

November 3, 2006

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

*506-3341
T 916 41
Jammy Janyal
5ERO / BLRO
At Charles*

**SUBJECT: FOLLOW-UP RELEASE REPORT: OCTOBER 25, 2006
STATE POLICE CASE # 06-06655
MOTIVA ENTERPRISES, LLC – NORCO REFINERY
AGENCY INTEREST #1406**

Dear Sir/Madam:

In accordance with the authorities listed below, Motiva Enterprises LLC, Norco Refinery is providing a follow-up report of a potential permit limit exceedence from the West Ops Ground Flare (EPN #9-84). This release was called in under the Shell Chemical facility on October 25, 2006 at 1533 hours flaring of off specification untreated dry gas by Shell Chemical's GO-1 process unit. A preliminary letter was submitted November 1, 2006 stating a final written report would be issued upon completion of calculations and incident investigation.

Authorities:

LAC 33:V.10111
LAC 33:I.3925.A
CFR 355.40(b)(3)
Title V Permit 2510-VI, General Condition XI and General Condition R

Final calculations confirm that no reportable quantities were exceeded. The maximum permitted emission rate for sulfur dioxide was exceeded. The details of the release are contained in the attached report. If you have any questions regarding this matter, please contact G. M. Friloux at (504) 465-7443 or Tim Aymond at (504) 465-6298.

I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this report, including all attachments, are true, accurate, and complete.

Sincerely,



Soy Tir
Manager Environmental

GMF/mse

Attachment

RECEIVED

NOV - 6 2006

DEQ
Single Point of Contact

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
Mr. Phil Frazier, Environmental Scientist
Louisiana Department of Environmental Quality
Southeast Regional Office
201 Evans Rd, Bldg. 4, Suite 420
New Orleans, LA 70123

**SHELL CHEMICAL LP
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 | Agency Contact | Date | Time | Shell Caller | Case Number |
| EOC | Brandon | 10/25/2006 | 1531 | CS Matherne | N/A |
| State Police and DEQ | Charlie | 10/25/2006 | 1533 | CS Matherne | 06-06655 |

| Follow-up Verbal Contact | | | | | |
|---------------------------------|-----------------------|-------------|-------------|---------------------|--------------------|
| Agency | Agency Contact | Date | Time | Shell Caller | Case Number |
| EOC | Brandon | 10/26/2006 | 1413 | CS Matherne | N/A |
| State Police and DEQ | Walter | 10/26/2006 | 1414 | CS Matherne | 06-06655 |

III. **Release Start/End Time:**

| Date/Time Start* | Date/Time End* | If Not Ended, Anticipated End Time | Weather Conditions At Start Time | Duration of Flare Smoking** |
|-------------------------|-----------------------|---|---|------------------------------------|
| 10/25/2006 @ 1515 | 10/26/2006 @ 0613 | N/A | Winds Southeast @ 10 mph Temperature 73 °F Overcast | 0 mins. |

*Flaring was not continuous during this timeframe. **Neither 40 CFR 60.18(c)(1), which limits flare smoking to no more than 5 minutes in any 2 consecutive hours nor LAC 33:III.1105, which limits flare smoking to no more than 6 hours in any 10 consecutive days, were exceeded during this event for the West Ops Ground flare.

IV. **Release Event Description and Cause:**

On October 25, 2006 operational issues at the Marathon Refinery caused them to send off-specification dry-gas, high in hydrogen sulfide, to Shell Chemical's GO-1 Process Unit. A portion of the off specification dry-gas was flared at the Motiva West Operations Ground Flare to prevent contamination of downstream catalysts and an operational upset at GO-1 with potential for subsequent flaring.

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

V.a Materials Released Above a RQ:

| Name | CAS Number | US DOT Hazard Class | EHS ? | Physical State (solid, liquid, gas) | RQ Standard | RQ(s) | Amount Released (Above Permitted Quantities) |
|-----------------|------------|---------------------|-------|-------------------------------------|--------------|----------|--|
| Carbon Monoxide | N/A | N/A | No | No | State Police | 5000 lbs | 196 lbs* |
| Sulfur Dioxide | 7446-09-5 | N/A | No | Gas | SARA | 500 lbs | 10 lbs |

* Per LAC 33:III.501C.11 (AQ240E), emissions increases due solely to a change in AP-42 factors do not constitute violations of the air permit. During this incident using the permit application basis, the carbon monoxide permit limit was not exceeded.

V.b Permitted Source Emissions (if applicable):

The sources listed in the following table are permitted in AQD Permit # 2510-V1.

| Emission Point Identification (EPN) | Pollutant | Permit Limit Avg (lb/hr) | Permit Limit Max (lb/hr) | Event Duration | Total Quantity Released by Event (lbs) | **Amount Released Above Permitted Quantity (lbs) |
|---|-----------------|--------------------------|--------------------------|----------------|--|--|
| 9-84 (West Ops Ground Flare, FG-201) | CO | 1.19 | 38.28 | 1 | 233 | 196* |
| | NO _x | 16.35 | 526.28 | 1 | 43 | 0 |
| | PM | 0.38 | 12.25 | 1 | 8 | 0 |
| | VOC's | 25.18 | 868.91 | 1 | 11 | 0 |
| | SO ₂ | 0.03 | 5.79 | 1 | 15 | 10 |
| | Hexane | 0.13 | 0.31 | 1 | 0.03 | 0 |
| Total quantity of carbon monoxide released above permitted quantities = | | | | | | 196 lbs* |
| Total quantity of sulfur dioxide released above permitted quantities = | | | | | | 10 lbs |

* Per LAC 33:III.501C.11 (AQ240E), emissions increases due solely to a change in AP-42 factors do not constitute violations of the air permit. During this incident using the permit application basis, the carbon monoxide permit limit was not exceeded.

** This is the quantity of material released above permitted maximum emission rates. It is this number-summed for each pollutant- which Shell evaluates against reportable quantities in the table in section V.a of this report. It is calculated using the formula below. This formula conservatively assumes the flare is emitting at its average rate just prior to and during the event.

$$\text{Total Quantity Above Permit Limit} = \text{Total Released} - [(\text{Permit Limit}_{\text{max}} - \text{Permit Limit}_{\text{avg}}) * \text{Duration}]$$

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

Emission calculations were performed using process data and appropriate AP-42 emission factors.

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

The materials were released from the Motiva West Ops Ground Flare. No fires or fatalities resulted from this release. No road closures or evacuations were required.

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

GO-1 operations flared the off-specification dry-gas until the hydrogen sulfide had returned to acceptable levels.

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

Not applicable, the incident was not in the control of Motiva.

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. For discharges to the ground or ground water, the following information shall also be included: all information of which the reporting party is aware that indicates pollutants are migrating, including, but not limited to, monitoring well data; possible routes of migrations; and all information of which the reporting party is aware regarding any public or private wells in the area of the migration used for drinking, stock watering, or irrigation:

N/A.

XI. Reporting party's status, other responsible parties:

The West Ops Ground Flare is owned and operated by Motiva Enterprises, LLC. SCOGI Louisiana Holdings LLC and Shell Chemical LP are the owner and operator, respectively, of the GO-1 process unit. Marathon is the supplier of dry gas to Shell Chemical.

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

This incident was not preventable by Motiva Enterprises, LLC.

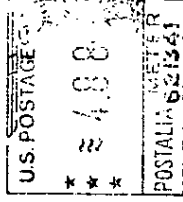
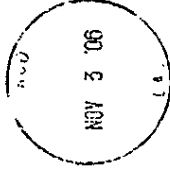
MOTIVA
ENTERPRISES LLC

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

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7004 0750 0004 1671 4976



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Louisiana Department of Environmental Quality
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