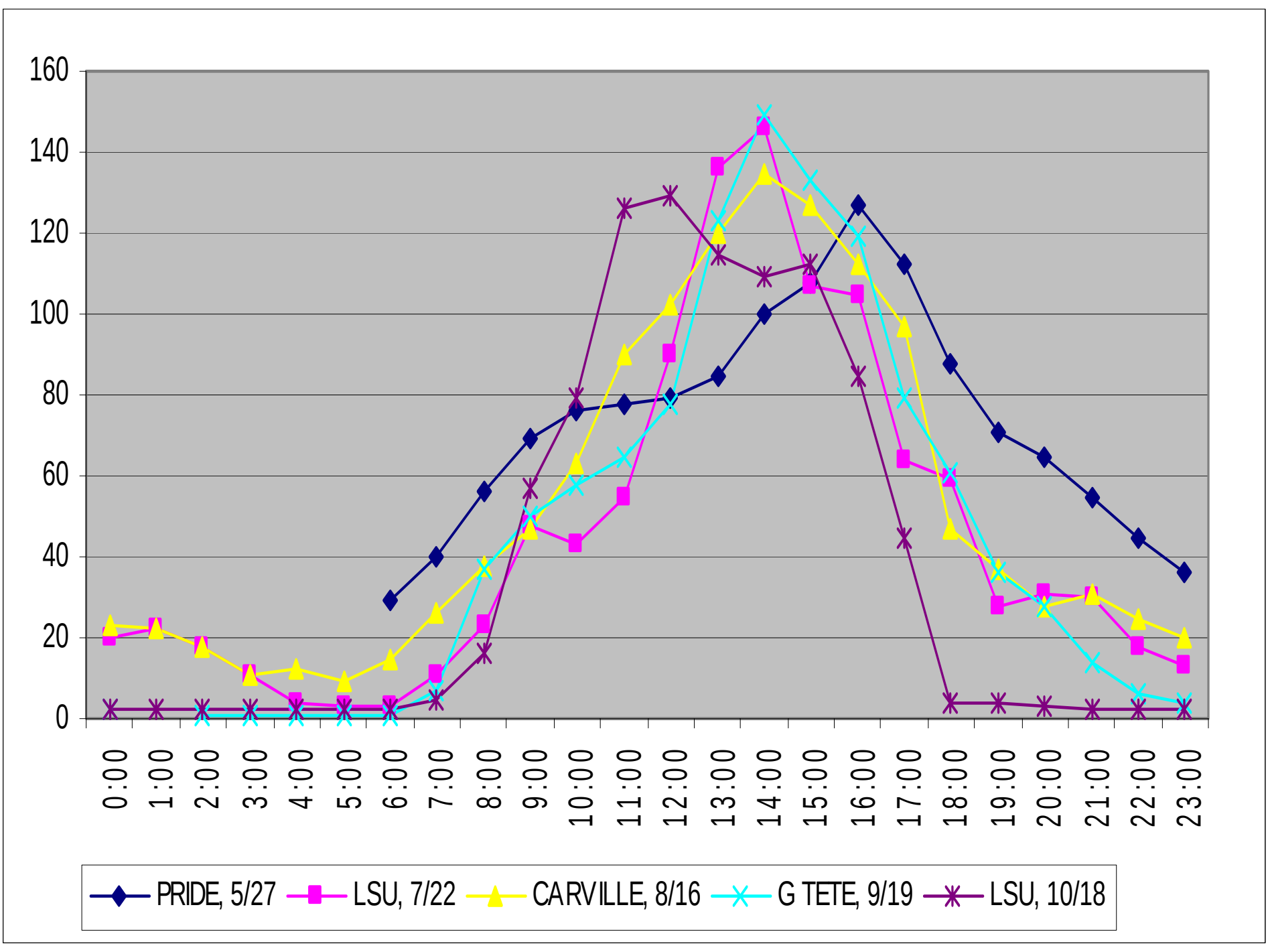
AGENDA

Welcome and Introductions
Final 2005 Ozone Results
Port Allen Episode on Jan 31, 2006
2005 Fenceline Monitoring Review
ExxonMobil Monitoring Results
Open Discussion
Adjourn

1-hr Ozone	2003	01-03	2004	02-04	2005	03-05
Baker	1	1	2	3	0	3
Capitol	2	4	1	5	0	3
LSU	3	4	1	5	2	6
Pride	0	0	0	0	1	1
Port Allen	2	3	1	4	0	3
Bayou Plaq	1	3	0	2	0	1
Carville	2	2	1	3	1	4
Grosse Tete	0	0	0	0	1	1
Dutchtown	0	0	0	0	0	0
French Set	0	0	0	0	0	0
	11	17	6	22	5	22
monitors out		2		3		2


160
140
120
100
80
60
40
20
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16:00
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18:00
19:00
20:00
21:00
22:00
23:00
PRIDE, 5/27
LSU, 7/22
CARVILLE, 8/16
G TETE, 9/19
LSU, 10/18

8hr Ozone	2003 (4th Hi)	01-03 (DV)	2004 (4th Hi)	02-04 (DV)	2005 (4th Hi)	03-05 (DV)	2006 (trigger)
Baker	**90**	84	**87**	**86**	84	**87**	84
Capitol	**89**	83	74	80	81	81	100
LSU	**100**	**86**	**91**	**89**	**97**	**96**	**67**
Pride	83	78	79	79	84	82	92
Port Allen	**89**	84	82	83	86	**85**	87
B Plaquemine	81	77	76	76	81	79	98
Carville	**91**	84	84	83	**85**	**86**	86
G Tete	**85**	79	76	78	**88**	83	91
Dutchtown	82	77	82	79	78	80	95
F Settlement	82	77	75	77	77	78	103
monitors out		1		2		4	

Consequences of Failure-to-Attain

- **Re-classification to *Moderate* (end-07)**
- **New Attainment Date – June 15, 2010**
- **Attainment SIP in 12 months (end-08)**
- **Modeled Attainment Demonstration**
- **Help? from CAIR-NOx Reductions by 09**
- **Additional Controls for NOx? VOC?**
- **New Controls by May 1, 2009**
- **Survey for Status Post Chapter 22**

Port Allen Episode-Jan 31, 2006

Review of 2005 Fenceline Monitoring

Chris Carville/Maurice Oubre
Engineering Group 1

HRVOC AOCs

HRVOC Compounds

- **1,3-Butadiene**
- **Butene and Isomers**
- **Ethylene**
- **Propylene**
- **Toluene**
- **Xylene and Isomers**

HRVOC AOCs

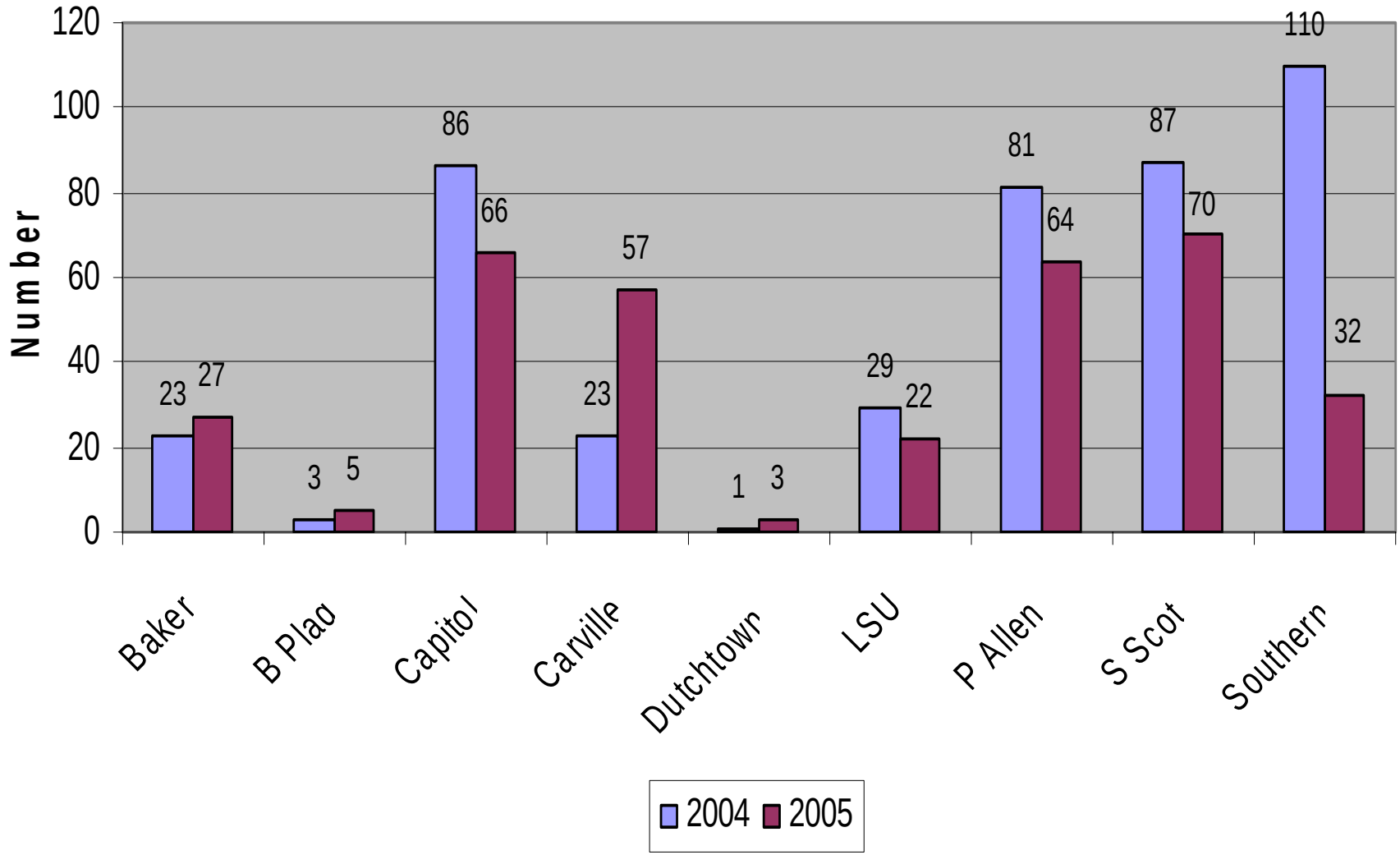
- **Issued to 15 facilities in October 2004 to install additional monitoring**
- **Monitoring began May 1, 2005**
- **Monitoring to continue for 2 years**
- **Each station has a TNMOC analyzer, either a canister system or a GC, and a met tower for wind speed and direction**
- **Data reported to DEQ monthly**

HRVOC AOCs

Strikes at DEQ Monitors in 2005

- **Decreased from 443 in 04 to 330 in 05 --- 25% Reduction (See Chart)**
- 35% Decrease in Downtown BR Area
- Slight Decrease of Significant (>100ppb) HRVOC Strikes --- 92 to 87
- Significant 13BD Strikes Dropped from 8 to 1
- Carville Increase Due to Fueling Activities in Carville Base --- Monitor to be Relocated

Strikes at DEQ Monitors by Site



HRVOC AOCs

Strikes at DEQ Monitors (continued)

- Decreased from 443 in 04 to 330 in 05 --- 25% Reduction (See Chart 1)
- **35% Decrease in Downtown BR Area**
- **Slight Decrease of Significant (>100ppb) HRVOC Strikes --- 92 to 87**
- **Significant 13BD Strikes Dropped from 8 to 1**
- **Chapter 39 RQs (see table)**

HRVOC AOCs

Chapter 39 RQs: >100lbs

	No.	Total Amt. (lbs)	>1k (lbs)	>10k (lbs)	Largest (lbs)
2003(1)	24	64,600	10	1	18,000
2004	71	250,000	25	3	66,000
2005	24	80,000	10	3	21,000

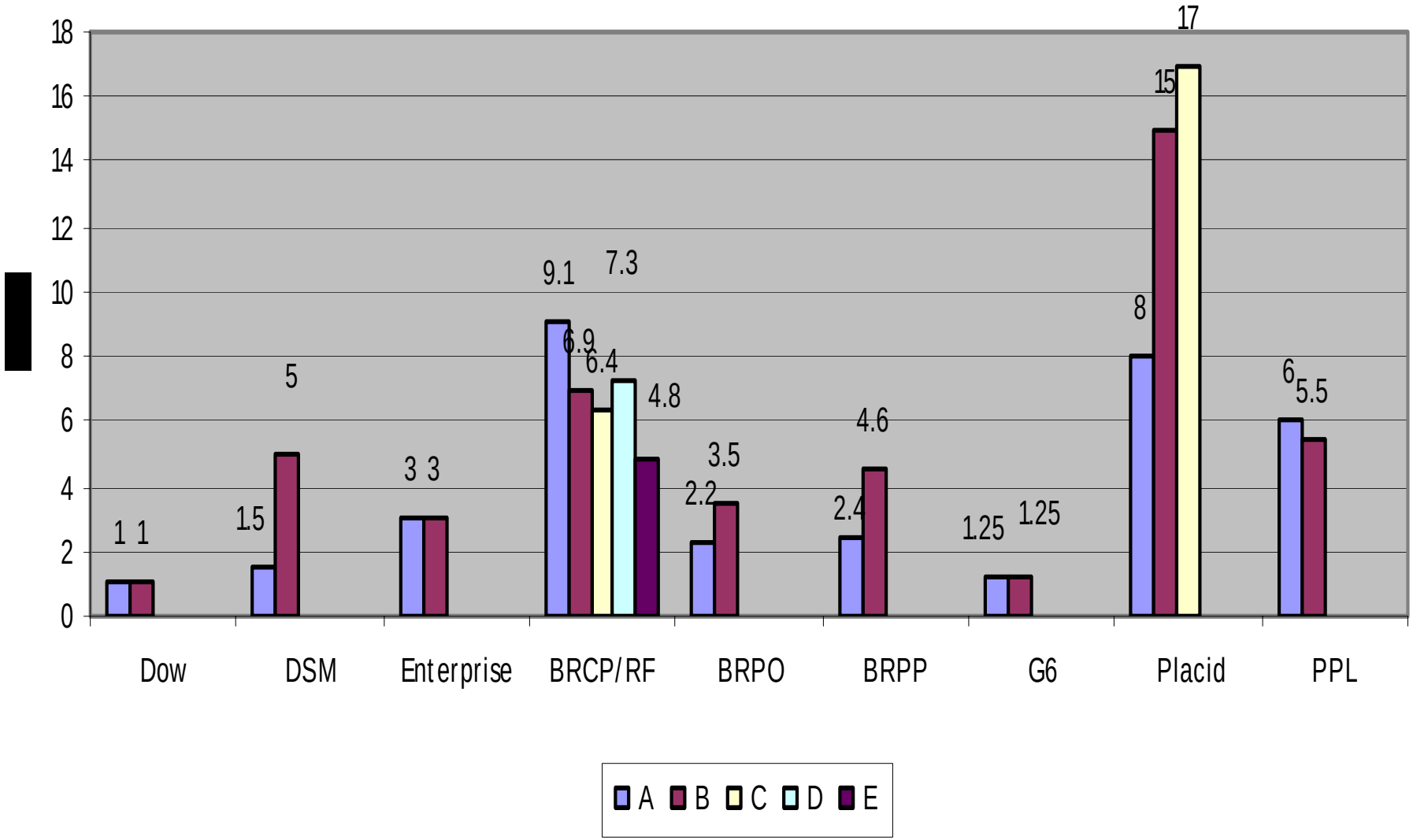
(1) From August 15

HRVOC AOCs

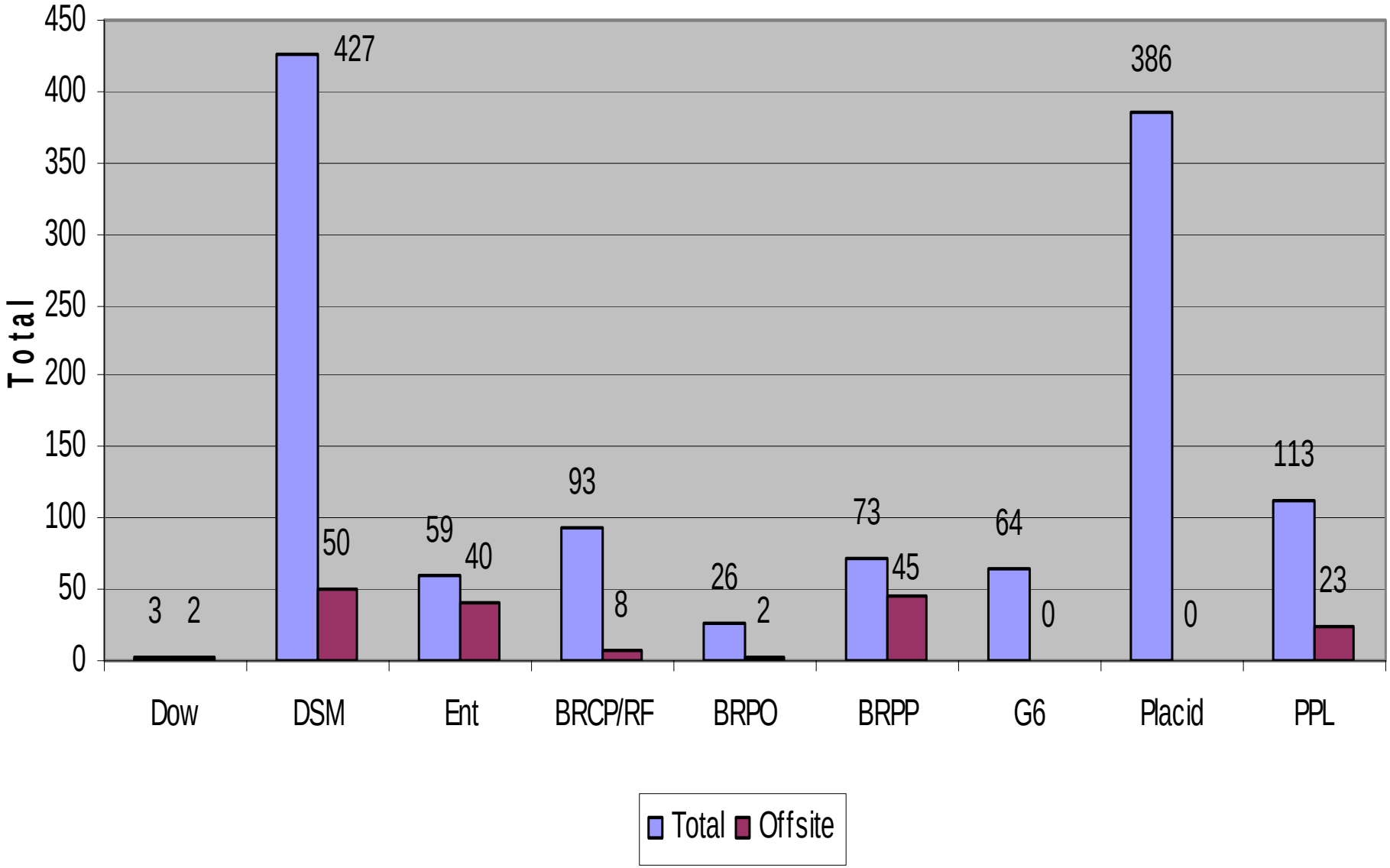
Facility Monitoring Results

- **See Chart 2 for Current Trigger Set Points**
- **See Chart 3 for Number of Strikes**
- **Plants have attributed 63% of strikes to permitted emissions.**
- **Plants located emission source – 18%**
- **BRCP/BRRF, DSM --- Most Successful in Finding Source**

2 - Strike Sample Set Point at Facilities



3 - Fenceline Strikes in 2005



HRVOC AOCs

Facility Monitoring Results

- **See Chart 2 for Current Trigger Set Points**
- **See Chart 3 for Number of Strikes**
- **Plants attributed about 50% of strikes to permitted emissions/source not located.**
- **Plants located probable source – 35%**

HRVOC AOCs

Examples of Findings

- **Blowing down level gauge**
- **Broken bolt on vessel connector**
- **Found worn gasket on guidepole**
- **Depressurizing vessel for maintenance**
- **Blown rupture disc**
- **Exchanger leaking into cooling water system**
- **Leak on reactor line**
- **Tank regulator leaking**
- **Air mover on tank**

HRVOC AOCs

Comments by Plant

Dow

- **3 Strikes --- Plant Not Upwind (2), Other - GC in calibration**
- **Trigger Set Points --- 1ppm**
- **Typical Max TNMOC --- 0.8ppm**
- **Manually Triggering Canisters Every 6th Day**

DSM (Lion)

- **427 Strikes --- SP at 5ppm (GC), 1.5 (Canister)**
- **Source Located --- 33%**

HRVOC AOCs

DSM (continued)

- **Source Not Located for Most North Strikes**
- **Sources for GC Strikes --- Operations and Maintenance Activities, Leaks**

Enterprise

- **59 Strikes --- SP at 3ppm**
- **40 Attributed to Offsite – WD at North Station Was Off by 30^0**
- **Often Flaring During Strikes**

HRVOC AOCs

BRCP/BRRF

- **93 Strikes --- SP 5 to 9ppm**
- **Source Located About 50% of Time**
- **Response Team - GC/Back-Tracking**
- **Sources Mainly Leaks, Tanks, Maintenance Activities, Loading**
- **Emissions from DPW yard**

HRVOC AOCs

BRPO

- **26 Strikes --- SP at 2 and 3.5ppm**
- **Flare often contributing to strikes.**
- **Most Strikes --- Permitted Emissions**
- **Emissions at West Monitor from Offsite**

BRPP

- **73 Strikes --- SP at 2.4 and 4.6ppm**
- **45 Offsite Strikes – Many from Plantation**
- **Most Strikes --- Permitted Emissions**

HRVOC AOCs

Geismar 6

- **64 Strikes --- SPs at 1.25**
- **Specific Source Not Found in Most Cases**
- **Refueling Activities Causing Strikes --- 65%**
- **Carville Monitor Will be Relocated**

Placid

- **386 Strikes --- SPs at 8, 15 and 17ppm**
- **Most Strikes from Normal Activities --- Tank Operations, Loading, etc**

HRVOC AOCs

Plantation

- **113 Strikes --- SP at 6 and 5.5ppm**
- **Most Attributed to Normal Operations**
- **Observed Higher Emissions with Winter-Grade Gasoline**

HRVOC AOCs

Possible Rule Changes

- **Storage and Loading Regulations**
  - **Require Better Emission Control**
  - **Inspections with Hawk Camera**

- **Flare Regulation**
  - **Limit to Emergency Use Only**
  - **Exemption for Insignificant Flaring**

The End