux	05-02910
LDEQ (via State Police)	Angie	05/09/2005 @ 1520	WP Gauthreaux	N/A
EOC	Jason	05/09/2005 @ 1525	WP Gauthreaux	N/A
State Police	Linda	05/10/2005 @ 2307	JP LeSaicherre	05-02910
LDEQ (via State Police)	Linda	05/10/2005 @ 2307	JP LeSaicherre	N/A
EOC	Jim	05/10/2005 @ 2305	JP LeSaicherre	N/A
State Police	Lashanda	05/11/2005 @ 2250	WP Gauthreaux	05-02910

Follow-up Verbal Contact (continued)				
Agency	Contact	Date/Time	Shell Caller	Case#
LDEQ (via State Police)	Lashanda	05/11/2005 @ 2250	WP Gauthreaux	N/A
EOC	Steve	05/11/2005 @ 2251	WP Gauthreaux	N/A
State Police	Traci	05/13/2005 @ 0311	WP Gauthreaux	05-02910
LDEQ (via State Police)	Traci	05/13/2005 @ 0311	WP Gauthreaux	N/A
EOC	Dee	05/13/2005 @ 0313	WP Gauthreaux	N/A
State Police	Charlie	05/13/2005 @ 1621	RL Cooper	05-02910
LDEQ (via State Police)	Charlie	05/13/2005 @ 1621	RL Cooper	N/A
EOC	Steve	05/13/2005 @ 1605	RL Cooper	N/A

### III. Release Start/End Time

Date/Time Start	Date/Time End	If Not Ended, Anticipated End Time	Weather Conditions During Release
05/03/2005 @ 1340	05/13/2005 @ 1315	N/A	78°F; NE winds at 10 mph

### IV. Release Event Description

On May 3, 2005, the Coker, Hydrocracker, and CR-1 process units unexpectedly shut down due to a loss of 100# instrument air. The 100# instrument air block valve on the line supplying the Coker, Hydrocracker, and CR-1 was mistakenly closed. An operator was instructed to close the 2" soft water valve for maintenance to repair a leak, and the operator mistakenly identified the 2" 100# instrument air valve as the 2" soft water valve. The instrument air system is operated and maintained by Shell Chemical LP – Norco Chemical Plant – East Site personnel. Motiva has no operational control over the instrument air system.

The release did not result in an emergency condition. There were no fires, fatalities, injuries or road closures.

#### V.a. Material Released

Name	CAS Number	US DOT Hazard Class.	EHS ?	Physical State	RQ Standard	Applicable RQ(s) (lbs)	Amount Released (lbs)
Sulfur Dioxide <sup>1</sup>	7746-09-5	N/A	Yes	Gas	SARA	500	296.24
VOC's	N/A	N/A	No	Gas	DEQ, State Police	5000	1303.74

<sup>1</sup> Sulfur dioxide release estimates are based on an assumption of 100% conversion of hydrogen sulfide to sulfur dioxide during combustion.

**V.b. Permitted Source Emissions (if applicable):**

<b>Emission Point (EPN)</b>	<b>Pollutant</b>	<b>Permit Limit Avg (lb/hr)</b>	<b>Permit Limit Max (lb/hr)</b>	<b>Event Duration (hr)</b>	<b>Total Quantity Released by Event (lbs)</b>	<b>Amount Released Above Permitted Quantity** (lbs)</b>
HCU Flare FE-301 (4-84)	Sulfur Dioxide	0.61	7.99	6	318.50	296.24
Coker Flare FE-401 (2-84)	Total VOCs	2.42	17.04	5	1376.84	1303.74

\*\* This is the quantity of material released above permitted maximum emission rates. It is this number – summed for each pollutant – which Motiva evaluates against reportable quantities in the table in Section V.a of this report. It is calculated using the formula below. Finally, the maximum permitted emissions allowed at the source is subtracted to yield the amount emitted above the permitted limit. If the number is negative, then a zero is entered (no emissions above the permitted rate).

*Amount Released Above Permitted Quantity = Total Quantity Released by Event (lb) + [(Permit Limit Average, lb/hr) x (Duration, hr)] – [(Permit Limit Maximum, lb/hr) x (Duration, hr)]*

**V.c. Description of methodology used for calculations and estimates:**

Emission calculations were performed using process knowledge, stream speciation, and physical properties, and appropriate AP-42 emission factors.

**VI. Statement of actual or probable fate or disposition of the material:**

The material was released to air and dispersed naturally. No adverse offsite impact occurred. No road closure or evacuation was required.

**VII. Immediate remedial or corrective actions taken, or to be taken, to stop the release and/or to recover pollutants**

The affected operating units were safely shut down until the instrument air situation was brought back into control.

**VIII. Procedures or measures which have or will be adopted to prevent recurrence of the incident or similar incidents**

Motiva was informed by Shell Chemical that they would verify that all plot edge valves have proper identification tags attached to them. Shell Chemical will also ensure operations personnel are trained in unit isolation procedures annually. A method or process for better line identification will also be developed by Shell.

**IX. If an unpermitted or unlicensed site or facility was involved in the release, a schedule for submitting a permit or license application to the department, or rationale for not requiring a permit or license:**

No unpermitted or unlicensed facility was involved in this release.



**X. Reporting party's status/other responsible parties:**

Motiva Enterprises LLC, Norco Refinery is the owner and operator of the Coker Flare, HCU Flare, CR-1 Unit, HCU Unit, and Coker Unit. Shell Chemical LP – Norco Chemical Plant – East Site is the operator of the Utilities instrument air system.

**XI. A determination of whether or not the release was preventable; if not, an explanation of why the release was not preventable.**

This release was not preventable by Motiva since Motiva does not have operational control over the instrument air system or Shell Chemical operators.

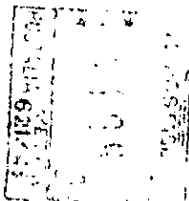
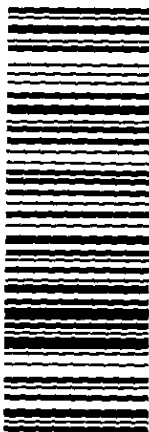
**CERTIFIED MAIL™**

**MOTIV**

ENTERPRISES LLC

15536 River Road P.O. Box 10 Norco, LA 70079

7004 251D 0006 2819 9095



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