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August 1, 2011

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via Hand-Delivery

Re: Comments on Draft Permit PAL46 For Total Petrochemical USA, Inc.'s Port Arthur Refinery

I. INTRODUCTION

Environmental Integrity Project, the Lone Star Chapter of Sierra Club, Air Alliance Houston, and Community In-Power and Development Association, Inc. (collectively "Commenters") submit these comments regarding Draft Plant-wide Applicability Limit Permit No. 46 ("Draft Permit") for Total Petrochemicals USA, Inc.'s ("Total") Port Arthur Refinery. Commenters oppose issuance of the Draft Permit at this time, because the Commission lacks authority to issue federal Plant-wide Applicability Limits ("PAL") permits and because the Draft Permit and Total's application fail to satisfy requirements of Texas law. The Commission lacks authority to issue federal Plant-wide Applicability Limit permits, because EPA has not approved the Commission's PAL rules as part of the Texas State Implementation Plan ("SIP"). Commenters are also concerned that Total's application is incomplete, the pollutant caps in the Draft Permit are too high, and that the Draft Permit fails to require sufficient monitoring to ensure that pollutant caps in the Draft Permit are enforceable.

Total has indicated that it is willing to work with Commenters to address concerns about the Port Arthur Refinery PAL application. Commenters appreciate Total's openness to dialog with the public and look forward to working with Total to resolve concerns about its application.

However, in light of the issues discussed at length below, issuance of the Draft Permit at this time would violate both federal and Texas law. Accordingly, Commenters oppose issuance of the Draft Permit until the concerns discussed below have been resolved.

The *Environmental Integrity Project* ("EIP") is a nonpartisan, nonprofit organization dedicated to effective enforcement of environmental laws and to the prevention of political interference with those laws. EIP works closely with communities in Texas and throughout the nation seeking to enforce those laws.

The *Lone Star Chapter of the Sierra Club* is an outdoor recreation and conservation organization representing approximately 24,000 Texans and 10 regional groups from Big Bend to Houston. The Lone Star Chapter of the Sierra Club values diversity and promotes environmental education and environmental justice in its efforts to fulfill its mission to explore, enjoy, and protect our Texas natural heritage and to protect public health.

Air Alliance Houston was formed to reduce air pollution in the Houston region and protect public health and the environment through research, education, and advocacy. Air Alliance Houston focuses on improving air quality in the Houston area to protect children's health, developing community programs to address environmental justice issues, and educating children and adults in local communities about air quality issues and prevention of exposure.

Community In-Power and Development Association is a Port Arthur-based community advocacy group that focuses on environmental justice and social and economic rights issues.

II. PROCEDURAL BACKGROUND

On October 27, 2009, Total submitted an application for a state flexible permit and a federal PAL authorization. EPA disapproved the Commission's flexible permitting program under 30 Tex. Admin. Code Chapter 116, Subchapter G on June 30, 2010. Based upon concerns

about this disapproval, Total abandoned its application for a state flexible permit. However, its application for a federal PAL permit remained alive. The Executive Director ("ED") of the Texas Commission on Environmental Quality ("TCEQ" or "Commission") determined that the PAL application was technically complete and Notice of Application and Preliminary Decision was published in the Port Arthur News on July 1, 2011. EIP and other citizen groups submitted a letter to the ED, TCEQ General Counsel, and the TCEQ Commissioners on July 5, 2011 indicating that the Commission did not have authority to issue federal PAL permits, requesting that no federal PAL permit be issued by the Commission until such time as EPA has approved the Commission's PAL rules as part of the Texas SIP, and requesting additional time to review and comment upon pending PAL permit applications, including the Draft Permit.[1] On July 26, 2011, EIP received notice via Email that its request for an extension of the comment period for the Draft Permit was denied and that comments regarding the Draft Permit must be submitted by August 1, 2011.[2]

III. ISSUES

A. TCEQ Does Not Have Authority to Issue Federal PAL Permits

EPA disapproved Texas' request to incorporate its PAL rules as part of the Texas SIP because, according to EPA, the submitted rules are inconsistent with the requirements of the federal Clean Air Act.[3] Until such time as the EPA approves a revision to the Texas SIP incorporating the Commission's PAL rules, the Commission may not issue federal PAL permits. This is so because federal PAL permits issued by the Commission provide an alternative to the

[1] *See* Attachment 1, July 5, 2011 Letter to TCEQ regarding recent PAL permit applications.

[2] *See* Attachment 2, Response to the July 5, 2011 PAL letter.

[3] 75 Fed Reg. 56,424 (Sept. 15, 2010).

SIP-mandated preconstruction application process for modifications to existing major stationary sources covered by PAL permits. The federal Clean Air Act provides that, with certain exception inapplicable to the present case, states may not take any action that modifies any SIP requirement that applies to any stationary source.[4] Issuance of a federal PAL permit is an action within in the purview of this prohibition. Thus, because federal PAL permits modify SIP requirements with respect to stationary sources, the Commission does not currently have the authority to issue federal PAL permits.

Texas PAL permits that purport to excuse a stationary source from compliance with any Texas SIP requirement are ineffective and mislead the permit holder and the public about the applicability of those requirements.[5] Any owner or operator who makes modifications to an existing facility in reliance upon a Texas PAL permit may be subject to an EPA enforcement action or citizen suit in federal court if the modification triggers federal preconstruction requirements under Texas' SIP-approved rules. Moreover, unless and until the Commission's PAL rules are approved as part of the Texas SIP, the Commission's issuance of federal PAL permits is itself a violation of federal law that may give rise to an EPA enforcement action or a

[4] 42 U.S.C. § 7410(i); *In re Waste Management of Louisiana*, No. 2006 CA 1011, 2007 WL 2377337 at *3-*4. (La. App., August 22, 2007) (holding that Louisiana permitting authority improperly exempted applicant from PSD review. The agency could not rely upon exemption that was not part of the state's SIP.).

[5] *See United States v. Ford Motor Co*., 814 F.2d 1099, 1103 (6th Cir. 1987) (holding that compliance with a state court consent decree was not a defense to non-compliance with SIP emission limits because, "the original [SIP] emission limit remains fully enforceable until a revision or variance is approved by both the State and EPA"); *St. Bernard Commenters for Envtl. Quality, Inc. v. Chalmette Refining L.L.C.*, 399 F. Supp. 2d 726, 734 (E.D. La. 2005) ("Because there is no evidence that [an emergency state rule] has been approved by the EPA, it is not a valid and enforceable part of Louisiana's implementation plan, and it does not change defendant's [benzene emission limits]" in SIP-approved permits.); *United States v. General Dynamics Corp.*, 755 F. Supp. 720, 722-24 (N.D. Tex. 1991) (plaintiff's compliance with state issued, non-EPA approved "agreed board orders," whose effect was to raise the emissions limitations set by the Texas SIP, did not relieve defendant from compliance with the emission limitations of the Texas SIP); *Public Citizen v. Amer. Elec. Power Co.*, No. 5:05-CV-39-DF, 2006 WL 3813766 , at *5-6 (E.D. Tex. Dec. 27, 2006) (finding that Texas could not raise a PSD permit limit "without federal approval").

citizen suit against the Commission.[6] The Commission should not issue ineffective permits that unnecessarily expose permit holders to potential liability and mislead the public about the projects a permit holder may lawfully undertake in reliance on a TCEQ-issued permit. Accordingly, the Commission should not issue any federal PAL permits, including the Draft Permit, until the Texas PAL rules have been approved as part of the Texas SIP.

B. Texas' Revised PAL Rules Do Not Satisfy Federal Requirements for State PAL Programs

While we recognize that the Commission has revised its PAL rules in response to concerns raised by EPA in its disapproval of the Commission's initial PAL submittal, Commenters are concerned that the Commission's revised PAL rules do not satisfy all federal requirements for state PAL programs.[7] For example, the Commission revised 30 Tex. Admin. Code § 116.186(b)(9) to provide that failure to use a monitoring system required by the PAL rules is a PAL permit violation. This revision does not satisfy the 40 C.F.R. §§ 51.156(f)(12)(i)(D) and 51.166(w)(12)(i)(d) requirement that state PAL rules provide that the failure to use a required monitoring system renders a PAL *invalid*.[8] Such a provision is especially important for Texas PALs given that the Commission has improperly issued many PAL permits to Texas facilities pursuant to its disapproved rules and the PAL policy that

[6] 42 U.S.C. §§ 7404 and 7413; *Communities For A Better Environment v. Cenco Refining Co.*, 180 F.Supp.2d 1062 (C.D.Cal.,2001); *Oregon Environmental Council v. Oregon Dept. of Environmental Quality*, 775 F.Supp. 353 (D.Or.,1991).

[7] 36 Tex. Reg. 1305 (February 25, 2011) ("This rulemaking and the companion rulemaking. . .address issues identified by EPA in its September 15, 2010, final disapproval notice and ensure that TCEQ regulatory requirements regarding the NSR permitting program meet the requirements of the Federal Clean Air Act and are approvable into the SIP.")

[8] For TCEQ explanation of this revision, *see* 36 Tex. Reg. 1307. For EPA's disapproval, *see* 75 Fed. Reg. 56,433 ("There is no mandate that failure to use a monitoring system that meets the requirements of this section renders the PAL invalid, as required by 40 CFR 51.165(f)(12)(i)(D) and 51.166(w)(12)(i)(d).")

predated those rules. Such permits may not require monitoring systems that satisfy state and federal PAL requirements. Thus, PAL caps in these permits may not be practically enforceable. Making the failure to use a required monitoring system a mere permit violation is not sufficient to ensure that PAL permits are not used to circumvent federal preconstruction requirements. If PAL caps are not practically enforceable, and compliance with those caps cannot be adequately evaluated by the Commission and the public, there can be no assurance that construction undertaken in reliance upon such PAL permits does not actually cause an exceedance of PAL emission caps. In order to comply with the requirements of 40 C.F.R. §§ 51.156(f)(12)(i)(D) and 51.166(w)(12)(i)(d), Texas must revise its rules to clearly indicate that a permit holder's failure to use a required monitoring system renders its PAL permit invalid.

C. Total's Application and the Draft Permit Fail to Satisfy Texas PAL Requirements

Putting aside Commenters' concern that the Commission lacks authority to issue federal PAL permits, Commenters also object to issuance of the Draft Permit at this time, because Total's application and the Draft Permit fail to satisfy the Commission's PAL rules. Total has indicated that it is willing to work with Commenters to resolve concerns about its application, and much work remains to be done before Total's application and Draft Permit will satisfy all Texas PAL requirements.

1. Total's Application Does Not Include All Information Required by 30 Tex. Admin. Code § 116.182

In order to be granted a PAL permit, the applicant must submit an application that includes all information specified by 30 Tex. Admin. Code § 116.182.[9] As Commenters explain

[9] 30 Tex. Admin. Code § 116.182 ("In order to be granted a PAL permit.. . .the owner or operator of the proposed facility shall submit information to the commission that demonstrates all of the following information is submitted[.]")

in detail below, Total's application does not fulfill this requirement. Until Total supplements its application as indicated below, the Draft Permit may not properly issue.

30 Tex. Admin. Code § 116.182(1) states that PAL applications must include "a list of all facilities, or emissions units at a major stationary source, that emit the PAL pollutant, including their registration or permit number, their potential to emit, and the expected maximum capacity. In addition, the owner or operator of the source shall indicate which, if any, federal or state applicable requirements, emission limitations, or work practices apply to each unit."

Total's EPN Summary, included as part of Appendix C to its application, includes a list of some NSR permits (including emission limits) for emission units covered by the PAL. However, this list is incomplete and does not identify Permit By Rule authorizations, Standard Permits, and emissions authorized under those permits. Total must supplement its application to identify all permits and limits applicable to emissions units for those pollutants covered by the PAL.

Total's PAL application does not include specific information about other federal and state requirements, emission limitations (including those required under the Texas SIP and EPA consent decrees), or work practices that apply to emission units covered by the Draft PAL. Without such information, it is not possible to determine whether the PAL caps and monitoring provisions proposed in the Draft Permit are consistent with existing emission limits and operational constraints for the Port Arthur Refinery.

Until Total supplements its application to include all information required under 30 Tex. Admin. Code § 116.182(1), the ED will not have a sufficient basis on which it may be determined that Total's proposed baseline actual emissions have been adjusted downward to

exclude emissions that would constitute a violation of currently enforceable emission limits as required by 30 Tex. Admin. Code § 116.12(3)(B).

30 Tex. Admin. Code § 116.182(2) states that PAL applications must include "calculations of the baseline actual emissions with supporting documentation."

While Appendix C of Total's application does include some information about the emission calculations used to establish the Draft Permit PAL caps, information sufficient to determine whether the proposed Caps were properly calculated is not included in the application.

According to the Emissions Calculations section in Appendix C, various adjustments were made to reported actuals during the baseline period. For each pollutant, the total adjustment made across all emission units is listed in Table 3-1 of the application.

Table 3-1 Summary of Baseline Actual Emissions

Pollutant	First Calendar Year			Second Calendar Year			Baseline Actual Emissions (tpy)
	AEI (tpy)	Adjustments (tpy)	Adjusted Emissions (tpy)	AEI (tpy)	Adjustments (tpy)	Adjusted Emissions (tpy)	
VOC[1]	1,234.29	155.19	1,389.48	1,137.32	263.93	1,401.25	1,395.36
PM/PM_{10}[1]	190.28	431.21	621.49	198.71	419.98	618.69	620.09
SO_2[2]	207.54	455.35	662.90	136.25	502.21	638.46	650.68
NOx[1]	1,251.19	-51.36	1,199.83	1,114.32	-69.17	1,045.16	1,122.49
CO[1]	841.96	250.62	1,092.58	923.35	165.33	1,088.68	1,090.63
H_2S[3]	1.32	8.99	10.31	10.33	-0.02	10.31	10.31

1. VOC, PM/PM_{10}, NO_X, and CO baseline emissions were based on adjusted emissions reported in 1999 and 2000 emission inventories.
2. SO_2 baseline emissions were based on adjusted emissions reported in 2000 and 2001 emission inventories.
3. H_2S baseline emissions were based on adjusted emissions reported in 2001 and 2002 emission inventories.

For each pollutant covered by the Draft Permit and listed in Table 3-1, except NOx and H2S, the adjustments made to reported emissions exceed federal significance levels. In order to determine whether these adjustments were properly made, for each adjustment it must be determined: 1) whether the rationale for the adjustment is consistent with the definition of baseline actual emissions found at 30 Tex. Admin. Code § 116.12(3)(B) and other applicable PAL requirements; and 2) whether the numerical adjustment made is reasonable. Thus, for example, according to Total's Baseline Actual Emissions Tables, "Authorized emissions have been used to adjust the emissions for 1999 and 2000 reporting years for all fugitive sources." If an adjustment of all reported fugitive emissions based upon authorized emissions is inconsistent with PAL requirements, these adjustments were improper. Moreover, even if this kind of adjustment to reported fugitive emissions is consistent with Texas PAL requirements (we believe that it is not), it must also be determined whether the adjustment made for each emission unit reflects current authorized limits. The application does not provide material support or identify which rule(s), law(s), or guidance that Total relied upon to determine that the kinds of adjustments it has made are proper. Thus, Total's application is incomplete.

For each adjustment rationale listed in the footnotes of the Baseline Actual Emissions section of Appendix C, what is the rule, statute, or agency policy that the ED has relied upon to determine that the adjustment was proper? For each adjustment identified in the Emissions Calculation section of Appendix C, what information has the ED reviewed in order to determine that the specific numeric adjustment made was reasonable? Was this information made available to the public as part of Total's PAL application file?

Total's application also lacks any supporting documentation regarding the completeness and accuracy of the emissions inventory information it relied upon to establish baseline actual

emissions. According to 30 Tex. Admin. Code § 116.12(3)(D), "The average rate shall not be based on any consecutive 24-month period for which there is inadequate information for determining annual emissions, in tons per year, and for adjusting this amount." EPA has commented, for example, that "two separate stack tests completed. . .in 2001 and 1996. . .each of which lasted less than 24 hours" were not sufficient to establish a PAL in accordance with the definition of baseline actual emissions.[10] What information has the ED relied upon to ensure that the baseline emission data that Total relies upon is adequate information for determining actual annual emissions during the baseline period? Was this information made available to the public as part of Total's PAL application file?

30 Tex. Admin. Code § 116.182(3) states that PAL applications must include "the calculation procedures that the permit holder proposes to use to convert the monitoring system data to monthly emissions and annual emissions based on a 12-month rolling total for each month."

According to Total's application, "Total will use the calculation methodologies presented in Appendix C of this application in conjunction with actual facility data to estimate monthly emissions."[11] Appendix C does not appear to include any discussion of the calculation methodologies that Total will use to convert monitoring system data to monthly and annual emissions. What information has the ED relied upon to determine that Total's application satisfies 30 Tex. Admin. Code § 116.182(3)?

[10] *See* Attachment 3, EPA Comments on Essroc Plant-wide Applicability Limitation Permit (No. 019-21450-00008), March 26, 2007 at 2.
[11] Application at 5-1.

30 Tex. Admin. Code § 116.182(4) states that PAL applications must include information demonstrating that the "monitoring and recordkeeping proposed satisfy the requirements of § 116.186[.]"

Total's application states that:

> In addition to the requirements in 30 Tex. Admin. Code § 116.186 (relating to General and Special Conditions), Total proposes to use the monitoring and recordkeeping requirements currently established in PAR permits with exceptions for corrections, revisions, and/or updates that may be included in the new Flex/PAL permit to achieve consistency, enhance compliance management, and conform to Flex/PAL permit flexibility. However, Total anticipates that final monitoring and recordkeeping requirements will be established through [the] draft permit negotiation process.[12]

First, we have been unable to identify any information in Total's application that demonstrates compliance with the monitoring requirements of 116.186. There is no discussion in the application of the monitoring requirements in current Port Arthur Refinery permits.

Second, Total's proposal to use the monitoring and recordkeeping requirements currently established in Port Arthur Refinery permits seems to have been abandoned. Initially, it was proposed that monitoring requirements in current permits would be incorporated by reference into the Total PAL permit. This would have been accomplished by including the following language in the PAL's Special Conditions: "Emission rates for. . .[sources not monitored by CEMS] shall be calculated as specified in Special Condition Nos. 4 through 7 below and as specified in the permits summarized in Attachment A of this permit."[13] However, it was later decided that ongoing compliance requirements for each source category would be laid out in

[12] Application at 5-1.
[13] *See* Attachment 4, Excerpt from non-final draft of proposed PAL permit included in Total's PAL application file.

special conditions for each source category and that incorporation by reference of the monitoring requirements in current permits for the Port Arthur Refinery would therefore be unnecessary.[14]

Thus, the application does not include sufficient information to determine what monitoring will be used to demonstrate compliance with the PAL cap or to determine whether such monitoring is adequate to ensure that PAL caps are enforceable. Moreover, because Total and TCEQ have decided not to incorporate monitoring requirements from Total's current permits, one cannot look to Port Arthur's current permits for this information.

2. Were Baseline Actual Emissions Adjusted To Exclude Emissions In Excess of Current and Past Allowables?

A PAL is the sum of the baseline actual emissions of the PAL pollutant for each existing facility at the source to be covered.[15] Baseline actual emissions for each pollutant is the average rate, in tons per year, at which the facility actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the ten-year period immediately preceding the date a complete permit application is received for a permit.[16] The rate must be adjusted downward to exclude emissions that: (i) would have exceeded an emission limitation with which the source must currently comply and (ii) non-compliant emissions that occurred during the consecutive 24-month period.[17]

[14] *See* Attachment 5, May 9, 2011 email from Casey Stark to Robert Havalda re: PAL46.

[15] 30 Tex. Admin. Code § 116.188.

[16] 30 Tex. Admin. Code § 116.12(3)(B).

[17] 30 Tex. Admin. Code §§ 116.12(3)(B) and (D).

Total's application includes an "EPN Summary" table that lists currently authorized annual emission limits for emission units that contribute to the Port Arthur Refinery PAL caps.[18] Appendix C to Total's application includes a Table that lists the baseline actual emissions for each emission unit that contributed to the proposed PAL caps.[19] For many emission units, the baseline actual emissions used to calculate PAL caps exceed the current annual allowable emission limits listed for those units as listed in the EPN Summary. Either Total's EPN Summary does not account for all allowable emissions of PAL pollutants from emission units that contribute to the PAL caps in the Draft Permit, or the baseline actual emissions used to calculate the PAL caps were not adjusted downward to exclude emissions that would constitute violations of current Port Arthur Refinery limits. These emission units are listed in Attachment 8. If the limits listed in the EPN Summary are accurate, cap contributions for these emission units must be adjusted downward to exclude emissions in excess current emission limits.[20] If additional emissions from these units have been authorized, Total's application must be updated to identify the permits or registrations authorizing additional emissions and the amount of emissions these permits and registrations authorize.[21] Based upon Total's application, it appears that the Draft Permit emission caps are based upon baseline actual emissions that have not properly been adjusted to exclude emissions in excess of current allowables. Thus, there is inadequate information to support a finding that the Draft Permit PAL caps are consistent with

[18] *See* Attachment 6, EPN Summary from Appendix C to Total's application.

[19] *See* Attachment 7, "Baseline Actual Emissions" from Appendix C to Total's application.

[20] 30 Tex. Admin. Code § 116.12(3)(B).

[21] 30 Tex. Admin. Code § 116.182(1) requires PAL applications to include "a list of all facilities, or emissions units at a major stationary source, that emit the PAL pollutant, including their registration or permit number, their potential to emit, and the expected maximum capacity. In addition, the owner or operator of the source shall indicate which, if any, federal or state applicable requirements, emission limitations, or work practices apply to each unit" (emphasis added).

the requirements of the Commission's PAL rules. The PAL caps must be adjusted or Total's application must be supplemented with additional information, or both, before the Draft Permit may be properly issued.

The Commission's rules clearly indicate that baseline actual emissions must be "adjusted downward to exclude *any* emissions that would have exceeded an emission limitation with which the major stationary source must currently comply."[22] Hourly limits and other short-term emission limits for emission units covered by the Draft Permit are emission limits within the purview of this rule. While the EPN Summary included in Total's application lists current annual limits for many sources of emission covered by the PAL, it does not list short-term limits for these same emission sources. Neither does Total's application indicate whether baseline actual emissions listed in the application included emissions in excess of currently applicable short-term limits applicable to emission units covered by the Draft Permit. Baseline actuals must be adjusted downward to exclude short-term emissions in excess of current short-term limits, even if such emissions did not cause annual emissions in excess of current annual limits. Total's application must be supplemented to include information demonstrating that its baseline actual emissions have been adjusted to account for short-term emission in excess of current short-term emission limits. Until Total supplements its application, the ED lacks sufficient evidence to determine whether the baseline actual emissions used to establish PAL caps in the Draft Permit are consistent with the Commission's PAL rules.

Nothing in Total's PAL application indicates that baseline actual emissions have been adjusted downward to exclude non-compliant emissions that occurred within the baseline period. While we have not yet reviewed Title V compliance reports submitted for the Port Arthur

[22] 30 Tex. Admin. Code § 116.12(3)(B).

Refinery during the baseline periods used for Total's PAL application, there is evidence that violations of emission limits during the baseline period did occur. For example, on July 10, 2002, the Commission entered an agreed order based upon alleged violations of H2S and SO2 emission limits, which occurred during various upset events in 2001.[23] What steps have been taken to ensure that Total's baseline actual emissions have been adjusted to exclude non-compliant emissions that occurred during the baseline period?

What material, if any, has Total submitted as part of its application that would enable the ED to determine whether baseline actual emissions have been adjusted to exclude emissions in excess of allowable limits currently in effect or in effect during the baseline period?

3. The Draft Permit Does Not Include Monitoring Requirements Sufficient to Make Emission Caps Enforceable

By definition, a PAL must be enforceable.[24] The Commission's PAL rules also require that "[t]he PAL monitoring system. . .accurately determine all emissions of the PAL pollutant," and that "[a]ny monitoring system authorized for use in the PAL permit must be based on source science and meet generally acceptable scientific procedures for data quality and manipulation."[25] Information demonstrating that an applicant's proposed monitoring procedures will satisfy these requirements must be submitted as part of the PAL permit application.[26]

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[23] *See* Attachment 9, Agreed Order, Docket No. 2002-0148-AIR-E.

[24] 30 Tex. Admin Code § 116.12(22) ("Plant-wide applicability limit—An emission limitation expressed, in tons per year, for a pollutant at a major stationary source, that is enforceable and established in a plant-wide applicability limit permit under § 116.186 of this title (relating to General and Special Conditions.") *See* also, 40 CFR § 51.165(f)(2)(v), which emphasizes that PALs are to be "enforceable as a practical matter." 40 CFR § 51.165(f)(2) lists definitions to be used for developing PAL SIP provisions submitted by states for approval by EPA.

[25] 30 Tex. Admin. Code § 116.186(c)(2).

[26] 30 Tex. Admin. Code § 116.182(4).

According to Special Condition 5A of the Draft Permit, "Routine emissions of NOx and CO [from flares] shall be calculated using the flare emission factors approved by TCEQ in permit applications for NOx and CO and the HHV of the fuel gas and assistant gas."

Which emission factors and which permit applications are references by this condition? Why is this information not included in the Draft Permit or Total's application? Without this information, how is the public, the EPA, or the TCEQ to determine the amount of annual routine emissions from the flares? What method will be used to calculate upset emissions from the flares? Why is there no condition in the Draft Permit regarding monitoring for upset emissions from the flares?

Special Conditions 6B, 7B, 8B, 9, 10B, and 15A of the Draft Permit state that for pollutants not monitored by CEMS, emissions will be calculated using "available stack test data, vendor guarantees, or emission factors" in conjunction with other information that varies according to the kind of equipment dealt with in each condition. These Special Conditions fail to require adequate monitoring to ensure compliance with PAL permit caps. Which emission factors may be used to demonstrate compliance for each emission unit? Which vendor guarantees may be used to demonstrate compliance for each emission unit? If the Draft Permit does not identify which emission factors and vendor guarantees are appropriate means for calculating emissions from a particular emission unit for purposes of demonstrating compliance with Draft Permit PAL caps, what assurance is there that Total will use appropriate emission factors and vendor guarantees to demonstrate compliance? In order to ensure that the Draft Permit PAL caps are enforceable, the Draft Permit must include more specific monitoring requirements. Moreover, Total must supplement its application to include information

demonstrating that the emission factors, stack tests, and vendor guarantees it proposes to use to establish compliance with its PAL caps are adequate indicators of annual emissions from the emission units for which such demonstrations will be made.

The Draft Permit does not include any requirement that Total conduct stack testing for emissions from any emission unit. For which emission units does the ED intend stack test data to be used to establish compliance with PAL caps? What are the parameters for stack tests to be conducted for these units? How often do stack tests need to be conducted in order to reliably determine whether Total is complying with its PAL caps? What information has the ED considered that indicates that stack tests are sufficient to determine annual emissions for those emission units to be monitored by stack tests? If stack testing is necessary to determine annual emissions from emission units covered by the Draft Permit, why does the Draft Permit not require stack testing for those emission units?

30 Tex. Admin. Code § 116.186(c)(3)(D)(iii) states that "if technically practicable, the owner or operator of a significant facility that relies on an emission factor to calculate PAL pollutant emissions shall conduct validation testing to determine a site-specific emission factor within six months of PAL issuance, unless the executive director determines that testing is not required." It may be the case that Total intends to use stack testing to determine site-specific emission factors as required by 116.186(c)(3)(D)(iii). Why doesn't the Draft Permit include a provision requiring stack tests to validate emission factors? Has the ED determined that stack testing is not required to validate emission factors to be used to estimate emissions from any emission unit(s) covered by the Draft PAL? If so, which emission units? What is the basis for this decision, and what information has Total provided indicating that stack testing should not be required?

4. Baseline Actual Emissions for Fugitives Is Based Upon Potential to Emit and Not Actual Historical Emissions

According to Total's application, "[f]ugitive emissions reported in emission inventories were based on actual leak rates. Because compliance with. . .PAL caps is anticipated to be based on component counts, all fugitive emissions have been adjusted to current PTE for all fugitive areas."[27] The PAL cap contribution for emission units operating during the baseline period must be based upon actual emissions. Adjustment of reported actual fugitive emissions during the baseline period to reflect the PTE for all components is inconsistent with this requirement and has the effect of improperly inflating the Draft Permit VOC and PM caps.[28]

IV. CONCLUSION

In light of these concerns, Commenters respectfully request that the ED decline to issue the Draft Permit until such time as:

1) The Commission's PAL rules are approved as part of the Texas SIP;

2) Total has supplemented its application to include all information required by the Commission's PAL rules;

3) The public has had an opportunity to review and comment upon Total's supplemented application; and

4) Deficiencies in the Draft Permit have been corrected.

Any questions regarding these comments should be directed to Gabriel Clark-Leach of the Environmental Integrity Project at the email address or telephone number indicated below.

[27] Application at 3-2.

[28] *See*, 30 Tex. Admin. Code §§ 116.12(3)(B) and (E) and 116.188. According to 30 Tex. Admin. Code § 116.12(3)(E), baseline actual emissions "shall include fugitive emissions to the extent quantifiable." Total's application does not indicate that fugitive emissions from the Port Arthur Refinery are not quantifiable.

Respectfully Submitted,

ENVIRONMENTAL INTEGRITY PROJECT

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ATTACHMENT 1

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July 5, 2011

Chairman Shaw and Commissioners Garcia and Rubinstein *via U.S. Mail*
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Re: Unauthorized Issuance of Federal PAL Permits

Honorable Commissioners, Executive Director, and General Counsel of the Texas Commission on Environmental Quality:

It has recently come to our attention that the Executive Director of the Texas Commission on Environmental Quality ("TCEQ") has issued two federal Plant-wide Applicability Limit ("PAL") permits to Exxon Mobil for its Beaumont and Baytown chemical plants[1] and has made a preliminary decision to issue a PAL permit to Total Petrochemicals for its Port Arthur Refinery.[2] On June 27, 2011, Environmental Integrity Project submitted a Public Information Act request to the TCEQ asking for information related to these permit applications.[3] On behalf of the undersigned, we are writing to request (1) an extension of time, and leave to late file motions to overturn the two Exxon Mobil PALs in accordance with TCEQ's procedural rules for challenging permits issued by the Executive Director,[4] and (2) that the deadline for comments on

[1] PAL15 (Exxon Mobil's Beaumont Chemical Plant issued on May 26, 2011), and PAL16 (Exxon Mobil's Baytown Chemical Plant issued on June 16, 2011).

[2] PAL 46 for Total Petrochemicals USA's Port Arthur Refinery.

[3] Attachment A, Public Information Act Request submitted on June 27, 2011 (PIR No. 11.06.27.15).

[4] *See* 30 Tex. Admin. Code § 50.139.

Total Petrochemical's application be extended. We request that each of these deadlines be extended until 30 days after we have received the application materials responsive to our public information request. Granting these requests would simply give us the chance to assess and provide comments on these PAL permits. We also request that a management delay be placed on all PAL applications until such time as EPA approves a revision to the Texas State Implementation Plan ("SIP") incorporating the Commission's PAL rules.

EPA disapproved Texas' request to incorporate its PAL rules as part of the Texas SIP, because, according to EPA, the submitted rules are inconsistent with the requirements of the federal Clean Air Act.[5] Until such time as the EPA approves a revision to the Texas SIP incorporating the Commission's PAL rules, the Commission may not issue PAL permits authorizing modifications that would otherwise trigger federal New Source Review requirements, establish significance levels less stringent than those in the Texas SIP, or modify any Texas SIP requirement that applies to any stationary source.[6] In other words, the Commission currently lacks the authority to issue federal PAL permits.

Texas PAL permits that purport to excuse a stationary source from compliance with any Texas SIP requirement are ineffective and mislead the permit holder as well as the public about the kind of modification effectively authorized under such permits.[7] PAL permit holders that modify their facilities in reliance upon a Texas PAL permit may be subject to an EPA enforcement action or a citizen suit in federal court if such modifications require a federal preconstruction authorization. Moreover, issuance of federal PAL permits is itself a violation of federal law that may give rise to an EPA enforcement action or a citizen suit against the Commission.[8] The Commission should not issue ineffective permits that unnecessarily expose permit holders to potential liability and mislead the public about the projects a permit holder may lawfully undertake in reliance on a TCEQ-issued permit. Accordingly, the Commission should not issue any federal PAL permits until the Texas PAL rules have been approved as part of the

[5] 75 Fed Reg. 56,424 (Sept. 15, 2010).

[6] 42 U.S.C. § 7410(i); *In re Waste Management of Louisiana*, No. 2006 CA 1011, 2007 WL 2377337 at *3-*4. (La. App., August 22, 2007). (holding that Louisiana permitting authority improperly exempted applicant from PSD review. The agency could not rely upon exemption that was not part of the state's SIP.).

[7] *See United States v. Ford Motor Co.*, 814 F.2d 1099, 1103 (6th Cir. 1987) (holding that compliance with a state court consent decree was not a defense to non-compliance with SIP emission limits because, "the original [SIP] emission limit remains fully enforceable until a revision or variance is approved by both the State and EPA"); *St. Bernard Citizens for Envtl. Quality, Inc. v. Chalmette Refining L.L.C.*, 399 F. Supp. 2d 726, 734 (E.D. La. 2005) ("Because there is no evidence that [an emergency state rule] has been approved by the EPA, it is not a valid and enforceable part of Louisiana's implementation plan, and it does not change defendant's [benzene emission limits]" in SIP-approved permits.); *United States v. General Dynamics Corp.*, 755 F. Supp. 720, 722-24 (N.D. Tex. 1991) (plaintiff's compliance with state issued, non-EPA approved "agreed board orders," whose effect was to raise the emissions limitations set by the Texas SIP, did not relieve defendant from compliance with the emission limitations of the Texas SIP); *Public Citizen v. Amer. Elec. Power Co.*, No. 5:05-CV-39-DF, 2006 WL 3813766 , at *5-6 (E.D. Tex. Dec. 27, 2006) (finding that Texas could not raise a PSD permit limit "without federal approval").

[8] 42 U.S.C. §§ 7404 and 7413; *Communities For A Better Environment v. Cenco Refining Co.*, 180 F.Supp.2d 1062 (C.D.Cal.,2001); *Oregon Environmental Council v. Oregon Dept. of Environmental Quality*, 775 F.Supp. 353 (D.Or.,1991).

Texas SIP. If you have any questions regarding this request, please contact Gabriel Clark-Leach, Environmental Integrity Project attorney, at (512) 637-9478.

Respectfully Submitted,

By:

Gabriel Clark-Leach, Attorney
ENVIRONMENTAL INTEGRITY PROJECT

1303 San Antonio Street, Suite 200
Austin, Texas 78701
Phone: 512-637-9477
Fax: 512-584-8019
gclark-leach@environmentalintegrity.org

Neil Carman, Clean Air Program Director
SIERRA CLUB, LONE STAR CHAPTER

Matthew Tejada, Executive Director
AIR ALLIANCE HOUSTON

Juan Parras, Director
TEXAS ENVIRONMENTAL JUSTICE ADVOCACY SERVICES (T.E.J.A.S.)

Enclosure

cc: Richard A. Hyde, Deputy Director, TCEQ Office of Permitting and Registration
Steve Hagle, Director of TCEQ Air Permits Division
Stephanie Bergeron Perdue, Deputy Director, TCEQ Office of Legal Services
Blas J. Coy, Jr., TCEQ Public Interest Counsel
Jeff Robinson, Chief, EPA Region 6 Air Permits Section

ATTACHMENT A

Gabriel Clark-Leach

From: Marcie Alexander
Sent: Monday, June 27, 2011 2:38 PM
To: openrecs@tceq.texas.gov
Subject: PIR request re: PAL permits and applications

Pursuant to Tex. Gov't Code Chapter 552, the Environmental Integrity Project requests the following information concerning the Plantwide Applicability Limit (PAL) applications and permits for the following facilities:

1. PAL46—Total's Port Arthur Refinery (RN102457520):
    1. Application
    2. Preliminary Determination Summary
    3. Draft Permit
    4. Any comments received regarding this application (including comments from EPA)
    5. Correspondence w/ EPA regarding this application

2. PAL15—Exxon Mobil's Beaumont Chemical Plant (RN100542844):
    1. Application
    2. Preliminary Determination Summary
    3. Draft Permit
    4. Final Permit
    5. Copy of First notice made by applicant (newspaper tear sheet) unless included in application.
    6. Any comments received regarding this application (including comments from EPA)
    7. Correspondence w/ EPA regarding this application

3. PAL16—Exxon Mobil's Baytown Chemical Plant (RN102574803):
    1. Application
    2. Preliminary Determination Summary
    3. Draft Permit
    4. Final Permit
    5. Copy of First notice made by applicant (newspaper tear sheet) unless included in application.
    6. Any comments received regarding this application (including comments from EPA)
    7. Correspondence w/ EPA regarding this application

4. List of all applications for new PAL permits submitted since 1/1/2009.

5. Any agency memos or guidance concerning the PAL program in light of EPA's disapproval of the Texas PAL rules.

Whenever possible we would prefer to receive electronic copies of the files. Please contact me if you have any questions about this request.

Thanks,

Marcie Alexander
Environmental Integrity Project
1303 San Antonio Street, Suite 200
Austin, TX 78701
Direct: (512) 637-9476
Fax: (512) 584-8019

ATTACHMENT 2

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 26, 2011

Dear Mr. Clark-Leach:

We have received your request to extend the deadline for comments on Total Petrochemical's PAL application. The company published the Notice of Application and Preliminary Decision on July 1, 2011 in the *Port Arthur News* pursuant to TCEQ rules. Therefore, the public comment period will not be extended and will end on August 1, 2011. If you have any questions, please contact Ms. Beryl Thatcher at (512) 239-5374.

Sincerely,

Michael P. Wilson, P.E., Assistant Director
Air Permits Division
Office of Permitting and Registration

ATTACHMENT 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 26 2007

(AR-18J)

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Re: Essroc Plant-wide Applicability Limitation Permit (No. 019-21450-00008)

Dear Ms. Sizemore:

On November 29th, 2006 we completed a review of and submitted comments on a draft Plant-wide Applicability Limitation (PAL) permit for Essroc Cement Corporation in Speed, Indiana (permit # 21450). After further discussions with your staff and Essroc, we would like to clarify our concerns originally provided to you in November.

As you are aware, the proposed permit would establish plant-wide emission limitations for nitrogen oxides (NOx) and sulfur dioxide (SO2), with a baseline period starting August 1, 1995, and ending July 31, 1997. The facility listed two "major" emission units (or stacks), as defined by 40 C.F.R. § 52.21(aa)(2)(iv), that would be covered by the PAL: Kiln #1 and Kiln #2. Based on our discussions and further review, we have two concerns that should be addressed prior to issuance of the final permit.

First, we are concerned that the proposed PAL limit for NOx for Kiln #2 does not consider all federally enforceable limitations. The definition of baseline actual emissions states that the PAL "shall be adjusted downward to exclude any emissions that would have exceeded an emission limitation with which the major stationary source must currently comply...." (40 C.F.R. § 52.21 (b)(48)(ii)(c) and 326 IAC 2-2-1(e)(2)(C)). The Technical Support Document (TSD) for the new source review (NSR) Reform rules clarifies that sources must adjust their baseline actual emission rates to account for all legally enforceable operational restrictions that have been imposed on the sources since the baseline period (see page I-3-8 and 9 of the November 22, 2002 TSD for the Prevention of Significant Deterioration and Non-attainment Area New Source Review Regulations). IDEM established the proposed PAL limit utilizing the allowable emission limitation of 4.4 pounds per ton of clinker, required by 326 IAC 10-1-4(b)(1) of Indiana's State Implementation Plan (SIP). However, it appears that IDEM did not adjust the baseline actual emissions rate downward to account for additional emission reductions required since the proposed baseline period.

The permitting record shows that two applicable requirements have taken effect since the chosen 1995-1997 baseline period. The first is a requirement to comply with the 4.4 pounds per ton of clinker emission limit contained in 326 IAC 10-1-4. Essroc complied with this requirement by installing an indirect firing system and a low-NOx burner in 1997. The second applicable requirement is the Nitrogen Oxide Reduction Program contained in 326 IAC 10-3-3 of the SIP. Having a choice of three options to demonstrate compliance with this program, Essroc chose to comply by operating a low-NOx burner (see Condition D.3.7(a) of Essroc's June 15, 2004 Part 70 Operating Permit). Since the operation of a low-NOx burner is required by a federally enforceable permit limitation, Indiana Department of Environmental Management (IDEM) must consider any emission reduction that result from the operation of the low-NOx burner in establishing the PAL baseline actual emission rate for NOx.

We therefore do not agree that Essroc can set its PAL baseline actual emissions rate based on the 4.4 pounds per ton SIP allowable emission limitation. The PAL limit must be adjusted to recognize the operation of the low-NOx burners.

Secondly, the SO2 PAL proposed in the permit is based on two separate stack tests completed on Kilns #1 and #2 in 2001 and 1996, respectively, each of which lasted less than 24 hours. We do not believe that these tests are adequate to establish the PAL in accordance with the definition of "baseline actual emissions" which states "the average rate shall not be based on any consecutive 24-month period for which there is inadequate information for determining annual emissions" (40 C.F.R. § 52.21(b)(48)(ii)(e)). Sulfur dioxide emissions from cement kilns are highly variable, as is evidenced by our review of continuous emission monitoring (CEM) data for this type of facility. We find that the establishment of a PAL based on less than one day of data from a facility with highly variable emissions, without sufficient information pertaining to the sulfur content of the raw material, is not adequate for the establishment of a PAL.

We ask that IDEM resolve the concerns above prior to permit issuance. If you have any questions regarding these comments, please feel free to contact Ethan Chatfield, of my staff, at (312) 886-5112.

Sincerely yours,

Pamela Blakley

Pamela Blakley, Chief
Air Permits Section

ATTACHMENT 4

SPECIAL CONDITIONS

Permit Number PALXX

PLANT-WIDE APPLICABILITY LIMIT

1. Any project to be authorized by permit amendment, permit by rule, or other Texas Commission on Environmental Quality (TCEQ) permitting mechanisms, including the modification of existing facilities or the addition of new facilities, shall not be subject to federal new source review for the air pollutants listed below provided the total plant wide emissions from the TOTAL Port Arthur Refinery do not exceed the Plant Wide Applicability Limit (PAL) of:

POLLUTANT	PAL
VOC	1420.36 tons per year on a rolling 12-month basis
PM	645.09 tons per year on a rolling 12-month basis
PM_{10}	635.09 tons per year on a rolling 12-month basis
$PM_{2.5}$	630.09 tons per year on a rolling 12-month basis
SO_2	690.68 tons per year on a rolling 12-month basis
NO_x	1147.49 tons per year on a rolling 12-month basis
CO	1190.63 tons per year on a rolling 12-month basis
H_2S	20.31 tons per year on a rolling 12-month basis

2. If future actual emission rates exceed the PAL thresholds listed above, the permittee shall be subject to federal new source review for that air pollutant. Only the changes that cause the new emission rates to exceed the PAL threshold are subject to federal new source review. The permittee shall submit to the TCEQ a federal new source review permit application for the changes that cause actual emissions to exceed the PAL.

DETERMINATION OF COMPLIANCE

3. Emission rates of the pollutants listed in Special Condition No. 1, in tons per year, shall be calculated for each facility at the Total Port Arthur Refinery which has emissions of the pollutant. Compliance with the PALs specified in Special Condition No. 1 shall be demonstrated on a rolling 12-month basis.

   Emissions data from existing Continuous Emissions Monitoring System (CEMS) located in the exhaust of the emissions sources summarized in Table 1 of this permit shall be used to calculate the emission rates for the pollutants monitored. Emission rates from other sources shall be calculated as specified in Special Condition Nos. 4 through 7 below and as specified in the permits summarized in Attachment A of this permit.

ATTACHMENT 5

Robert Havalda - FW: PAL 46

From: Casey STARK <casey.stark@total.com>
To: Robert Havalda <RHavalda@tceq.state.tx.us>
Date: 5/9/2011 2:23 PM
Subject: FW: PAL 46
CC: Benjamin Hurst <benjamin@sageenvironmental.com>, Jeff BAKER <jeff.baker@total.com>
Attachments: TOTAL - PAR - DRAFT PAL Permit Language (050911).docx

Robert,

Thank you for the update. Please see some of our thoughts/comments on your items below. A revised draft PAL is attached as well.

If you have any questions, we can discuss them in our meeting this Friday or you can just give me a call. Thank you for your consideration in this matter.

Sincerely,

Casey Stark
Environmental Advisor
TOTAL Petrochemicals
409-963-6042

From: Robert Havalda [mailto:Robert.Havalda@tceq.texas.gov]
Sent: Friday, May 06, 2011 3:12 PM
To: Casey STARK
Subject: PAL 46

Since I was not able to get you an updated draft today, wanted to give you an update of what I am still working on and what I think I need from you.

1. I was checking to see if you didn't need the attachment. Still working my way through differing opinions but it looks like a modified one will still be in the PAL. Doing a matrix/check list of EPN and pollutant to show clearly which EPNs contribute to the PALs.

TOTAL Comment: This table was originally included when the approach to the permit structure was to leave the majority of the ongoing compliance language in the existing State permits. The table was needed in order to provide a reference of which permit contained the relevant compliance language for each emissions source. However, TCEQ and TOTAL have subsequently agreed to include the ongoing compliance language for each source category in the PAL permit; therefore, this table is no longer necessary.
Please note that pursuant to PAL rules that any source subject to a NSR authorization that emits a PAL pollutant in covered and subject to the PAL (i.e., a PAL is an "all-in" actual emissions cap). As such, there does appear to be a need to summarize EPNs contributing to each PAL (as was previously done with Texas Flexible permits).

2. It looks like the PAL limits will go on a small MAERT for the PAL.

TOTAL Comment: At this time, TOTAL does not have any comment on this approach. However, TOTAL may comment upon review of the proposed MAERT.

Haven't finished going through the CEMS listing but it looks like conditions for Cogen and FCCU have some that should be on the list.

TOTAL Comment: Please see the updated Table 1 in the attached file.

3. Found a few sources that didn't seem to be included and will be putting them in: Carbon systems, some thermal oxidizers, reformer, some waste water sources (may be sour water but still checking), etc.

TOTAL Comment: Thermal oxidizers appear to be addressed in the special conditions for SRU and Loading. Wastewater sources are addressed in what is now Special Condition No. 15 of the attached file. Special Condition No. 8 has been added to the attached file to address the Reformer Regen Vent. Special Condition No. 14 has been added to the attached file to address the carbon systems.

4. Working on some pollutants for some sources. Tanks - H2S, Loading - H2S, PM for other loading, etc.

TOTAL Comment: Tanks with H2S emissions are asphalt tanks which are calculated in TankESP. PM emissions are not currently authorized from the loading operations.

5. Working on an MSS reference statement. Haven't gotten management approval yet though.

TOTAL Comment: At this time, TOTAL does not have any comment. However, TOTAL may comment upon review of the proposed special condition.

If you have any questions, let me know.

Thank you,

Robert Havalda, P.E.
Texas Commission on Environmental Quality
Air Permits Division
Phone: 512-239-1660
Fax: 512-239-1323
Email: RHavalda@tceq.state.tx.us

ATTACHMENT 6

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
EPN Summary

Old FIN	Old EPN	New FIN	New EPN	EPN NAME	Historic, Current Permit Number	Status in Permit	Currently Authorized Emission Limits					
							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
812C	104	01ACU1202A	01ACU1202A	ACU-1 Charge Heater 202A 187 MMBtu/hr	3615	Current	11.22	49.14	13.25	32.60	4.94	8.80
101	101	01ACU1H101	01ACU1H101	Crude Unit Heater H-101	9194A	Current	11.60	50.80	6.44	28.20	3.90	17.08
347	347	55FCCURFGS	55FCCURFGS	Regenerator Flue Gas - Post 2006 Project	18936	Current	82.42	159.43	143.69	323.48	81.91	184.85
355	355	20GASTRKFG	20GASTRKFG	Process Fugitives	19490	Current	-	-	-	-	-	-
356	356	20GASLOAD	20GASFLARE	Flare	19490	Current	0.93	1.04	8.04	8.86	-	-
357	357	20DISTLDG	20DISTLDG	DIST LOADING (GASOLINE LOADING RACK)	19490	Current	-	-	-	-	-	-
-	PBTX1	04BTXFUGS	04BTXFUGS	BTX Process Fugitives	5694A	Current	-	-	-	-	-	-
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	Fugitives	20381	Current	-	-	-	-	-	-
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	Equipment Fugitives	43109	Current	-	-	-	-	-	-
61ST301BLR	61STKBLR	61BLRH300	61STACKBLR (Common Stack)	Boilers - 61ST301BLR - 61ST351BLR (249 MMBtu/hr each)	43109	Current	24.90	63.46	35.54	64.72	14.24	14.28
61ST351BLR	61STKBLR	61BLRH350										
804E	107	50TDPH-1	50TDPH-1	TDP Charge Heater	55684	Current	3.90	10.95	2.76	7.81	1.03	1.18
805A	109	51DHT1H-1	51DHT1H-1	805 Charge Heater	2347	Current	2.52	8.14	4.46	14.41	1.67	2.18
805B	121	51DHT1H-3	51DHT1H-3	805 Reboiler	2347	Current	1.60	5.59	3.23	11.32	1.20	1.72
810A	123	10GRUHTRB1	10GRUHTRB1	810 AROM PREF HEATER B1	PBR	Current	3.00	13.14	3.46	15.14	0.36	1.57
812A	102	02ACU2H201	02ACU2H201	Heater Crude Unit H-201	18936	Current	22.20	43.51	9.52	24.24	5.87	6.07
812B	103	01VACTH301	01VACTH301	Heater H-301	9194A	Current	10.50	45.99	4.09	17.90	2.82	12.37
812D	105	01ACU1202B	01ACU1202B	ACU-1 Charge Heater 202B 187 MMBtu/hr	3615	Current	11.22	49.14	13.25	32.60	4.94	8.80
813A	120	52DHT2H-1	52DHT2H-1	MHC H-1 Heater	2347	Current	2.03	7.12	4.11	14.41	1.53	2.18
813C	325A	52DHT2H-2	52DHT2H-2A/B	MHC H-2 Heater	2347	Current	2.30	8.07	4.66	16.33	1.74	2.48
813C	325B											
BHA	138	-	-	BH-BOILER 12-1	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
BHB	139	-	-	BH-BOILER 12-2	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	BENZENE NESHP	Missing Authorization	CIAE	-	-	-	-	-	-
BTXA	192	04BTXH-51	04BTXH-51	Benzene Reboiler Trim Heater (23.0 MMBtu/hr fired duty)	5694A	Current	1.38	6.05	1.69	7.39	0.61	0.84
BTXB	193	04BTXH-52	04BTXH-52	Toluene Reboiler Trim Heater (50.0 MMBtu/hr fired duty)	5694A	Current	3.00	13.14	3.67	16.07	1.32	1.80
BTXC	310	04BTXH-53	04BTXH-53	Xylene Reboiler Trim Heater (56.0 MMBtu/hr fired duty)	5694A	Current	3.36	14.72	4.11	18.00	1.48	2.03
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	BENZENE WASTEWATER PROCESS DRAINS	Missing Authorization	Remove from permit	-	-	-	-	-	-
LAB-SUMP	BZ-WWPD	-	-	BENZENE WASTEWATER PROCESS DRAINS	Shutdown	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
COGENA	326	60COGENTRB	60COGENSTK	45 MW Gas Turbine & 205 MMBtu/hr Boiler (previously EPN 326)	16840	Current	145.01	472.91	77.26	336.62	21.74	77.00
DOCKFLARE1	BZDVRCOMB	45DOCKIPCV	45DOCKSFLR	DOCK FLARE 1	46396	CIAE	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
DOCKFLARE1	FBZDVR	-	-	DOCK FLARE 1	Shutdown	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
F111	F111	51DHT1FUGS	51DHT1FUGS	DHT-1 Unit Fugitives	2347	Current	-	-	-	-	-	-
F319	F319	08ALKYFUGS	08ALKYFUGS	Butane Storage Tank Fugitives	49136, 56409	Current	-	-	-	-	-	-
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	Catalyst Transport	18936	CIAE	-	-	-	-	-	-
F350	F350	55FCCUFUGS	55FCCUFUGS	Process Area Fugitives	18936	Current	-	-	-	-	-	-
F350	PTU	55FCCUFUGS	55FCCUPTUC	FCCU PTU Clarifier Fugitives	73928	CIAE	-	-	-	-	-	-
F351	F351	67FPMCLTWR	67FPMCLTWR	FPM Cooling Tower	18936	Current	-	-	-	-	-	-
F359	F359	28LPGFUGS	28LPGFUGS	LPG Piping Fugitives	19965, 56409	Current	-	-	-	-	-	-
FEXPTET	FEXPTET	-	-	EXPLORER / TET PIPELINE FUGITIVES	Missing Authorization	CIAE	-	-	-	-	-	-
GOHDSA	305	13UNIBH301	13UNIBH301	Gas Oil HDS Unit Heater	9193A	Current	12.00	52.56	7.33	32.12	2.64	4.70
HDSCRA	191	17REFHTRS	17REFHTRS	Six Reformer Heaters	5694A, 84944	Current	29.89	130.93	30.88	135.26	11.13	15.24
HDSCRB	190	17NHTHTRS	17NHTHTRS	Two Naphtha HDS Heaters	5694A, 84944	Current	12.56	55.01	9.21	40.34	3.32	4.55

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
EPN Summary

Old FIN	Old EPN	New FIN	New EPN	EPN NAME	Historic, Current Permit Number	Status in Permit	Currently Authorized Emission Limits					
							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	ISOM Process Fugitives	71651	Current	-	-	-	-	-	-
ISOM A	299	16ISOMHTR	16ISOMHTR	ISOMERIZATION HEATER	STD EXEMPT 7	Current	8.41	36.82	1.83	8.00	2.51	10.99
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	Dock 1 Loading Losses	46396	Current	-	-	-	-	-	-
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	DOCK FLARE 1	46396	CIAE	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	DOCK FLARE 1	46396	CIAE	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	L153-B	46396	Current	-	-	-	-	-	-
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	LAB HOOD VENTS	PBR 106.123	Current	-	-	-	-	-	-
LAB-SUMP	BNZ_NSHP	-	-	BENZENE NESHP	Shutdown	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	Lab Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
LR-342	342	18TRKLOAD	18TRKLOAD	Tank Truck Loading	17352	Current	-	-	-	-	-	-
N17	N17	40CSPLTH-1	40CSPLTH-1	Condensate Splitter Heater	36644, 20381	Current	16.89	46.22	2.32	10.17	6.08	7.22
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	North PWS Equipment Fugitives	56385	Current	-	-	-	-	-	-
P701C	F149	02FWCLGTWR	02FWCLGTWR	ACU 2 Cooling Tower	49136	Current	-	-	-	-	-	-
P804	F108	50TDPFUGS	50TDPFUGS	TDP Fugitives	55684	Current	-	-	-	-	-	-
P804C	F147	-	-	804 REFORMER COOLING TOWER	Inactive	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
P805C	F146	67805CLTWR	67805CLTWR	805 REFORMER COOLING TOWER	PBR	Current	-	-	-	-	-	-
P807C	F150	08ALKCLTWR	08ALKCLTWR	Alkylation Unit Cooling Tower	49136	Current	-	-	-	-	-	-
P810	F124	10GRUFUGS	10GRUFUGS	810 AROMATIC PREFRACTIONATOR	81517	Current	-	-	-	-	-	-
P812	F106	02ACU2FUGS	02ACU2FUGS	ACU-2 Fugitives	49136	Current	-	-	-	-	-	-
P813	F122	52DHT2FUGS	52DHT2FUGS	DHT-2 Unit Fugitives	2347	Current	-	-	-	-	-	-
P817	F817	37SWS2FUGS	37SWS2FUGS	Fugitives	17920	Current	-	-	-	-	-	-
PAT	F143	67C200FUGS	67C200FUGS	AMINE TREATER	55129	Current	-	-	-	-	-	-
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	ACU 2 Cooling Tower	49136	Current	-	-	-	-	-	-
PBTX2	FBTX2	-	-	BTX FUGITIVES (DOCKS)	Missing Authorization	CIAE	-	-	-	-	-	-
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	BTX Storage Tank Process Fugitives	5694A	Current	-	-	-	-	-	-
PBH	F138	-	-	BOILER HOUSE FUGTIVES	Missing Authorization	CIAE	-	-	-	-	-	-
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	Cogen Train Fugitives	16840	Current	-	-	-	-	-	-
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	Cooling Tower	16840	Current	-	-	-	-	-	-
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	ACU-1 Fugitives	9194A	Current	-	-	-	-	-	-
PCRUDE	F318	09SATLQFUG	09SATLQFUG	ATMOSPHERIC CRUDE UNIT	71651, 73928, 75532,	Current	-	-	-	-	-	-
PCRUDE	F318	14FGTFUGS	14FGTFUGS	ATMOSPHERIC CRUDE UNIT	9194A	Current	-	-	-	-	-	-
PCT11	F320	67NORTHCT	67NORTHCT	Cooling Tower Fugitives	9194A	Current	-	-	-	-	-	-
PCVS	FCVS	-	-	CLOSED VENT SYSTEM	Missing Authorization	CIAE	-	-	-	-	-	-
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	Dock 1 Equipment Fugitives	46396	Current	-	-	-	-	-	-
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	DOCK FUGITIVES	46396	Current	-	-	-	-	-	-
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	DOCK FUGITIVES	46396	CIAE	-	-	-	-	-	-
PFLR1	141	53MIDFLARE	53MIDFLARE	Middle Flare	18936, 54026	Current	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap
PFLR2	142	53SOUTHFLR	53SOUTHFLR	South Flare	18936, 54026	Current	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap
PFLR3	307	41NORTHFLR	41NORTHFLR	North Flare	18936, 54026	Current	32.99	27.67	226.89	160.53	10.66	9.94
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	Unibon Fugitives	9193A	Current	-	-	-	-	-	-
PHDSCR	F190	17REFFUGS	17REFFUGS	Reformer Process Fugitives	5694A	Current	-	-	-	-	-	-
PHDSCR	311	17REFREGEN	17REFREGEN	Catalyst Regeneration	5694A, 72108	Current	-	-	1.53	6.72	-	-
PMOGAS	F317	20MOGASBLD	20MOGASBLD	Mogas Blending Unit Fugitives	9193A	Current	-	-	-	-	-	-
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	FILTER PRESS WASTE SLUDGE BOXES	Shutdown	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
PRSE	F302	10DEMEXFUG	10DEMEXFUG	Fugitives	8983A	Current	-	-	-	-	-	-
PSRU	F310	14SRU1FUGS	14SRU1FUGS	SRU 1 Fugitives	9195A	Current	-	-	-	-	-	-
PSRU	F312	14SRU1LOAD	14SRU1LOAD	SRU-1 Truck Loading Rack	9195A , 9193	Current	-	-	-	-	-	-
PSRU	F309	14SRU1PIT	14SRU1PIT	SRU-1 Sulfur Pit Fugitives	9195A	Current	-	-	-	-	-	-
PSRU	F310	15SCOTFUGS	15SCOTFUGS	SCOT Fugitives	9195A , 9193	Current	-	-	-	-	-	-
PSRU	125	33SRU3	15SRUINCIN	Sulfur Recovery Tail Gas Thermal Oxidizer	9195A , 9193	Current	4.50	13.14	40.37	113.94	37.80	66.20
PSRU	F313	33SRU3LOAD	33SRU3LOAD	SRU-3 Truck Loading Rack	9195A	Current	-	-	-	-	-	-
PSRU	F311	33SRU3PIT	33SRU3PIT	SRU-3 Sulfur Pit Fugitives	9195A	Current	-	-	-	-	-	-
F-930	F-930	-	-	FUGITIVES	20381	CIAE	-	-	-	-	-	-
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	Tank Farm Fugitives	56409	Current	-	-	-	-	-	-

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							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
PSULF	FSULF	04SULFFUGS	04SULFFUGS	Sulfolane Process Fugitives	5694A	Current	-	-	-	-	-	-
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	SOUR WATER FUGITIVES	17920	Current	-	-	-	-	-	-
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	Process Fugitives	17352	Current	-	-	-	-	-	-
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	Benzene NESHAPS Pretreatment Unit Equipment Fugitives	56385	Current	-	-	-	-	-	-
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	NESHAP WASTEWATER FUGITIVES	Missing Authorization	CIAE	-	-	-	-	-	-
PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	WWT FRONT BOX	Missing Authorization	CIAE	-	-	-	-	-	-
PWWT	PWWT	-	-	WWT FRONT BOX	Missing Authorization	CIAE	-	-	-	-	-	-
RSEA	302	10DEMEXH-2	10DEMEXH-2	RSE Asphalt and Resin Phase Heater	9193, 8983A	Current	3.84	16.84	2.56	11.23	1.83	8.02
RSEB	309	10DEMEXH-4	10DEMEXH-4	DEMEX DMO Phase Heater	9193, 8983A	Current	9.48	41.50	3.51	15.38	2.13	9.31
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	South PWS Equipment Fugitives	56385	Current	-	-	-	-	-	-
T1000	1000	38TANK1000	38TANK1000	Tank 1000	17920	Current	-	-	-	-	-	-
T1001	1001	38TANK1001	38TANK1001	Tank 1001	17920	Current	-	-	-	-	-	-
T2001	2001	20TANK2001	20TANK2001	Two Gasoline Storage Tanks	19490	Current	-	-	-	-	-	-
T2002	2002	20TANK2002	20TANK2002	Two Gasoline Storage Tanks	19490	Current	-	-	-	-	-	-
T2003	2003	20TANK2003	20TANK2003	Diesel Storage Tank	19490	Current	-	-	-	-	-	-
T301	329	18TANK0301	18TANK0301	Tank 301	17352	Current	-	-	-	-	-	-
T302	330	18TANK0302	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
T303	331	18TANK0303	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
T305	333	18TANK0305	18TANK0305	Tank 305	17352	Current	-	-	-	-	-	-
T306	334	18TANK0306	18TANK0306	Tank 306	17352	Current	-	-	-	-	-	-
T316	316	22TANK0316	22TANK0316	Tank 316	17352	Current	-	-	-	-	-	-
T317	317	22TANK0317	22TANK0317	Tank 317	17352	Current	-	-	-	-	-	-
T401A	401A	67TANK401A	67TANK401A	Equalization Tank VOC (TK-401A)	56385	Current	-	-	-	-	-	-
T401B	401B	67TANK401B	67TANK401B	Equalization Tank VOC (TK-401B)	56385	Current	-	-	-	-	-	-
T415	415	-	-	Tank 415	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T416	416	22TANK0416	22TANK0416	TANK 416	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T421	421	22TANK0421	22TANK0421	TANK 421	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T422	422	22TANK0422	22TANK0422	TANK 422	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T441	441	22TANK0441	22TANK0441	Tank 441	18936, 46396	Current	-	-	-	-	-	-
T445	445	22TANK0445	22TANK0445	TANK 445	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T446	446	22TANK0446	22TANK0446	TANK 446	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T452	452	22TANK0452	22TANK0452	Tank 452	49743	Current	-	-	-	-	-	-
T453	453	22TANK0453	22TANK0453	Tank 453	49743	Current	-	-	-	-	-	-
T454	454	22TANK0454	22TANK0454	Tank 454	49743	Current	-	-	-	-	-	-
T455	455	22TANK0455	22TANK0455	Tank 455	49743	Current	-	-	-	-	-	-
T462	462	22TANK0462	22TANK0462	TANK 462	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T463	463	22TANK0463	22TANK0463	TANK 463	Demo'd	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
T466	466	22TANK0466	22TANK0466	TANK 466	18936	Current	-	-	-	-	-	-
T470	470	22TANK0470	22TANK0470	TANK NO. 470	18936	Current	-	-	-	-	-	-
T475	222	22TANK0475	22TANK0475	Tank 475	49743	Current	-	-	-	-	-	-
T476	223	22TANK0476	22TANK0476	Tank 476	49743	Current	-	-	-	-	-	-
T477	212	22TANK0477	22TANK0477	Tank 477	49743	Current	-	-	-	-	-	-
T478	215	22TANK0478	22TANK0478	Tank 478	49743	Current	-	-	-	-	-	-
T479	217	22TANK0479	22TANK0479	Tank 479	49743	Current	-	-	-	-	-	-
T480	480	22TANK0480	22TANK0480	Tank 480	49743	Current	-	-	-	-	-	-
T481	T481	22TANK0481	22TANK0481	Tank 481	49743	Current	-	-	-	-	-	-
T500A	500A	67TANK500A	67TANK500A	South Storm Water Tank (TK-500A)	56385	Current	-	-	-	-	-	-
T500B	500B	67TANK500B	67TANK500B	North Storm Water Tank (TK-500B)	56385	Current	-	-	-	-	-	-
T502	502	22TANK0502	22TANK0502	Light Raffinate Storage Tank	56409	Current	-	-	-	-	-	-
T503	503	22TANK0503	22TANK0503	Water Draw Collection Tank (TK-503)	18936, 56385	Current	-	-	-	-	-	-
T504	504	67TANK0504	67TANK0504	Recovered Oil Tank	56385	Current	-	-	-	-	-	-
T505	505	67TANK0505	67TANK0505	NESHAP Wastewater Tank	56385, 18936	Current	-	-	-	-	-	-
T516	516	22TANK0516	22TANK0516	Tank 516	46396	Current	-	-	-	-	-	-
T524	524	22TANK0524	22TANK0524	Tank 524	46396	Current	-	-	-	-	-	-
T525	525	22TANK0525	22TANK0525	Tank 525	46396	Current	-	-	-	-	-	-
T526	526	22TANK0526	22TANK0526	Tank 526	46396	Current	-	-	-	-	-	-
T530	530	22TANK0530	22TANK0530	TANK 530	56735	Current	-	-	-	-	-	-

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							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
T531	531	22TANK0531	22TANK0531	Tank No. 531	18936	Current	-	-	-	-	-	-
T532	532	22TANK0532	22TANK0532	Tank 532	46396	Current	-	-	-	-	-	-
T536	536	22TANK0536	22TANK0536	Tank No. 536	18936	Current	-	-	-	-	-	-
T538	538	22TANK0538	22TANK0538	Gasoline Storage Tank	56409	Current	-	-	-	-	-	-
T540	540	22TANK0540	22TANK0540	Water Draw Collection Tank (TK-540)	56385	Current	-	-	-	-	-	-
T541	541	22TANK0541	22TANK0541	Tank 541	46396	Current	-	-	-	-	-	-
T542	542	22TANK0542	22TANK0542	Tank 542	46396	Current	-	-	-	-	-	-
T543	543	22TANK0543	22TANK0543	Tank 543	46396	Current	-	-	-	-	-	-
T545	545	22TANK0545	22TANK0545	Tank 545	46396	Current	-	-	-	-	-	-
T558	558	22TANK0558	22TANK0558	Tank No. 558	18936	Current	-	-	-	-	-	-
T559	559	22TANK0559	22TANK0559	Tank No. 559	18936	Current	-	-	-	-	-	-
T560	560	22TANK0560	22TANK0560	Tank No. 560	18936	Current	-	-	-	-	-	-
T561	561	22TANK0561	22TANK0561	Tank No. 561	49743, 18936	Current	-	-	-	-	-	-
T562	562	22TANK0562	22TANK0562	Tank No. 562	18936	Current	-	-	-	-	-	-
T563	563	22TANK0563	22TANK0563	Tank No. 563	18936	Current	-	-	-	-	-	-
T572	572	22TANK0572	22TANK0572	Toluene Storage Tank	56409	Current	-	-	-	-	-	-
T574	574	22TANK0574	22TANK0574	Heavy Raffinate Tank	56409	Current	-	-	-	-	-	-
T587	587	22TANK0587	22TANK0587	Tank No. 587	18936, 46396	Current	-	-	-	-	-	-
T588	588	22TANK0588	22TANK0588	Tank 588	46396	Current	-	-	-	-	-	-
T589	589	22TANK0589	22TANK0589	Tank No. 589	18936, 46396	Current	-	-	-	-	-	-
T591	591	22TANK0591	22TANK0591	Tank 591	18936, 46396	Current	-	-	-	-	-	-
T595	252	67TANK0595	67TANK0595	Recovered Oil Tank	56385	Current	-	-	-	-	-	-
T596	596	67TANK0596	67TANK0596	Recovered Oil Tank	56385	Current	-	-	-	-	-	-
T597	597	22TANK0597	22TANK0597	Tank 597	46396	Current	-	-	-	-	-	-
T598	598	22TANK0598	22TANK0598	Tank 598	46396	Current	-	-	-	-	-	-
T599	599	22TANK0599	22TANK0599	Tank 599	46396	Current	-	-	-	-	-	-
T650	650	22TANK0650	22TANK0650	Toluene Storage Tank	56409	Current	-	-	-	-	-	-
T651	651	22TANK0651	22TANK0651	Toluene Storage Tank	56409	Current	-	-	-	-	-	-
T660	660	67TANK0660	67TK0660CC	IGF Float Tank (TK-660) Carbon Canisters	56385	Current	-	-	-	-	-	-
T902	902	22TANK0902	22TANK0902	Tank 902	18936, 46396	Current	-	-	-	-	-	-
T905	905	67TANK0905	67TANK0905	NESHAP Wastewater Tank	56385	Current	-	-	-	-	-	-
T906	906	22TANK0906	22TANK0906	TANK 906	49982	Current	-	-	-	-	-	-
T907	907	22TANK0907	22TANK0907	TANK 907	49982	Current	-	-	-	-	-	-
T909	909	22TANK0909	22TANK0909	Tank 909	46396	Current	-	-	-	-	-	-
T910	910	22TANK0910	22TANK0910	Tank 910	46396	Current	-	-	-	-	-	-
T911	911	22TANK0911	22TANK0911	TANK 911	56385 - proposed	Current	-	-	-	-	-	-
T913	913	22TANK0913	22TANK0913	TANK 913	70700	Current	-	-	-	-	-	-
T917	917	22TANK0917	22TANK0917	Tank 917	18936, 46396	Current	-	-	-	-	-	-
T918	918	22TANK0918	22TANK0918	Tank 918	46396, 18936	Current	-	-	-	-	-	-
T919	919	22TANK0919	22TANK0919	Tank 919	46396	Current	-	-	-	-	-	-
T920	920	22TANK0920	22TANK0920	Tank 920	46396	Current	-	-	-	-	-	-
T921	921	22TANK0921	22TANK0921	Tank 921	56409	Current	-	-	-	-	-	-
T922	922	22TANK0922	22TANK0922	Tank 922	56409	Current	-	-	-	-	-	-
T923	923	08TANK0923	08TANK0923	ACID STORAGE TANK AT ALKYLATION UNIT	Std. Exemption	Current	-	-	-	-	-	-
T924	924	22TANK0924	22TANK0924	No. 6 Oil Storage Tank	56409	Current	-	-	-	-	-	-
T925	925	22TANK0925	22TANK0925	Tank No. 925	46396, 18936, PBR	Current	-	-	-	-	-	-
T926	926	22TANK0926	22TK926FLR	Tank 926 Flare	46396	Current	22TK926FLR	22TK926FLR	22TK926FLR	22TK926FLR	22TK926FLR	22TK926FLR
T927	927	67TANK0927	67TANK0927	North Storm Water Tank	56385	Current	-	-	-	-	-	-
T928	928	50TANK0928	50BZTNKFLR	Benzene Tank Flare	46396	Current	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR
T929	929	50TANK0929	50BZTNKFLR	Benzene Tank Flare	46396	Current	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR
T930	930	50TANK0930	50BZTNKFLR	Benzene Tank Flare	46396	Current	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR
T934	934	22TANK0934	22TANK0934	Tank 934	18936, 46396	Current	-	-	-	-	-	-
T935	935	22TANK0935	22TANK0935	Tank 935	46396	Current	-	-	-	-	-	-
T938	179	22TANK0938	22TANK0938	Tank 938	46396	Current	-	-	-	-	-	-
T939	180	22TANK0939	22TANK0939	Tank 939	46396	Current	-	-	-	-	-	-
T941	941	04TANK0941	04TANK0941	Storage Tank	5694A	Current	-	-	-	-	-	-
T946	946	04TANK0946	04TANK0946	Storage Tank	5694A	Current	-	-	-	-	-	-

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							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
T947	947	04TANK0947	04TANK0947	Storage Tank	5694A	Current	-	-	-	-	-	-
T948	948	22TANK0948	22TANK0948	Tank 948	46396	Current	-	-	-	-	-	-
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	Terminal Sump	Missing Authorization	Remove from permit	-	-	-	-	-	-
TK506	506	22TANK0506	22TANK0506	TANK 506	PBR	Current	-	-	-	-	-	-
TK522	522	22TANK0522	22TANK0522	Tank 522	18936, 46396, 49743	Current	-	-	-	-	-	-
TK537	537	22TANK0537	22TANK0537	Tank 537	46396	Current	-	-	-	-	-	-
TK586	586	22TANK0586	22TANK0586	Tank 586	18936, 46396	Current	-	-	-	-	-	-
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	VACUUM TRUCK LOADING	MSS Permit	Remove from Permit	-	-	-	-	-	-
WWT-AB	WWT-AB	-	-	WWT AERATION BASIN	Shutdown	Remove from permit	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	WWT BARREL PUMP BOX	Missing Authorization	Remove from permit	-	-	-	-	-	-
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	South Barrel Pump Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	WWT CATCH BASIN	Missing Authorization	Remove from permit	-	-	-	-	-	-
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	WWT CPI (SOUTH)	Missing Authorization	Remove from permit	-	-	-	-	-	-
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	North CPI Carbon Canisters	56385	Current	-	-	-	-	-	-
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	Biological Treatment Unit Equipment Fugitives	56385	Current	-	-	-	-	-	-
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	WWT NORTH BARREL PUMB BOX INLET	Missing Authorization	Remove from permit	-	-	-	-	-	-
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	North Barel Pump Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	North Storm Water Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	WWT RAPID MIX TANK	Missing Authorization	Remove from permit	-	-	-	-	-	-
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	South Storm Water Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	WWT-STK	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	01ACU1WWFG	01ACU1WWFG	ACU-1 Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	01VACTFUGS	01VACTFUGS	Vac. Tower Process Fugitives	73890	Current	-	-	-	-	-	-
-	-	02ACU2WWFG	02ACU2WWFG	ACU-2/Jet Treater Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	04BTXWWFUG	04BTXWWFUG	BTX/Sulfolane Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	08ALKYWWFG	08ALKYWWFG	Alkylation Unit Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	08LSWALKY	08LSWALKY	Lift Station West End of Alky	56385	Current	-	-	-	-	-	-
-	-	08TANK0668	08TANK0668	TANK 668	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	08TANK0669	08TANK0669	TANK 669	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	09SLWWFUG	09SLWWFUG	Sat Liquids Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	10DMXWWFUG	10DMXWWFUG	Demex Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	10GRUWWFUG	10GRUWWFUG	GRU Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	13UNIWWFUG	13UNIWWFUG	Unibon Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	14ATUWWFUG	14ATUWWFUG	Amine Treater Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	14SR1WWFUG	14SR1WWFUG	SRU-1/SCOT Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	14TANK0101	14TANK0101	TANK 101	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	14TANK0102	14TANK0102	TANK 102	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	16ISOMWWFG	16ISOMWWFG	Isomerization Unit Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	17FGRCSFUG	17FGRCSFUG	Flare Gas Recovery	55151	Current	-	-	-	-	-	-
-	-	17NHTWWFUG	17NHTWWFUG	NHT/Reformer Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	17NHTFUGS	17NHTFUGS	NHT Process Fugitives	5694A	Current	-	-	-	-	-	-
-	-	18RAILLOAD	18RAILLOAD	Rail Car Loading	17352	Current	-	-	-	-	-	-
-	-	18ASPHTVRS	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0300	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0310	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0311	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0312	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0313	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0314	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-
-	-	18TANK0315	18ASPHTVRS	Vapor Recovery System	17352	Current	-	-	-	-	-	-

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
-	-	18TANKV330	18TANKV330	Tank 330	17352	Current	-	-	-	-	-	-
-	-	20LSTRKRCK	20LSTRKRCK	Truck Rack Drain Sump and Lift Station	56385	Current	-	-	-	-	-	-
T2000	T2000	20TANK2000	20TANK2000	TANK 2000	35329	Current	-	-	-	-	-	-
-	-	22ASTNKFUG	22ASTNKFUG	Asphalt/Asphalt Blendstock Storage Tank Fugitives	49743	Current	-	-	-	-	-	-
-	-	22CRTNKFUG	22CRTNKFUG	Crude Storage Tank Fugitives	49743	Current	-	-	-	-	-	-
-	-	22BZNTKFUG	22BZNTKFUG	Fugitives	20381	Current	-	-	-	-	-	-
-	-	22BZNTKFLR	22BZNTKFLR	Vapor Combustion Unit	20381	Current	0.30	1.22	0.29	1.28	0.01	0.01
-	-	22GOTNKFUG	22GOTNKFUG	Gas Oil Storage Tank Fugitives	49743	Current	-	-	-	-	-	-
-	-	22OSFTKFUG	22OSFTKFUG	Piping Fugitives	46396	Current	-	-	-	-	-	-
T474	474	45TANK0474	45TANK0474	Dock Wastewater Tank	56385	Current	-	-	-	-	-	-
-	-	22TANK0482	22TANK0482	Tank 482	46396	Current	-	-	-	-	-	-
-	-	22TANK0484	22TANK0484	TANK 484	35330	Current	-	-	-	-	-	-
-	-	22TANK0595	22TANK0595	TANK 595	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	22TANK0596	22TANK0596	TANK 596	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	22TANK0678	41NORTHFLR	North Flare	18936	Current	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap
-	-	22TANK0679	41NORTHFLR	North Flare	18936	Current	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap
-	-	22TANK0680	41NORTHFLR	North Flare	18936	Current	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap
-	-	22TANK0681	22TANK0681	TANK 681	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	22TANK0682	22TANK0682	TANK 682	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	22TANK0800	22TANK0800	EFR Tank	20381	Current	-	-	-	-	-	-
-	-	22TANK0801	22TANK0801	EFR Tank	20381	Current	-	-	-	-	-	-
-	-	22TANK0802	22TANK0802	EFR Tank	20381	Current	-	-	-	-	-	-
-	-	22TANK0805	22TANK0805	EFR Tank	20381	Current	-	-	-	-	-	-
-	-	22TANK0807	22TANK0807	IFR Tank	20381	Current	-	-	-	-	-	-
-	-	22TANK0808	22BZNTKFLR*	Vapor Combustion Unit	20381	Current	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR
-	-	22TANK0809	22BZNTKFLR*	Vapor Combustion Unit	20381	Current	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR
-	-	22TANK0810	22BZNTKFLR*	Vapor Combustion Unit	20381	Current	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR
-	-	22TANK0811	22TANK0811	IFR Tank (Toluene)	20381	Current	-	-	-	-	-	-
-	-	22TANK0812	22TANK0812	IFR Tank (Toluene)	20381	Current	-	-	-	-	-	-
-	-	22TANK0813	22TANK0813	IFR Tank (Toluene)	20381	Current	-	-	-	-	-	-
-	-	22TANK0814	22TANK0814	TANK 814	49982	Current	-	-	-	-	-	-
-	-	22TANK0815	22TANK0815	TANK 815	49982	Current	-	-	-	-	-	-
-	-	22TK926FLR	22TK926FLR	TANK 926	46396	Current	0.38	1.66	0.69	2.74	-	-
-	-	28LPGHOSE	28LPGHOSE	LPG Hose Disconnect Losses	19965	Current	-	-	-	-	-	-
-	-	33SR2WWFUG	33SR2WWFUG	SRU-2 Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	33SRU3FUGS	33SRU3FUGS	SRU 3 Fugitives	9195A	Current	-	-	-	-	-	-
-	-	37SWS2WWFG	37SWS2WWFG	SWS-2 Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	38SWS1WWFG	38SWS1WWFG	SWS-1 Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	40CSOWSUMP	40CSOWCC	Condensate Splitter Oily Water Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	40CSWWFUG	40CSWWFUG	Condensate Splitter Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	45DOCK2PCV	45DOCK2PCV	Dock 2	18936	Current	-	-	-	-	-	-
-	-	45DOCK2FUG	45DOCK2FUG	Dock 2 Piping Fugitives	49743	Current	-	-	-	-	-	-
-	-	45DOCK2PCV	45DOCK2LDG	Dock 2 Loading	49743	Current	-	-	-	-	-	-
-	-	45DOCK45V1	45DOCK45V1	Dock Spill Back Collection Sump	56385	Current	-	-	-	-	-	-
-	-	45DOCK45V2	45DOCK45V2	Dock Spill Back Collection Sump	56385	Current	-	-	-	-	-	-
-	-	45DOCK45V3	45DOCK45V3	Dock Spill Back Collection Sump	56385	Current	-	-	-	-	-	-
-	-	45DOCK1PCV	45DOCKSFLR	DOCK FLARE 1	46396	CIAE	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
-	-	45DOCK3PCV	45DOCKSFLR	DOCK FLARE 1	46396	CIAE	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
-	-	45DOCKSFLR	45DOCKSFLR	DOCK FLARE 1	46396	CIAE	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
-	-	45DOCK1PCV	45DOCKFLR2	DOCK FLARE 2	46396	CIAE	45DOCKTO2	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
-	-	45DOCK3PCV	45DOCKFLR2	DOCK FLARE 2	46396	CIAE	45DOCKTO2	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
-	-	45DOCKFLR2	45DOCKFLR2	DOCK FLARE 2	46396	CIAE	45DOCKTO2	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP	45DOCKTO1	45DOCKTOCAP
-	-	45DOCK3FUG	45DOCK3FUG	Dock 3 Equipment Fugitives	46396	Current	-	-	-	-	-	-

APIRT
OCT 27 2009

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
EPN Summary

Old FIN	Old EPN	New FIN	New EPN	EPN NAME	Historic, Current Permit Number	Status in Permit	Currently Authorized Emission Limits					
							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
-	-	45DOCKV104	45V104CC	Dock 2 Spill Back Tank Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	50BZTNKFLR	50BZTNKFLR	Benzene Tank Flare	46396	Current	0.58	5.22	0.56	7.32	-	-
-	-	50TDPWWFUG	50TDPWWFUG	Toluene Disproportion Unit Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	51DHT1WWFG	51DHT1WWFG	DHT-1 Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	52DHT2WWFG	52DHT2WWFG	DHT-2 Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	52FLORPWS	52FLORPWCC	Florida Unit Process Water Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	52FLWWFUG	52FLWWFUG	Florida Unit Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	52LS811SMP	52LS811SMP	811 Sump East of East End Complex	56385	Current	-	-	-	-	-	-
-	-	52LSE813	52LSE813	Lift Station East End of Unit 813	56385	Current	-	-	-	-	-	-
-	-	54GHT1FUGS	54GHT1FUGS	FCCU Gasoline Hydrodesulfurization Fugitives	Missing Authorization	CIAE	-	-	-	-	-	-
-	-	54GHT2FUGS	54GHT2FUGS	FCCU Gasoline Hydrodesulfurization Fugitives	Missing Authorization	CIAE	-	-	-	-	-	-
-	-	55FCCWWFUG	55FCCWWFUG	FCCU Process Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	55JETTRFUG	55JETTRFUG	840 - Jet Treater	41280	Current	-	-	-	-	-	-
-	-	55JETTRSUMP	55JETTRCC	Jet Treater Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	55OFFGSFUG	55OFFGSFUG	FCCU Offgas Process Fugitives	18936	Current	-	-	-	-	-	-
-	-	58GSHDSCTR	58GSHDSCTR	FCC Naphtha HDS Cooling Tower	18936	Current	-	-	-	-	-	-
-	-	58GSHDSFUG	58GSHDSFUG	FCC Naphtha HDS Process Unit Fugitives	18936	Current	-	-	-	-	-	-
-	-	60CGWWFUG	60CGWWFUG	Cogeneration Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	60COGENPWS	60CGNPWCC	Cogen Unit Process Water Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	60COGENSWS	60CGNSWCC	Cogen Unit Storm Water Sump Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	61PBWWFUG	61PBWWFUG	Package Boilers Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	67AERTKA	67AERTKA	Aeration Tank (TK-403A)	56385	Current	-	-	-	-	-	-
-	-	67AERTKB	67AERTKB	Aeration Tank (TK-403B)	56385	Current	-	-	-	-	-	-
-	-	67AERTKC	67AERTKC	Aeration Tank (TK-403C)	56385	Current	-	-	-	-	-	-
-	-	67BSMNT	67BSMNT	Bar Screen Maintenance	56385	Current	-	-	-	-	-	-
-	-	67C200AFUG	67C200AFUG	C-200 Area Fugitives	55072	Current	-	-	-	-	-	-
-	-	67C200WWFG	67C200WWFG	C-200 Area Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	67CLAR405A	67CLAR405A	Clarifier Tank (TK-405A)	56385	Current	-	-	-	-	-	-
-	-	67CLAR405B	67CLAR405B	Clarifier Tank (TK-405B)	56385	Current	-	-	-	-	-	-
-	-	67CLAR405C	67CLAR405C	Clarifier Tank (TK-405C)	56385	Current	-	-	-	-	-	-
-	-	67CLAREFTK	67CLAREFTK	Clarifier Effluent Tank	56385	Current	-	-	-	-	-	-
-	-	67CLARFLTK	67CLARFLTK	Clarifier Float Tank (TK-406)	56385	Current	-	-	-	-	-	-
-	-	67FLSPTK	67FLSPTK	Flocculator/Splitter Tank (TK-404)	56385	Current	-	-	-	-	-	-
-	-	67LS61P20	67LS61P20	Old DI Unit Lift Station	56385	Current	-	-	-	-	-	-
-	-	67LSBIOTRT	67LSBIOTRT	Biological Unit Process Area Sump	56385	Current	-	-	-	-	-	-
-	-	67LSEDAF	67LSEDAF	Lift Station East of DAF	56385	Current	-	-	-	-	-	-
-	-	67LSN560	67LSN560	Lift Station North of TK-560	56385	Current	-	-	-	-	-	-
-	-	67LSN595	67LSN595	Lift Station North of TK-595	56385	Current	-	-	-	-	-	-
-	-	67LSN905	67LSN905	Lift Station North of TK-905	56385	Current	-	-	-	-	-	-
-	-	67LSNE660	67LSNE660	Lift Station Northeast of TK-660	56385	Current	-	-	-	-	-	-
-	-	67LSS602	67LSS602	Lift Station South of TK-602	56385	Current	-	-	-	-	-	-
-	-	67LSWSHOUT	67LSWSHOUT	Washout Slab Lift Station	56385	Current	-	-	-	-	-	-
-	-	67NCPIMNT	67NCPIMNT	North Corrugated Plate Interceptor	56385	Current	-	-	-	-	-	-
-	-	67NPWWFUG	67NPWWFUG	North Process Sewer Wastewater Fugitives	56385	Current	-	-	-	-	-	-
-	-	67NSHAPFUG	67NSHAPFUG	NESHAP Fugitives	Missing Authorization	CIAE	-	-	-	-	-	-
-	-	67PHADJSPL	67PHADJCC	pH Adjuster/Splitter Tank (TK-402) Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	67SCALBIO	67SCALBIO	Contract Biosludge Dewatering	56385	Current	-	-	-	-	-	-

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							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
-	-	67SCALFUEL	67SCALCC	Contract ScalFuel Dewatering Carbon Canisters	56385	Current	-	-	-	-	-	-
-	-	67SCPIMNT	67SCPIMNT	South Corrugated Plate Interceptor (CPI) Maintenance	56385	Current	-	-	-	-	-	-
-	-	67SOUTHAPD	67SOUTHAPD	South APD	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	67SSTRMWTR	67SSTRMWTR	Storm Water	Missing Authorization	Remove from permit	-	-	-	-	-	-
-	-	67TANK0636	67TANK0636	Solids/Liquids Wastewater Tank	56385	Current	-	-	-	-	-	-
-	-	RECOILFUG	RECOILFUG	Recovered Oil System Equipment Fugitives	56385	Current	-	-	-	-	-	-
-	-	SOLIDLIQFU	SOLIDLIQFU	Solids/Liquids System Equipment Fugitives	56385	Current	-	-	-	-	-	-
-	-	06VDU2CHTR	06VDU2CHTR	VDU-2 Heater	46396	Current	2.97	11.71	6.89	13.64	2.37	4.39
-	-	06VDU2FUGS	06VDU2FUGS	VDU-2 Fugitives	46396	Current	-	-	-	-	-	-
-	-	22TANK0933	22TANK0933	Tank 933	46396	Current	-	-	-	-	-	-
-	-	22TANK0940	22TANK0940	Tank 940	46396	Current	-	-	-	-	-	-
-	-	22TKDCPFUGS	22TKDCPFUGS	DCP Fugitives	46396	Current	-	-	-	-	-	-
-	-	25SRUINCIN	25SRUINCIN	SRU Complex Tail Gas Incinerator	46396	Current	6.40	14.59	39.53	35.85	55.31	136.66
-	-	36SRUINCIN	36SRUINCIN	SRU 5 Incinerator	46396	Current	6.40	14.59	39.53	35.85	55.31	136.66
-	-	30CKRFLARE	30CKRFLARE	DCP Flare	46396	Current	0.01	0.01	0.01	0.04	0.01	0.05
-	-	30CKRFUGS	30CKRFUGS	CU Fugitives	46396	Current	-	-	-	-	-	-
-	-	30CKRHTR1	30CKRHTR1	CU - Heater 1	46396	Current	2.11	7.18	7.95	25.10	5.06	8.07
-	-	30CKRHTR2	30CKRHTR2	CU - Heater 2	46396	Current	2.11	7.18	7.95	25.10	5.06	8.07
-	-	30CKRTRKLD	30CKRTRKLD	Coke Handling	46396	Current	-	-	-	-	-	-
-	-	30DCPCT1	30DCPCT1	DCP Cooling Tower	46396	Current	-	-	-	-	-	-
-	-	31KNHTHTR	31KNHTHTR	KNHT Charge Heater	46396	Current	1.26	1.38	2.92	1.61	1.01	0.52
-	-	34SRUFUGS	34SRUFUGS	SRU/TGU Fugitives	46396	Current	-	-	-	-	-	-
-	-	37TANK1002	37TANK1002	Tank DCP SW	46396	Current	-	-	-	-	-	-
-	-	67TANK0401C	67TANK0401C	Tank 401C	46396	Current	-	-	-	-	-	-
-	-	67TANK0500C	67TANK0500C	Tank 500C	46396	Current	-	-	-	-	-	-
-	-	38V107	38V107	SW Skimmed Oil (Tank 38V-107)	46396	Current	-	-	-	-	-	-
-	-	22TANK0517	22TANK0517	Tank 517	90747	Current	-	-	-	-	-	-
-	-	42FGTFUGS	42FGTFUGS	ARU-2 Fugitives	46396	Current	-	-	-	-	-	-
-	-	43DHT3CHTR	43DHT3CHTR	DHT-3 Charge Heater	46396	Current	1.50	5.91	3.48	6.89	1.20	2.22
-	-	43DHT3CMSS	43DHT3CMSS	DHT-3 Heater MSS	46396	Current	-	-	3.50	-	-	-
-	-	43DHT3FUGS	43DHT3FUGS	DHT-3 Fugitives	46396	Current	-	-	-	-	-	-
-	-	47SWS4FUGS	47SWS4FUGS	SWS-4 Fugitives	46396	Current	-	-	-	-	-	-
-	-	35SRU5FUGS	35SRU5FUGS	SRU Fugitives	46396	Current	-	-	-	-	-	-
-	-	31KNHTFUGS	31KNHTFUGS	KNHT Fugitives	46396	Current	-	-	-	-	-	-
-	-	19PSAFUGS	19PSAFUGS	PSA Fugitives	46396	Current	-	-	-	-	-	-
-	-	30AMSTFUGS	30AMSTFUGS	AMST Fugitives	46396	Current	-	-	-	-	-	-
-	-	30CKRH1MSS	30CKRH1MSS	CU - Heater 1 MSS	46396	Current	13.72	1.15	14.68	1.23	5.06	0.42
-	-	30CKRH2MSS	30CKRH2MSS	CU - Heater 2 MSS	46396	Current	13.72	1.15	14.68	1.23	5.06	0.42
-	-	MSSILE	MSSILE	Process Equipment MSS to ATM	46396	Current	-	-	-	-	-	-
-	-	MSS_TA	MSS_TA	MSS T/A Bubble 1	46596, MSS Permit	Current	178.67	11.13	1,043.77	59.23	14,940.65	116.00
-	-	MSS_ATM	MSS_ATM	MSS Atmospheric Bubble 2	46596, MSS Permit	Current	3.29	0.35	0.86	0.18	0.39	0.04
-	-	MSS_TKFLR	MSS_TKFLR	Benzene Tank Flare MSS	MSS Permit	Current	-	-	-	-	-	-
-	-	MSS_WGS	MSS_WGS	FCCU Wet Gas Scrubber Emissions During Startup	MSS Permit	Current	-	-	97.59	0.18	674.26	8.30
-	-	MSS_COGEN	MSS_COGEN	Cogen MSS	MSS Permit	Current	135.49	1.47	-	-	-	-
-	-	MSS_INCIN	MSS_INCIN	SRU Incinerator Emissions During MSS	MSS Permit	Current	4.78	5.09	92.19	51.95	519.44	50.64
-	-	55OGTCLTWR	55OGTCLTWR	OGT Cooling Tower	18936	Current	-	-	-	-	-	-
-	-	54GHTSUMP	54GHTCC	GHT Unit Sump	56385	Current	-	-	-	-	-	-
-	-	45DOCKV104	45V1CC	Dock 1 Spillback Collection Sump	56385	Current	-	-	-	-	-	-
-	-	45DOCKV3A	45V3ACC	Dock 3A Spillback Collection Sump	56385	Current	-	-	-	-	-	-
-	-	45DOCKV3B	45V3BCC	Dock 3B Spillback Collection Sump	56385	Current	-	-	-	-	-	-
-	-	67SBOWSCC	67SBOWSCC	Sulfur Block Oily Water Sewer	56385	Current	-	-	-	-	-	-
-	-	67SBSEWCC	67SBSEWCC	Sulfur Block Storm Sewer	56385	Current	-	-	-	-	-	-

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
EPN Summary

Old FIN	Old EPN	New FIN	New EPN	EPN NAME	Historic, Current Permit Number	Status in Permit	Currently Authorized Emission Limits					
							NOx		CO		SO_2	
							lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
-	-	67GFOWSCC	67GFOWSCC	Greenfield Area Oily Water Sewer	56385	Current	-	-	-	-	-	-
-	-	67GFSEWCC	67GFSEWCC	Greenfield Area Storm Sewer	56385	Current	-	-	-	-	-	-
-	-	67VDUOWSCC	67VDUOWSCC	Vacuum Distillation Unit 2 (VDU-2) Oily Water Sewer	56385	Current	-	-	-	-	-	-
-	-	67SKIMCC	67SKIMCC	Sour Water Skim Oil Tank	56385	Current	-	-	-	-	-	-
-	-	CVSPH3MACT	CVSPH3MACT	CVSPH Fugitives	Missing Authorization	Current	-	-	-	-	-	-
-	-	45DOCKTO1	45DOCKTO1	Marine Terminal Thermal Oxidizer 1	46396	Current	10.08	45DOCKTOCAP	15.42	45DOCKTOCAP	0.14	45DOCKTOCAP
-	-	45DOCKTO2	45DOCKTO2	Marine Terminal Thermal Oxidizer 2	46396	Current	19.51	45DOCKTOCAP	29.84	45DOCKTOCAP	0.16	45DOCKTOCAP
-	-	45DOCKTOCAP	45DOCKTOCAP	Marine Terminal Thermal Oxidizers 1 and 2 Cap	46396	Current	-	4.95	-	14.67	-	0.02
-	-	22CRUDECAP	22CRUDECAP	Crude Tank Cap	46396	Current	-	-	-	-	-	-
-	-	22GASOILCAP	22GASOILCAP	Gas Oil Tank Cap	46396	Current	-	-	-	-	-	-
-	-	22CBOCAP	22CBOCAP	Carbon Black Oil Tank Cap	46396	Current	-	-	-	-	-	-
-	-	22DIESELCAP	22DIESELCAP	Diesel Tank Cap	46396	Current	-	-	-	-	-	-
-	-	22GASCAP	22GASCAP	Gasoline Tank Cap	46396	Current	-	-	-	-	-	-
-	-	22JETCAP	22JETCAP	Jet Tank Cap	46396	Current	-	-	-	-	-	-
					Site Wide Totals		**876.92**	**1,538.98**	**2,091.98**	**1,809.98**	**16,499.90**	**953.89**

Notes:
O/D/S = Out of Service, Demolished, and/or Shutdown
CIAE = Consolidated into another EPN

TOTAL PETROCHEMICALS USA, INC.
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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
01ACU1202A	01ACU1202A	1.01	1.28	1.39	6.10	-	-	-	-	-	-
01ACU1H101	01ACU1H101	0.93	4.10	0.81	3.50	-	-	-	-	-	-
55FCCURFGS	55FCCURFGS	5.63	50.83	52.96	226.30	-	-	3.92	15.50	-	-
20GASTRKFG	20GASTRKFG	1.04	4.55	-	-	-	-	-	-	-	-
20GASLOAD	20GASFLARE	7.09	7.05	-	-	-	-	-	-	-	-
20DISTLDG	20DISTLDG	-	-	-	-	-	-	-	-	-	-
04BTXFUGS	04BTXFUGS	3.50	15.32	-	-	-	-	-	-	-	-
40CSPLTFUG	40CSPLTFUG	1.33	5.84	-	-	-	-	-	-	-	-
61BLRFUGS	61BLRFUGS	0.02	0.09	-	-	-	-	-	-	-	-
61BLRH300	61STACKBLR (Common Stack)	2.74	9.98	3.80	13.84	-	-	-	-	-	-
61BLRH350											
50TDPH-1	50TDPH-1	0.21	0.96	0.29	0.82	-	-	-	-	-	-
51DHT1H-1	51DHT1H-1	0.33	1.07	0.47	1.52	-	-	-	-	-	-
51DHT1H-3	51DHT1H-3	0.24	0.84	0.34	1.19	-	-	-	-	-	-
10GRUHTRB1	10GRUHTRB1	0.16	0.71	0.22	0.98	-	-	-	-	-	-
02ACU2H201	02ACU2H201	0.77	1.58	1.37	2.82	-	-	-	-	-	-
01VACTH301	01VACTH301	0.59	2.60	0.51	2.25	-	-	-	-	-	-
01ACU1202B	01ACU1202B	1.01	1.28	1.39	6.10	-	-	-	-	-	-
52DHT2H-1	52DHT2H-1	0.31	1.07	0.43	1.52	-	-	-	-	-	-
52DHT2H-2	52DHT2H-2A/B	0.35	1.21	0.49	1.72	-	-	-	-	-	-
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
67BNZNSHAP	67BNZNSHAP	-	-	-	-	-	-	-	-	-	-
04BTXH-51	04BTXH-51	0.12	0.55	0.17	0.75	-	-	-	-	-	-
04BTXH-52	04BTXH-52	0.27	1.18	0.38	1.63	-	-	-	-	-	-
04BTXH-53	04BTXH-53	0.31	1.33	0.42	1.83	-	-	-	-	-	-
67BZFFWWPD	67BZFFWWPD	-	-	-	-	-	-	-	-	-	-
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
60COGENTRB	60COGENSTK	2.33	7.08	5.65	19.91	-	-	-	-	-	-
45DOCK1PCV	45DOCKSFLR	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
-	-	45DOCKTOCAP	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
51DHT1FUGS	51DHT1FUGS	45DOCKTOCAP	20.95	-	-	0.05	0.21	-	-	-	-
08ALKYFUGS	08ALKYFUGS	45DOCKTOCAP	42.94	-	-	-	-	-	-	-	-
55FCCUFUGS	55FCCUCHOP	45DOCKTOCAP	-	0.02	0.10	0.05	0.22	-	-	-	-
55FCCUFUGS	55FCCUFUGS	45DOCKTOCAP	46.38	0.41	1.80	0.05	0.22	-	-	-	-
55FCCUFUGS	55FCCUPTUC	45DOCKTOCAP	0.21	-	-	0.05	0.22	-	-	-	-
67FPMCLTWR	67FPMCLTWR	7.56	33.12	-	-	-	-	-	-	-	-
28LPGFUGS	28LPGFUGS	4.07	20.53	-	-	0.01	0.01	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
13UNIBH301	13UNIBH301	0.58	2.53	0.50	2.19	-	-	-	-	-	-
17REFHTRS	17REFHTRS	2.27	9.94	3.13	13.73	-	-	-	-	-	-
17NHTHTRS	17NHTHTRS	0.68	3.00	0.94	4.14	-	-	-	-	-	-

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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
16ISOMFUGS	16ISOMFUGS	0.01	0.53	-	-	-	-	-	-	-	-
16ISOMHTR	16ISOMHTR	0.26	1.14	0.70	3.05	-	-	-	-	-	-
45DOCKAPCV	45DOCK1LDG	29.69	6.56	-	-	-	-	-	-	-	-
45DOCKAPCV	45DOCKSFLR	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCKBPCV	45DOCKSFLR	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCKBPCV	45DOCKBLDG	45DOCK1LDG	45DOCK1LDG	-	-	-	-	-	-	-	-
75LABHOODS	75LABHOODS	-	-	-	-	-	-	-	-	-	-
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
75LABSUMP	75LABCC	0.01	0.01	-	-	-	-	-	-	-	-
18TRKLOAD	18TRKLOAD	0.15	0.68	-	-	-	-	-	-	-	-
40CSPLTH-1	40CSPLTH-1	0.58	2.50	2.32	10.17	-	-	-	-	-	-
NPWSFUG	NPWSFUG	0.10	0.44	-	-	-	-	-	-	-	-
02FWCLGTWR	02FWCLGTWR	0.36	1.60	-	-	-	-	-	-	-	-
50TDPFUGS	50TDPFUGS	1.37	6.01	-	-	-	-	-	-	-	-
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
67805CLTWR	67805CLTWR	0.07	0.30	-	-	-	-	-	-	-	-
08ALKCLTWR	08ALKCLTWR	0.38	1.66	-	-	-	-	-	-	-	-
10GRUFUGS	10GRUFUGS	0.09	0.38	0.03	1.13	-	-	-	-	-	-
02ACU2FUGS	02ACU2FUGS	8.34	45.03	-	-	0.09	0.06	0.01	0.01	-	-
52DHT2FUGS	52DHT2FUGS	4.39	23.44	-	-	0.01	0.06	-	-	-	-
37SWS2FUGS	37SWS2FUGS	0.06	0.25	-	-	0.04	0.15	0.01	0.02	-	-
67C200FUGS	67C200FUGS	0.92	4.01	-	-	-	-	-	-	-	-
02HDCLGTWR	02HDCLGTWR	0.10	0.46	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
04BTXTKFUG	04BTXTKFUG	0.37	1.66	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
60COGENFUG	60COGENFUG	0.25	1.11	-	-	-	-	-	-	-	-
67COGENCT	67COGENCT	0.72	2.52	-	-	-	-	-	-	-	-
01ACU1FUGS	01ACU1FUGS	5.58	26.17	-	-	0.01	0.02	0.01	0.01	-	-
09SATLQFUG	09SATLQFUG	0.29	1.28	-	-	-	-	-	-	-	-
14FGTFUGS	14FGTFUGS	-	-	-	-	-	-	-	-	-	-
67NORTHCT	67NORTHCT	0.40	1.80	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
45DOCK1FUG	45DOCK1FUG	1.57	6.87	-	-	-	-	-	-	-	-
45DOCKAFUG	45DOCKAFUG	-	-	-	-	-	-	-	-	-	-
45DOCKBFUG	45DOCKBFUG	-	-	-	-	-	-	-	-	-	-
53MIDFLARE	53MIDFLARE	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	-	-	-	-
53SOUTHFLR	53SOUTHFLR	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	-	-	-	-
41NORTHFLR	41NORTHFLR	755.77	312.36	-	-	0.12	0.11	-	-	-	-
13UNIBFUGS	13UNIBFUGS	5.86	43.07	-	-	0.33	1.46	0.01	0.01	-	-
17REFFUGS	17REFFUGS	6.50	28.50	-	-	-	-	-	-	-	-
17REFREGEN	17REFREGEN	0.04	0.18	-	-	-	-	-	-	1.93	1.99
20MOGASBLD	20MOGASBLD	0.89	3.90	-	-	-	-	-	-	-	-
67PRESSBOX	67PRESSBOX	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
10DEMEXFUG	10DEMEXFUG	1.28	5.63	-	-	-	-	-	-	-	-
14SRU1FUGS	14SRU1FUGS	0.01	0.01	-	-	0.01	0.03	-	-	-	-
14SRU1LOAD	14SRU1LOAD	-	-	-	-	0.01	0.01	-	-	-	-
14SRU1PIT	14SRU1PIT	-	-	-	-	0.01	0.01	-	-	-	-
15SCOTFUGS	15SCOTFUGS	0.02	0.12	-	-	0.07	0.27	-	-	-	-
33SRU3	15SRUINCIN	2.00	7.60	1.08	3.15	1.06	1.85	-	-	-	-
33SRU3LOAD	33SRU3LOAD	-	-	-	-	0.01	0.01	-	-	-	-
33SRU3PIT	33SRU3PIT	-	-	-	-	0.01	0.01	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
22TKFMFUGS	22TKFMFUGS	0.78	3.44	-	-	-	-	-	-	-	-

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
04SULFFUGS	04SULFFUGS	2.49	10.90	-	-	-	-	-	-	-	-
38SWS1FUGS	38SWS1FUGS	-	-	-	-	-	-	-	-	-	-
18ASPHTFUG	18ASPHTFUG	0.37	1.62	-	-	-	-	-	-	-	-
NESHAPSFUG	NESHAPSFUG	0.37	1.64	-	-	-	-	-	-	-	-
67NSHAPFUG	67NSHAPCVS	-	-	-	-	-	-	-	-	-	-
67PWWTFUGS	67PWWTFUGS	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
10DEMEXH-2	10DEMEXH-2	0.37	1.63	0.88	3.85	-	-	-	-	-	-
10DEMEXH-4	10DEMEXH-4	0.51	2.23	0.44	1.92	-	-	-	-	-	-
SPWSFUG	SPWSFUG	0.19	0.84	-	-	-	-	-	-	-	-
38TANK1000	38TANK1000	0.14	0.61	-	-	0.01	0.05	0.01	0.01	-	-
38TANK1001	38TANK1001	0.11	0.49	-	-	0.02	0.04	0.01	0.02	-	-
20TANK2001	20TANK2001	2.39	5.70	-	-	-	-	-	-	-	-
20TANK2002	20TANK2002	-	Cap	-	-	-	-	-	-	-	-
20TANK2003	20TANK2003	1.57	0.32	-	-	-	-	-	-	-	-
18TANK0301	18TANK0301	0.94	0.10	-	-	-	-	-	-	-	-
18TANK0302	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0303	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0305	18TANK0305	2.52	0.20	-	-	-	-	-	-	-	-
18TANK0306	18TANK0306	1.60	0.20	-	-	-	-	-	-	-	-
22TANK0316	22TANK0316	0.17	0.14	-	-	-	-	-	-	-	-
22TANK0317	22TANK0317	0.20	0.14	-	-	-	-	-	-	-	-
67TANK401A	67TANK401A	0.01	0.01	-	-	-	-	-	-	-	-
67TANK401B	67TANK401B	0.01	0.01	-	-	-	-	-	-	-	-
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0416	22TANK0416	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0421	22TANK0421	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0422	22TANK0422	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0441	22TANK0441	31.88	4.27	-	-	-	-	-	-	-	-
22TANK0445	22TANK0445	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0446	22TANK0446	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0452	22TANK0452	10.80	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0453	22TANK0453	10.80	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0454	22TANK0454	10.80	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0455	22TANK0455	10.77	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0462	22TANK0462	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0463	22TANK0463	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
22TANK0466	22TANK0466	0.25	1.10	-	-	-	-	-	-	-	-
22TANK0470	22TANK0470	0.94	4.10	-	-	-	-	-	-	-	-
22TANK0475	22TANK0475	13.19	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0476	22TANK0476	13.19	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0477	22TANK0477	11.36	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0478	22TANK0478	11.36	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0479	22TANK0479	11.36	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0480	22TANK0480	9.08	22CRUDECAP	-	-	-	-	-	-	-	-
22TANK0481	22TANK0481	9.09	22CRUDECAP	-	-	-	-	-	-	-	-
67TANK500A	67TANK500A	0.21	0.52	-	-	-	-	-	-	-	-
67TANK500B	67TANK500B	0.21	0.52	-	-	-	-	-	-	-	-
22TANK0502	22TANK0502	1.56	2.73	-	-	-	-	-	-	-	-
22TANK0503	22TANK0503	0.06	0.05	-	-	-	-	-	-	-	-
67TANK0504	67TANK0504	0.02	1.27	-	-	-	-	-	-	-	-
67TANK0505	67TANK0505	0.44	0.63	-	-	-	-	-	-	-	-
22TANK0516	22TANK0516	0.22	0.10	-	-	-	-	-	-	-	-
22TANK0524	22TANK0524	11.29	22DIESELCAP	-	-	-	-	-	-	-	-
22TANK0525	22TANK0525	0.85	22JETCAP	-	-	-	-	-	-	-	-
22TANK0526	22TANK0526	0.71	1.05	-	-	-	-	-	-	-	-
22TANK0530	22TANK0530	0.02	1.04	-	-	-	-	-	-	-	-

TOTAL PETROCHEMICALS USA, INC.
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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
22TANK0531	22TANK0531	0.84	2.21	-	-	-	-	-	-	-	-
22TANK0532	22TANK0532	4.30	22GASCAP	-	-	-	-	-	-	-	-
22TANK0536	22TANK0536	6.53	0.43	-	-	-	-	-	-	-	-
22TANK0538	22TANK0538	39.86	1.94	-	-	-	-	-	-	-	-
22TANK0540	22TANK0540	0.11	0.12	-	-	-	-	-	-	-	-
22TANK0541	22TANK0541	3.10	22GASCAP	-	-	-	-	-	-	-	-
22TANK0542	22TANK0542	3.17	22GASCAP	-	-	-	-	-	-	-	-
22TANK0543	22TANK0543	0.66	22JETCAP	-	-	-	-	-	-	-	-
22TANK0545	22TANK0545	0.83	0.40	-	-	-	-	-	-	-	-
22TANK0558	22TANK0558	0.88	22GASOILCAP	-	-	-	-	-	-	-	-
22TANK0559	22TANK0559	0.92	22GASOILCAP	-	-	-	-	-	-	-	-
22TANK0560	22TANK0560	0.92	22GASOILCAP	-	-	-	-	-	-	-	-
22TANK0561	22TANK0561	0.92	22GASOILCAP	-	-	-	-	-	-	-	-
22TANK0562	22TANK0562	0.34	4.22	-	-	-	-	-	-	-	-
22TANK0563	22TANK0563	1.29	4.22	-	-	-	-	-	-	-	-
22TANK0572	22TANK0572	0.34	0.32	-	-	-	-	-	-	-	-
22TANK0574	22TANK0574	0.91	0.80	-	-	-	-	-	-	-	-
22TANK0587	22TANK0587	7.87	6.49	-	-	-	-	-	-	-	-
22TANK0588	22TANK0588	0.61	0.49	-	-	-	-	-	-	-	-
22TANK0589	22TANK0589	1.18	22CBOCAP	-	-	-	-	-	-	-	-
22TANK0591	22TANK0591	0.64	0.41	-	-	-	-	-	-	-	-
67TANK0595	67TANK0595	0.21	0.99	-	-	-	-	-	-	-	-
67TANK0596	67TANK0596	0.06	1.52	-	-	-	-	-	-	-	-
22TANK0597	22TANK0597	1.88	0.36	-	-	-	-	-	-	-	-
22TANK0598	22TANK0598	1.88	0.36	-	-	-	-	-	-	-	-
22TANK0599	22TANK0599	0.28	0.23	-	-	-	-	-	-	-	-
22TANK0650	22TANK0650	0.34	0.18	-	-	-	-	-	-	-	-
22TANK0651	22TANK0651	0.34	0.18	-	-	-	-	-	-	-	-
67TANK0660	67TK0660CC	0.01	0.01	-	-	-	-	-	-	-	-
22TANK0902	22TANK0902	31.88	2.90	-	-	-	-	-	-	-	-
67TANK0905	67TANK0905	0.21	1.18	-	-	-	-	-	-	-	-
22TANK0906	22TANK0906	0.05	2.21	-	-	-	-	-	-	-	-
22TANK0907	22TANK0907	0.05	2.15	-	-	-	-	-	-	-	-
22TANK0909	22TANK0909	0.67	22JETCAP	-	-	-	-	-	-	-	-
22TANK0910	22TANK0910	0.42	22JETCAP	-	-	-	-	-	-	-	-
22TANK0911	22TANK0911	1.05	2.55	-	-	-	-	-	-	-	-
22TANK0913	22TANK0913	0.19	8.47	-	-	-	-	-	-	-	-
22TANK0917	22TANK0917	31.88	22DIESELCAP	-	-	-	-	-	-	-	-
22TANK0918	22TANK0918	2.92	5.69	-	-	-	-	-	-	-	-
22TANK0919	22TANK0919	0.33	0.92	-	-	-	-	-	-	-	-
22TANK0920	22TANK0920	0.24	0.85	-	-	-	-	-	-	-	-
22TANK0921	22TANK0921	3.93	22DIESELCAP	-	-	-	-	-	-	-	-
22TANK0922	22TANK0922	3.93	22DIESELCAP	-	-	-	-	-	-	-	-
08TANK0923	08TANK0923	-	-	-	-	-	-	-	-	-	-
22TANK0924	22TANK0924	0.39	0.01	-	-	-	-	-	-	-	-
22TANK0925	22TANK0925	1.20	22CBOCAP	-	-	-	-	-	-	-	-
22TANK0926	22TK926FLR	22TK926FLR	22TK926FLR	22TK926FLR	22TK926FLR	-	-	-	-	-	-
67TANK0927	67TANK0927	0.44	0.01	-	-	-	-	-	-	-	-
50TANK0928	50BZTNKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	-	-	-	-	-	-
50TANK0929	50BZTNKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	-	-	-	-	-	-
50TANK0930	50BZTNKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	50BZNTKFLR	-	-	-	-	-	-
22TANK0934	22TANK0934	11.29	22DIESELCAP	-	-	-	-	-	-	-	-
22TANK0935	22TANK0935	2.37	22GASCAP	-	-	-	-	-	-	-	-
22TANK0938	22TANK0938	1.37	3.79	-	-	-	-	-	-	-	-
22TANK0939	22TANK0939	1.39	3.65	-	-	-	-	-	-	-	-
04TANK0941	04TANK0941	0.19	0.30	-	-	-	-	-	-	-	-
04TANK0946	04TANK0946	0.25	0.39	-	-	-	-	-	-	-	-

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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
04TANK0947	04TANK0947	0.24	0.01	-	-	-	-	-	-	-	-
22TANK0948	22TANK0948	0.83	0.57	-	-	-	-	-	-	-	-
67TERMSUMP	67TERMSUMP	-	-	-	-	-	-	-	-	-	-
22TANK0506	22TANK0506	0.89	2.66	-	-	-	-	-	-	-	-
22TANK0522	22TANK0522	0.20	0.28	-	-	-	-	-	-	-	-
22TANK0537	22TANK0537	0.28	0.45	-	-	-	-	-	-	-	-
22TANK0586	22TANK0586	0.09	0.63	-	-	-	-	-	-	-	-
VACUUMTRKS	VACUUMTRKS	-	-	-	-	-	-	-	-	-	-
-	-	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S	O/D/S
67WWTBPBIN	67WWTBPBIN	-	-	-	-	-	-	-	-	-	-
67SBPSUMP	67SBPCC	0.01	0.01	-	-	-	-	-	-	-	-
67WWTCATCH	67WWTCATCH	-	-	-	-	-	-	-	-	-	-
67WWTCPIS	67WWTCPIS	-	-	-	-	-	-	-	-	-	-
67NCPI	67NCPICC	0.03	0.12	-	-	-	-	-	-	-	-
BIOTRTFUG	BIOTRTFUG	0.15	0.66	-	-	-	-	-	-	-	-
67WWTNBPBI	67WWTNBPBI	-	-	-	-	-	-	-	-	-	-
67NBPSUMP	67NBPCC	0.01	0.01	-	-	-	-	-	-	-	-
67NSWSUMP	67NSWCC	0.10	0.14	-	-	-	-	-	-	-	-
67WWTRAPID	67WWTRAPID	-	-	-	-	-	-	-	-	-	-
67SSWSUMP	67SSWCC	0.05	0.14	-	-	-	-	-	-	-	-
67WWTNSKTK	67WWTNSKTK	-	-	-	-	-	-	-	-	-	-
01ACU1WWFG	01ACU1WWFG	0.33	1.46	-	-	-	-	-	-	-	-
01VACTFUGS	01VACTFUGS	0.02	0.08	-	-	-	-	-	-	-	-
02ACU2WWFG	02ACU2WWFG	0.70	3.07	-	-	-	-	-	-	-	-
04BTXWWFUG	04BTXWWFUG	0.37	1.62	-	-	-	-	-	-	-	-
08ALKYWWFG	08ALKYWWFG	0.37	1.64	-	-	-	-	-	-	-	-
08LSWALKY	08LSWALKY	0.16	0.42	-	-	-	-	-	-	-	-
08TANK0668	08TANK0668	-	-	-	-	-	-	-	-	-	-
08TANK0669	08TANK0669	-	-	-	-	-	-	-	-	-	-
09SLWWFUG	09SLWWFUG	0.30	1.32	-	-	-	-	-	-	-	-
10DMXWWFUG	10DMXWWFUG	0.15	0.66	-	-	-	-	-	-	-	-
10GRUWWFUG	10GRUWWFUG	0.09	0.41	-	-	-	-	-	-	-	-
13UNIWWFUG	13UNIWWFUG	0.25	1.10	-	-	-	-	-	-	-	-
14ATUWWFUG	14ATUWWFUG	0.15	0.66	-	-	-	-	-	-	-	-
14SR1WWFUG	14SR1WWFUG	0.18	0.80	-	-	-	-	-	-	-	-
14TANK0101	14TANK0101	-	-	-	-	-	-	-	-	-	-
14TANK0102	14TANK0102	-	-	-	-	-	-	-	-	-	-
16ISOMWWFG	16ISOMWWFG	0.14	0.63	-	-	-	-	-	-	-	-
17FGRCSFUG	17FGRCSFUG	0.34	1.43	-	-	-	-	-	-	-	-
17NHTWWFUG	17NHTWWFUG	0.35	1.52	-	-	-	-	-	-	-	-
17NHTFUGS	17NHTFUGS	2.29	10.01	-	-	0.02	0.05	-	-	-	-
18RAILLOAD	18RAILLOAD	0.27	0.11	-	-	-	-	-	-	-	-
18ASPHTVRS	18ASPHTVRS	15.05	1.20	-	-	0.01	0.02	-	-	-	-
18TANK0300	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0310	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0311	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0312	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0313	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0314	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-
18TANK0315	18ASPHTVRS	18ASPHTVRS	18ASPHTVRS	-	-	18ASPHTVRS	18ASPHTVRS	-	-	-	-

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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
18TANKV330	18TANKV330	0.16	0.25	-	-	-	-	-	-	-	-
~~20LSTRKRCK~~	~~20LSTRKRCK~~	0.09	0.06	-	-	-	-	-	-	-	-
20TANK2000	20TANK2000	1.49	0.03	-	-	-	-	-	-	-	-
22ASTNKFUG	22ASTNKFUG	0.12	0.53	-	-	-	-	-	-	-	-
22CRTNKFUG	22CRTNKFUG	0.51	2.22	-	-	-	-	-	-	-	-
22BZNTKFUG	22BZNTKFUG	-	-	-	-	-	-	-	-	-	-
22BZNTKFLR	22BZNTKFLR	0.04	0.06	-	-	-	-	-	-	-	-
22GOTNKFUG	22GOTNKFUG	0.16	0.70	-	-	-	-	-	-	-	-
22OSFTKFUG	22OSFTKFUG	1.28	5.58	-	-	-	-	-	-	-	-
45TANK0474	45TANK0474	0.04	0.06	-	-	-	-	-	-	-	-
22TANK0482	22TANK0482	8.89	8.91	-	-	-	-	-	-	-	-
22TANK0484	22TANK0484	0.28	1.24	-	-	-	-	-	-	-	-
22TANK0595	22TANK0595	-	-	-	-	-	-	-	-	-	-
22TANK0596	22TANK0596	-	-	-	-	-	-	-	-	-	-
22TANK0678	41NORTHFLR	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	-	-	-	-
22TANK0679	41NORTHFLR	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	-	-	-	-
22TANK0680	41NORTHFLR	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	Flare Cap	-	-	-	-
22TANK0681	22TANK0681	-	-	-	-	-	-	-	-	-	-
22TANK0682	22TANK0682	-	-	-	-	-	-	-	-	-	-
22TANK0800	22TANK0800	4.95	6.28	-	-	-	-	-	-	-	-
22TANK0801	22TANK0801	4.95	6.28	-	-	-	-	-	-	-	-
22TANK0802	22TANK0802	4.95	6.28	-	-	-	-	-	-	-	-
22TANK0805	22TANK0805	3.33	4.08	-	-	-	-	-	-	-	-
22TANK0807	22TANK0807	1.26	5.04	-	-	-	-	-	-	-	-
22TANK0808	22BZNTKFLR*	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	-	-	-	-	-	-
22TANK0809	22BZNTKFLR*	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	-	-	-	-	-	-
22TANK0810	22BZNTKFLR*	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	22BZNTKFLR	-	-	-	-	-	-
22TANK0811	22TANK0811	0.68	0.24	-	-	-	-	-	-	-	-
22TANK0812	22TANK0812	0.56	0.24	-	-	-	-	-	-	-	-
22TANK0813	22TANK0813	0.56	0.24	-	-	-	-	-	-	-	-
22TANK0814	22TANK0814	0.03	1.53	-	-	-	-	-	-	-	-
22TANK0815	22TANK0815	0.02	0.89	-	-	-	-	-	-	-	-
22TK926FLR	22TK926FLR	0.01	0.01	-	-	-	-	-	-	-	-
28LPGHOSE	28LPGHOSE	0.07	0.29	-	-	0.01	0.01	-	-	-	-
33SR2WWFUG	33SR2WWFUG	0.04	0.15	-	-	-	-	-	-	-	-
33SRU3FUGS	33SRU3FUGS	0.01	0.03	-	-	0.01	0.06	-	-	-	-
37SWS2WWFG	37SWS2WWFG	0.05	0.21	-	-	-	-	-	-	-	-
38SWS1WWFG	38SWS1WWFG	0.08	0.35	-	-	-	-	-	-	-	-
40CSOWSUMP	40CSOWCC	0.01	0.01	-	-	-	-	-	-	-	-
40CSWWFUG	40CSWWFUG	0.46	2.01	-	-	-	-	-	-	-	-
45DOCK2PCV	45DOCK2PCV	13.82	0.47	-	-	-	-	-	-	-	-
45DOCK2FUG	45DOCK2FUG	0.31	1.34	-	-	-	-	-	-	-	-
45DOCK2PCV	45DOCK2LDG	1.05	1.14	-	-	-	-	-	-	-	-
45DOCK45V1	45DOCK45V1	0.08	0.01	-	-	-	-	-	-	-	-
45DOCK45V2	45DOCK45V2	0.08	0.01	-	-	-	-	-	-	-	-
45DOCK45V3	45DOCK45V3	0.08	0.01	-	-	-	-	-	-	-	-
45DOCK1PCV	45DOCKSFLR	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCK3PCV	45DOCKSFLR	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCKSFLR	45DOCKSFLR	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCK1PCV	45DOCKFLR2	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCK3PCV	45DOCKFLR2	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCKFLR2	45DOCKFLR2	45DOCKTO1	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCK3FUG	45DOCK3FUG	1.57	6.87	-	-	-	-	-	-	-	-

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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
45DOCKV104	45V104CC	0.01	0.01	-	-	-	-	-	-	-	-
50BZTNKFLR	50BZTNKFLR	0.06	0.04	-	-	-	-	-	-	-	-
50TDPWWFUG	50TDPWWFUG	0.08	0.34	-	-	-	-	-	-	-	-
51DHT1WWFG	51DHT1WWFG	0.26	1.15	-	-	-	-	-	-	-	-
52DHT2WWFG	52DHT2WWFG	0.14	0.60	-	-	-	-	-	-	-	-
52FLORPWS	52FLORPWCC	0.01	0.04	-	-	-	-	-	-	-	-
52FLWWFUG	52FLWWFUG	0.16	0.72	-	-	-	-	-	-	-	-
52LS811SMP	52LS811SMP	0.22	0.66	-	-	-	-	-	-	-	-
52LSE813	52LSE813	0.08	0.19	-	-	-	-	-	-	-	-
54GHT1FUGS	54GHT1FUGS	-	-	-	-	-	-	-	-	-	-
54GHT2FUGS	54GHT2FUGS	-	-	-	-	-	-	-	-	-	-
55FCCWWFUG	55FCCWWFUG	0.83	3.63	-	-	-	-	-	-	-	-
55JETTRFUG	55JETTRFUG	0.88	3.86	-	-	-	-	-	-	-	-
55JETTRSUMP	55JETTRCC	0.01	0.01	-	-	-	-	-	-	-	-
55OFFGSFUG	55OFFGSFUG	0.67	3.00	-	-	-	-	-	-	-	-
58GSHDSCTR	58GSHDSCTR	0.13	0.55	-	-	-	-	-	-	-	-
58GSHDSFUG	58GSHDSFUG	2.85	12.46	-	-	0.02	0.06	-	-	-	-
60CGWWFUG	60CGWWFUG	0.27	1.17	-	-	-	-	-	-	-	-
60COGENPWS	60CGNPWCC	0.01	0.01	-	-	-	-	-	-	-	-
60COGENSWS	60CGNSWCC	0.02	0.05	-	-	-	-	-	-	-	-
61PBWWFUG	61PBWWFUG	0.04	0.18	-	-	-	-	-	-	-	-
67AERTKA	67AERTKA	8.11	29.35	-	-	-	-	-	-	-	-
67AERTKB	67AERTKB	8.11	29.35	-	-	-	-	-	-	-	-
67AERTKC	67AERTKC	8.11	29.35	-	-	-	-	-	-	-	-
67BSMNT	67BSMNT	0.07	0.01	-	-	-	-	-	-	-	-
67C200AFUG	67C200AFUG	0.72	0.72	-	-	-	-	-	-	-	-
67C200WWFG	67C200WWFG	0.05	0.23	-	-	-	-	-	-	-	-
67CLAR405A	67CLAR405A	0.03	0.24	-	-	-	-	-	-	-	-
67CLAR405B	67CLAR405B	0.03	0.24	-	-	-	-	-	-	-	-
67CLAR405C	67CLAR405C	0.03	0.24	-	-	-	-	-	-	-	-
67CLAREFTK	67CLAREFTK	0.12	0.99	-	-	-	-	-	-	-	-
67CLARFLTK	67CLARFLTK	0.12	<0.01	-	-	-	-	-	-	-	-
67FLSPTK	67FLSPTK	0.01	0.01	-	-	-	-	-	-	-	-
67LS61P20	67LS61P20	0.10	0.30	-	-	-	-	-	-	-	-
67LSBIOTRT	67LSBIOTRT	0.05	0.14	-	-	-	-	-	-	-	-
67LSEDAF	67LSEDAF	0.15	0.14	-	-	-	-	-	-	-	-
67LSN560	67LSN560	0.15	0.02	-	-	-	-	-	-	-	-
67LSN595	67LSN595	0.08	0.01	-	-	-	-	-	-	-	-
67LSN905	67LSN905	0.15	0.13	-	-	-	-	-	-	-	-
67LSNE660	67LSNE660	0.14	0.11	-	-	-	-	-	-	-	-
67LSS602	67LSS602	0.08	0.02	-	-	-	-	-	-	-	-
67LSWSHOUT	67LSWSHOUT	0.22	0.82	-	-	-	-	-	-	-	-
67NCPIMNT	67NCPIMNT	0.01	0.01	-	-	-	-	-	-	-	-
67NPWWFUG	67NPWWFUG	0.04	0.15	-	-	-	-	-	-	-	-
67NSHAPFUG	67NSHAPFUG	-	-	-	-	-	-	-	-	-	-
67PHADJSPL	67PHADJCC	0.01	0.01	-	-	-	-	-	-	-	-
67SCALBIO	67SCALBIO	0.01	0.01	-	-	-	-	-	-	-	-

TOTAL PETROCHEMICALS USA, INC.
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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
67SCALFUEL	67SCALCC	0.01	0.01	-	-	-	-	-	-	-	-
67SCPIMNT	67SCPIMNT	0.01	0.01	-	-	-	-	-	-	-	-
67SOUTHAPD	67SOUTHAPD	-	-	-	-	-	-	-	-	-	-
67SSTRMWTR	67SSTRMWTR	-	-	-	-	-	-	-	-	-	-
67TANK0636	67TANK0636	0.20	0.05	-	-	-	-	-	-	-	-
RECOILFUG	RECOILFUG	0.48	2.09	-	-	-	-	-	-	-	-
SOLIDLIQFU	SOLIDLIQFU	0.17	0.75	-	-	-	-	-	-	-	-
06VDU2CHTR	06VDU2CHTR	0.52	2.06	0.74	2.91	-	-	-	-	-	-
06VDU2FUGS	06VDU2FUGS	1.73	7.56	-	-	0.03	0.14	-	-	-	-
22TANK0933	22TANK0933	1.23	22DIESELCAP	-	-	-	-	-	-	-	-
22TANK0940	22TANK0940	0.12	22JETCAP	-	-	-	-	-	-	-	-
22TKDCPFUGS	22TKDCPFUGS	0.05	0.20	-	-	-	-	-	-	-	-
25SRUINCIN	25SRUINCIN	0.43	0.98	0.60	1.36	0.03	0.07	-	-	-	-
36SRUINCIN	36SRUINCIN	0.43	0.98	0.60	1.36	0.03	0.07	-	-	-	-
30CKRFLARE	30CKRFLARE	0.04	0.14	-	-	0.01	0.01	0.01	0.01	-	-
30CKRFUGS	30CKRFUGS	6.60	28.90	-	-	0.21	0.90	0.01	0.01	-	-
30CKRHTR1	30CKRHTR1	1.11	3.78	1.57	5.35	-	-	-	-	-	-
30CKRHTR2	30CKRHTR2	1.11	3.78	1.57	5.35	-	-	-	-	-	-
30CKRTRKLD	30CKRTRKLD	-	-	0.21	0.86	-	-	-	-	-	-
30DCPCT1	30DCPCT1	0.60	2.65	0.32	1.42	-	-	-	-	-	-
31KNHTHTR	31KNHTHTR	0.22	0.24	0.31	0.34	-	-	-	-	-	-
34SRUFUGS	34SRUFUGS	0.21	0.91	-	-	0.13	0.57	0.02	0.08	-	-
37TANK1002	37TANK1002	0.16	0.03	-	-	-	-	-	-	-	-
67TANK0401C	67TANK0401C	0.01	0.01	-	-	-	-	-	-	-	-
67TANK0500C	67TANK0500C	4.26	0.31	-	-	-	-	-	-	-	-
38V107	38V107	0.01	0.01	-	-	-	-	-	-	-	-
22TANK0517	22TANK0517	0.73	0.47	-	-	-	-	-	-	-	-
42FGTFUGS	42FGTFUGS	0.31	1.35	-	-	0.07	0.31	0.01	0.01	-	-
43DHT3CHTR	43DHT3CHTR	0.26	1.01	0.37	1.47	-	-	-	-	-	-
43DHT3CMSS	43DHT3CMSS	-	-	-	-	-	-	-	-	-	-
43DHT3FUGS	43DHT3FUGS	1.53	6.70	-	-	0.08	0.34	0.01	0.01	-	-
47SWS4FUGS	47SWS4FUGS	0.01	0.01	-	-	0.01	0.03	0.01	0.03	-	-
35SRU5FUGS	35SRU5FUGS	0.21	0.91	-	-	0.13	0.57	0.02	0.08	-	-
31KNHTFUGS	31KNHTFUGS	1.05	4.61	-	-	0.05	0.22	0.01	0.01	-	-
19PSAFUGS	19PSAFUGS	0.41	1.82	-	-	-	-	-	-	-	-
30AMSTFUGS	30AMSTFUGS	-	-	-	-	-	-	0.02	0.11	-	-
30CKRH1MSS	30CKRH1MSS	1.11	1.09	1.57	0.13	-	-	-	-	-	-
30CKRH2MSS	30CKRH2MSS	1.11	1.09	1.57	0.13	-	-	-	-	-	-
MSSILE	MSSILE	17.74	6.18	-	-	-	-	-	-	-	-
MSS_TA	MSS_TA	1,293.44	64.53	-	-	161.91	1.53	-	-	-	-
MSS_ATM	MSS_ATM	1,412.79	47.07	0.85	0.05	5.18	0.08	-	-	-	-
MSS_TKFLR	MSS_TKFLR	3.50	0.41	-	-	-	-	-	-	-	-
MSS_WGS	MSS_WGS	-	-	-	-	-	-	-	-	-	-
MSS_COGEN	MSS_COGEN	-	-	-	-	-	-	-	-	-	-
MSS_INCIN	MSS_INCIN	2.13	2.92	1.15	1.58	1.13	1.55	-	-	-	-
55OGTCLTWR	55OGTCLTWR	0.13	0.55	-	-	-	-	-	-	-	-
54GHTSUMP	54GHTCC	<0.01	0.02	-	-	-	-	-	-	-	-
45DOCKV104	45V1CC	<0.01	0.01	-	-	-	-	-	-	-	-
45DOCKV3A	45V3ACC	<0.01	0.01	-	-	-	-	-	-	-	-
45DOCKV3B	45V3BCC	<0.01	0.01	-	-	-	-	-	-	-	-
67SBOWSCC	67SBOWSCC	0.02	0.05	-	-	-	-	-	-	-	-
67SBSEWCC	67SBSEWCC	0.04	0.05	-	-	-	-	-	-	-	-

TOTAL PETROCHEMICALS USA, INC.
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EPN Summary

New FIN	New EPN	Currently Authorized Emission Limits									
		VOC		PM/PM_{10}		H_2S		NH_3		HCl	
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
67GFOWSCC	67GFOWSCC	0.11	0.46	-	-	-	-	-	-	-	-
67GFSEWCC	67GFSEWCC	1.05	4.60	-	-	-	-	-	-	-	-
67VDUOWSCC	67VDUOWSCC	0.02	0.09	-	-	-	-	-	-	-	-
67SKIMCC	67SKIMCC	0.01	0.03	-	-	-	-	-	-	-	-
CVSPH3MACT	CVSPH3MACT	-	-	-	-	-	-	-	-	-	-
45DOCKTO1	45DOCKTO1	5.82	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCKTO2	45DOCKTO2	11.63	45DOCKTOCAP	-	-	-	-	-	-	-	-
45DOCKTOCAP	45DOCKTOCAP	-	3.40	-	-	-	-	-	-	-	-
22CRUDECAP	22CRUDECAP	-	37.98	-	-	-	-	-	-	-	-
22GASOILCAP	22GASOILCAP	-	0.25	-	-	-	-	-	-	-	-
22CBOCAP	22CBOCAP	-	0.16	-	-	-	-	-	-	-	-
22DIESELCAP	22DIESELCAP	-	14.50	-	-	-	-	-	-	-	-
22GASCAP	22GASCAP	-	40.73	-	-	-	-	-	-	-	-
22JETCAP	22JETCAP	-	0.38	-	-	-	-	-	-	-	-
Site Wide Totals		**4,121.70**	**1,464.04**	**92.96**	**360.31**	**171.09**	**11.61**	**4.10**	**15.93**	**1.93**	**1.99**

ATTACHMENT 7

BASELINE ACTUAL EMISSIONS

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Summary

VOC (Site-wide)	1999	2000	
Reported in EI [B]	1,234.29	1,137.32	
Baseline Adjustments	155.19	263.93	**Average**
Adjusted Emissions [A]	1,389.48	1,401.25	**1,395.36**

NO_X (Site-wide)	1999	2000	
Reported in EI [B]	1251.19	1114.32	
Baseline Adjustments	89.11	73,588.22	
Consent Decree Adjustments [C]	(140.47)	(104.11)	**Average**
Finalized Emissions	1199.83	75747.70	**38,473.76**

PM/PM_{10} (Site-wide)	1999	2000	
Reported in EI [B]	190.28	198.71	
Baseline Adjustments	431.21	419.98	**Average**
Adjusted Emissions [A]	621.49	618.69	**620.09**

SO_2 (Site-wide)	2000	2001	
Reported in EI [D]	207.54	136.25	
Baseline Adjustments	455.35	502.21	**Average**
Adjusted Emissions [A]	662.90	638.46	**650.68**

CO (Site-wide)	1999	2000	
Reported in EI [B]	841.96	923.35	
Baseline Adjustments	250.62	165.33	**Average**
Adjusted Emissions [A]	1092.58	1088.68	**1,090.63**

H_2S (Site-wide)	2001	2002	
Reported in EI [B]	1.32	10.33	
Baseline Adjustments	8.99	(0.02)	**Average**
Adjusted Emissions [A]	10.31	10.31	**10.31**

Notes:

[A] Adjustments to the baseline emissions may include emissions changes associated with authorization of new emissions sources or emission rates, modification to emission sources, unit shutdowns, representing de minimis emissions, etc. A summary of the adjusted emission rates by EPN/FIN is provided in the following tables.

[B] Per 1999 and 2000 AEI Report submittals.

[C] Based on Consent Decree required reductions for combustion sources.

[D] Per 2000 and 2001 AEI Report submittals.

[B] Per 2001 and 2002 AEI Report submittals.

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Baseline Emissions - VOC

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
812C	104	01ACU1202A	01ACU1202A	1.04	1.10	[1][2]
101	101	01ACU1H101	01ACU1H101	2.65	3.11	[1][2]
347	347	55FCCURFGS	55FCCURFGS	16.65	16.40	[1][2]
355	355	20GASTRKFG	20GASTRKFG	4.55	4.55	[8]
356	356	20GASLOAD	20GASFLARE	7.30	7.85	[1][2]
357	357	20DISTLDG	20DISTLDG	0.00	0.00	[1][2]
-	PBTX1	04BTXFUGS	04BTXFUGS	15.32	15.32	[8]
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	5.84	5.84	[3]
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	0.09	0.09	[8]
61ST301BLR	61STKBLR	61BLRH300	61BLRSTACK	9.98	9.98	[3]
61ST351BLR	61STKBLR	61BLRH350				
804E	107	50TDPH-1	50TDPH-1	0.39	0.39	[1][2]
805A	109	51DHT1H-1	51DHT1H-1	0.44	0.50	[1][2]
805B	121	51DHT1H-3	51DHT1H-3	0.38	0.39	[1][2]
810A	123	10GRUHTRB1	10GRUHTRB1	0.25	0.41	[1][2]
812A	102	02ACU2H201	02ACU2H201	1.70	1.55	[1][2]
812B	103	01VACTH301	01VACTH301	2.31	2.29	[1][2]
812D	105	01ACU1202B	01ACU1202B	1.01	1.00	[1][2]
813A	120	52DHT2H-1	52DHT2H-1	0.42	0.76	[1][2]
813C	325A	52DHT2H-2	52DHT2H-2A/B	0.82	0.73	[1][2]
813C	325B					
BHA	138	-	-	-	-	[4]
BHB	139	-	-	-	-	[4]
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	0.00	0.00	[4][17]
BTXA	192	04BTXH-51	04BTXH-51	0.42	0.26	[1][2]
BTXB	193	04BTXH-52	04BTXH-52	1.21	1.09	[1][2]
BTXC	310	04BTXH-53	04BTXH-53	1.40	1.19	[1][2]
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	0.00	0.00	[4][17]
LAB-SUMP	BZ-WWPD	-	-	-	-	[4][17]
COGENA	326	60COGENTRB	60COGENSTK	20.69	22.43	[1][2]
DOCKFLARE1	BZDVRCOMB	45DOCK1PCV	45DOCKSFLR	3.60	6.08	[1][2][13]
DOCKFLARE1	FBZDVR	-	-	0.00	0.00	[4]
F111	F111	51DHT1FUGS	51DHT1FUGS	20.95	20.95	[8]
F319	F319	08ALKYFUGS	08ALKYFUGS	42.94	42.94	[8]
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	0.00	0.00	[1][2]
F350	F350	55FCCUFUGS	55FCCUFUGS	46.38	46.38	[8]
F350	PTU	55FCCUFUGS	55FCCUPTUC	0.21	0.21	[8]
F351	F351	67FPMCLTWR	67FPMCLTWR	31.00	31.00	[5]
F359	F359	28LPGFUGS	28LPGFUGS	20.53	20.53	[8]
FEXPTET	FEXPTET	-	-	-	-	[14]
GOHDSA	305	13UNIBH301	13UNIBH301	1.40	1.34	[1][2]
HDSCRA	191	17REFHTRS	17REFHTRS	3.00	2.59	[1][2]
HDSCRB	190	17NHTHTRS	17NHTHTRS	2.32	1.97	[1][2]
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	0.53	0.53	[8]
ISOM A	299	16ISOMHTR	16ISOMHTR	0.40	0.31	[1][2]
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	7.51	4.46	[10]
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	0.00	0.00	[4]
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	0.00	0.00	[4]
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	0.00	0.00	[5]
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	0.00	0.00	[16]
LAB-SUMP	BNZ_NSHP	-	-	-	-	[4][17]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	0.01	0.01	[5]
LR-342	342	18TRKLOAD	18TRKLOAD	0.68	0.68	[11]
N17	N17	40CSPLTH-1	40CSPLTH-1	2.50	2.50	[3]
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	0.44	0.44	[8]
P701C	F149	02FWCLGTWR	02FWCLGTWR	1.00	1.00	[11]
P804	F108	50TDPFUGS	50TDPFUGS	6.01	6.01	[8]
P804C	F147	-	-	0.00	0.00	[4]
P805C	F146	67805CLTWR	67805CLTWR	0.30	0.30	[3]
P807C	F150	08ALKCLTWR	08ALKCLTWR	1.00	1.00	[11]
P810	F124	10GRUFUGS	10GRUFUGS	0.38	0.38	[8]
P812	F106	02ACU2FUGS	02ACU2FUGS	45.03	45.03	[8]
P813	F122	52DHT2FUGS	52DHT2FUGS	23.44	23.44	[8]
P817	F817	37SWS2FUGS	37SWS2FUGS	0.25	0.25	[8]
PAT	F143	67C200FUGS	67C200FUGS	-	-	[14]
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	0.46	0.46	[11]
PBTX2	FBTX2	-	-	-	-	[14]
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	1.66	1.66	[8]
PBH	F138	-	-	-	-	[14]
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	1.11	1.11	[8]
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	1.00	0.11	[2][11]
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	26.17	26.17	[8]
PCRUDE	F318	09SATLQFUG	09SATLQFUG	1.28	1.28	[8]
PCRUDE	F318	14FGTFUGS	14FGTFUGS	-	-	[14]
PCT11	F320	67NORTHCT	67NORTHCT	1.80	0.37	[1][2]
PCVS	FCVS	-	-	0.00	0.00	[4]
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	6.87	6.87	[8]
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	-	-	[14]
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	-	-	[14]
PFLR1	141	53MIDFLARE	53MIDFLARE	-	-	[7]
PFLR2	142	53SOUTHFLR	53SOUTHFLR	-	-	[7]
PFLR3	307	41NORTHFLR	41NORTHFLR	312.36	312.36	[7]
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	43.07	43.07	[8]
PHDSCR	F190	17REFFUGS	17REFFUGS	28.50	28.50	[8]
PHDSCR	311	17REFREGEN	17REFREGEN	0.18	0.18	[11]
PMOGAS	F317	20MOGASBLD	20MOGASBLD	2.29	2.51	[1][2]
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	0.00	0.00	[4][17]
PRSE	F302	10DEMEXFUG	10DEMEXFUG	5.63	5.63	[8]
PSRU	F310	14SRU1FUGS	14SRU1FUGS	0.01	0.01	[8]
PSRU	F312	14SRU1LOAD	14SRU1LOAD	0.00	0.00	[1][2]
PSRU	F309	14SRU1PIT	14SRU1PIT	0.00	0.00	[1][2]
PSRU	F310	15SCOTFUGS	15SCOTFUGS	0.12	0.12	[8]
PSRU	125	33SRU3	15SRUINCIN	2.63	2.70	[1][2]
PSRU	F313	33SRU3LOAD	33SRU3LOAD	0.00	0.00	[1][2]
PSRU	F311	33SRU3PIT	33SRU3PIT	0.00	0.00	[1][2]
F-930	F-930	-	-	-	-	[14]
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	3.44	3.44	[8]
PSULF	FSULF	04SULFFUGS	04SULFFUGS	10.90	10.90	[8]
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	-	-	[14]
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	1.62	1.62	[8]
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	1.64	1.64	[8]
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	-	-	[14]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	-	-	[14]
PWWT	PWWT	-	-	-	-	[14]
RSEA	302	10DEMEXH-2	10DEMEXH-2	0.81	1.01	[1][2]
RSEB	309	10DEMEXH-4	10DEMEXH-4	1.70	1.91	[1][2]
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	0.84	0.84	[8]
T1000	1000	38TANK1000	38TANK1000	0.30	0.30	[11]
T1001	1001	38TANK1001	38TANK1001	0.20	0.20	[11]
T2001	2001	20TANK2001	20TANK2001	5.70	5.70	[6]
T2002	2002	20TANK2002	20TANK2002	-	-	[15]
T2003	2003	20TANK2003	20TANK2003	0.06	0.21	[1][2]
T301	329	18TANK0301	18TANK0301	0.00	0.01	[1][2]
T302	330	18TANK0302	18ASPHTVRS	-	-	[9]
T303	331	18TANK0303	18ASPHTVRS	-	-	[9]
T305	333	18TANK0305	18TANK0305	0.01	0.01	[1][2]
T306	334	18TANK0306	18TANK0306	0.01	0.03	[1][2]
T316	316	22TANK0316	22TANK0316	0.02	0.02	[1][2]
T317	317	22TANK0317	22TANK0317	0.03	0.04	[1][2]
T401A	401A	67TANK401A	67TANK401A	0.01	0.01	[17]
T401B	401B	67TANK401B	67TANK401B	0.01	0.01	[17]
T415	415	-	-	0.00	0.00	[4]
T416	416	22TANK0416	22TANK0416	0.00	0.00	[4]
T421	421	22TANK0421	22TANK0421	0.00	0.00	[4]
T422	422	22TANK0422	22TANK0422	0.00	0.00	[4]
T441	441	22TANK0441	22TANK0441	0.84	0.44	[1][2]
T445	445	22TANK0445	22TANK0445	0.00	0.00	[4]
T446	446	22TANK0446	22TANK0446	0.00	0.00	[4]
T452	452	22TANK0452	22TANK0452	-	-	[12]
T453	453	22TANK0453	22TANK0453	-	-	[12]
T454	454	22TANK0454	22TANK0454	-	-	[12]
T455	455	22TANK0455	22TANK0455	-	-	[12]
T462	462	22TANK0462	22TANK0462	0.00	0.00	[4]
T463	463	22TANK0463	22TANK0463	0.00	0.00	[4]
T466	466	22TANK0466	22TANK0466	0.22	0.15	[4]
T470	470	22TANK0470	22TANK0470	0.65	0.64	[4]
T475	222	22TANK0475	22TANK0475	-	-	[12]
T476	223	22TANK0476	22TANK0476	-	-	[12]
T477	212	22TANK0477	22TANK0477	-	-	[12]
T478	215	22TANK0478	22TANK0478	-	-	[12]
T479	217	22TANK0479	22TANK0479	-	-	[12]
T480	480	22TANK0480	22TANK0480	-	-	[12]
T481	T481	22TANK0481	22TANK0481	-	-	[12]
T500A	500A	67TANK500A	67TANK500A	0.52	0.52	[17]
T500B	500B	67TANK500B	67TANK500B	0.52	0.52	[17]
T502	502	22TANK0502	22TANK0502	2.73	2.73	[6]
T503	503	22TANK0503	22TANK0503	0.05	0.05	[17]
T504	504	67TANK0504	67TANK0504	1.27	1.27	[17]
T505	505	67TANK0505	67TANK0505	0.63	0.63	[17]
T516	516	22TANK0516	22TANK0516	0.00	0.02	[1][2]
T524	524	22TANK0524	22TANK0524	-	-	[12]
T525	525	22TANK0525	22TANK0525	-	-	[12]
T526	526	22TANK0526	22TANK0526	1.53	1.79	[1][2]

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T530	530	22TANK0530	22TANK0530	1.04	1.04	[3]
T531	531	22TANK0531	22TANK0531	1.08	1.10	[1][2]
T532	532	22TANK0532	22TANK0532	-	-	[12]
T536	536	22TANK0536	22TANK0536	0.15	0.16	[1][2]
T538	538	22TANK0538	22TANK0538	0.37	0.42	[1][2]
T540	540	22TANK0540	22TANK0540	0.12	0.12	[17]
T541	541	22TANK0541	22TANK0541	-	-	[12]
T542	542	22TANK0542	22TANK0542	-	-	[12]
T543	543	22TANK0543	22TANK0543	-	-	[12]
T545	545	22TANK0545	22TANK0545	0.00	0.00	[1][2][13]
T558	558	22TANK0558	22TANK0558	-	-	[12]
T559	559	22TANK0559	22TANK0559	-	-	[12]
T560	560	22TANK0560	22TANK0560	-	-	[12]
T561	561	22TANK0561	22TANK0561	-	-	[12]
T562	562	22TANK0562	22TANK0562	4.22	4.22	[6]
T563	563	22TANK0563	22TANK0563	4.22	4.22	[6]
T572	572	22TANK0572	22TANK0572	0.32	0.32	[1][2]
T574	574	22TANK0574	22TANK0574	0.80	0.80	[6]
T587	587	22TANK0587	22TANK0587	0.01	0.01	[1][2]
T588	588	22TANK0588	22TANK0588	0.14	0.49	[1][5]
T589	589	22TANK0589	22TANK0589	-	-	[12]
T591	591	22TANK0591	22TANK0591	15.69	26.63	[1][5]
T595	252	67TANK0595	67TANK0595	0.99	0.99	[17]
T596	596	67TANK0596	67TANK0596	1.52	1.52	[17]
T597	597	22TANK0597	22TANK0597	1.29	1.58	[1][2]
T598	598	22TANK0598	22TANK0598	1.29	1.58	[1][2]
T599	599	22TANK0599	22TANK0599	0.09	0.13	[1][2]
T650	650	22TANK0650	22TANK0650	0.14	0.14	[1][2]
T651	651	22TANK0651	22TANK0651	0.14	0.14	[1][2]
T660	660	67TANK0660	67TK0660CC	0.01	0.01	[17]
T902	902	22TANK0902	22TANK0902	0.64	0.63	[1][2]
T905	905	67TANK0905	67TANK0905	1.18	1.18	[17]
T906	906	22TANK0906	22TANK0906	2.21	2.21	[6]
T907	907	22TANK0907	22TANK0907	2.15	2.15	[6]
T909	909	22TANK0909	22TANK0909	-	-	[12]
T910	910	22TANK0910	22TANK0910	3.60	3.60	[6]
T911	911	22TANK0911	22TANK0911	2.55	2.55	[17]
T913	913	22TANK0913	22TANK0913	0.00	0.00	[5][2]
T917	917	22TANK0917	22TANK0917	-	-	[12]
T918	918	22TANK0918	22TANK0918	-	-	[12]
T919	919	22TANK0919	22TANK0919	0.92	0.92	[6]
T920	920	22TANK0920	22TANK0920	2.71	2.71	[1][2]
T921	921	22TANK0921	22TANK0921	0.51	0.70	[1][2]
T922	922	22TANK0922	22TANK0922	0.55	0.70	[1][2]
T923	923	08TANK0923	08TANK0923	0.00	0.00	[1][2]
T924	924	22TANK0924	22TANK0924	0.00	0.00	[1][2]
T925	925	22TANK0925	22TANK0925	-	-	[12]
T926	926	22TANK0926	22TK926FLR	0.46	0.49	[1][2]
T927	927	67TANK0927	67TANK0927	0.01	0.01	[17]
T928	928	50TANK0928	50BZTNKFLR	0.44	0.45	[1][2]
T929	929	50TANK0929	50BZTNKFLR	0.16	0.16	[1][2]

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T930	930	50TANK0930	50BZTNKFLR	0.35	0.41	[1][2]
T934	934	22TANK0934	22TANK0934	-	-	[12]
T935	935	22TANK0935	22TANK0935	-	-	[12]
T938	179	22TANK0938	22TANK0938	3.79	3.79	[6]
T939	180	22TANK0939	22TANK0939	0.15	0.13	[1][2]
T941	941	04TANK0941	04TANK0941	0.08	0.08	[1][2]
T946	946	04TANK0946	04TANK0946	0.10	0.10	[1][2]
T947	947	04TANK0947	04TANK0947	0.00	0.00	[1][2]
T948	948	22TANK0948	22TANK0948	0.04	0.06	[1][2]
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	0.00	0.00	[4][17]
TK506	506	22TANK0506	22TANK0506	0.01	0.00	[1][2]
TK522	522	22TANK0522	22TANK0522	-	-	[12]
TK537	537	22TANK0537	22TANK0537	-	-	[12]
TK586	586	22TANK0586	22TANK0586	0.00	0.00	[1][2]
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	5.52	5.52	[1][2]
WWT-AB	WWT-AB	-	-	0.00	0.00	[4][17]
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	0.00	0.00	[4][17]
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	0.01	0.01	[17]
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	0.00	0.00	[4][17]
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	0.00	0.00	[4][17]
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	0.12	0.12	[17]
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	0.66	0.66	[17]
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	0.00	0.00	[4][17]
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	0.01	0.01	[17]
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	0.14	0.14	[17]
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	0.00	0.00	[4][17]
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	0.14	0.14	[17]
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	0.00	0.00	[4][17]
-	-	01ACU1WWFG	01ACU1WWFG	1.46	1.46	[8]
-	-	01VACTFUGS	01VACTFUGS	-	-	[14]
-	-	02ACU2WWFG	02ACU2WWFG	3.07	3.07	[8]
-	-	04BTXWWFUG	04BTXWWFUG	1.62	1.62	[8]
-	-	08ALKYWWFG	08ALKYWWFG	1.64	1.64	[8]
-	-	08LSWALKY	08LSWALKY	0.42	0.42	[17]
-	-	08TANK0668	08TANK0668	-	-	[1][2]
-	-	08TANK0669	08TANK0669	-	-	[1][2]
-	-	09SLWWFUG	09SLWWFUG	1.32	1.32	[8]
-	-	10DMXWWFUG	10DMXWWFUG	0.66	0.66	[8]
-	-	10GRUWWFUG	10GRUWWFUG	0.41	0.41	[8]
-	-	13UNIWWFUG	13UNIWWFUG	1.10	1.10	[8]
-	-	14ATUWWFUG	14ATUWWFUG	0.66	0.66	[8]
-	-	14SR1WWFUG	14SR1WWFUG	0.80	0.80	[8]
-	-	14TANK0101	14TANK0101	-	-	[1][2]
-	-	14TANK0102	14TANK0102	-	-	[1][2]
-	-	16ISOMWWFG	16ISOMWWFG	0.63	0.63	[8]
-	-	17FGRCSFUG	17FGRCSFUG	-	-	[14]
-	-	17NHTWWFUG	17NHTWWFUG	1.52	1.52	[8]
-	-	17NHTFUGS	17NHTFUGS	10.01	10.01	[8]
-	-	18RAILLOAD	18RAILLOAD	-	-	[1][2]
-	-	18ASPHTVRS	18ASPHTVRS	1.00	1.00	[11]
-	-	18TANK0300	18ASPHTVRS	-	-	[9]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	18TANK0310	18ASPHTVRS	-	-	[9]
-	-	18TANK0311	18ASPHTVRS	-	-	[9]
-	-	18TANK0312	18ASPHTVRS	-	-	[9]
-	-	18TANK0313	18ASPHTVRS	-	-	[9]
-	-	18TANK0314	18ASPHTVRS	-	-	[9]
-	-	18TANK0315	18ASPHTVRS	-	-	[9]
-	-	18TANKV330	18TANKV330	0.25	0.25	[11]
-	-	20LSTRKRCK	20LSTRKRCK	0.06	0.06	[17]
T2000	T2000	20TANK2000	20TANK2000	0.02	0.07	[1][2]
-	-	22ASTNKFUG	22ASTNKFUG	0.53	0.53	[8]
-	-	22CRTNKFUG	22CRTNKFUG	2.22	2.22	[8]
-	-	22BZNTKFUG	22BZNTKFUG	0.00	0.00	[8]
-	-	22BZNTKFLR	22BZNTKFLR	0.04	0.04	[11]
-	-	22GOTNKFUG	22GOTNKFUG	0.70	0.70	[8]
-	-	22OSFTKFUG	22OSFTKFUG	5.58	5.58	[8]
T474	474	45TANK0474	45TANK0474	0.06	0.06	[17]
-	-	22TANK0482	22TANK0482	-	-	[12]
-	-	22TANK0484	22TANK0484	1.00	1.00	[11]
-	-	22TANK0595	22TANK0595	ng Authori	ng Authori	[5]
-	-	22TANK0596	22TANK0596	ng Authori	ng Authori	[5]
-	-	22TANK0678	41NORTHFLR	Flare Cap	Flare Cap	[7]
-	-	22TANK0679	41NORTHFLR	Flare Cap	Flare Cap	[7]
-	-	22TANK0680	41NORTHFLR	Flare Cap	Flare Cap	[7]
-	-	22TANK0681	22TANK0681	ng Authori	ng Authori	[4]
-	-	22TANK0682	22TANK0682	ng Authori	ng Authori	[4]
-	-	22TANK0800	22TANK0800	6.28	6.28	[3]
-	-	22TANK0801	22TANK0801	6.28	6.28	[3]
-	-	22TANK0802	22TANK0802	6.28	6.28	[3]
-	-	22TANK0805	22TANK0805	4.08	4.08	[3]
-	-	22TANK0807	22TANK0807	5.04	5.04	[3]
-	-	22TANK0808	22BZNTKFLR*	2BZNTKFL	2BZNTKFL	[1][2]
-	-	22TANK0809	22BZNTKFLR*	2BZNTKFL	2BZNTKFL	[1][2]
-	-	22TANK0810	22BZNTKFLR*	2BZNTKFL	2BZNTKFL	[1][2]
-	-	22TANK0811	22TANK0811	0.24	0.24	[3]
-	-	22TANK0812	22TANK0812	0.24	0.24	[3]
-	-	22TANK0813	22TANK0813	0.24	0.24	[3]
-	-	22TANK0814	22TANK0814	1.53	1.53	[3]
-	-	22TANK0815	22TANK0815	0.89	0.89	[3]
-	-	22TK926FLR	22TK926FLR	0.01	0.01	[3]
-	-	28LPGHOSE	28LPGHOSE	0.29	0.29	[3]
-	-	33SR2WWFUG	33SR2WWFUG	0.15	0.15	[8]
-	-	33SRU3FUGS	33SRU3FUGS	0.03	0.03	[8]
-	-	37SWS2WWFG	37SWS2WWFG	0.21	0.21	[8]
-	-	38SWS1WWFG	38SWS1WWFG	0.35	0.35	[8]
-	-	40CSOWSUMP	40CSOWCC	0.01	0.01	[17]
-	-	40CSWWFUG	40CSWWFUG	2.01	2.01	[8]
-	-	45DOCK2PCV	45DOCK2PCV	-	-	[1][2]
-	-	45DOCK2FUG	45DOCK2FUG	1.34	1.34	[8]
-	-	45DOCK2PCV	45DOCK2LDG	1.14	1.14	[3]
-	-	45DOCK45V1	45DOCK45V1	0.01	0.01	[17]
-	-	45DOCK45V2	45DOCK45V2	0.01	0.01	[17]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	45DOCK45V3	45DOCK45V3	0.01	0.01	[17]
-	-	45DOCK1PCV	45DOCKSFLR	-	-	[1][2]
-	-	45DOCK3PCV	45DOCKSFLR	-	-	[1][2]
-	-	45DOCKSFLR	45DOCKSFLR	-	-	[1][2]
-	-	45DOCK1PCV	45DOCKFLR2	-	-	[1][2]
-	-	45DOCK3PCV	45DOCKFLR2	-	-	[1][2]
-	-	45DOCKFLR2	45DOCKFLR2	-	-	[1][2]
-	-	45DOCK3FUG	45DOCK3FUG	6.87	6.87	[8]
-	-	45DOCKV104	45V104CC	0.01	0.01	[17]
-	-	50BZTNKFLR	50BZTNKFLR	-	-	[1][2]
-	-	50TDPWWFUG	50TDPWWFUG	0.34	0.34	[8]
-	-	51DHT1WWFG	51DHT1WWFG	1.15	1.15	[8]
-	-	52DHT2WWFG	52DHT2WWFG	0.60	0.60	[8]
-	-	52FLORPWS	52FLORPWCC	0.04	0.04	[17]
-	-	52FLWWFUG	52FLWWFUG	0.72	0.72	[8]
-	-	52LS811SMP	52LS811SMP	0.66	0.66	[17]
-	-	52LSE813	52LSE813	0.19	0.19	[17]
-	-	54GHT1FUGS	54GHT1FUGS	-	-	[14]
-	-	54GHT2FUGS	54GHT2FUGS	-	-	[14]
-	-	55FCCWWFUG	55FCCWWFUG	3.63	3.63	[8]
-	-	55JETTRFUG	55JETTRFUG	3.86	3.86	[1][2]
-	-	55JETTRSUMP	55JETTRCC	0.01	0.01	[17]
-	-	55OFFGSFUG	55OFFGSFUG	3.00	3.00	[8]
-	-	58GSHDSCTR	58GSHDSCTR	0.55	0.55	[3]
-	-	58GSHDSFUG	58GSHDSFUG	12.46	12.46	[8]
-	-	60CGWWFUG	60CGWWFUG	1.17	1.17	[8]
-	-	60COGENPWS	60CGNPWCC	0.01	0.01	[17]
-	-	60COGENSWS	60CGNSWCC	0.05	0.05	[17]
-	-	61PBWWFUG	61PBWWFUG	0.18	0.18	[8]
-	-	67AERTKA	67AERTKA	29.35	29.35	[17]
-	-	67AERTKB	67AERTKB	29.35	29.35	[17]
-	-	67AERTKC	67AERTKC	29.35	29.35	[17]
-	-	67BSMNT	67BSMNT	0.01	0.01	[17]
-	-	67C200AFUG	67C200AFUG	0.72	0.72	[1][2]
-	-	67C200WWFG	67C200WWFG	0.23	0.23	[8]
-	-	67CLAR405A	67CLAR405A	0.24	0.24	[17]
-	-	67CLAR405B	67CLAR405B	0.24	0.24	[17]
-	-	67CLAR405C	67CLAR405C	0.24	0.24	[17]
-	-	67CLAREFTK	67CLAREFTK	0.99	0.99	[17]
-	-	67CLARFLTK	67CLARFLTK	<0.01	<0.01	[17]
-	-	67FLSPTK	67FLSPTK	0.01	0.01	[17]
-	-	67LS61P20	67LS61P20	0.30	0.30	[17]
-	-	67LSBIOTRT	67LSBIOTRT	0.14	0.14	[17]
-	-	67LSEDAF	67LSEDAF	0.14	0.14	[17]
-	-	67LSN560	67LSN560	0.02	0.02	[17]
-	-	67LSN595	67LSN595	0.01	0.01	[17]
-	-	67LSN905	67LSN905	0.13	0.13	[17]
-	-	67LSNE660	67LSNE660	0.11	0.11	[17]
-	-	67LSS602	67LSS602	0.02	0.02	[17]
-	-	67LSWSHOUT	67LSWSHOUT	0.82	0.82	[17]
-	-	67NCPIMNT	67NCPIMNT	0.01	0.01	[17]

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-	-	67NPWWFUG	67NPWWFUG	0.15	0.15	[8]
-	-	67NSHAPFUG	67NSHAPFUG	-	-	[14]
-	-	67PHADJSPL	67PHADJCC	0.01	0.01	[17]
-	-	67SCALBIO	67SCALBIO	0.01	0.01	[17]
-	-	67SCALFUEL	67SCALCC	0.01	0.01	[17]
-	-	67SCPIMNT	67SCPIMNT	0.01	0.01	[17]
-	-	67SOUTHAPD	67SOUTHAPD	-	-	[17]
-	-	67SSTRMWTR	67SSTRMWTR	-	-	[17]
-	-	67TANK0636	67TANK0636	0.05	0.05	[17]
-	-	RECOILFUG	RECOILFUG	2.09	2.09	[8]
-	-	SOLIDLIQFU	SOLIDLIQFU	0.75	0.75	[8]
-	-	06VDU2CHTR	06VDU2CHTR	2.06	2.06	[3]
-	-	06VDU2FUGS	06VDU2FUGS	7.56	7.56	[3]
-	-	22TANK0933	22TANK0933	-	-	[12]
-	-	22TANK0940	22TANK0940	-	-	[12]
-	-	22TKDCPFUGS	22TKDCPFUGS	0.20	0.20	[3]
-	-	25SRUINCIN	25SRUINCIN	0.98	0.98	[3]
-	-	36SRUINCIN	36SRUINCIN	0.98	0.98	[3]
-	-	30CKRFLARE	30CKRFLARE	0.14	0.14	[3]
-	-	30CKRFUGS	30CKRFUGS	28.90	28.90	[3]
-	-	30CKRHTR1	30CKRHTR1	3.78	3.78	[3]
-	-	30CKRHTR2	30CKRHTR2	3.78	3.78	[3]
-	-	30CKRTRKLD	30CKRTRKLD	0.00	0.00	[3]
-	-	30DCPCT1	30DCPCT1	2.65	2.65	[3]
-	-	31KNHTHTR	31KNHTHTR	0.24	0.24	[3]
-	-	34SRUFUGS	34SRUFUGS	0.91	0.91	[3]
-	-	37TANK1002	37TANK1002	0.03	0.03	[3]
-	-	67TANK0401C	67TANK0401C	0.01	0.01	[3]
-	-	67TANK0500C	67TANK0500C	0.31	0.31	[3]
-	-	38V107	38V107	0.01	0.01	[3]
-	-	22TANK0517	22TANK0517	0.47	0.47	[3]
-	-	42FGTFUGS	42FGTFUGS	1.35	1.35	[3]
-	-	43DHT3CHTR	43DHT3CHTR	1.01	1.01	[3]
-	-	43DHT3CMSS	43DHT3CMSS	0.00	0.00	[3]
-	-	43DHT3FUGS	43DHT3FUGS	6.70	6.70	[3]
-	-	47SWS4FUGS	47SWS4FUGS	0.01	0.01	[3]
-	-	35SRU5FUGS	35SRU5FUGS	0.91	0.91	[3]
-	-	31KNHTFUGS	31KNHTFUGS	4.61	4.61	[3]
-	-	19PSAFUGS	19PSAFUGS	1.82	1.82	[3]
-	-	30AMSTFUGS	30AMSTFUGS	0.00	0.00	[3]
-	-	30CKRH1MSS	30CKRH1MSS	1.09	1.09	[3]
-	-	30CKRH2MSS	30CKRH2MSS	1.09	1.09	[3]
-	-	MSSILE	MSSILE	6.18	6.18	[3]
-	-	MSS_TA	MSS_TA	64.53	64.53	[3]
-	-	MSS_ATM	MSS_ATM	47.07	47.07	[3]
-	-	MSS_TKFLR	MSS_TKFLR	0.41	0.41	[3]
-	-	MSS_WGS	MSS_WGS	0.00	0.00	[3]
-	-	MSS_COGEN	MSS_COGEN	0.00	0.00	[3]
-	-	MSS_INCIN	MSS_INCIN	2.92	2.92	[3]
-	-	55OGTCLTWR	55OGTCLTWR	0.55	0.55	[3]
-	-	54GHTSUMP	54GHTCC	0.02	0.02	[3] [17]

APHRT
OCT 27 2009

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - VOC

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	45DOCKV104	45V1CC	0.01	0.01	[3][17]
-	-	45DOCKV3A	45V3ACC	0.01	0.01	[3][17]
-	-	45DOCKV3B	45V3BCC	0.01	0.01	[3][17]
-	-	67SBOWSCC	67SBOWSCC	0.05	0.05	[3][17]
-	-	67SBSEWCC	67SBSEWCC	0.05	0.05	[3][17]
-	-	67GFOWSCC	67GFOWSCC	0.46	0.46	[3][17]
-	-	67GFSEWCC	67GFSEWCC	4.60	4.60	[3][17]
-	-	67VDUOWSCC	67VDUOWSCC	0.09	0.09	[3][17]
-	-	67SKIMCC	67SKIMCC	0.03	0.03	[3][17]
-	-	22CRUDECAP	22CRUDECAP	37.98	37.98	[12]
-	-	22GASOILCAP	22GASOILCAP	0.82	0.82	[12]
-	-	22CBOCAP	22CBOCAP	0.16	0.16	[12]
-	-	22DIESELCAP	22DIESELCAP	15.23	15.23	[12]
-	-	22GASCAP	22GASCAP	40.73	40.73	[12]
-	-	22JETCAP	22JETCAP	0.43	0.43	[12]

Adjustment Reference

1. Actual emissions for 1999 were obtained from Annual Emission Inventory Reports (1999) submittals.
2. Actual emissions for 2000 were obtained from Annual Emission Inventory Reports (2000) submittals.
3. Equipment started-up after the baseline period; therefore, permit allowable emissions have been substituted.
4. Equipment has been shutdown/demolished; therefore, reported emissions have been removed.
5. Emissions reported in the emissions inventory were not creditable and have been adjusted to creditable emission rate.
6. Equipment was altered during or after the baseline period, permit allowable emissions have been substituted.
7. Flare gas recovery started-up after the baseline period; therefore, permit allowable emissions have been substituted. Since permit allowables capped 53MIDFLARE, 53SOUTHFLARE, and 41NORTHFLARE, adjustment is illustrated accordingly.
8. Authorized emissions have been used to adjust the emissions for 1999 and 2000 reporting years for all fugitive sources.
9. Emissions reported under both tank and vapor recovery system EPN. Therefore, tank emissions were removed.
10. Loading emissions calculations listed Naphtha A/Naphtha B and Heavy Raffinate A/B as four different streams. Only "B" streams had a DRE applied; the "A" streams contributed 130 tons of uncontrolled VOC to the emissions totals. Therefore, 65 tpy per source has been removed from these emissions in 1999.
11. These sources were omitted from the 1999 and/or 2000 emission inventories because the emissions were less than 1 tpy. They have been adjusted to the smaller of either their creditable allowables or 1 tpy.
12. This source is part of an emissions cap. The total caps represent an operational change subsequent to the baseline operations, and are therefore being substituted for baseline reported emissions. The caps are listed at the bottom of the table.
13. Emissions reported in 1999-2000 were grandfathered emissions and are therefore considered creditable.
14. No current authorization for EPN; therefore, assumed shutdown or rolled into another EPN.
15. The emissions from this tank are capped with 20TANK2001.
16. De minimis activity; therefore, reported emissions have been removed.
17. All emissions from wastewater sources are based on current allowable in wastewater permit since calculation methodology has been updated since baseline period. Sources which are no long in wastewater permit have been removed.

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
812C	104	01ACU1202A	01ACU1202A	33.25	34.45	[1][2]
101	101	01ACU1H101	01ACU1H101	34.92	36.21	[1][2]
347	347	55FCCURFGS	55FCCURFGS	231.85	74.18	[1][2]
355	355	20GASTRKFG	20GASTRKFG	-	-	[10]
356	356	20GASLOAD	20GASFLARE	2.80	2.80	[5]
357	357	20DISTLDG	20DISTLDG	-	-	[10]
-	PBTX1	04BTXFUGS	04BTXFUGS	-	-	[10]
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	-	-	[10]
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	-	-	[10]
61ST301BLR	61STKBLR	61BLRH300	61BLRSTACK	63.46	63.46	[3]
61ST351BLR	61STKBLR	61BLRH350				
804E	107	50TDPH-1	50TDPH-1	10.95	10.92	[5][2]
805A	109	51DHT1H-1	51DHT1H-1	17.91	19.88	[1][2]
805B	121	51DHT1H-3	51DHT1H-3	7.80	7.78	[1][2]
810A	123	10GRUHTRB1	10GRUHTRB1	7.32	11.74	[1][2]
812A	102	02ACU2H201	02ACU2H201	52.72	47.14	[1][2]
812B	103	01VACTH301	01VACTH301	31.53	30.69	[1][2]
812D	105	01ACU1202B	01ACU1202B	32.96	32.03	[1][2]
813A	120	52DHT2H-1	52DHT2H-1	12.25	21.51	[1][2]
813C	325A	52DHT2H-2	52DHT2H-2A/B	23.79	20.70	[1][2]
813C	325B					
BHA	138	-	-	0.00	0.00	[4]
BHB	139	-	-	0.00	0.00	[4]
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	-	-	[10]
BTXA	192	04BTXH-51	04BTXH-51	4.18	2.56	[1][2]
BTXB	193	04BTXH-52	04BTXH-52	11.93	10.50	[1][2]
BTXC	310	04BTXH-53	04BTXH-53	13.85	11.51	[1][2]
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	-	-	[10]
LAB-SUMP	BZ-WWPD	-	-	-	-	[10]
COGENA	326	60COGENTRB	60COGENSTK	265.78	268.54	[1][2]
DOCKFLARE1	BZDVRCOMB	45DOCK1PCV	45DOCKSFLR	0.50	0.84	[1][2][6]
DOCKFLARE1	FBZDVR	-	-	-	-	[10]
F111	F111	51DHT1FUGS	51DHT1FUGS	-	-	[10]
F319	F319	08ALKYFUGS	08ALKYFUGS	-	-	[10]
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	-	-	[10]
F350	F350	55FCCUFUGS	55FCCUFUGS	-	-	[10]
F350	PTU	55FCCUFUGS	55FCCUPTUC	-	-	[10]
F351	F351	67FPMCLTWR	67FPMCLTWR	-	-	[10]
F359	F359	28LPGFUGS	28LPGFUGS	-	-	[10]
FEXPTET	FEXPTET	-	-	-	-	[10]
GOHDSA	305	13UNIBH301	13UNIBH301	27.59	25.95	[1][2]
HDSCRA	191	17REFHTRS	17REFHTRS	197.06	167.64	[1][2]
HDSCRB	190	17NHTHTRS	17NHTHTRS	45.86	38.20	[1][2]
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	-	-	[10]
ISOM A	299	16ISOMHTR	16ISOMHTR	16.32	12.47	[1][2]
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	-	-	[10]
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	0.00	0.00	[6]
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	0.00	0.00	[6]
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	-	-	[10]
LAB-SUMP	BNZ_NSHP	-	-	-	-	[10]
LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	-	-	[10]
LR-342	342	18TRKLOAD	18TRKLOAD	-	-	[10]
N17	N17	40CSPLTH-1	40CSPLTH-1	46.22	46.22	[3]
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	-	-	[10]
P701C	F149	02FWCLGTWR	02FWCLGTWR	-	-	[10]
P804	F108	50TDPFUGS	50TDPFUGS	-	-	[10]
P804C	F147	-	-	-	-	[10]
P805C	F146	67805CLTWR	67805CLTWR	-	-	[10]
P807C	F150	08ALKCLTWR	08ALKCLTWR	-	-	[10]
P810	F124	10GRUFUGS	10GRUFUGS	-	-	[10]
P812	F106	02ACU2FUGS	02ACU2FUGS	-	-	[10]
P813	F122	52DHT2FUGS	52DHT2FUGS	-	-	[10]
P817	F817	37SWS2FUGS	37SWS2FUGS	-	-	[10]
PAT	F143	67C200FUGS	67C200FUGS	-	-	[10]
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	-	-	[10]
PBTX2	FBTX2	-	-	-	-	[10]
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	-	-	[10]
PBH	F138	-	-	-	-	[10]
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	-	-	[10]
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	-	-	[10]
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	-	-	[10]
PCRUDE	F318	09SATLQFUG	09SATLQFUG	-	-	[10]
PCRUDE	F318	14FGTFUGS	14FGTFUGS	-	-	[10]
PCT11	F320	67NORTHCT	67NORTHCT	-	-	[10]
PCVS	FCVS	-	-	-	-	[10]
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	-	-	[10]
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	-	-	[10]
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	-	-	[10]
PFLR1	141	53MIDFLARE	53MIDFLARE	-	-	[7]
PFLR2	142	53SOUTHFLR	53SOUTHFLR	-	-	[7]
PFLR3	307	41NORTHFLR	41NORTHFLR	27.67	27.67	[7]
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	-	-	[10]
PHDSCR	F190	17REFFUGS	17REFFUGS	-	-	[10]
PHDSCR	311	17REFREGEN	17REFREGEN	2.94	2.77	[1][2]
PMOGAS	F317	20MOGASBLD	20MOGASBLD	-	-	[10]
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	-	-	[10]
PRSE	F302	10DEMEXFUG	10DEMEXFUG	-	-	[10]
PSRU	F310	14SRU1FUGS	14SRU1FUGS	-	-	[10]
PSRU	F312	14SRU1LOAD	14SRU1LOAD	-	-	[10]
PSRU	F309	14SRU1PIT	14SRU1PIT	-	-	[10]
PSRU	F310	15SCOTFUGS	15SCOTFUGS	-	-	[10]
PSRU	125	33SRU3	15SRUINCIN	2.54	2.61	[1][2]
PSRU	F313	33SRU3LOAD	33SRU3LOAD	-	-	[10]
PSRU	F311	33SRU3PIT	33SRU3PIT	-	-	[10]
F-930	F-930	-	-	-	-	[10]
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	-	-	[10]
PSULF	FSULF	04SULFFUGS	04SULFFUGS	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	-	-	[10]
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	-	-	[10]
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	-	-	[10]
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	-	-	[10]
PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	-	-	[10]
PWWT	PWWT	-	-	-	-	[10]
RSEA	302	10DEMEXH-2	10DEMEXH-2	8.00	9.77	[1][2]
RSEB	309	10DEMEXH-4	10DEMEXH-4	22.44	24.62	[1][2]
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	-	-	[10]
T1000	1000	38TANK1000	38TANK1000	-	-	[10]
T1001	1001	38TANK1001	38TANK1001	-	-	[10]
T2001	2001	20TANK2001	20TANK2001	-	-	[10]
T2002	2002	20TANK2002	20TANK2002	-	-	[10]
T2003	2003	20TANK2003	20TANK2003	-	-	[10]
T301	329	18TANK0301	18TANK0301	-	-	[10]
T302	330	18TANK0302	18ASPHTVRS	-	-	[10]
T303	331	18TANK0303	18ASPHTVRS	-	-	[10]
T305	333	18TANK0305	18TANK0305	-	-	[10]
T306	334	18TANK0306	18TANK0306	-	-	[10]
T316	316	22TANK0316	22TANK0316	-	-	[10]
T317	317	22TANK0317	22TANK0317	-	-	[10]
T401A	401A	67TANK401A	67TANK401A	-	-	[10]
T401B	401B	67TANK401B	67TANK401B	-	-	[10]
T415	415	-	-	-	-	[10]
T416	416	22TANK0416	22TANK0416	-	-	[10]
T421	421	22TANK0421	22TANK0421	-	-	[10]
T422	422	22TANK0422	22TANK0422	-	-	[10]
T441	441	22TANK0441	22TANK0441	-	-	[10]
T445	445	22TANK0445	22TANK0445	-	-	[10]
T446	446	22TANK0446	22TANK0446	-	-	[10]
T452	452	22TANK0452	22TANK0452	-	-	[10]
T453	453	22TANK0453	22TANK0453	-	-	[10]
T454	454	22TANK0454	22TANK0454	-	-	[10]
T455	455	22TANK0455	22TANK0455	-	-	[10]
T462	462	22TANK0462	22TANK0462	-	-	[10]
T463	463	22TANK0463	22TANK0463	-	-	[10]
T466	466	22TANK0466	22TANK0466	-	-	[10]
T470	470	22TANK0470	22TANK0470	-	-	[10]
T475	222	22TANK0475	22TANK0475	-	-	[10]
T476	223	22TANK0476	22TANK0476	-	-	[10]
T477	212	22TANK0477	22TANK0477	-	-	[10]
T478	215	22TANK0478	22TANK0478	-	-	[10]
T479	217	22TANK0479	22TANK0479	-	-	[10]
T480	480	22TANK0480	22TANK0480	-	-	[10]
T481	T481	22TANK0481	22TANK0481	-	-	[10]
T500A	500A	67TANK500A	67TANK500A	-	-	[10]
T500B	500B	67TANK500B	67TANK500B	-	-	[10]
T502	502	22TANK0502	22TANK0502	-	-	[10]
T503	503	22TANK0503	22TANK0503	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
T504	504	67TANK0504	67TANK0504	-	-	[10]
T505	505	67TANK0505	67TANK0505	-	-	[10]
T516	516	22TANK0516	22TANK0516	-	-	[10]
T524	524	22TANK0524	22TANK0524	-	-	[10]
T525	525	22TANK0525	22TANK0525	-	-	[10]
T526	526	22TANK0526	22TANK0526	-	-	[10]
T530	530	22TANK0530	22TANK0530	-	-	[10]
T531	531	22TANK0531	22TANK0531	-	-	[10]
T532	532	22TANK0532	22TANK0532	-	-	[10]
T536	536	22TANK0536	22TANK0536	-	-	[10]
T538	538	22TANK0538	22TANK0538	-	-	[10]
T540	540	22TANK0540	22TANK0540	-	-	[10]
T541	541	22TANK0541	22TANK0541	-	-	[10]
T542	542	22TANK0542	22TANK0542	-	-	[10]
T543	543	22TANK0543	22TANK0543	-	-	[10]
T545	545	22TANK0545	22TANK0545	-	-	[10]
T558	558	22TANK0558	22TANK0558	-	-	[10]
T559	559	22TANK0559	22TANK0559	-	-	[10]
T560	560	22TANK0560	22TANK0560	-	-	[10]
T561	561	22TANK0561	22TANK0561	-	-	[10]
T562	562	22TANK0562	22TANK0562	-	-	[10]
T563	563	22TANK0563	22TANK0563	-	-	[10]
T572	572	22TANK0572	22TANK0572	-	-	[10]
T574	574	22TANK0574	22TANK0574	-	-	[10]
T587	587	22TANK0587	22TANK0587	-	-	[10]
T588	588	22TANK0588	22TANK0588	-	-	[10]
T589	589	22TANK0589	22TANK0589	-	-	[10]
T591	591	22TANK0591	22TANK0591	-	-	[10]
T595	252	67TANK0595	67TANK0595	-	-	[10]
T596	596	67TANK0596	67TANK0596	-	-	[10]
T597	597	22TANK0597	22TANK0597	-	-	[10]
T598	598	22TANK0598	22TANK0598	-	-	[10]
T599	599	22TANK0599	22TANK0599	-	-	[10]
T650	650	22TANK0650	22TANK0650	-	-	[10]
T651	651	22TANK0651	22TANK0651	-	-	[10]
T660	660	67TANK0660	67TK0660CC	-	-	[10]
T902	902	22TANK0902	22TANK0902	-	-	[10]
T905	905	67TANK0905	67TANK0905	-	-	[10]
T906	906	22TANK0906	22TANK0906	-	-	[10]
T907	907	22TANK0907	22TANK0907	-	-	[10]
T909	909	22TANK0909	22TANK0909	-	-	[10]
T910	910	22TANK0910	22TANK0910	-	-	[10]
T911	911	22TANK0911	22TANK0911	-	-	[10]
T913	913	22TANK0913	22TANK0913	-	-	[10]
T917	917	22TANK0917	22TANK0917	-	-	[10]
T918	918	22TANK0918	22TANK0918	-	-	[10]
T919	919	22TANK0919	22TANK0919	-	-	[10]
T920	920	22TANK0920	22TANK0920	-	-	[10]
T921	921	22TANK0921	22TANK0921	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
T922	922	22TANK0922	22TANK0922	-	-	[10]
T923	923	08TANK0923	08TANK0923	-	-	[10]
T924	924	22TANK0924	22TANK0924	-	-	[10]
T925	925	22TANK0925	22TANK0925	-	-	[10]
T926	926	22TANK0926	22TK926FLR	0.00	0.00	[1][2]
T927	927	67TANK0927	67TANK0927	-	-	[10]
T928	928	50TANK0928	50BZTNKFLR	0.00	0.00	[1][2]
T929	929	50TANK0929	50BZTNKFLR	0.00	0.00	[1][2]
T930	930	50TANK0930	50BZTNKFLR	0.00	0.00	[1][2]
T934	934	22TANK0934	22TANK0934	-	-	[10]
T935	935	22TANK0935	22TANK0935	-	-	[10]
T938	179	22TANK0938	22TANK0938	-	-	[10]
T939	180	22TANK0939	22TANK0939	-	-	[10]
T941	941	04TANK0941	04TANK0941	-	-	[10]
T946	946	04TANK0946	04TANK0946	-	-	[10]
T947	947	04TANK0947	04TANK0947	-	-	[10]
T948	948	22TANK0948	22TANK0948	-	-	[10]
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	-	-	[10]
TK506	506	22TANK0506	22TANK0506	-	-	[10]
TK522	522	22TANK0522	22TANK0522	-	-	[10]
TK537	537	22TANK0537	22TANK0537	-	-	[10]
TK586	586	22TANK0586	22TANK0586	-	-	[10]
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	-	-	[10]
WWT-AB	WWT-AB	-	-	-	-	[10]
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	-	-	[10]
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	-	-	[10]
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	-	-	[10]
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	-	-	[10]
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	-	-	[10]
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	-	-	[10]
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	-	-	[10]
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	-	-	[10]
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	-	-	[10]
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	-	-	[10]
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	-	-	[10]
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	-	-	[10]
-	-	01ACU1WWFG	01ACU1WWFG	-	-	[10]
-	-	01VACTFUGS	01VACTFUGS	-	-	[10]
-	-	02ACU2WWFG	02ACU2WWFG	-	-	[10]
-	-	04BTXWWFUG	04BTXWWFUG	-	-	[10]
-	-	08ALKYWWFG	08ALKYWWFG	-	-	[10]
-	-	08LSWALKY	08LSWALKY	-	-	[10]
-	-	08TANK0668	08TANK0668	-	-	[10]
-	-	08TANK0669	08TANK0669	-	-	[10]
-	-	09SLWWFUG	09SLWWFUG	-	-	[10]
-	-	10DMXWWFUG	10DMXWWFUG	-	-	[10]
-	-	10GRUWWFUG	10GRUWWFUG	-	-	[10]
-	-	13UNIWWFUG	13UNIWWFUG	-	-	[10]
-	-	14ATUWWFUG	14ATUWWFUG	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	14SR1WWFUG	14SR1WWFUG	-	-	[10]
-	-	14TANK0101	14TANK0101	-	-	[10]
-	-	14TANK0102	14TANK0102	-	-	[10]
-	-	16ISOMWWFG	16ISOMWWFG	-	-	[10]
-	-	17FGRCSFUG	17FGRCSFUG	-	-	[10]
-	-	17NHTWWFUG	17NHTWWFUG	-	-	[10]
-	-	17NHTFUGS	17NHTFUGS	-	-	[10]
-	-	18RAILLOAD	18RAILLOAD	-	-	[10]
-	-	18ASPHTVRS	18ASPHTVRS	-	-	[10]
-	-	18TANK0300	18ASPHTVRS	-	-	[10]
-	-	18TANK0310	18ASPHTVRS	-	-	[10]
-	-	18TANK0311	18ASPHTVRS	-	-	[10]
-	-	18TANK0312	18ASPHTVRS	-	-	[10]
-	-	18TANK0313	18ASPHTVRS	-	-	[10]
-	-	18TANK0314	18ASPHTVRS	-	-	[10]
-	-	18TANK0315	18ASPHTVRS	-	-	[10]
-	-	18TANKV330	18TANKV330	-	-	[10]
-	-	20LSTRKRCK	20LSTRKRCK	-	-	[10]
T2000	T2000	20TANK2000	20TANK2000	-	-	[10]
-	-	22ASTNKFUG	22ASTNKFUG	-	-	[10]
-	-	22CRTNKFUG	22CRTNKFUG	-	-	[10]
-	-	22BZNTKFUG	22BZNTKFUG	-	-	[10]
-	-	22BZNTKFLR	22BZNTKFLR	0.15	0.15	[8][9]
-	-	22GOTNKFUG	22GOTNKFUG	-	-	[10]
-	-	22OSFTKFUG	22OSFTKFUG	-	-	[10]
-	-	45TANK0474	45TANK0474	-	-	[10]
-	-	22TANK0482	22TANK0482	-	-	[10]
-	-	22TANK0484	22TANK0484	-	-	[10]
-	-	22TANK0595	22TANK0595	-	-	[10]
-	-	22TANK0596	22TANK0596	-	-	[10]
-	-	22TANK0678	41NORTHFLR	-	-	[7]
-	-	22TANK0679	41NORTHFLR	-	-	[7]
-	-	22TANK0680	41NORTHFLR	-	-	[7]
-	-	22TANK0681	22TANK0681	-	-	[10]
-	-	22TANK0682	22TANK0682	-	-	[10]
-	-	22TANK0800	22TANK0800	-	-	[10]
-	-	22TANK0801	22TANK0801	-	-	[10]
-	-	22TANK0802	22TANK0802	-	-	[10]
-	-	22TANK0805	22TANK0805	-	-	[10]
-	-	22TANK0807	22TANK0807	-	-	[10]
-	-	22TANK0808	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0809	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0810	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0811	22TANK0811	-	-	[10]
-	-	22TANK0812	22TANK0812	-	-	[10]
-	-	22TANK0813	22TANK0813	-	-	[10]
-	-	22TANK0814	22TANK0814	-	-	[10]
-	-	22TANK0815	22TANK0815	-	-	[10]
-	-	22TK926FLR	22TK926FLR	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	28LPGHOSE	28LPGHOSE	-	-	[10]
-	-	33SR2WWFUG	33SR2WWFUG	-	-	[10]
-	-	33SRU3FUGS	33SRU3FUGS	-	-	[10]
-	-	37SWS2WWFG	37SWS2WWFG	-	-	[10]
-	-	38SWS1WWFG	38SWS1WWFG	-	-	[10]
-	-	40CSOWSUMP	40CSOWCC	-	-	[10]
-	-	40CSWWFUG	40CSWWFUG	-	-	[10]
-	-	45DOCK2PCV	45DOCK2PCV	-	-	[10]
-	-	45DOCK2FUG	45DOCK2FUG	-	-	[10]
-	-	45DOCK2PCV	45DOCK2LDG	-	-	[10]
-	-	45DOCK45V1	45DOCK45V1	-	-	[10]
-	-	45DOCK45V2	45DOCK45V2	-	-	[10]
-	-	45DOCK45V3	45DOCK45V3	-	-	[10]
-	-	45DOCK1PCV	45DOCKSFLR	-	-	[6]
-	-	45DOCK3PCV	45DOCKSFLR	-	-	[6]
-	-	45DOCKSFLR	45DOCKSFLR	-	-	[6]
-	-	45DOCK1PCV	45DOCKFLR2	-	-	[6]
-	-	45DOCK3PCV	45DOCKFLR2	-	-	[6]
-	-	45DOCKFLR2	45DOCKFLR2	-	-	[6]
-	-	45DOCK3FUG	45DOCK3FUG	-	-	[10]
-	-	45DOCKV104	45V104CC	-	-	[10]
-	-	50BZTNKFLR	50BZTNKFLR	0.85	0.85	[8][9]
-	-	50TDPWWFUG	50TDPWWFUG	-	-	[10]
-	-	51DHT1WWFG	51DHT1WWFG	-	-	[10]
-	-	52DHT2WWFG	52DHT2WWFG	-	-	[10]
-	-	52FLORPWS	52FLORPWCC	-	-	[10]
-	-	52FLWWFUG	52FLWWFUG	-	-	[10]
-	-	52LS811SMP	52LS811SMP	-	-	[10]
-	-	52LSE813	52LSE813	-	-	[10]
-	-	54GHT1FUGS	54GHT1FUGS	-	-	[10]
-	-	54GHT2FUGS	54GHT2FUGS	-	-	[10]
-	-	55FCCWWFUG	55FCCWWFUG	-	-	[10]
-	-	55JETTRFUG	55JETTRFUG	-	-	[10]
-	-	55JETTRSUMP	55JETTRCC	-	-	[10]
-	-	55OFFGSFUG	55OFFGSFUG	-	-	[10]
-	-	58GSHDSCTR	58GSHDSCTR	-	-	[10]
-	-	58GSHDSFUG	58GSHDSFUG	-	-	[10]
-	-	60CGWWFUG	60CGWWFUG	-	-	[10]
-	-	60COGENPWS	60CGNPWCC	-	-	[10]
-	-	60COGENSWS	60CGNSWCC	-	-	[10]
-	-	61PBWWFUG	61PBWWFUG	-	-	[10]
-	-	67AERTKA	67AERTKA	-	-	[10]
-	-	67AERTKB	67AERTKB	-	-	[10]
-	-	67AERTKC	67AERTKC	-	-	[10]
-	-	67BSMNT	67BSMNT	-	-	[10]
-	-	67C200AFUG	67C200AFUG	-	-	[10]
-	-	67C200WWFG	67C200WWFG	-	-	[10]
-	-	67CLAR405A	67CLAR405A	-	-	[10]
-	-	67CLAR405B	67CLAR405B	-	-	[10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	67CLAR405C	67CLAR405C	-	-	[10]
-	-	67CLAREFTK	67CLAREFTK	-	-	[10]
-	-	67CLARFLTK	67CLARFLTK	-	-	[10]
-	-	67FLSPTK	67FLSPTK	-	-	[10]
-	-	67LS61P20	67LS61P20	-	-	[10]
-	-	67LSBIOTRT	67LSBIOTRT	-	-	[10]
-	-	67LSEDAF	67LSEDAF	-	-	[10]
-	-	67LSN560	67LSN560	-	-	[10]
-	-	67LSN595	67LSN595	-	-	[10]
-	-	67LSN905	67LSN905	-	-	[10]
-	-	67LSNE660	67LSNE660	-	-	[10]
-	-	67LSS602	67LSS602	-	-	[10]
-	-	67LSWSHOUT	67LSWSHOUT	-	-	[10]
-	-	67NCPIMNT	67NCPIMNT	-	-	[10]
-	-	67NPWWFUG	67NPWWFUG	-	-	[10]
-	-	67NSHAPFUG	67NSHAPFUG	-	-	[10]
-	-	67PHADJSPL	67PHADJCC	-	-	[10]
-	-	67SCALBIO	67SCALBIO	-	-	[10]
-	-	67SCALFUEL	67SCALCC	-	-	[10]
-	-	67SCPIMNT	67SCPIMNT	-	-	[10]
-	-	67SOUTHAPD	67SOUTHAPD	-	-	[10]
-	-	67SSTRMWTR	67SSTRMWTR	-	-	[10]
-	-	67TANK0636	67TANK0636	-	-	[10]
-	-	RECOILFUG	RECOILFUG	-	-	[10]
-	-	SOLIDLIQFU	SOLIDLIQFU	-	-	[10]
-	-	06VDU2CHTR	06VDU2CHTR	11.71	11.71	[3]
-	-	06VDU2FUGS	06VDU2FUGS	-	-	[3][10]
-	-	22TANK0933	22TANK0933	-	-	[3][10]
-	-	22TANK0940	22TANK0940	-	-	[3][10]
-	-	22TKDCPFUGS	22TKDCPFUGS	-	-	[3][10]
-	-	25SRUINCIN	25SRUINCIN	14.59	14.59	[3]
-	-	36SRUINCIN	36SRUINCIN	14.59	14.59	[3]
-	-	30CKRFLARE	30CKRFLARE	0.01	0.01	[3]
-	-	30CKRFUGS	30CKRFUGS	-	-	[3][10]
-	-	30CKRHTR1	30CKRHTR1	7.18	7.18	[3]
-	-	30CKRHTR2	30CKRHTR2	7.18	7.18	[3]
-	-	30CKRTRKLD	30CKRTRKLD	-	-	[3][10]
-	-	30DCPCT1	30DCPCT1	-	-	[3][10]
-	-	31KNHTHTR	31KNHTHTR	1.38	1.38	[3]
-	-	34SRUFUGS	34SRUFUGS	-	-	[3][10]
-	-	37TANK1002	37TANK1002	-	-	[3][10]
-	-	67TANK0401C	67TANK0401C	-	-	[3][10]
-	-	67TANK0500C	67TANK0500C	-	-	[3][10]
-	-	38V107	38V107	-	-	[3][10]
-	-	22TANK0517	22TANK0517	-	-	[3][10]
-	-	42FGTFUGS	42FGTFUGS	-	-	[3][10]
-	-	43DHT3CHTR	43DHT3CHTR	5.91	5.91	[3]
-	-	43DHT3CMSS	43DHT3CMSS			[3][10]
-	-	43DHT3FUGS	43DHT3FUGS			[3][10]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - NO_x

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	47SWS4FUGS	47SWS4FUGS	-	-	[3][10]
-	-	35SRU5FUGS	35SRU5FUGS	-	-	[3][10]
-	-	31KNHTFUGS	31KNHTFUGS	-	-	[3][10]
-	-	19PSAFUGS	19PSAFUGS	-	-	[3][10]
-	-	30AMSTFUGS	30AMSTFUGS	-	-	[3][10]
-	-	30CKRH1MSS	30CKRH1MSS	1.15	1.15	[3]
-	-	30CKRH2MSS	30CKRH2MSS	1.15	1.15	[3]
-	-	MSSILE	MSSILE	-	-	[3][10]
-	-	MSS_TA	MSS_TA	11.13	11.13	[3]
-	-	MSS_ATM	MSS_ATM	0.35	0.35	[3]
-	-	MSS_TKFLR	MSS_TKFLR	-	-	[3][10]
-	-	MSS_WGS	MSS_WGS	-	-	[3][10]
-	-	MSS_COGEN	MSS_COGEN	1.47	1.47	[3]
-	-	MSS_INCIN	MSS_INCIN	5.09	5.09	[3]
-	-	55OGTCLTWR	55OGTCLTWR	-	-	[3][10]
-	-	54GHTSUMP	54GHTCC	-	-	[3][10]
-	-	45DOCKV104	45V1CC	-	-	[3][10]
-	-	45DOCKV3A	45V3ACC	-	-	[3][10]
-	-	45DOCKV3B	45V3BCC	-	-	[3][10]
-	-	67SBOWSCC	67SBOWSCC	-	-	[3][10]
-	-	67SBSEWCC	67SBSEWCC	-	-	[3][10]
-	-	67GFOWSCC	67GFOWSCC	-	-	[3][10]
-	-	67GFSEWCC	67GFSEWCC	-	-	[3][10]
-	-	67VDUOWSCC	67VDUOWSCC	-	-	[3][10]
-	-	67SKIMCC	67SKIMCC	-	-	[3][10]

Adjustment

1. Actual emissions for 1999 were obtained from Annual Emission Inventory Reports (1999) submittals.
2. Actual emissions for 2000 were obtained from Annual Emission Inventory Reports (2000) submittals.
3. Equipment started-up after the baseline period; therefore, permit allowable emissions have been substituted.
4. Equipment has been shutdown/demolished; therefore, reported emissions have been removed.
5. Emissions reported in the emissions inventory were not creditable and have been adjusted to creditable emission rate.
6. All Dock stack emissions are capped and represented under 45DOCKSFLR for 1999 and 2000 reporting years.
7. Flare gas recovery started-up after the baseline period; therefore, permit allowable emissions have been substituted. Since permit allowables capped 53MIDFLARE, 53SOUTHFLARE, and 41NORTHFLARE, adjustment is illustrated accordingly.
8. These sources were omitted from the 1999 and/or 2000 emission inventories because the emissions were less than 1 tpy. They have been adjusted to the smaller of either their creditable allowables or 1 tpy.
9. Emissions reported in 1999-2000 were grandfathered emissions and are therefore considered creditable.
10. This source is not a NOx source.

TOTAL PETROCHEMICALS USA, C.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - PM/PM_{10}

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
812C	104	01ACU1202A	01ACU1202A	9.16	9.70	[1][2]
101	101	01ACU1H101	01ACU1H101	2.28	2.42	[1][2]
347	347	55FCCURFGS	55FCCURFGS	114.91	108.69	[8]
355	355	20GASTRKFG	20GASTRKFG	-	-	[9]
356	356	20GASLOAD	20GASFLARE	-	-	[9]
357	357	20DISTLDG	20DISTLDG	-	-	[9]
-	PBTX1	04BTXFUGS	04BTXFUGS	-	-	[9]
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	-	-	[9]
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	-	-	[9]
61ST301BLR	61STKBLR	61BLRH300	61BLRSTACK	13.84	13.84	[3]
61ST351BLR	61STKBLR	61BLRH350	61BLRSTACK			
804E	107	50TDPH-1	50TDPH-1	0.54	0.53	[1][2]
805A	109	51DHT1H-1	51DHT1H-1	0.78	0.89	[1][2]
805B	121	51DHT1H-3	51DHT1H-3	0.68	0.00	[1][2]
810A	123	10GRUHTRB1	10GRUHTRB1	0.35	0.57	[1][2]
812A	102	02ACU2H201	02ACU2H201	3.03	2.77	[1][2]
812B	103	01VACTH301	01VACTH301	1.99	1.98	[1][2]
812D	105	01ACU1202B	01ACU1202B	8.92	8.86	[1][2]
813A	120	52DHT2H-1	52DHT2H-1	0.58	1.05	[1][2]
813C	325A	52DHT2H-2	52DHT2H-2A/B	1.14	1.01	[1][2]
813C	325B					
BHA	138	-	-	-	-	[4]
BHB	139	-	-	-	-	[4]
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	-	-	[9]
BTXA	192	04BTXH-51	04BTXH-51	1.00	0.62	[1][2]
BTXB	193	04BTXH-52	04BTXH-52	2.85	2.56	[1][2]
BTXC	310	04BTXH-53	04BTXH-53	3.31	2.81	[1][2]
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	-	-	[9]
LAB-SUMP	BZ-WWPD	-	-	-	-	[9]
COGENA	326	60COGENTRB	60COGENSTK	20.73	27.06	[1][2]
DOCKFLARE1	BZDVRCOMB	45DOCK1PCV	45DOCKSFLR	0.00	0.00	[1][2][6]
DOCKFLARE1	FBZDVR	-	-	-	-	[9]
F111	F111	51DHT1FUGS	51DHT1FUGS	-	-	[9]
F319	F319	08ALKYFUGS	08ALKYFUGS	-	-	[9]
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	1.80	1.80	[1][2]
F350	F350	55FCCUFUGS	55FCCUFUGS	0.00	0.00	[1][2]
F350	PTU	55FCCUFUGS	55FCCUPTUC	-	-	[9]
F351	F351	67FPMCLTWR	67FPMCLTWR	147.30	147.30	[7]
F359	F359	28LPGFUGS	28LPGFUGS	-	-	[9]
FEXPTET	FEXPTET	-	-	-	-	[9]
GOHDSA	305	13UNIBH301	13UNIBH301	1.20	1.16	[1][2]
HDSCRA	191	17REFHTRS	17REFHTRS	8.84	7.61	[1][2]
HDSCRB	190	17NHTHTRS	17NHTHTRS	5.48	4.66	[1][2]
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	-	-	[9]
ISOM A	299	16ISOMHTR	16ISOMHTR	0.71	0.56	[1][2]
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	-	-	[9]
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	0.00	0.00	[1][2][6]
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	0.00	0.00	[1][2][6]
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	-	-	[9]
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	-	-	[9]
LAB-SUMP	BNZ_NSHP	-	-	-	-	[9]

TOTAL PETROCHEMICALS USA, C.
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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	-	-	[9]
LR-342	342	18TRKLOAD	18TRKLOAD	-	-	[9]
N17	N17	40CSPLTH-1	40CSPLTH-1	10.17	10.17	[3]
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	-	-	[9]
P701C	F149	02FWCLGTWR	02FWCLGTWR	42.94	42.94	[7]
P804	F108	50TDPFUGS	50TDPFUGS	-	-	[9]
P804C	F147	-	-	0.00	0.00	[4]
P805C	F146	67805CLTWR	67805CLTWR	46.49	46.49	[7]
P807C	F150	08ALKCLTWR	08ALKCLTWR	33.95	33.95	[7]
P810	F124	10GRUFUGS	10GRUFUGS	0.00	0.00	[1][2]
P812	F106	02ACU2FUGS	02ACU2FUGS	-	-	[9]
P813	F122	52DHT2FUGS	52DHT2FUGS	-	-	[9]
P817	F817	37SWS2FUGS	37SWS2FUGS	-	-	[9]
PAT	F143	67C200FUGS	67C200FUGS	-	-	[9]
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	12.48	12.48	[7]
PBTX2	FBTX2	-	-	-	-	[9]
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	-	-	[9]
PBH	F138	-	-	-	-	[9]
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	-	-	[9]
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	8.99	8.99	[7]
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	-	-	[9]
PCRUDE	F318	09SATLQFUG	09SATLQFUG	-	-	[9]
PCRUDE	F318	14FGTFUGS	14FGTFUGS	-	-	[9]
PCT11	F320	67NORTHCT	67NORTHCT	49.06	49.06	[7]
PCVS	FCVS	-	-	-	-	[9]
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	-	-	[9]
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	-	-	[9]
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	-	-	[9]
PFLR1	141	53MIDFLARE	53MIDFLARE	-	-	[9]
PFLR2	142	53SOUTHFLR	53SOUTHFLR	-	-	[9]
PFLR3	307	41NORTHFLR	41NORTHFLR	-	-	[9]
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	-	-	[9]
PHDSCR	F190	17REFFUGS	17REFFUGS	-	-	[9]
PHDSCR	311	17REFREGEN	17REFREGEN	8.75	8.23	[1][2]
PMOGAS	F317	20MOGASBLD	20MOGASBLD	-	-	[9]
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	-	-	[9]
PRSE	F302	10DEMEXFUG	10DEMEXFUG	-	-	[9]
PSRU	F310	14SRU1FUGS	14SRU1FUGS	-	-	[9]
PSRU	F312	14SRU1LOAD	14SRU1LOAD	-	-	[9]
PSRU	F309	14SRU1PIT	14SRU1PIT	-	-	[9]
PSRU	F310	15SCOTFUGS	15SCOTFUGS	-	-	[9]
PSRU	125	33SRU3	15SRUINCIN	1.60	1.64	[1][2]
PSRU	F313	33SRU3LOAD	33SRU3LOAD	-	-	[9]
PSRU	F311	33SRU3PIT	33SRU3PIT	-	-	[9]
F-930	F-930	-	-	-	-	[9]
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	-	-	[9]
PSULF	FSULF	04SULFFUGS	04SULFFUGS	-	-	[9]
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	-	-	[9]
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	-	-	[9]
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	-	-	[9]
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	-	-	[9]

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PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	-	-	[9]
PWWT	PWWT	-	-	-	-	[9]
RSEA	302	10DEMEXH-2	10DEMEXH-2	1.91	2.39	[1][2]
RSEB	309	10DEMEXH-4	10DEMEXH-4	1.47	1.65	[1][2]
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	-	-	[9]
T1000	1000	38TANK1000	38TANK1000	-	-	[9]
T1001	1001	38TANK1001	38TANK1001	-	-	[9]
T2001	2001	20TANK2001	20TANK2001	-	-	[9]
T2002	2002	20TANK2002	20TANK2002	-	-	[9]
T2003	2003	20TANK2003	20TANK2003	-	-	[9]
T301	329	18TANK0301	18TANK0301	-	-	[9]
T302	330	18TANK0302	18ASPHTVRS	-	-	[9]
T303	331	18TANK0303	18ASPHTVRS	-	-	[9]
T305	333	18TANK0305	18TANK0305	-	-	[9]
T306	334	18TANK0306	18TANK0306	-	-	[9]
T316	316	22TANK0316	22TANK0316	-	-	[9]
T317	317	22TANK0317	22TANK0317	-	-	[9]
T401A	401A	67TANK401A	67TANK401A	-	-	[9]
T401B	401B	67TANK401B	67TANK401B	-	-	[9]
T415	415	-	-	-	-	[9]
T416	416	22TANK0416	22TANK0416	-	-	[9]
T421	421	22TANK0421	22TANK0421	-	-	[9]
T422	422	22TANK0422	22TANK0422	-	-	[9]
T441	441	22TANK0441	22TANK0441	-	-	[9]
T445	445	22TANK0445	22TANK0445	-	-	[9]
T446	446	22TANK0446	22TANK0446	-	-	[9]
T452	452	22TANK0452	22TANK0452	-	-	[9]
T453	453	22TANK0453	22TANK0453	-	-	[9]
T454	454	22TANK0454	22TANK0454	-	-	[9]
T455	455	22TANK0455	22TANK0455	-	-	[9]
T462	462	22TANK0462	22TANK0462	-	-	[9]
T463	463	22TANK0463	22TANK0463	-	-	[9]
T466	466	22TANK0466	22TANK0466	-	-	[9]
T470	470	22TANK0470	22TANK0470	-	-	[9]
T475	222	22TANK0475	22TANK0475	-	-	[9]
T476	223	22TANK0476	22TANK0476	-	-	[9]
T477	212	22TANK0477	22TANK0477	-	-	[9]
T478	215	22TANK0478	22TANK0478	-	-	[9]
T479	217	22TANK0479	22TANK0479	-	-	[9]
T480	480	22TANK0480	22TANK0480	-	-	[9]
T481	T481	22TANK0481	22TANK0481	-	-	[9]
T500A	500A	67TANK500A	67TANK500A	-	-	[9]
T500B	500B	67TANK500B	67TANK500B	-	-	[9]
T502	502	22TANK0502	22TANK0502	-	-	[9]
T503	503	22TANK0503	22TANK0503	-	-	[9]
T504	504	67TANK0504	67TANK0504	-	-	[9]
T505	505	67TANK0505	67TANK0505	-	-	[9]
T516	516	22TANK0516	22TANK0516	-	-	[9]
T524	524	22TANK0524	22TANK0524	-	-	[9]
T525	525	22TANK0525	22TANK0525	-	-	[9]
T526	526	22TANK0526	22TANK0526	-	-	[9]

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T530	530	22TANK0530	22TANK0530	-	-	[9]
T531	531	22TANK0531	22TANK0531	-	-	[9]
T532	532	22TANK0532	22TANK0532	-	-	[9]
T536	536	22TANK0536	22TANK0536	-	-	[9]
T538	538	22TANK0538	22TANK0538	-	-	[9]
T540	540	22TANK0540	22TANK0540	-	-	[9]
T541	541	22TANK0541	22TANK0541	-	-	[9]
T542	542	22TANK0542	22TANK0542	-	-	[9]
T543	543	22TANK0543	22TANK0543	-	-	[9]
T545	545	22TANK0545	22TANK0545	-	-	[9]
T558	558	22TANK0558	22TANK0558	-	-	[9]
T559	559	22TANK0559	22TANK0559	-	-	[9]
T560	560	22TANK0560	22TANK0560	-	-	[9]
T561	561	22TANK0561	22TANK0561	-	-	[9]
T562	562	22TANK0562	22TANK0562	-	-	[9]
T563	563	22TANK0563	22TANK0563	-	-	[9]
T572	572	22TANK0572	22TANK0572	-	-	[9]
T574	574	22TANK0574	22TANK0574	-	-	[9]
T587	587	22TANK0587	22TANK0587	-	-	[9]
T588	588	22TANK0588	22TANK0588	-	-	[9]
T589	589	22TANK0589	22TANK0589	-	-	[5][9]
T591	591	22TANK0591	22TANK0591	-	-	[9]
T595	252	67TANK0595	67TANK0595	-	-	[9]
T596	596	67TANK0596	67TANK0596	-	-	[9]
T597	597	22TANK0597	22TANK0597	-	-	[9]
T598	598	22TANK0598	22TANK0598	-	-	[9]
T599	599	22TANK0599	22TANK0599	-	-	[9]
T650	650	22TANK0650	22TANK0650	-	-	[9]
T651	651	22TANK0651	22TANK0651	-	-	[9]
T660	660	67TANK0660	67TK0660CC	-	-	[9]
T902	902	22TANK0902	22TANK0902	-	-	[9]
T905	905	67TANK0905	67TANK0905	-	-	[9]
T906	906	22TANK0906	22TANK0906	-	-	[9]
T907	907	22TANK0907	22TANK0907	-	-	[9]
T909	909	22TANK0909	22TANK0909	-	-	[9]
T910	910	22TANK0910	22TANK0910	-	-	[9]
T911	911	22TANK0911	22TANK0911	-	-	[9]
T913	913	22TANK0913	22TANK0913	-	-	[9]
T917	917	22TANK0917	22TANK0917	-	-	[9]
T918	918	22TANK0918	22TANK0918	-	-	[9]
T919	919	22TANK0919	22TANK0919	-	-	[9]
T920	920	22TANK0920	22TANK0920	-	-	[9]
T921	921	22TANK0921	22TANK0921	-	-	[9]
T922	922	22TANK0922	22TANK0922	-	-	[9]
T923	923	08TANK0923	08TANK0923	-	-	[9]
T924	924	22TANK0924	22TANK0924	-	-	[9]
T925	925	22TANK0925	22TANK0925	-	-	[5][9]
T926	926	22TANK0926	22TK926FLR	-	-	[9]
T927	927	67TANK0927	67TANK0927	-	-	[9]
T928	928	50TANK0928	50BZTNKFLR	-	-	[9]
T929	929	50TANK0929	50BZTNKFLR	-	-	[9]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
T930	930	50TANK0930	50BZTNKFLR	-	-	[9]
T934	934	22TANK0934	22TANK0934	-	-	[9]
T935	935	22TANK0935	22TANK0935	-	-	[9]
T938	179	22TANK0938	22TANK0938	-	-	[9]
T939	180	22TANK0939	22TANK0939	-	-	[9]
T941	941	04TANK0941	04TANK0941	-	-	[9]
T946	946	04TANK0946	04TANK0946	-	-	[9]
T947	947	04TANK0947	04TANK0947	-	-	[9]
T948	948	22TANK0948	22TANK0948	-	-	[9]
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	-	-	[9]
TK506	506	22TANK0506	22TANK0506	-	-	[9]
TK522	522	22TANK0522	22TANK0522	-	-	[9]
TK537	537	22TANK0537	22TANK0537	-	-	[9]
TK586	586	22TANK0586	22TANK0586	-	-	[5][9]
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	-	-	[9]
WWT-AB	WWT-AB	-	-	-	-	[9]
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	-	-	[9]
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	-	-	[9]
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	-	-	[9]
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	-	-	[9]
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	-	-	[9]
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	-	-	[9]
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	-	-	[9]
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	-	-	[9]
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	-	-	[9]
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	-	-	[9]
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	-	-	[9]
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	-	-	[9]
-	-	01ACU1WWFG	01ACU1WWFG	-	-	[9]
-	-	01VACTFUGS	01VACTFUGS	-	-	[9]
-	-	02ACU2WWFG	02ACU2WWFG	-	-	[9]
-	-	04BTXWWFUG	04BTXWWFUG	-	-	[9]
-	-	08ALKYWWFG	08ALKYWWFG	-	-	[9]
-	-	08LSWALKY	08LSWALKY	-	-	[9]
-	-	08TANK0668	08TANK0668	-	-	[9]
-	-	08TANK0669	08TANK0669	-	-	[9]
-	-	09SLWWFUG	09SLWWFUG	-	-	[9]
-	-	10DMXWWFUG	10DMXWWFUG	-	-	[9]
-	-	10GRUWWFUG	10GRUWWFUG	-	-	[9]
-	-	13UNIWWFUG	13UNIWWFUG	-	-	[9]
-	-	14ATUWWFUG	14ATUWWFUG	-	-	[9]
-	-	14SR1WWFUG	14SR1WWFUG	-	-	[9]
-	-	14TANK0101	14TANK0101	-	-	[9]
-	-	14TANK0102	14TANK0102	-	-	[9]
-	-	16ISOMWWFG	16ISOMWWFG	-	-	[9]
-	-	17FGRCSFUG	17FGRCSFUG	-	-	[9]
-	-	17NHTWWFUG	17NHTWWFUG	-	-	[9]
-	-	17NHTFUGS	17NHTFUGS	-	-	[9]
-	-	18RAILLOAD	18RAILLOAD	-	-	[9]
-	-	18ASPHTVRS	18ASPHTVRS	-	-	[9]
-	-	18TANK0300	18ASPHTVRS	-	-	[9]

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	18TANK0310	18ASPHTVRS	-	-	[9]
-	-	18TANK0311	18ASPHTVRS	-	-	[9]
-	-	18TANK0312	18ASPHTVRS	-	-	[9]
-	-	18TANK0313	18ASPHTVRS	-	-	[9]
-	-	18TANK0314	18ASPHTVRS	-	-	[9]
-	-	18TANK0315	18ASPHTVRS	-	-	[9]
-	-	18TANKV330	18TANKV330	-	-	[9]
-	-	20LSTRKRCK	20LSTRKRCK	-	-	[9]
T2000	T2000	20TANK2000	20TANK2000	-	-	[9]
-	-	22ASTNKFUG	22ASTNKFUG	-	-	[9]
-	-	22CRTNKFUG	22CRTNKFUG	-	-	[9]
-	-	22BZNTKFUG	22BZNTKFUG	-	-	[9]
-	-	22BZNTKFLR	22BZNTKFLR	-	-	[9]
-	-	22GOTNKFUG	22GOTNKFUG	-	-	[9]
-	-	22OSFTKFUG	22OSFTKFUG	-	-	[9]
-	-	45TANK0474	45TANK0474	-	-	[9]
-	-	22TANK0482	22TANK0482	-	-	[9]
-	-	22TANK0484	22TANK0484	-	-	[9]
-	-	22TANK0595	22TANK0595	-	-	[9]
-	-	22TANK0596	22TANK0596	-	-	[9]
-	-	22TANK0678	41NORTHFLR	-	-	[9]
-	-	22TANK0679	41NORTHFLR	-	-	[9]
-	-	22TANK0680	41NORTHFLR	-	-	[9]
-	-	22TANK0681	22TANK0681	-	-	[9]
-	-	22TANK0682	22TANK0682	-	-	[9]
-	-	22TANK0800	22TANK0800	-	-	[9]
-	-	22TANK0801	22TANK0801	-	-	[9]
-	-	22TANK0802	22TANK0802	-	-	[9]
-	-	22TANK0805	22TANK0805	-	-	[9]
-	-	22TANK0807	22TANK0807	-	-	[9]
-	-	22TANK0808	22BZNTKFLR*	-	-	[9]
-	-	22TANK0809	22BZNTKFLR*	-	-	[9]
-	-	22TANK0810	22BZNTKFLR*	-	-	[9]
-	-	22TANK0811	22TANK0811	-	-	[9]
-	-	22TANK0812	22TANK0812	-	-	[9]
-	-	22TANK0813	22TANK0813	-	-	[9]
-	-	22TANK0814	22TANK0814	-	-	[9]
-	-	22TANK0815	22TANK0815	-	-	[9]
-	-	22TK926FLR	22TK926FLR	-	-	[9]
-	-	28LPGHOSE	28LPGHOSE	-	-	[9]
-	-	33SR2WWFUG	33SR2WWFUG	-	-	[9]
-	-	33SRU3FUGS	33SRU3FUGS	-	-	[9]
-	-	37SWS2WWFG	37SWS2WWFG	-	-	[9]
-	-	38SWS1WWFG	38SWS1WWFG	-	-	[9]
-	-	40CSOWSUMP	40CSOWCC	-	-	[9]
-	-	40CSWWFUG	40CSWWFUG	-	-	[9]
-	-	45DOCK2PCV	45DOCK2PCV	-	-	[9]
-	-	45DOCK2FUG	45DOCK2FUG	-	-	[9]
-	-	45DOCK2PCV	45DOCK2LDG	-	-	[9]
-	-	45DOCK45V1	45DOCK45V1	-	-	[9]
-	-	45DOCK45V2	45DOCK45V2	-	-	[9]

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-	-	45DOCK45V3	45DOCK45V3	-	-	[9]
-	-	45DOCK1PCV	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCK3PCV	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCKSFLR	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCK1PCV	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCK3PCV	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCKFLR2	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCK3FUG	45DOCK3FUG	-	-	[9]
-	-	45DOCKV104	45V104CC	-	-	[9]
-	-	50BZTNKFLR	50BZTNKFLR	-	-	[9]
-	-	50TDPWWFUG	50TDPWWFUG	-	-	[9]
-	-	51DHT1WWFG	51DHT1WWFG	-	-	[9]
-	-	52DHT2WWFG	52DHT2WWFG	-	-	[9]
-	-	52FLORPWS	52FLORPWCC	-	-	[9]
-	-	52FLWWFUG	52FLWWFUG	-	-	[9]
-	-	52LS811SMP	52LS811SMP	-	-	[9]
-	-	52LSE813	52LSE813	-	-	[9]
-	-	54GHT1FUGS	54GHT1FUGS	-	-	[9]
-	-	54GHT2FUGS	54GHT2FUGS	-	-	[9]
-	-	55FCCWWFUG	55FCCWWFUG	-	-	[9]
-	-	55JETTRFUG	55JETTRFUG	-	-	[9]
-	-	55JETTRSUMP	55JETTRCC	-	-	[9]
-	-	55OFFGSFUG	55OFFGSFUG	-	-	[9]
-	-	58GSHDSCTR	58GSHDSCTR	14.98	14.98	[3]
-	-	58GSHDSFUG	58GSHDSFUG	-	-	[9]
-	-	60CGWWFUG	60CGWWFUG	-	-	[9]
-	-	60COGENPWS	60CGNPWCC	-	-	[9]
-	-	60COGENSWS	60CGNSWCC	-	-	[9]
-	-	61PBWWFUG	61PBWWFUG	-	-	[9]
-	-	67AERTKA	67AERTKA	-	-	[9]
-	-	67AERTKB	67AERTKB	-	-	[9]
-	-	67AERTKC	67AERTKC	-	-	[9]
-	-	67BSMNT	67BSMNT	-	-	[9]
-	-	67C200AFUG	67C200AFUG	-	-	[9]
-	-	67C200WWFG	67C200WWFG	-	-	[9]
-	-	67CLAR405A	67CLAR405A	-	-	[9]
-	-	67CLAR405B	67CLAR405B	-	-	[9]
-	-	67CLAR405C	67CLAR405C	-	-	[9]
-	-	67CLAREFTK	67CLAREFTK	-	-	[9]
-	-	67CLARFLTK	67CLARFLTK	-	-	[9]
-	-	67FLSPTK	67FLSPTK	-	-	[9]
-	-	67LS61P20	67LS61P20	-	-	[9]
-	-	67LSBIOTRT	67LSBIOTRT	-	-	[9]
-	-	67LSEDAF	67LSEDAF	-	-	[9]
-	-	67LSN560	67LSN560	-	-	[9]
-	-	67LSN595	67LSN595	-	-	[9]
-	-	67LSN905	67LSN905	-	-	[9]
-	-	67LSNE660	67LSNE660	-	-	[9]
-	-	67LSS602	67LSS602	-	-	[9]
-	-	67LSWSHOUT	67LSWSHOUT	-	-	[9]
-	-	67NCPIMNT	67NCPIMNT	-	-	[9]

TOTAL PETROCHEMICALS USA INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - PM/PM_{10}

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	67NPWWFUG	67NPWWFUG	-	-	[9]
-	-	67NSHAPFUG	67NSHAPFUG	-	-	[9]
-	-	67PHADJSPL	67PHADJCC	-	-	[9]
-	-	67SCALBIO	67SCALBIO	-	-	[9]
-	-	67SCALFUEL	67SCALCC	-	-	[9]
-	-	67SCPIMNT	67SCPIMNT	-	-	[9]
-	-	67SOUTHAPD	67SOUTHAPD	-	-	[9]
-	-	67SSTRMWTR	67SSTRMWTR	-	-	[9]
-	-	67TANK0636	67TANK0636	-	-	[9]
-	-	RECOILFUG	RECOILFUG	-	-	[9]
-	-	SOLIDLIQFU	SOLIDLIQFU	-	-	[9]
-	-	06VDU2CHTR	06VDU2CHTR	2.91	2.91	[3]
-	-	06VDU2FUGS	06VDU2FUGS	-	-	[3][9]
-	-	22TANK0933	22TANK0933	-	-	[3][9]
-	-	22TANK0940	22TANK0940	-	-	[3][9]
-	-	22TKDCPFUGS	22TKDCPFUGS	-	-	[3][9]
-	-	25SRUINCIN	25SRUINCIN	1.36	1.36	[3]
-	-	36SRUINCIN	36SRUINCIN	1.36	1.36	[3]
-	-	30CKRFLARE	30CKRFLARE	-	-	[3][9]
-	-	30CKRFUGS	30CKRFUGS	-	-	[3][9]
-	-	30CKRHTR1	30CKRHTR1	5.35	5.35	[3]
-	-	30CKRHTR2	30CKRHTR2	5.35	5.35	[3]
-	-	30CKRTRKLD	30CKRTRKLD	0.86	0.86	[3]
-	-	30DCPCT1	30DCPCT1	1.42	1.42	[3]
-	-	31KNHTHTR	31KNHTHTR	0.34	0.34	[3]
-	-	34SRUFUGS	34SRUFUGS	-	-	[3][9]
-	-	37TANK1002	37TANK1002	-	-	[3][9]
-	-	67TANK0401C	67TANK0401C	-	-	[3][9]
-	-	67TANK0500C	67TANK0500C	-	-	[3][9]
-	-	38V107	38V107	-	-	[3][9]
-	-	22TANK0517	22TANK0517	-	-	[3][9]
-	-	42FGTFUGS	42FGTFUGS	-	-	[3][9]
-	-	43DHT3CHTR	43DHT3CHTR	1.47	1.47	[3]
-	-	43DHT3CMSS	43DHT3CMSS	-	-	[3][9]
-	-	43DHT3FUGS	43DHT3FUGS	-	-	[3][9]
-	-	47SWS4FUGS	47SWS4FUGS	-	-	[3][9]
-	-	35SRU5FUGS	35SRU5FUGS	-	-	[3][9]
-	-	31KNHTFUGS	31KNHTFUGS	-	-	[3][9]
-	-	19PSAFUGS	19PSAFUGS	-	-	[3][9]
-	-	30AMSTFUGS	30AMSTFUGS	-	-	[3][9]
-	-	30CKRH1MSS	30CKRH1MSS	0.13	0.13	[3]
-	-	30CKRH2MSS	30CKRH2MSS	0.13	0.13	[3]
-	-	MSSILE	MSSILE	-	-	[3][9]
-	-	MSS_TA	MSS_TA	-	-	[3][9]
-	-	MSS_ATM	MSS_ATM	0.05	0.05	[3]
-	-	MSS_TKFLR	MSS_TKFLR	-	-	[3][9]
-	-	MSS_WGS	MSS_WGS	-	-	[3][9]
-	-	MSS_COGEN	MSS_COGEN	-	-	[3][9]
-	-	MSS_INCIN	MSS_INCIN	1.58	1.58	[3]
-	-	55OGTCLTWR	55OGTCLTWR	14.98	14.98	[3]
-	-	54GHTSUMP	54GHTCC	-	-	[3][9]

TOTAL PETROCHEMICALS USA INC.
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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	45DOCKV104	45V1CC	-	-	[3][9]
-	-	45DOCKV3A	45V3ACC	-	-	[3][9]
-	-	45DOCKV3B	45V3BCC	-	-	[3][9]
-	-	67SBOWSCC	67SBOWSCC	-	-	[3][9]
-	-	67SBSEWCC	67SBSEWCC	-	-	[3][9]
-	-	67GFOWSCC	67GFOWSCC	-	-	[3][9]
-	-	67GFSEWCC	67GFSEWCC	-	-	[3][9]
-	-	67VDUOWSCC	67VDUOWSCC	-	-	[3][9]
-	-	67SKIMCC	67SKIMCC	-	-	[3][9]

Adjustment Reference

1. Actual emissions for 1999 were obtained from Annual Emission Inventory Reports (1999) submittals.
2. Actual emissions for 2000 were obtained from Annual Emission Inventory Reports (2000) submittals.
3. Equipment started-up after the baseline period; therefore, permit allowable emissions have been substituted.
4. Equipment has been shutdown/demolished; therefore, reported emissions have been removed.
5. Emissions reported in the emissions inventory were not creditable and have been adjusted to creditable emission rate.
6. All Dock stack emissions are capped and represented under 45DOCKSFLR for 1999 and 2000 reporting years.
7. The 1999-2000 emissions have been adjusted to account for updated emission calculation methodology.
8. Historic emission calculation methodology was inaccurately reported; therefore, emissions have been adjusted to reflect accurate totals.
9. This source is not a PM source.

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - SO_2

Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
812C	104	01ACU1202A	01ACU1202A	6.30	6.23	[1][2]
101	101	01ACU1H101	01ACU1H101	4.72	4.57	[1][2]
347	347	55FCCURFGS	55FCCURFGS	73.09	49.50	[1][2]
355	355	20GASTRKFG	20GASTRKFG	-	-	[9]
356	356	20GASLOAD	20GASFLARE	-	-	[5][9]
357	357	20DISTLDG	20DISTLDG	-	-	[9]
-	PBTX1	04BTXFUGS	04BTXFUGS	-	-	[9]
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	-	-	[9]
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	-	-	[9]
61ST301BLR	61STKBLR	61BLRH300	61BLRSTACK	14.28	14.28	[3]
61ST351BLR	61STKBLR	61BLRH350	61BLRSTACK			
804E	107	50TDPH-1	50TDPH-1	0.75	0.33	[1][2]
805A	109	51DHT1H-1	51DHT1H-1	1.73	1.66	[1][2]
805B	121	51DHT1H-3	51DHT1H-3	0.14	0.14	[5]
810A	123	10GRUHTRB1	10GRUHTRB1	0.80	0.85	[1][2]
812A	102	02ACU2H201	02ACU2H201	5.40	4.65	[1][2]
812B	103	01VACTH301	01VACTH301	3.85	3.78	[1][2]
812D	105	01ACU1202B	01ACU1202B	5.76	5.24	[1][2]
813A	120	52DHT2H-1	52DHT2H-1	1.47	1.59	[1][2]
813C	325A	52DHT2H-2	52DHT2H-2A/B	1.41	1.59	[1][2]
813C	325B					
BHA	138	-	-	0.00	0.00	[4]
BHB	139	-	-	0.00	0.00	[4]
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	-	-	[9]
BTXA	192	04BTXH-51	04BTXH-51	0.44	0.19	[1][2]
BTXB	193	04BTXH-52	04BTXH-52	1.82	1.11	[1][2]
BTXC	310	04BTXH-53	04BTXH-53	2.00	1.95	[1][2]
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	-	-	[9]
LAB-SUMP	BZ-WWPD	-	-	-	-	[9]
COGENA	326	60COGENTRB	60COGENSTK	12.04	2.98	[1][2]
DOCKFLARE1	BZDVRCOMB	45DOCK1PCV	45DOCKSFLR	0.00	0.00	[1][2][6]
DOCKFLARE1	FBZDVR	-	-	-	-	[9]
F111	F111	51DHT1FUGS	51DHT1FUGS	-	-	[9]
F319	F319	08ALKYFUGS	08ALKYFUGS	-	-	[9]
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	-	-	[9]
F350	F350	55FCCUFUGS	55FCCUFUGS	-	-	[9]
F350	PTU	55FCCUFUGS	55FCCUPTUC	-	-	[9]
F351	F351	67FPMCLTWR	67FPMCLTWR	0.00	0.00	[1][2]
F359	F359	28LPGFUGS	28LPGFUGS	-	-	[9]
FEXPTET	FEXPTET	-	-	-	-	[9]
GOHDSA	305	13UNIBH301	13UNIBH301	2.25	2.11	[1][2]
HDSCRA	191	17REFHTRS	17REFHTRS	14.83	16.46	[1][2]
HDSCRB	190	17NHTHTRS	17NHTHTRS	3.32	3.42	[1][2]
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	-	-	[9]
ISOM A	299	16ISOMHTR	16ISOMHTR	1.08	1.20	[1][2]
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	-	-	[9]
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	0.00	0.00	[1][2][6]
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	0.00	0.00	[1][2][6]
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	-	-	[9]

TOTAL PETROCHEMICALS USA, INC.
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Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	-	-	[9]
LAB-SUMP	BNZ_NSHP	-	-	-	-	[9]
LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	-	-	[9]
LR-342	342	18TRKLOAD	18TRKLOAD	-	-	[9]
N17	N17	40CSPLTH-1	40CSPLTH-1	7.22	7.22	[3]
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	-	-	[9]
P701C	F149	02FWCLGTWR	02FWCLGTWR	-	-	[9]
P804	F108	50TDPFUGS	50TDPFUGS	-	-	[9]
P804C	F147	-	-	-	-	[9]
P805C	F146	67805CLTWR	67805CLTWR	-	-	[9]
P807C	F150	08ALKCLTWR	08ALKCLTWR	-	-	[9]
P810	F124	10GRUFUGS	10GRUFUGS	-	-	[9]
P812	F106	02ACU2FUGS	02ACU2FUGS	-	-	[9]
P813	F122	52DHT2FUGS	52DHT2FUGS	-	-	[9]
P817	F817	37SWS2FUGS	37SWS2FUGS	-	-	[9]
PAT	F143	67C200FUGS	67C200FUGS	-	-	[9]
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	-	-	[9]
PBTX2	FBTX2	-	-	-	-	[9]
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	-	-	[9]
PBH	F138	-	-	-	-	[9]
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	-	-	[9]
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	-	-	[9]
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	-	-	[9]
PCRUDE	F318	09SATLQFUG	09SATLQFUG	-	-	[9]
PCRUDE	F318	14FGTFUGS	14FGTFUGS	-	-	[9]
PCT11	F320	67NORTHCT	67NORTHCT	-	-	[9]
PCVS	FCVS	-	-	-	-	[9]
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	-	-	[9]
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	0.00	0.00	[1][2]
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	0.00	0.00	[1][2]
PFLR1	141	53MIDFLARE	53MIDFLARE	-	Cap	[7]
PFLR2	142	53SOUTHFLR	53SOUTHFLR	-	Cap	[7]
PFLR3	307	41NORTHFLR	41NORTHFLR	9.94	9.94	[7]
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	-	-	[9]
PHDSCR	F190	17REFFUGS	17REFFUGS	-	-	[9]
PHDSCR	311	17REFREGEN	17REFREGEN	1.92	0.00	[1][2]
PMOGAS	F317	20MOGASBLD	20MOGASBLD	-	-	[9]
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	-	-	[9]
PRSE	F302	10DEMEXFUG	10DEMEXFUG	-	-	[9]
PSRU	F310	14SRU1FUGS	14SRU1FUGS	-	-	[9]
PSRU	F312	14SRU1LOAD	14SRU1LOAD	0.00	0.00	[1][2]
PSRU	F309	14SRU1PIT	14SRU1PIT	0.00	0.00	[1][2]
PSRU	F310	15SCOTFUGS	15SCOTFUGS	-	-	[9]
PSRU	125	33SRU3	15SRUINCIN	8.93	20.40	[1][2]
PSRU	F313	33SRU3LOAD	33SRU3LOAD	0.00	0.00	[1][2]
PSRU	F311	33SRU3PIT	33SRU3PIT	0.00	0.00	[1][2]
F-930	F-930	-	-	-	-	[9]
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	-	-	[9]
PSULF	FSULF	04SULFFUGS	04SULFFUGS	-	-	[9]

TOTAL PETROCHEMICALS USA, INC.
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Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	-	-	[9]
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	-	-	[9]
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	-	-	[9]
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	-	-	[9]
PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	-	-	[9]
PWWT	PWWT	-	-	-	-	[9]
RSEA	302	10DEMEXH-2	10DEMEXH-2	1.70	1.73	[1][2]
RSEB	309	10DEMEXH-4	10DEMEXH-4	3.21	2.84	[1][2]
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	-	-	[9]
T1000	1000	38TANK1000	38TANK1000	-	-	[9]
T1001	1001	38TANK1001	38TANK1001	-	-	[9]
T2001	2001	20TANK2001	20TANK2001	-	-	[9]
T2002	2002	20TANK2002	20TANK2002	-	-	[9]
T2003	2003	20TANK2003	20TANK2003	-	-	[9]
T301	329	18TANK0301	18TANK0301	-	-	[9]
T302	330	18TANK0302	18ASPHTVRS	-	-	[9]
T303	331	18TANK0303	18ASPHTVRS	-	-	[9]
T305	333	18TANK0305	18TANK0305	-	-	[9]
T306	334	18TANK0306	18TANK0306	-	-	[9]
T316	316	22TANK0316	22TANK0316	-	-	[9]
T317	317	22TANK0317	22TANK0317	-	-	[9]
T401A	401A	67TANK401A	67TANK401A	-	-	[9]
T401B	401B	67TANK401B	67TANK401B	-	-	[9]
T415	415	-	-	-	-	[9]
T416	416	22TANK0416	22TANK0416	-	-	[9]
T421	421	22TANK0421	22TANK0421	-	-	[9]
T422	422	22TANK0422	22TANK0422	-	-	[9]
T441	441	22TANK0441	22TANK0441	-	-	[9]
T445	445	22TANK0445	22TANK0445	-	-	[9]
T446	446	22TANK0446	22TANK0446	-	-	[9]
T452	452	22TANK0452	22TANK0452	-	-	[9]
T453	453	22TANK0453	22TANK0453	-	-	[9]
T454	454	22TANK0454	22TANK0454	-	-	[9]
T455	455	22TANK0455	22TANK0455	-	-	[9]
T462	462	22TANK0462	22TANK0462	-	-	[9]
T463	463	22TANK0463	22TANK0463	-	-	[9]
T466	466	22TANK0466	22TANK0466	-	-	[9]
T470	470	22TANK0470	22TANK0470	-	-	[9]
T475	222	22TANK0475	22TANK0475	-	-	[9]
T476	223	22TANK0476	22TANK0476	-	-	[9]
T477	212	22TANK0477	22TANK0477	-	-	[9]
T478	215	22TANK0478	22TANK0478	-	-	[9]
T479	217	22TANK0479	22TANK0479	-	-	[9]
T480	480	22TANK0480	22TANK0480	-	-	[9]
T481	T481	22TANK0481	22TANK0481	-	-	[9]
T500A	500A	67TANK500A	67TANK500A	-	-	[9]
T500B	500B	67TANK500B	67TANK500B	-	-	[9]
T502	502	22TANK0502	22TANK0502	-	-	[9]
T503	503	22TANK0503	22TANK0503	-	-	[9]

TOTAL PETROCHEMICALS USA, INC.
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Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
T504	504	67TANK0504	67TANK0504	-	-	[9]
T505	505	67TANK0505	67TANK0505	-	-	[9]
T516	516	22TANK0516	22TANK0516	-	-	[9]
T524	524	22TANK0524	22TANK0524	-	-	[9]
T525	525	22TANK0525	22TANK0525	-	-	[9]
T526	526	22TANK0526	22TANK0526	-	-	[9]
T530	530	22TANK0530	22TANK0530	-	-	[9]
T531	531	22TANK0531	22TANK0531	-	-	[9]
T532	532	22TANK0532	22TANK0532	-	-	[9]
T536	536	22TANK0536	22TANK0536	-	-	[9]
T538	538	22TANK0538	22TANK0538	-	-	[9]
T540	540	22TANK0540	22TANK0540	-	-	[9]
T541	541	22TANK0541	22TANK0541	-	-	[9]
T542	542	22TANK0542	22TANK0542	-	-	[9]
T543	543	22TANK0543	22TANK0543	-	-	[9]
T545	545	22TANK0545	22TANK0545	-	-	[9]
T558	558	22TANK0558	22TANK0558	-	-	[9]
T559	559	22TANK0559	22TANK0559	-	-	[9]
T560	560	22TANK0560	22TANK0560	-	-	[9]
T561	561	22TANK0561	22TANK0561	-	-	[9]
T562	562	22TANK0562	22TANK0562	-	-	[9]
T563	563	22TANK0563	22TANK0563	-	-	[9]
T572	572	22TANK0572	22TANK0572	-	-	[9]
T574	574	22TANK0574	22TANK0574	-	-	[9]
T587	587	22TANK0587	22TANK0587	-	-	[9]
T588	588	22TANK0588	22TANK0588	-	-	[9]
T589	589	22TANK0589	22TANK0589	-	-	[9]
T591	591	22TANK0591	22TANK0591	-	-	[9]
T595	252	67TANK0595	67TANK0595	-	-	[9]
T596	596	67TANK0596	67TANK0596	-	-	[9]
T597	597	22TANK0597	22TANK0597	-	-	[9]
T598	598	22TANK0598	22TANK0598	-	-	[9]
T599	599	22TANK0599	22TANK0599	-	-	[9]
T650	650	22TANK0650	22TANK0650	-	-	[9]
T651	651	22TANK0651	22TANK0651	-	-	[9]
T660	660	67TANK0660	67TK0660CC	-	-	[9]
T902	902	22TANK0902	22TANK0902	-	-	[9]
T905	905	67TANK0905	67TANK0905	-	-	[9]
T906	906	22TANK0906	22TANK0906	-	-	[9]
T907	907	22TANK0907	22TANK0907	-	-	[9]
T909	909	22TANK0909	22TANK0909	-	-	[9]
T910	910	22TANK0910	22TANK0910	-	-	[9]
T911	911	22TANK0911	22TANK0911	-	-	[9]
T913	913	22TANK0913	22TANK0913	-	-	[9]
T917	917	22TANK0917	22TANK0917	-	-	[9]
T918	918	22TANK0918	22TANK0918	-	-	[9]
T919	919	22TANK0919	22TANK0919	-	-	[9]
T920	920	22TANK0920	22TANK0920	-	-	[9]
T921	921	22TANK0921	22TANK0921	-	-	[9]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - SO_2

Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
T922	922	22TANK0922	22TANK0922	-	-	[9]
T923	923	08TANK0923	08TANK0923	-	-	[9]
T924	924	22TANK0924	22TANK0924	-	-	[9]
T925	925	22TANK0925	22TANK0925	-	-	[9]
T926	926	22TANK0926	22TK926FLR	0.00	0.00	[1][2]
T927	927	67TANK0927	67TANK0927	-	-	[9]
T928	928	50TANK0928	50BZTNKFLR	0.00	0.00	[1][2]
T929	929	50TANK0929	50BZTNKFLR	0.00	0.00	[1][2]
T930	930	50TANK0930	50BZTNKFLR	0.00	0.00	[1][2]
T934	934	22TANK0934	22TANK0934	-	-	[9]
T935	935	22TANK0935	22TANK0935	-	-	[9]
T938	179	22TANK0938	22TANK0938	-	-	[9]
T939	180	22TANK0939	22TANK0939	-	-	[9]
T941	941	04TANK0941	04TANK0941	-	-	[9]
T946	946	04TANK0946	04TANK0946	-	-	[9]
T947	947	04TANK0947	04TANK0947	-	-	[9]
T948	948	22TANK0948	22TANK0948	-	-	[9]
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	-	-	[1][2]
TK506	506	22TANK0506	22TANK0506	-	-	[9]
TK522	522	22TANK0522	22TANK0522	-	-	[9]
TK537	537	22TANK0537	22TANK0537	-	-	[9]
TK586	586	22TANK0586	22TANK0586	-	-	[9]
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	-	-	[9]
WWT-AB	WWT-AB	-	-	-	-	[9]
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	-	-	[9]
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	-	-	[9]
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	-	-	[9]
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	-	-	[9]
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	-	-	[9]
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	-	-	[9]
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	-	-	[9]
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	-	-	[9]
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	-	-	[9]
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	-	-	[9]
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	-	-	[9]
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	-	-	[9]
-	-	01ACU1WWFG	01ACU1WWFG	-	-	[9]
-	-	01VACTFUGS	01VACTFUGS	-	-	[9]
-	-	02ACU2WWFG	02ACU2WWFG	-	-	[9]
-	-	04BTXWWFUG	04BTXWWFUG	-	-	[9]
-	-	08ALKYWWFG	08ALKYWWFG	-	-	[9]
-	-	08LSWALKY	08LSWALKY	-	-	[9]
-	-	08TANK0668	08TANK0668	-	-	[9]
-	-	08TANK0669	08TANK0669	-	-	[9]
-	-	09SLWWFUG	09SLWWFUG	-	-	[9]
-	-	10DMXWWFUG	10DMXWWFUG	-	-	[9]
-	-	10GRUWWFUG	10GRUWWFUG	-	-	[9]
-	-	13UNIWWFUG	13UNIWWFUG	-	-	[9]
-	-	14ATUWWFUG	14ATUWWFUG	-	-	[9]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - SO_2

Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
-	-	14SR1WWFUG	14SR1WWFUG	-	-	[9]
-	-	14TANK0101	14TANK0101	-	-	[9]
-	-	14TANK0102	14TANK0102	-	-	[9]
-	-	16ISOMWWFG	16ISOMWWFG	-	-	[9]
-	-	17FGRCSFUG	17FGRCSFUG	-	-	[9]
-	-	17NHTWWFUG	17NHTWWFUG	-	-	[9]
-	-	17NHTFUGS	17NHTFUGS	-	-	[9]
-	-	18RAILLOAD	18RAILLOAD	-	-	[9]
-	-	18ASPHTVRS	18ASPHTVRS	-	-	[9]
-	-	18TANK0300	18ASPHTVRS	-	-	[9]
-	-	18TANK0310	18ASPHTVRS	-	-	[9]
-	-	18TANK0311	18ASPHTVRS	-	-	[9]
-	-	18TANK0312	18ASPHTVRS	-	-	[9]
-	-	18TANK0313	18ASPHTVRS	-	-	[9]
-	-	18TANK0314	18ASPHTVRS	-	-	[9]
-	-	18TANK0315	18ASPHTVRS	-	-	[9]
-	-	18TANKV330	18TANKV330	-	-	[9]
-	-	20LSTRKRCK	20LSTRKRCK	-	-	[9]
T2000	T2000	20TANK2000	20TANK2000	-	-	[9]
-	-	22ASTNKFUG	22ASTNKFUG	-	-	[9]
-	-	22CRTNKFUG	22CRTNKFUG	-	-	[9]
-	-	22BZNTKFUG	22BZNTKFUG	-	-	[9]
-	-	22BZNTKFLR	22BZNTKFLR	0.01	0.01	[8]
-	-	22GOTNKFUG	22GOTNKFUG	-	-	[9]
-	-	22OSFTKFUG	22OSFTKFUG	-	-	[9]
-	-	45TANK0474	45TANK0474	-	-	[9]
-	-	22TANK0482	22TANK0482	-	-	[9]
-	-	22TANK0484	22TANK0484	-	-	[9]
-	-	22TANK0595	22TANK0595	-	-	[9]
-	-	22TANK0596	22TANK0596	-	-	[9]
-	-	22TANK0678	41NORTHFLR	-	-	[7]
-	-	22TANK0679	41NORTHFLR	-	-	[7]
-	-	22TANK0680	41NORTHFLR	-	-	[7]
-	-	22TANK0681	22TANK0681	-	-	[9]
-	-	22TANK0682	22TANK0682	-	-	[9]
-	-	22TANK0800	22TANK0800	-	-	[9]
-	-	22TANK0801	22TANK0801	-	-	[9]
-	-	22TANK0802	22TANK0802	-	-	[9]
-	-	22TANK0805	22TANK0805	-	-	[9]
-	-	22TANK0807	22TANK0807	-	-	[9]
-	-	22TANK0808	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0809	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0810	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0811	22TANK0811	-	-	[9]
-	-	22TANK0812	22TANK0812	-	-	[9]
-	-	22TANK0813	22TANK0813	-	-	[9]
-	-	22TANK0814	22TANK0814	-	-	[9]
-	-	22TANK0815	22TANK0815	-	-	[9]
-	-	22TK926FLR	22TK926FLR	-		

TOTAL PETROCHEMICALS USA, INC.
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Baseline Emissions - SO_2

Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
-	-	28LPGHOSE	28LPGHOSE	-	-	[9]
-	-	33SR2WWFUG	33SR2WWFUG	-	-	[9]
-	-	33SRU3FUGS	33SRU3FUGS	-	-	[9]
-	-	37SWS2WWFG	37SWS2WWFG	-	-	[9]
-	-	38SWS1WWFG	38SWS1WWFG	-	-	[9]
-	-	40CSOWSUMP	40CSOWCC	-	-	[9]
-	-	40CSWWFUG	40CSWWFUG	-	-	[9]
-	-	45DOCK2PCV	45DOCK2PCV	-	-	[9]
-	-	45DOCK2FUG	45DOCK2FUG	-	-	[9]
-	-	45DOCK2PCV	45DOCK2LDG	-	-	[9]
-	-	45DOCK45V1	45DOCK45V1	-	-	[9]
-	-	45DOCK45V2	45DOCK45V2	-	-	[9]
-	-	45DOCK45V3	45DOCK45V3	-	-	[9]
-	-	45DOCK1PCV	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCK3PCV	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCKSFLR	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCK1PCV	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCK3PCV	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCKFLR2	45DOCKFLR2	0.02	0.02	[6][8]
-	-	45DOCK3FUG	45DOCK3FUG	-	-	[9]
-	-	45DOCKV104	45V104CC	-	-	[9]
-	-	50BZTNKFLR	50BZTNKFLR	-	-	[9]
-	-	50TDPWWFUG	50TDPWWFUG	-	-	[9]
-	-	51DHT1WWFG	51DHT1WWFG	-	-	[9]
-	-	52DHT2WWFG	52DHT2WWFG	-	-	[9]
-	-	52FLORPWS	52FLORPWCC	-	-	[9]
-	-	52FLWWFUG	52FLWWFUG	-	-	[9]
-	-	52LS811SMP	52LS811SMP	-	-	[9]
-	-	52LSE813	52LSE813	-	-	[9]
-	-	54GHT1FUGS	54GHT1FUGS	-	-	[9]
-	-	54GHT2FUGS	54GHT2FUGS	-	-	[9]
-	-	55FCCWWFUG	55FCCWWFUG	-	-	[9]
-	-	55JETTRFUG	55JETTRFUG	-	-	[9]
-	-	55JETTRSUMP	55JETTRCC	-	-	[9]
-	-	55OFFGSFUG	55OFFGSFUG	-	-	[9]
-	-	58GSHDSCTR	58GSHDSCTR	-	-	[9]
-	-	58GSHDSFUG	58GSHDSFUG	-	-	[9]
-	-	60CGWWFUG	60CGWWFUG	-	-	[9]
-	-	60COGENPWS	60CGNPWCC	-	-	[9]
-	-	60COGENSWS	60CGNSWCC	-	-	[9]
-	-	61PBWWFUG	61PBWWFUG	-	-	[9]
-	-	67AERTKA	67AERTKA	-	-	[9]
-	-	67AERTKB	67AERTKB	-	-	[9]
-	-	67AERTKC	67AERTKC	-	-	[9]
-	-	67BSMNT	67BSMNT	-	-	[9]
-	-	67C200AFUG	67C200AFUG	-	-	[9]
-	-	67C200WWFG	67C200WWFG	-	-	[9]
-	-	67CLAR405A	67CLAR405A	-	-	[9]
-	-	67CLAR405B	67CLAR405B	-	-	[9]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - SO_2

Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
-	-	67CLAR405C	67CLAR405C	-	-	[9]
-	-	67CLAREFTK	67CLAREFTK	-	-	[9]
-	-	67CLARFLTK	67CLARFLTK	-	-	[9]
-	-	67FLSPTK	67FLSPTK	-	-	[9]
-	-	67LS61P20	67LS61P20	-	-	[9]
-	-	67LSBIOTRT	67LSBIOTRT	-	-	[9]
-	-	67LSEDAF	67LSEDAF	-	-	[9]
-	-	67LSN560	67LSN560	-	-	[9]
-	-	67LSN595	67LSN595	-	-	[9]
-	-	67LSN905	67LSN905	-	-	[9]
-	-	67LSNE660	67LSNE660	-	-	[9]
-	-	67LSS602	67LSS602	-	-	[9]
-	-	67LSWSHOUT	67LSWSHOUT	-	-	[9]
-	-	67NCPIMNT	67NCPIMNT	-	-	[9]
-	-	67NPWWFUG	67NPWWFUG	-	-	[9]
-	-	67NSHAPFUG	67NSHAPFUG	-	-	[9]
-	-	67PHADJSPL	67PHADJCC	-	-	[9]
-	-	67SCALBIO	67SCALBIO	-	-	[9]
-	-	67SCALFUEL	67SCALCC	-	-	[9]
-	-	67SCPIMNT	67SCPIMNT	-	-	[9]
-	-	67SOUTHAPD	67SOUTHAPD	-	-	[9]
-	-	67SSTRMWTR	67SSTRMWTR	-	-	[9]
-	-	67TANK0636	67TANK0636	-	-	[9]
-	-	RECOILFUG	RECOILFUG	-	-	[9]
-	-	SOLIDLIQFU	SOLIDLIQFU	-	-	[9]
-	-	06VDU2CHTR	06VDU2CHTR	4.39	4.39	[3]
-	-	06VDU2FUGS	06VDU2FUGS	-	-	[3][9]
-	-	22TANK0933	22TANK0933	-	-	[3][9]
-	-	22TANK0940	22TANK0940	-	-	[3][9]
-	-	22TKDCPFUGS	22TKDCPFUGS	-	-	[3][9]
-	-	25SRUINCIN	25SRUINCIN	136.66	136.66	[3]
-	-	36SRUINCIN	36SRUINCIN	136.66	136.66	[3]
-	-	30CKRFLARE	30CKRFLARE	0.05	0.05	[3]
-	-	30CKRFUGS	30CKRFUGS	-	-	[3][9]
-	-	30CKRHTR1	30CKRHTR1	8.07	8.07	[3]
-	-	30CKRHTR2	30CKRHTR2	8.07	8.07	[3]
-	-	30CKRTRKLD	30CKRTRKLD	-	-	[3][9]
-	-	30DCPCT1	30DCPCT1	-	-	[3][9]
-	-	31KNHTHTR	31KNHTHTR	0.52	0.52	[3]
-	-	34SRUFUGS	34SRUFUGS	-	-	[3][9]
-	-	37TANK1002	37TANK1002	-	-	[3][9]
-	-	67TANK0401C	67TANK0401C	-	-	[3][9]
-	-	67TANK0500C	67TANK0500C	-	-	[3][9]
-	-	38V107	38V107	-	-	[3][9]
-	-	22TANK0517	22TANK0517	-	-	[3][9]
-	-	42FGTFUGS	42FGTFUGS	-	-	[3][9]
-	-	43DHT3CHTR	43DHT3CHTR	2.22	2.22	[3]
-	-	43DHT3CMSS	43DHT3CMSS	-	-	[3][9]
-	-	43DHT3FUGS	43DHT3FUGS	-	-	[3][9]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - SO_2

Previous FIN	Previous EPN	New FIN	New EPN	2000 Actual tpy	2001 Actual tpy	Adjustment Reference
-	-	47SWS4FUGS	47SWS4FUGS	-	-	[3][9]
-	-	35SRU5FUGS	35SRU5FUGS	-	-	[3][9]
-	-	31KNHTFUGS	31KNHTFUGS	-	-	[3][9]
-	-	19PSAFUGS	19PSAFUGS	-	-	[3][9]
-	-	30AMSTFUGS	30AMSTFUGS	-	-	[3][9]
-	-	30CKRH1MSS	30CKRH1MSS	0.42	0.42	[3]
-	-	30CKRH2MSS	30CKRH2MSS	0.42	0.42	[3]
-	-	MSSILE	MSSILE	-	-	[3][9]
-	-	MSS_TA	MSS_TA	116.00	116.00	[3]
-	-	MSS_ATM	MSS_ATM	0.04	0.04	[3]
-	-	MSS_TKFLR	MSS_TKFLR	-	-	[3][9]
-	-	MSS_WGS	MSS_WGS	8.30	8.30	[3]
-	-	MSS_COGEN	MSS_COGEN	-	-	[3][9]
-	-	MSS_INCIN	MSS_INCIN	50.64	50.64	[3]
-	-	55OGTCLTWR	55OGTCLTWR	-	-	[3][9]
-	-	54GHTSUMP	54GHTCC	-	-	[3][9]
-	-	45DOCKV104	45V1CC	-	-	[3][9]
-	-	45DOCKV3A	45V3ACC	-	-	[3][9]
-	-	45DOCKV3B	45V3BCC	-	-	[3][9]
-	-	67SBOWSCC	67SBOWSCC	-	-	[3][9]
-	-	67SBSEWCC	67SBSEWCC	-	-	[3][9]
-	-	67GFOWSCC	67GFOWSCC	-	-	[3][9]
-	-	67GFSEWCC	67GFSEWCC	-	-	[3][9]
-	-	67VDUOWSCC	67VDUOWSCC	-	-	[3][9]
-	-	67SKIMCC	67SKIMCC	-	-	[3][9]

Adjustment Reference

1. Actual emissions for 2000 were obtained from Annual Emission Inventory Reports (2000) submittals.
2. Actual emissions for 2001 were obtained from Annual Emission Inventory Reports (2001) submittals.
3. Equipment started-up after the baseline period; therefore, permit allowable emissions have been substituted.
4. Equipment has been shutdown/demolished; therefore, reported emissions have been removed.
5. Emissions reported in the emissions inventory were not creditable and have been adjusted to creditable emission rate.
6. All Dock stack emissions are capped and represented under 45DOCKFLR2 for 2000 and 2001 reporting years.
7. Flare gas recovery started-up after the baseline period; therefore, permit allowable emissions have been substituted. Since permit allowables capped 53MIDFLARE, 53SOUTHFLARE, and 41NORTHFLARE, adjustment is illustrated accordingly.
8. These sources were omitted from the 2000 and/or 2001 emission inventories because the emissions were less than 1 tpy. They have been adjusted to the smaller of either their creditable allowables or 1 tpy.
9. This source is not a SO_2 source.

TOTAL PETROCHEMICALS USA INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - CO

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
812C	104	01ACU1202A	01ACU1202A	24.42	25.86	[1][2]
101	101	01ACU1H101	01ACU1H101	18.27	19.37	[1][2]
347	347	55FCCURFGS	55FCCURFGS	224.04	224.04	[5]
355	355	20GASTRKFG	20GASTRKFG	-	-	[9]
356	356	20GASLOAD	20GASFLARE	30.02	32.83	[1][2]
357	357	20DISTLDG	20DISTLDG	-	-	[9]
-	PBTX1	04BTXFUGS	04BTXFUGS	-	-	[9]
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	-	-	[9]
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	-	-	[9]
61ST301BLR	61STKBLR	61BLRH300	61BLRSTACK	64.72	64.72	[3]
61ST351BLR	61STKBLR	61BLRH350	61BLRSTACK			
804E	107	50TDPH-1	50TDPH-1	1.72	1.68	[1][2]
805A	109	51DHT1H-1	51DHT1H-1	5.47	6.20	[1][2]
805B	121	51DHT1H-3	51DHT1H-3	4.76	6.20	[1][2]
810A	123	10GRUHTRB1	10GRUHTRB1	1.10	1.81	[1][2]
812A	102	02ACU2H201	02ACU2H201	21.22	19.39	[1][2]
812B	103	01VACTH301	01VACTH301	15.90	15.82	[1][2]
812D	105	01ACU1202B	01ACU1202B	23.79	23.63	[1][2]
813A	120	52DHT2H-1	52DHT2H-1	1.85	3.31	[1][2]
813C	325A	52DHT2H-2	52DHT2H-2A/B	3.58	3.19	[1][2]
813C	325B					
BHA	138	-	-	0.00	0.00	[4]
BHB	139	-	-	0.00	0.00	[4]
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	-	-	[9]
BTXA	192	04BTXH-51	04BTXH-51	4.45	2.78	[1][2]
BTXB	193	04BTXH-52	04BTXH-52	12.69	11.42	[1][2]
BTXC	310	04BTXH-53	04BTXH-53	14.73	12.51	[1][2]
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	-	-	[9]
LAB-SUMP	BZ-WWPD	-	-	-	-	[9]
COGENA	326	60COGENTRB	60COGENSTK	1.59	3.31	[1][2]
DOCKFLARE1	BZDVRCOMB	45DOCK1PCV	45DOCKSFLR	3.80	6.45	[1][2][6]
DOCKFLARE1	FBZDVR	-	-	-	-	[9]
F111	F111	51DHT1FUGS	51DHT1FUGS	-	-	[9]
F319	F319	08ALKYFUGS	08ALKYFUGS	-	-	[9]
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	-	-	[9]
F350	F350	55FCCUFUGS	55FCCUFUGS	-	-	[9]
F350	PTU	55FCCUFUGS	55FCCUPTUC	-	-	[9]
F351	F351	67FPMCLTWR	67FPMCLTWR	-	-	[9]
F359	F359	28LPGFUGS	28LPGFUGS	-	-	[9]
FEXPTET	FEXPTET	-	-	-	-	[9]
GOHDSA	305	13UNIBH301	13UNIBH301	8.42	8.10	[1][2]
HDSCRA	191	17REFHTRS	17REFHTRS	70.68	60.87	[1][2]
HDSCRB	190	17NHTHTRS	17NHTHTRS	24.39	20.77	[1][2]
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	-	-	[9]
ISOM A	299	16ISOMHTR	16ISOMHTR	4.98	3.89	[1][2]
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	-	-	[9][6]
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	0.00	0.00	[1][2][6]
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	0.00	0.00	[1][2][6]
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	-	-	[9]
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	-	-	[9]
LAB-SUMP	BNZ_NSHP	-	-	-	-	[9]

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LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	-	-	[9]
LR-342	342	18TRKLOAD	18TRKLOAD	-	-	[9]
N17	N17	40CSPLTH-1	40CSPLTH-1	10.17	10.17	[3]
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	-	-	[9]
P701C	F149	02FWCLGTWR	02FWCLGTWR	-	-	[9]
P804	F108	50TDPFUGS	50TDPFUGS	-	-	[9]
P804C	F147	-	-	0.00	0.00	[4]
P805C	F146	67805CLTWR	67805CLTWR	-	-	[9]
P807C	F150	08ALKCLTWR	08ALKCLTWR	-	-	[9]
P810	F124	10GRUFUGS	10GRUFUGS	-	-	[9]
P812	F106	02ACU2FUGS	02ACU2FUGS	-	-	[9]
P813	F122	52DHT2FUGS	52DHT2FUGS	-	-	[9]
P817	F817	37SWS2FUGS	37SWS2FUGS	-	-	[9]
PAT	F143	67C200FUGS	67C200FUGS	-	-	[9]
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	-	-	[9]
PBTX2	FBTX2	-	-	-	-	[9]
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	-	-	[9]
PBH	F138	-	-	-	-	[9]
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	-	-	[9]
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	-	-	[9]
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	-	-	[9]
PCRUDE	F318	09SATLQFUG	09SATLQFUG	-	-	[9]
PCRUDE	F318	14FGTFUGS	14FGTFUGS	-	-	[9]
PCT11	F320	67NORTHCT	67NORTHCT	-	-	[9]
PCVS	FCVS	-	-	-	-	[9]
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	-	-	[9]
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	-	-	[9]
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	-	-	[9]
PFLR1	141	53MIDFLARE	53MIDFLARE	Cap	Cap	[7]
PFLR2	142	53SOUTHFLR	53SOUTHFLR	Cap	Cap	[7]
PFLR3	307	41NORTHFLR	41NORTHFLR	160.63	160.63	[7]
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	-	-	[9]
PHDSCR	F190	17REFFUGS	17REFFUGS	-	-	[9]
PHDSCR	311	17REFREGEN	17REFREGEN	0.89	0.84	[1][2]
PMOGAS	F317	20MOGASBLD	20MOGASBLD	-	-	[9]
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	-	-	[9]
PRSE	F302	10DEMEXFUG	10DEMEXFUG	-	-	[9]
PSRU	F310	14SRU1FUGS	14SRU1FUGS	-	-	[9]
PSRU	F312	14SRU1LOAD	14SRU1LOAD	-	-	[9]
PSRU	F309	14SRU1PIT	14SRU1PIT	-	-	[9]
PSRU	F310	15SCOTFUGS	15SCOTFUGS	-	-	[9]
PSRU	125	33SRU3	15SRUINCIN	50.96	52.40	[1][2]
PSRU	F313	33SRU3LOAD	33SRU3LOAD	-	-	[9]
PSRU	F311	33SRU3PIT	33SRU3PIT	-	-	[9]
F-930	F-930	-	-	-	-	[9]
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	-	-	[9]
PSULF	FSULF	04SULFFUGS	04SULFFUGS	-	-	[9]
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	-	-	[9]
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	-	-	[9]
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	-	-	[9]
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	-		

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PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	-	-	[9]
PWWT	PWWT	-	-	-	-	[9]
RSEA	302	10DEMEXH-2	10DEMEXH-2	5.58	6.97	[1][2]
RSEB	309	10DEMEXH-4	10DEMEXH-4	14.68	16.46	[1][2]
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	-	-	[9]
T1000	1000	38TANK1000	38TANK1000	-	-	[9]
T1001	1001	38TANK1001	38TANK1001	-	-	[9]
T2001	2001	20TANK2001	20TANK2001	-	-	[9]
T2002	2002	20TANK2002	20TANK2002	-	-	[9]
T2003	2003	20TANK2003	20TANK2003	-	-	[9]
T301	329	18TANK0301	18TANK0301	-	-	[9]
T302	330	18TANK0302	18ASPHTVRS	-	-	[9]
T303	331	18TANK0303	18ASPHTVRS	-	-	[9]
T305	333	18TANK0305	18TANK0305	-	-	[9]
T306	334	18TANK0306	18TANK0306	-	-	[9]
T316	316	22TANK0316	22TANK0316	-	-	[9]
T317	317	22TANK0317	22TANK0317	-	-	[9]
T401A	401A	67TANK401A	67TANK401A	-	-	[9]
T401B	401B	67TANK401B	67TANK401B	-	-	[9]
T415	415	-	-	-	-	[9]
T416	416	22TANK0416	22TANK0416	-	-	[9]
T421	421	22TANK0421	22TANK0421	-	-	[9]
T422	422	22TANK0422	22TANK0422	-	-	[9]
T441	441	22TANK0441	22TANK0441	-	-	[9]
T445	445	22TANK0445	22TANK0445	-	-	[9]
T446	446	22TANK0446	22TANK0446	-	-	[9]
T452	452	22TANK0452	22TANK0452	-	-	[9]
T453	453	22TANK0453	22TANK0453	-	-	[9]
T454	454	22TANK0454	22TANK0454	-	-	[9]
T455	455	22TANK0455	22TANK0455	-	-	[9]
T462	462	22TANK0462	22TANK0462	-	-	[9]
T463	463	22TANK0463	22TANK0463	-	-	[9]
T466	466	22TANK0466	22TANK0466	-	-	[9]
T470	470	22TANK0470	22TANK0470	-	-	[9]
T475	222	22TANK0475	22TANK0475	-	-	[9]
T476	223	22TANK0476	22TANK0476	-	-	[9]
T477	212	22TANK0477	22TANK0477	-	-	[9]
T478	215	22TANK0478	22TANK0478	-	-	[9]
T479	217	22TANK0479	22TANK0479	-	-	[9]
T480	480	22TANK0480	22TANK0480	-	-	[9]
T481	T481	22TANK0481	22TANK0481	-	-	[9]
T500A	500A	67TANK500A	67TANK500A	-	-	[9]
T500B	500B	67TANK500B	67TANK500B	-	-	[9]
T502	502	22TANK0502	22TANK0502	-	-	[9]
T503	503	22TANK0503	22TANK0503	-	-	[9]
T504	504	67TANK0504	67TANK0504	-	-	[9]
T505	505	67TANK0505	67TANK0505	-	-	[9]
T516	516	22TANK0516	22TANK0516	-	-	[9]
T524	524	22TANK0524	22TANK0524	-	-	[9]
T525	525	22TANK0525	22TANK0525	-	-	[9]
T526	526	22TANK0526	22TANK0526	-	-	[9]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
T530	530	22TANK0530	22TANK0530	-	-	[9]
T531	531	22TANK0531	22TANK0531	-	-	[9]
T532	532	22TANK0532	22TANK0532	-	-	[9]
T536	536	22TANK0536	22TANK0536	-	-	[9]
T538	538	22TANK0538	22TANK0538	-	-	[9]
T540	540	22TANK0540	22TANK0540	-	-	[9]
T541	541	22TANK0541	22TANK0541	-	-	[9]
T542	542	22TANK0542	22TANK0542	-	-	[9]
T543	543	22TANK0543	22TANK0543	-	-	[9]
T545	545	22TANK0545	22TANK0545	-	-	[9]
T558	558	22TANK0558	22TANK0558	-	-	[9]
T559	559	22TANK0559	22TANK0559	-	-	[9]
T560	560	22TANK0560	22TANK0560	-	-	[9]
T561	561	22TANK0561	22TANK0561	-	-	[9]
T562	562	22TANK0562	22TANK0562	-	-	[9]
T563	563	22TANK0563	22TANK0563	-	-	[9]
T572	572	22TANK0572	22TANK0572	-	-	[9]
T574	574	22TANK0574	22TANK0574	-	-	[9]
T587	587	22TANK0587	22TANK0587	-	-	[9]
T588	588	22TANK0588	22TANK0588	-	-	[9]
T589	589	22TANK0589	22TANK0589	-	-	[9]
T591	591	22TANK0591	22TANK0591	-	-	[9]
T595	252	67TANK0595	67TANK0595	-	-	[9]
T596	596	67TANK0596	67TANK0596	-	-	[9]
T597	597	22TANK0597	22TANK0597	-	-	[9]
T598	598	22TANK0598	22TANK0598	-	-	[9]
T599	599	22TANK0599	22TANK0599	-	-	[9]
T650	650	22TANK0650	22TANK0650	-	-	[9]
T651	651	22TANK0651	22TANK0651	-	-	[9]
T660	660	67TANK0660	67TK0660CC	-	-	[9]
T902	902	22TANK0902	22TANK0902	-	-	[9]
T905	905	67TANK0905	67TANK0905	-	-	[9]
T906	906	22TANK0906	22TANK0906	-	-	[9]
T907	907	22TANK0907	22TANK0907	-	-	[9]
T909	909	22TANK0909	22TANK0909	-	-	[9]
T910	910	22TANK0910	22TANK0910	-	-	[9]
T911	911	22TANK0911	22TANK0911	-	-	[9]
T913	913	22TANK0913	22TANK0913	-	-	[9]
T917	917	22TANK0917	22TANK0917	-	-	[9]
T918	918	22TANK0918	22TANK0918	-	-	[9]
T919	919	22TANK0919	22TANK0919	-	-	[9]
T920	920	22TANK0920	22TANK0920	-	-	[9]
T921	921	22TANK0921	22TANK0921	-	-	[9]
T922	922	22TANK0922	22TANK0922	-	-	[9]
T923	923	08TANK0923	08TANK0923	-	-	[9]
T924	924	22TANK0924	22TANK0924	-	-	[9]
T925	925	22TANK0925	22TANK0925	-	-	[9]
T926	926	22TANK0926	22TK926FLR	0.00	0.00	[1][2]
T927	927	67TANK0927	67TANK0927	-	-	[9]
T928	928	50TANK0928	50BZTNKFLR	0.00	0.00	[1][2]
T929	929	50TANK0929	50BZTNKFLR	0.00	0.00	[1][2]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
T930	930	50TANK0930	50BZTNKFLR	0.00	0.00	[1][2]
T934	934	22TANK0934	22TANK0934	-	-	[9]
T935	935	22TANK0935	22TANK0935	-	-	[9]
T938	179	22TANK0938	22TANK0938	-	-	[9]
T939	180	22TANK0939	22TANK0939	-	-	[9]
T941	941	04TANK0941	04TANK0941	-	-	[9]
T946	946	04TANK0946	04TANK0946	-	-	[9]
T947	947	04TANK0947	04TANK0947	-	-	[9]
T948	948	22TANK0948	22TANK0948	-	-	[9]
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	-	-	[9]
TK506	506	22TANK0506	22TANK0506	-	-	[9]
TK522	522	22TANK0522	22TANK0522	-	-	[9]
TK537	537	22TANK0537	22TANK0537	-	-	[9]
TK586	586	22TANK0586	22TANK0586	-	-	[9]
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	-	-	[9]
WWT-AB	WWT-AB	-	-	-	-	[9]
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	-	-	[9]
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	-	-	[9]
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	-	-	[9]
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	-	-	[9]
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	-	-	[9]
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	-	-	[9]
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	-	-	[9]
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	-	-	[9]
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	-	-	[9]
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	-	-	[9]
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	-	-	[9]
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	-	-	[9]
-	-	01ACU1WWFG	01ACU1WWFG	-	-	[9]
-	-	01VACTFUGS	01VACTFUGS	-	-	[9]
-	-	02ACU2WWFG	02ACU2WWFG	-	-	[9]
-	-	04BTXWWFUG	04BTXWWFUG	-	-	[9]
-	-	08ALKYWWFG	08ALKYWWFG	-	-	[9]
-	-	08LSWALKY	08LSWALKY	-	-	[9]
-	-	08TANK0668	08TANK0668	-	-	[9]
-	-	08TANK0669	08TANK0669	-	-	[9]
-	-	09SLWWFUG	09SLWWFUG	-	-	[9]
-	-	10DMXWWFUG	10DMXWWFUG	-	-	[9]
-	-	10GRUWWFUG	10GRUWWFUG	-	-	[9]
-	-	13UNIWWFUG	13UNIWWFUG	-	-	[9]
-	-	14ATUWWFUG	14ATUWWFUG	-	-	[9]
-	-	14SR1WWFUG	14SR1WWFUG	-	-	[9]
-	-	14TANK0101	14TANK0101	-	-	[9]
-	-	14TANK0102	14TANK0102	-	-	[9]
-	-	16ISOMWWFG	16ISOMWWFG	-	-	[9]
-	-	17FGRCSFUG	17FGRCSFUG	-	-	[9]
-	-	17NHTWWFUG	17NHTWWFUG	-	-	[9]
-	-	17NHTFUGS	17NHTFUGS	-	-	[9]
-	-	18RAILLOAD	18RAILLOAD	-	-	[9]
-	-	18ASPHTVRS	18ASPHTVRS	-	-	[9]
-	-	18TANK0300	18ASPHTVRS	-	-	[9]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	18TANK0310	18ASPHTVRS	-	-	[9]
-	-	18TANK0311	18ASPHTVRS	-	-	[9]
-	-	18TANK0312	18ASPHTVRS	-	-	[9]
-	-	18TANK0313	18ASPHTVRS	-	-	[9]
-	-	18TANK0314	18ASPHTVRS	-	-	[9]
-	-	18TANK0315	18ASPHTVRS	-	-	[9]
-	-	18TANKV330	18TANKV330	-	-	[9]
-	-	20LSTRKRCK	20LSTRKRCK	-	-	[9]
T2000	T2000	20TANK2000	20TANK2000	-	-	[9]
-	-	22ASTNKFUG	22ASTNKFUG	-	-	[9]
-	-	22CRTNKFUG	22CRTNKFUG	-	-	[9]
-	-	22BZNTKFUG	22BZNTKFUG	-	-	[9]
-	-	22BZNTKFLR	22BZNTKFLR	1.00	1.00	[8]
-	-	22GOTNKFUG	22GOTNKFUG	-	-	[9]
-	-	22OSFTKFUG	22OSFTKFUG	-	-	[9]
-	-	45TANK0474	45TANK0474	-	-	[9]
-	-	22TANK0482	22TANK0482	-	-	[9]
-	-	22TANK0484	22TANK0484	-	-	[9]
-	-	22TANK0595	22TANK0595	-	-	[9]
-	-	22TANK0596	22TANK0596	-	-	[9]
-	-	22TANK0678	41NORTHFLR	-	-	[7]
-	-	22TANK0679	41NORTHFLR	-	-	[7]
-	-	22TANK0680	41NORTHFLR	-	-	[7]
-	-	22TANK0681	22TANK0681	-	-	[9]
-	-	22TANK0682	22TANK0682	-	-	[9]
-	-	22TANK0800	22TANK0800	-	-	[9]
-	-	22TANK0801	22TANK0801	-	-	[9]
-	-	22TANK0802	22TANK0802	-	-	[9]
-	-	22TANK0805	22TANK0805	-	-	[9]
-	-	22TANK0807	22TANK0807	-	-	[9]
-	-	22TANK0808	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0809	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0810	22BZNTKFLR*	-	-	[1][2]
-	-	22TANK0811	22TANK0811	-	-	[9]
-	-	22TANK0812	22TANK0812	-	-	[9]
-	-	22TANK0813	22TANK0813	-	-	[9]
-	-	22TANK0814	22TANK0814	-	-	[9]
-	-	22TANK0815	22TANK0815	-	-	[9]
-	-	22TK926FLR	22TK926FLR	1.00	1.00	[8]
-	-	28LPGHOSE	28LPGHOSE	-	-	[9]
-	-	33SR2WWFUG	33SR2WWFUG	-	-	[9]
-	-	33SRU3FUGS	33SRU3FUGS	-	-	[9]
-	-	37SWS2WWFG	37SWS2WWFG	-	-	[9]
-	-	38SWS1WWFG	38SWS1WWFG	-	-	[9]
-	-	40CSOWSUMP	40CSOWCC	-	-	[9]
-	-	40CSWWFUG	40CSWWFUG	-	-	[9]
-	-	45DOCK2PCV	45DOCK2PCV	-	-	[9]
-	-	45DOCK2FUG	45DOCK2FUG	-	-	[9]
-	-	45DOCK2PCV	45DOCK2LDG	-	-	[9]
-	-	45DOCK45V1	45DOCK45V1	-	-	[9]
-	-	45DOCK45V2	45DOCK45V2	-	-	[9]

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Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	45DOCK45V3	45DOCK45V3	-	-	[9]
-	-	45DOCK1PCV	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCK3PCV	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCKSFLR	45DOCKSFLR	-	-	[1][2][6]
-	-	45DOCK1PCV	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCK3PCV	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCKFLR2	45DOCKFLR2	-	-	[1][2][6]
-	-	45DOCK3FUG	45DOCK3FUG	-	-	[9]
-	-	45DOCKV104	45V104CC	-	-	[9]
-	-	50BZTNKFLR	50BZTNKFLR	1.00	1.00	[8]
-	-	50TDPWWFUG	50TDPWWFUG	-	-	[9]
-	-	51DHT1WWFG	51DHT1WWFG	-	-	[9]
-	-	52DHT2WWFG	52DHT2WWFG	-	-	[9]
-	-	52FLORPWS	52FLORPWCC	-	-	[9]
-	-	52FLWWFUG	52FLWWFUG	-	-	[9]
-	-	52LS811SMP	52LS811SMP	-	-	[9]
-	-	52LSE813	52LSE813	-	-	[9]
-	-	54GHT1FUGS	54GHT1FUGS	-	-	[9]
-	-	54GHT2FUGS	54GHT2FUGS	-	-	[9]
-	-	55FCCWWFUG	55FCCWWFUG	-	-	[9]
-	-	55JETTRFUG	55JETTRFUG	-	-	[9]
-	-	55JETTRSUMP	55JETTRCC	-	-	[9]
-	-	55OFFGSFUG	55OFFGSFUG	-	-	[9]
-	-	58GSHDSCTR	58GSHDSCTR	-	-	[9]
-	-	58GSHDSFUG	58GSHDSFUG	-	-	[9]
-	-	60CGWWFUG	60CGWWFUG	-	-	[9]
-	-	60COGENPWS	60CGNPWCC	-	-	[9]
-	-	60COGENSWS	60CGNSWCC	-	-	[9]
-	-	61PBWWFUG	61PBWWFUG	-	-	[9]
-	-	67AERTKA	67AERTKA	-	-	[9]
-	-	67AERTKB	67AERTKB	-	-	[9]
-	-	67AERTKC	67AERTKC	-	-	[9]
-	-	67BSMNT	67BSMNT	-	-	[9]
-	-	67C200AFUG	67C200AFUG	-	-	[9]
-	-	67C200WWFG	67C200WWFG	-	-	[9]
-	-	67CLAR405A	67CLAR405A	-	-	[9]
-	-	67CLAR405B	67CLAR405B	-	-	[9]
-	-	67CLAR405C	67CLAR405C	-	-	[9]
-	-	67CLAREFTK	67CLAREFTK	-	-	[9]
-	-	67CLARFLTK	67CLARFLTK	-	-	[9]
-	-	67FLSPTK	67FLSPTK	-	-	[9]
-	-	67LS61P20	67LS61P20	-	-	[9]
-	-	67LSBIOTRT	67LSBIOTRT	-	-	[9]
-	-	67LSEDAF	67LSEDAF	-	-	[9]
-	-	67LSN560	67LSN560	-	-	[9]
-	-	67LSN595	67LSN595	-	-	[9]
-	-	67LSN905	67LSN905	-	-	[9]
-	-	67LSNE660	67LSNE660	-	-	[9]
-	-	67LSS602	67LSS602	-	-	[9]
-	-	67LSWSHOUT	67LSWSHOUT	-	-	[9]
-	-	67NCPIMNT	67NCPIMNT	-	-	[9]

TOTAL PETROCHEMICALS USA C.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - CO

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	67NPWWFUG	67NPWWFUG	-	-	[9]
-	-	67NSHAPFUG	67NSHAPFUG	-	-	[9]
-	-	67PHADJSPL	67PHADJCC	-	-	[9]
-	-	67SCALBIO	67SCALBIO	-	-	[9]
-	-	67SCALFUEL	67SCALCC	-	-	[9]
-	-	67SCPIMNT	67SCPIMNT	-	-	[9]
-	-	67SOUTHAPD	67SOUTHAPD	-	-	[9]
-	-	67SSTRMWTR	67SSTRMWTR	-	-	[9]
-	-	67TANK0636	67TANK0636	-	-	[9]
-	-	RECOILFUG	RECOILFUG	-	-	[9]
-	-	SOLIDLIQFU	SOLIDLIQFU	-	-	[9]
-	-	06VDU2CHTR	06VDU2CHTR	13.64	13.64	[3]
-	-	06VDU2FUGS	06VDU2FUGS	-	-	[3][9]
-	-	22TANK0933	22TANK0933	-	-	[3][9]
-	-	22TANK0940	22TANK0940	-	-	[3][9]
-	-	22TKDCPFUGS	22TKDCPFUGS	-	-	[3][9]
-	-	25SRUINCIN	25SRUINCIN	36.85	36.85	[3]
-	-	36SRUINCIN	36SRUINCIN	36.85	36.85	[3]
-	-	30CKRFLARE	30CKRFLARE	0.04	0.04	[3]
-	-	30CKRFUGS	30CKRFUGS	-	-	[3][9]
-	-	30CKRHTR1	30CKRHTR1	25.10	25.10	[3]
-	-	30CKRHTR2	30CKRHTR2	25.10	25.10	[3]
-	-	30CKRTRKLD	30CKRTRKLD	-	-	[3][9]
-	-	30DCPCT1	30DCPCT1	-	-	[3][9]
-	-	31KNHTHTR	31KNHTHTR	1.61	1.61	[3]
-	-	34SRUFUGS	34SRUFUGS	-	-	[3][9]
-	-	37TANK1002	37TANK1002	-	-	[3][9]
-	-	67TANK0401C	67TANK0401C	-	-	[3][9]
-	-	67TANK0500C	67TANK0500C	-	-	[3][9]
-	-	38V107	38V107	-	-	[3][9]
-	-	22TANK0517	22TANK0517	-	-	[3][9]
-	-	42FGTFUGS	42FGTFUGS	-	-	[3][9]
-	-	43DHT3CHTR	43DHT3CHTR	6.89	6.89	[3]
-	-	43DHT3CMSS	43DHT3CMSS	-	-	[3][9]
-	-	47SWS4FUGS	47SWS4FUGS	-	-	[3][9]
-	-	43DHT3FUGS	43DHT3FUGS	-	-	[3][9]
-	-	35SRU5FUGS	35SRU5FUGS	-	-	[3][9]
-	-	31KNHTFUGS	31KNHTFUGS	-	-	[3][9]
-	-	19PSAFUGS	19PSAFUGS	-	-	[3][9]
-	-	30AMSTFUGS	30AMSTFUGS	-	-	[3][9]
-	-	30CKRH1MSS	30CKRH1MSS	1.23	1.23	[3]
-	-	30CKRH2MSS	30CKRH2MSS	1.23	1.23	[3]
-	-	MSSILE	MSSILE	-	-	[3][9]
-	-	MSS_TA	MSS_TA	59.23	59.23	[3]
-	-	MSS_ATM	MSS_ATM	0.18	0.18	[3]
-	-	MSS_TKFLR	MSS_TKFLR	-	-	[3][9]
-	-	MSS_WGS	MSS_WGS	0.18	0.18	[3]
-	-	MSS_COGEN	MSS_COGEN	-	-	[3][9]
-	-	MSS_INCIN	MSS_INCIN	51.95	51.95	[3]
-	-	55OGTCLTWR	55OGTCLTWR	-	-	[3][9]
-	-	54GHTSUMP	54GHTCC	-	-	[3][9]

TOTAL PETROCHEMICALS USA C.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - CO

Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	Adjustment Reference
-	-	45DOCKV104	45V1CC	-	-	[3][9]
-	-	45DOCKV3A	45V3ACC	-	-	[3][9]
-	-	45DOCKV3B	45V3BCC	-	-	[3][9]
-	-	67SBOWSCC	67SBOWSCC	-	-	[3][9]
-	-	67SBSEWCC	67SBSEWCC	-	-	[3][9]
-	-	67GFOWSCC	67GFOWSCC	-	-	[3][9]
-	-	67GFSEWCC	67GFSEWCC	-	-	[3][9]
-	-	67VDUOWSCC	67VDUOWSCC	-	-	[3][9]
-	-	67SKIMCC	67SKIMCC	-	-	[3][9]

Adjustment Reference

1. Actual emissions for 1999 were obtained from Annual Emission Inventory Reports (1999) submittals.
2. Actual emissions for 2000 were obtained from Annual Emission Inventory Reports (2000) submittals.
3. Equipment started-up after the baseline period; therefore, permit allowable emissions have been substituted.
4. Equipment has been shutdown/demolished; therefore, reported emissions have been removed.
5. Emissions reported in the emissions inventory were not creditable and have been adjusted to creditable emission rate.
6. All Dock stack emissions are capped and represented under 45DOCKSFLR for 1999 and 2000 reporting years.
7. Flare gas recovery started-up after the baseline period; therefore, permit allowable emissions have been substituted. Since permit allowables capped 53MIDFLARE, 53SOUTHFLARE, and 41NORTHFLARE, adjustment is illustrated accordingly.
8. These sources were omitted from the 1999 and/or 2000 emission inventories because the emissions were less than 1 tpy. They have been adjusted to the smaller of either their creditable allowables or 1 tpy.
9. This source is not a CO source.

TOTAL PETROCHEMICALS USA INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
812C	104	01ACU1202A	01ACU1202A	-	-	[8]
101	101	01ACU1H101	01ACU1H101	-	-	[8]
347	347	55FCCURFGS	55FCCURFGS	-	-	[8]
355	355	20GASTRKFG	20GASTRKFG	-	-	[8]
356	356	20GASLOAD	20GASFLARE	-	-	[8]
357	357	20DISTLDG	20DISTLDG	-	-	[8]
-	PBTX1	04BTXFUGS	04BTXFUGS	-	-	[8]
40CSPLFUG	40CSPLTFUG	40CSPLTFUG	40CSPLTFUG	-	-	[8]
61BLR99FUG	61BLR99FUG	61BLRFUGS	61BLRFUGS	-	-	[8]
61ST301BLR	61STKBLR	61BLRH300	61BLRSTACK	-	-	[8]
61ST351BLR	61STKBLR	61BLRH350				
804E	107	50TDPH-1	50TDPH-1	-	-	[8]
805A	109	51DHT1H-1	51DHT1H-1	-	-	[8]
805B	121	51DHT1H-3	51DHT1H-3	-	-	[8]
810A	123	10GRUHTRB1	10GRUHTRB1	-	-	[8]
812A	102	02ACU2H201	02ACU2H201	-	-	[8]
812B	103	01VACTH301	01VACTH301	-	-	[8]
812D	105	01ACU1202B	01ACU1202B	-	-	[8]
813A	120	52DHT2H-1	52DHT2H-1	-	-	[8]
813C	325A	52DHT2H-2	52DHT2H-2A/B	-	-	[8]
813C	325B					
BHA	138	-	-	-	-	[8]
BHB	139	-	-	-	-	[8]
BNZ_NSHP	BNZ_NSHP	67BNZNSHAP	67BNZNSHAP	-	-	[8]
BTXA	192	04BTXH-51	04BTXH-51	-	-	[8]
BTXB	193	04BTXH-52	04BTXH-52	-	-	[8]
BTXC	310	04BTXH-53	04BTXH-53	-	-	[8]
BZ-WWPD	BZ-WWPD	67BZFFWWPD	67BZFFWWPD	-	-	[8]
LAB-SUMP	BZ-WWPD	-	-	-	-	[8]
COGENA	326	60COGENTRB	60COGENSTK	-	-	[8]
DOCKFLARE1	BZDVRCOMB	45DOCK1PCV	45DOCKSFLR	-	-	[8]
DOCKFLARE1	FBZDVR	-	-	-	-	[8]
F111	F111	51DHT1FUGS	51DHT1FUGS	0.21	0.21	[4]
F319	F319	08ALKYFUGS	08ALKYFUGS	-	-	[8]
F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	0.22	0.22	[4]
F350	F350	55FCCUFUGS	55FCCUFUGS	0.22	0.22	[4]
F350	PTU	55FCCUFUGS	55FCCUPTUC	0.22	0.22	[4]
F351	F351	67FPMCLTWR	67FPMCLTWR	-	-	[8]
F359	F359	28LPGFUGS	28LPGFUGS	0.01	0.01	[4]
FEXPTET	FEXPTET	-	-	-	-	[8]
GOHDSA	305	13UNIBH301	13UNIBH301	-	-	[8]
HDSCRA	191	17REFHTRS	17REFHTRS	-	-	[8]
HDSCRB	190	17NHTHTRS	17NHTHTRS	-	-	[8]
ISOM A	F299	16ISOMFUGS	16ISOMFUGS	-	-	[8]
ISOM A	299	16ISOMHTR	16ISOMHTR	-	-	[8]
L153-A	153-A	45DOCKAPCV	45DOCK1LDG	-	-	[8]
L153-A	BZDVRCOMB	45DOCKAPCV	45DOCKSFLR	-	-	[8]
L153-B	BZDVRCOMB	45DOCKBPCV	45DOCKSFLR	-	-	[8]
L153-B	153-B	45DOCKBPCV	45DOCKBLDG	-	-	[8]
LAB-HOODS	LAB-HOODS	75LABHOODS	75LABHOODS	-	-	[8]

TOTAL PETROCHEMICALS USA INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
LAB-SUMP	BNZ_NSHP	-	-	-	-	[8]
LAB-SUMP	LAB-SUMP	75LABSUMP	75LABCC	-	-	[8]
LR-342	342	18TRKLOAD	18TRKLOAD	-	-	[8]
N17	N17	40CSPLTH-1	40CSPLTH-1	-	-	[8]
NORTH-APD	NORTH-APD	NPWSFUG	NPWSFUG	-	-	[8]
P701C	F149	02FWCLGTWR	02FWCLGTWR	-	-	[8]
P804	F108	50TDPFUGS	50TDPFUGS	-	-	[8]
P804C	F147	-	-	-	-	[8]
P805C	F146	67805CLTWR	67805CLTWR	-	-	[8]
P807C	F150	08ALKCLTWR	08ALKCLTWR	-	-	[8]
P810	F124	10GRUFUGS	10GRUFUGS	-	-	[8]
P812	F106	02ACU2FUGS	02ACU2FUGS	0.06	0.06	[4]
P813	F122	52DHT2FUGS	52DHT2FUGS	0.06	0.06	[4]
P817	F817	37SWS2FUGS	37SWS2FUGS	0.15	0.15	[4]
PAT	F143	67C200FUGS	67C200FUGS	-	-	[8]
PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	-	-	[8]
PBTX2	FBTX2	-	-	-	-	[8]
PBTX3	FBTX3	04BTXTKFUG	04BTXTKFUG	-	-	[8]
PBH	F138	-	-	-	-	[8]
PCOGEN	FCOGEN	60COGENFUG	60COGENFUG	-	-	[8]
PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	-	-	[8]
PCRUDE	F318	01ACU1FUGS	01ACU1FUGS	0.02	0.02	[4]
PCRUDE	F318	09SATLQFUG	09SATLQFUG	-	-	[8]
PCRUDE	F318	14FGTFUGS	14FGTFUGS	-	-	[8]
PCT11	F320	67NORTHCT	67NORTHCT	-	-	[8]
PCVS	FCVS	-	-	-	-	[8]
PDOCKS	FDOCKS	45DOCK1FUG	45DOCK1FUG	-	-	[8]
PDOCKS	FDOCKS	45DOCKAFUG	45DOCKAFUG	-	-	[8]
PDOCKS	FDOCKS	45DOCKBFUG	45DOCKBFUG	-	-	[8]
PFLR1	141	53MIDFLARE	53MIDFLARE	Flare Cap	Flare Cap	[4]
PFLR2	142	53SOUTHFLR	53SOUTHFLR	Flare Cap	Flare Cap	[4]
PFLR3	307	41NORTHFLR	41NORTHFLR	0.11	0.11	[4]
PGOHDS	F314	13UNIBFUGS	13UNIBFUGS	1.46	1.46	[4]
PHDSCR	F190	17REFFUGS	17REFFUGS	-	-	[8]
PHDSCR	311	17REFREGEN	17REFREGEN	-	-	[8]
PMOGAS	F317	20MOGASBLD	20MOGASBLD	-	-	[8]
PRESS BOX	PRESS BOX	67PRESSBOX	67PRESSBOX	-	-	[8]
PRSE	F302	10DEMEXFUG	10DEMEXFUG	-	-	[8]
PSRU	F310	14SRU1FUGS	14SRU1FUGS	0.03	0.03	[4]
PSRU	F312	14SRU1LOAD	14SRU1LOAD	0.00	0.01	[1][2]
PSRU	F309	14SRU1PIT	14SRU1PIT	0.00	0.00	[1][2]
PSRU	F310	15SCOTFUGS	15SCOTFUGS	0.27	0.27	[4]
PSRU	125	33SRU3	15SRUINCIN	0.22	0.19	[1][2]
PSRU	F313	33SRU3LOAD	33SRU3LOAD	0.00	0.00	[1][2]
PSRU	F311	33SRU3PIT	33SRU3PIT	0.00	0.02	[1][2]
F-930	F-930	-	-	-	-	[8]
PSTORAGE	FSTORAGE	22TKFMFUGS	22TKFMFUGS	-	-	[8]
PSULF	FSULF	04SULFFUGS	04SULFFUGS	-	-	[8]
PSWS	FSWS	38SWS1FUGS	38SWS1FUGS	-	-	[8]
PTRUCKRACK	FTRUCKRACK	18ASPHTFUG	18ASPHTFUG	-	-	[8]

TOTAL PETROCHEMICALS USA C.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
PWTU	PWTU	NESHAPSFUG	NESHAPSFUG	-	-	[8]
PWTU	PWTU-CVS	67NSHAPFUG	67NSHAPCVS	-	-	[8]
PWWT	FWWT	67PWWTFUGS	67PWWTFUGS	-	-	[8]
PWWT	PWWT	-	-	-	-	[8]
RSEA	302	10DEMEXH-2	10DEMEXH-2	-	-	[8]
RSEB	309	10DEMEXH-4	10DEMEXH-4	-	-	[8]
SOUTH-APD	SOUTH-APD	SPWSFUG	SPWSFUG	-	-	[8]
T1000	1000	38TANK1000	38TANK1000	0.17	0.17	[1][2]
T1001	1001	38TANK1001	38TANK1001	0.28	0.28	[1][2]
T2001	2001	20TANK2001	20TANK2001	-	-	[8]
T2002	2002	20TANK2002	20TANK2002	-	-	[8]
T2003	2003	20TANK2003	20TANK2003	-	-	[8]
T301	329	18TANK0301	18TANK0301	-	-	[8]
T302	330	18TANK0302	18ASPHTVRS	ASPHTVR	ASPHTVI	[6]
T303	331	18TANK0303	18ASPHTVRS	ASPHTVR	ASPHTVI	[6]
T305	333	18TANK0305	18TANK0305	-	-	[8]
T306	334	18TANK0306	18TANK0306	-	-	[8]
T316	316	22TANK0316	22TANK0316	-	-	[8]
T317	317	22TANK0317	22TANK0317	-	-	[8]
T401A	401A	67TANK401A	67TANK401A	-	-	[8]
T401B	401B	67TANK401B	67TANK401B	-	-	[8]
T415	415	-	-	-	-	[8]
T416	416	22TANK0416	22TANK0416	-	-	[8]
T421	421	22TANK0421	22TANK0421	-	-	[8]
T422	422	22TANK0422	22TANK0422	-	-	[8]
T441	441	22TANK0441	22TANK0441	-	-	[8]
T445	445	22TANK0445	22TANK0445	-	-	[8]
T446	446	22TANK0446	22TANK0446	-	-	[8]
T452	452	22TANK0452	22TANK0452	-	-	[8]
T453	453	22TANK0453	22TANK0453	-	-	[8]
T454	454	22TANK0454	22TANK0454	-	-	[8]
T455	455	22TANK0455	22TANK0455	-	-	[8]
T462	462	22TANK0462	22TANK0462	-	-	[8]
T463	463	22TANK0463	22TANK0463	-	-	[8]
T466	466	22TANK0466	22TANK0466	-	-	[8]
T470	470	22TANK0470	22TANK0470	-	-	[8]
T475	222	22TANK0475	22TANK0475	-	-	[8]
T476	223	22TANK0476	22TANK0476	-	-	[8]
T477	212	22TANK0477	22TANK0477	-	-	[8]
T478	215	22TANK0478	22TANK0478	-	-	[8]
T479	217	22TANK0479	22TANK0479	-	-	[8]
T480	480	22TANK0480	22TANK0480	-	-	[8]
T481	T481	22TANK0481	22TANK0481	-	-	[8]
T500A	500A	67TANK500A	67TANK500A	-	-	[8]
T500B	500B	67TANK500B	67TANK500B	-	-	[8]
T502	502	22TANK0502	22TANK0502	-	-	[8]
T503	503	22TANK0503	22TANK0503	-	-	[8]
T504	504	67TANK0504	67TANK0504	-	-	[8]
T505	505	67TANK0505	67TANK0505	-	-	[8]
T516	516	22TANK0516	22TANK0516	-	-	[8]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
T524	524	22TANK0524	22TANK0524	-	-	[8]
T525	525	22TANK0525	22TANK0525	-	-	[8]
T526	526	22TANK0526	22TANK0526	-	-	[8]
T530	530	22TANK0530	22TANK0530	-	-	[8]
T531	531	22TANK0531	22TANK0531	-	-	[8]
T532	532	22TANK0532	22TANK0532	-	-	[8]
T536	536	22TANK0536	22TANK0536	-	-	[8]
T538	538	22TANK0538	22TANK0538	-	-	[8]
T540	540	22TANK0540	22TANK0540	-	-	[8]
T541	541	22TANK0541	22TANK0541	-	-	[8]
T542	542	22TANK0542	22TANK0542	-	-	[8]
T543	543	22TANK0543	22TANK0543	-	-	[8]
T545	545	22TANK0545	22TANK0545	-	-	[8]
T558	558	22TANK0558	22TANK0558	-	-	[8]
T559	559	22TANK0559	22TANK0559	-	-	[8]
T560	560	22TANK0560	22TANK0560	-	-	[8]
T561	561	22TANK0561	22TANK0561	-	-	[8]
T562	562	22TANK0562	22TANK0562	-	-	[8]
T563	563	22TANK0563	22TANK0563	-	-	[8]
T572	572	22TANK0572	22TANK0572	-	-	[8]
T574	574	22TANK0574	22TANK0574	-	-	[8]
T587	587	22TANK0587	22TANK0587	-	-	[8]
T588	588	22TANK0588	22TANK0588	-	-	[8]
T589	589	22TANK0589	22TANK0589	-	-	[8]
T591	591	22TANK0591	22TANK0591	-	-	[8]
T595	252	67TANK0595	67TANK0595	-	-	[8]
T596	596	67TANK0596	67TANK0596	-	-	[8]
T597	597	22TANK0597	22TANK0597	-	-	[8]
T598	598	22TANK0598	22TANK0598	-	-	[8]
T599	599	22TANK0599	22TANK0599	-	-	[8]
T650	650	22TANK0650	22TANK0650	-	-	[8]
T651	651	22TANK0651	22TANK0651	-	-	[8]
T660	660	67TANK0660	67TK0660CC	-	-	[8]
T902	902	22TANK0902	22TANK0902	-	-	[8]
T905	905	67TANK0905	67TANK0905	-	-	[8]
T906	906	22TANK0906	22TANK0906	-	-	[8]
T907	907	22TANK0907	22TANK0907	-	-	[8]
T909	909	22TANK0909	22TANK0909	-	-	[8]
T910	910	22TANK0910	22TANK0910	-	-	[8]
T911	911	22TANK0911	22TANK0911	-	-	[8]
T913	913	22TANK0913	22TANK0913	-	-	[8]
T917	917	22TANK0917	22TANK0917	-	-	[8]
T918	918	22TANK0918	22TANK0918	-	-	[8]
T919	919	22TANK0919	22TANK0919	-	-	[8]
T920	920	22TANK0920	22TANK0920	-	-	[8]
T921	921	22TANK0921	22TANK0921	-	-	[8]
T922	922	22TANK0922	22TANK0922	-	-	[8]
T923	923	08TANK0923	08TANK0923	-	-	[8]
T924	924	22TANK0924	22TANK0924	-	-	[8]
T925	925	22TANK0925	22TANK0925	-	-	[8]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
FlexPAL Permit Application
Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
T926	926	22TANK0926	22TK926FLR	-	-	[8]
T927	927	67TANK0927	67TANK0927	-	-	[8]
T928	928	50TANK0928	50BZTNKFLR	-	-	[8]
T929	929	50TANK0929	50BZTNKFLR	-	-	[8]
T930	930	50TANK0930	50BZTNKFLR	-	-	[8]
T934	934	22TANK0934	22TANK0934	-	-	[8]
T935	935	22TANK0935	22TANK0935	-	-	[8]
T938	179	22TANK0938	22TANK0938	-	-	[8]
T939	180	22TANK0939	22TANK0939	-	-	[8]
T941	941	04TANK0941	04TANK0941	-	-	[8]
T946	946	04TANK0946	04TANK0946	-	-	[8]
T947	947	04TANK0947	04TANK0947	-	-	[8]
T948	948	22TANK0948	22TANK0948	-	-	[8]
TERM-SUMP	TERM-SUMP	67TERMSUMP	67TERMSUMP	-	-	[8]
TK506	506	22TANK0506	22TANK0506	-	-	[8]
TK522	522	22TANK0522	22TANK0522	-	-	[8]
TK537	537	22TANK0537	22TANK0537	-	-	[8]
TK586	586	22TANK0586	22TANK0586	-	-	[8]
VACUUM-TRK	VACUUM-TRK	VACUUMTRKS	VACUUMTRKS	-	-	[8]
WWT-AB	WWT-AB	-	-	-	-	[8]
WWT-BPB	WWT-BPB	67WWTBPBIN	67WWTBPBIN	-	-	[8]
WWT-BPBOUT	WWT-BPBOUT	67SBPSUMP	67SBPCC	-	-	[8]
WWT-CATCH	WWT-CATCH	67WWTCATCH	67WWTCATCH	-	-	[8]
WWT-CPI	WWT-CPI	67WWTCPIS	67WWTCPIS	-	-	[8]
WWT-CPIN	WWT-CPIN	67NCPI	67NCPICC	-	-	[8]
WWT-DAF	WWT-DAF	BIOTRTFUG	BIOTRTFUG	-	-	[8]
WWT-NBPB	WWT-NBPB	67WWTNBPBI	67WWTNBPBI	-	-	[8]
WWT-NBPBOT	WWT-NBPBOT	67NBPSUMP	67NBPCC	-	-	[8]
WWT-NSTRMS	WWT-NSTRMS	67NSWSUMP	67NSWCC	-	-	[8]
WWT-RAPID	WWT-RAPID	67WWTRAPID	67WWTRAPID	-	-	[8]
WWT-SSTRMW	WWT-SSTRMW	67SSWSUMP	67SSWCC	-	-	[8]
WWT-STK	WWT-STK	67WWTNSKTK	67WWTNSKTK	-	-	[8]
-	-	01ACU1WWFG	01ACU1WWFG	-	-	[8]
-	-	01VACTFUGS	01VACTFUGS	-	-	[8]
-	-	02ACU2WWFG	02ACU2WWFG	-	-	[8]
-	-	04BTXWWFUG	04BTXWWFUG	-	-	[8]
-	-	08ALKYWWFG	08ALKYWWFG	-	-	[8]
-	-	08LSWALKY	08LSWALKY	-	-	[8]
-	-	08TANK0668	08TANK0668	-	-	[8]
-	-	08TANK0669	08TANK0669	-	-	[8]
-	-	09SLWWFUG	09SLWWFUG	-	-	[8]
-	-	10DMXWWFUG	10DMXWWFUG	-	-	[8]
-	-	10GRUWWFUG	10GRUWWFUG	-	-	[8]
-	-	13UNIWWFUG	13UNIWWFUG	-	-	[8]
-	-	14ATUWWFUG	14ATUWWFUG	-	-	[8]
-	-	14SR1WWFUG	14SR1WWFUG	-	-	[8]
-	-	14TANK0101	14TANK0101	-	-	[8]
-	-	14TANK0102	14TANK0102	-	-	[8]
-	-	16ISOMWWFG	16ISOMWWFG	-	-	[8]
-	-	17FGRCSFUG	17FGRCSFUG	-	-	[8]

TOTAL PETROCHEMICALS USA, INC.
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Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
-	-	17NHTWWFUG	17NHTWWFUG	-	-	[8]
-	-	17NHTFUGS	17NHTFUGS	0.05	0.05	[4]
-	-	18RAILLOAD	18RAILLOAD	-	-	[8]
-	-	18ASPHTVRS	18ASPHTVRS	0.02	0.02	[6][7]
-	-	18TANK0300	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANK0310	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANK0311	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANK0312	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANK0313	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANK0314	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANK0315	18ASPHTVRS	ASPHTVR	ASPHTVR	[6]
-	-	18TANKV330	18TANKV330	-	-	[8]
-	-	20LSTRKRCK	20LSTRKRCK	-	-	[8]
T2000	T2000	20TANK2000	20TANK2000	-	-	[8]
-	-	22ASTNKFUG	22ASTNKFUG	-	-	[8]
-	-	22CRTNKFUG	22CRTNKFUG	-	-	[8]
-	-	22BZNTKFUG	22BZNTKFUG	-	-	[8]
-	-	22BZNTKFLR	22BZNTKFLR	-	-	[8]
-	-	22GOTNKFUG	22GOTNKFUG	-	-	[8]
-	-	22OSFTKFUG	22OSFTKFUG	-	-	[8]
T474	474	45TANK0474	45TANK0474	-	-	[8]
-	-	22TANK0482	22TANK0482	-	-	[8]
-	-	22TANK0484	22TANK0484	-	-	[8]
-	-	22TANK0595	22TANK0595	-	-	[8]
-	-	22TANK0596	22TANK0596	-	-	[8]
-	-	22TANK0678	41NORTHFLR	0.00	0.00	[4]
-	-	22TANK0679	41NORTHFLR	0.00	0.00	[4]
-	-	22TANK0680	41NORTHFLR	0.00	0.00	[4]
-	-	22TANK0681	22TANK0681	-	-	[8]
-	-	22TANK0682	22TANK0682	-	-	[8]
-	-	22TANK0800	22TANK0800	-	-	[8]
-	-	22TANK0801	22TANK0801	-	-	[8]
-	-	22TANK0802	22TANK0802	-	-	[8]
-	-	22TANK0805	22TANK0805	-	-	[8]
-	-	22TANK0807	22TANK0807	-	-	[8]
-	-	22TANK0808	22BZNTKFLR*	-	-	[8]
-	-	22TANK0809	22BZNTKFLR*	-	-	[8]
-	-	22TANK0810	22BZNTKFLR*	-	-	[8]
-	-	22TANK0811	22TANK0811	-	-	[8]
-	-	22TANK0812	22TANK0812	-	-	[8]
-	-	22TANK0813	22TANK0813	-	-	[8]
-	-	22TANK0814	22TANK0814	-	-	[8]
-	-	22TANK0815	22TANK0815	-	-	[8]
-	-	22TK926FLR	22TK926FLR	-	-	[8]
-	-	28LPGHOSE	28LPGHOSE	0.01	0.01	[3]
-	-	33SR2WWFUG	33SR2WWFUG	-	-	[8]
-	-	33SRU3FUGS	33SRU3FUGS	0.06	0.06	[4]
-	-	37SWS2WWFG	37SWS2WWFG	-	-	[8]
-	-	38SWS1WWFG	38SWS1WWFG	-	-	[8]
-	-	40CSOWSUMP	40CSOWCC	-	-	[8]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
-	-	40CSWWFUG	40CSWWFUG	-	-	[8]
-	-	45DOCK2PCV	45DOCK2PCV	-	-	[8]
-	-	45DOCK2FUG	45DOCK2FUG	-	-	[8]
-	-	45DOCK2PCV	45DOCK2LDG	-	-	[8]
-	-	45DOCK45V1	45DOCK45V1	-	-	[8]
-	-	45DOCK45V2	45DOCK45V2	-	-	[8]
-	-	45DOCK45V3	45DOCK45V3	-	-	[8]
-	-	45DOCK1PCV	45DOCKSFLR	-	-	[8]
-	-	45DOCK3PCV	45DOCKSFLR	-	-	[8]
-	-	45DOCKSFLR	45DOCKSFLR	-	-	[8]
-	-	45DOCK1PCV	45DOCKFLR2	-	-	[8]
-	-	45DOCK3PCV	45DOCKFLR2	-	-	[8]
-	-	45DOCKFLR2	45DOCKFLR2	-	-	[8]
-	-	45DOCK3FUG	45DOCK3FUG	-	-	[8]
-	-	45DOCKV104	45V104CC	-	-	[8]
-	-	50BZTNKFLR	50BZTNKFLR	-	-	[8]
-	-	50TDPWWFUG	50TDPWWFUG	-	-	[8]
-	-	51DHT1WWFG	51DHT1WWFG	-	-	[8]
-	-	52DHT2WWFG	52DHT2WWFG	-	-	[8]
-	-	52FLORPWS	52FLORPWCC	-	-	[8]
-	-	52FLWWFUG	52FLWWFUG	-	-	[8]
-	-	52LS811SMP	52LS811SMP	-	-	[8]
-	-	52LSE813	52LSE813	-	-	[8]
-	-	54GHT1FUGS	54GHT1FUGS	-	-	[8]
-	-	54GHT2FUGS	54GHT2FUGS	-	-	[8]
-	-	55FCCWWFUG	55FCCWWFUG	-	-	[8]
-	-	55JETTRFUG	55JETTRFUG	-	-	[8]
-	-	55JETTRSUMP	55JETTRCC	-	-	[8]
-	-	55OFFGSFUG	55OFFGSFUG	-	-	[8]
-	-	58GSHDSCTR	58GSHDSCTR	-	-	[8]
-	-	58GSHDSFUG	58GSHDSFUG	0.06	0.06	[4]
-	-	60CGWWFUG	60CGWWFUG	-	-	[8]
-	-	60COGENPWS	60CGNPWCC	-	-	[8]
-	-	60COGENSWS	60CGNSWCC	-	-	[8]
-	-	61PBWWFUG	61PBWWFUG	-	-	[8]
-	-	67AERTKA	67AERTKA	-	-	[8]
-	-	67AERTKB	67AERTKB	-	-	[8]
-	-	67AERTKC	67AERTKC	-	-	[8]
-	-	67BSMNT	67BSMNT	-	-	[8]
-	-	67C200AFUG	67C200AFUG	-	-	[8]
-	-	67C200WWFG	67C200WWFG	-	-	[8]
-	-	67CLAR405A	67CLAR405A	-	-	[8]
-	-	67CLAR405B	67CLAR405B	-	-	[8]
-	-	67CLAR405C	67CLAR405C	-	-	[8]
-	-	67CLAREFTK	67CLAREFTK	-	-	[8]
-	-	67CLARFLTK	67CLARFLTK	-	-	[8]
-	-	67FLSPTK	67FLSPTK	-	-	[8]
-	-	67LS61P20	67LS61P20	-	-	[8]
-	-	67LSBIOTRT	67LSBIOTRT	-	-	[8]
-	-	67LSEDAF	67LSEDAF	-	-	[8]

TOTAL PETROCHEMICALS USA, INC.
Port Arthur Refinery - Port Arthur, TX
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Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
-	-	67LSN560	67LSN560	-	-	[8]
-	-	67LSN595	67LSN595	-	-	[8]
-	-	67LSN905	67LSN905	-	-	[8]
-	-	67LSNE660	67LSNE660	-	-	[8]
-	-	67LSS602	67LSS602	-	-	[8]
-	-	67LSWSHOUT	67LSWSHOUT	-	-	[8]
-	-	67NCPIMNT	67NCPIMNT	-	-	[8]
-	-	67NPWWFUG	67NPWWFUG	-	-	[8]
-	-	67NSHAPFUG	67NSHAPFUG	-	-	[8]
-	-	67PHADJSPL	67PHADJCC	-	-	[8]
-	-	67SCALBIO	67SCALBIO	-	-	[8]
-	-	67SCALFUEL	67SCALCC	-	-	[8]
-	-	67SCPIMNT	67SCPIMNT	-	-	[8]
-	-	67SOUTHAPD	67SOUTHAPD	-	-	[8]
-	-	67SSTRMWTR	67SSTRMWTR	-	-	[8]
-	-	67TANK0636	67TANK0636	-	-	[8]
-	-	RECOILFUG	RECOILFUG	-	-	[8]
-	-	SOLIDLIQFU	SOLIDLIQFU	-	-	[8]
-	-	06VDU2CHTR	06VDU2CHTR	-	-	[8]
-	-	06VDU2FUGS	06VDU2FUGS	0.14	0.14	[3]
-	-	22TANK0933	22TANK0933	-	-	[8]
-	-	22TANK0940	22TANK0940	-	-	[8]
-	-	22TKDCPFUGS	22TKDCPFUGS	-	-	[3][8]
-	-	25SRUINCIN	25SRUINCIN	0.07	0.07	[3]
-	-	36SRUINCIN	36SRUINCIN	0.07	0.07	[3]
-	-	30CKRFLARE	30CKRFLARE	0.01	0.01	[3]
-	-	30CKRFUGS	30CKRFUGS	0.90	0.90	[3]
-	-	30CKRHTR1	30CKRHTR1	-	-	[3][8]
-	-	30CKRHTR2	30CKRHTR2	-	-	[3][8]
-	-	30CKRTRKLD	30CKRTRKLD	-	-	[3][8]
-	-	30DCPCT1	30DCPCT1	-	-	[3][8]
-	-	31KNHTHTR	31KNHTHTR	-	-	[3][8]
-	-	34SRUFUGS	34SRUFUGS	0.57	0.57	[3]
-	-	37TANK1002	37TANK1002	-	-	[3][8]
-	-	67TANK0401C	67TANK0401C	-	-	[3][8]
-	-	67TANK0500C	67TANK0500C	-	-	[3][8]
-	-	38V107	38V107	-	-	[3][8]
-	-	22TANK0517	22TANK0517	-	-	[3][8]
-	-	42FGTFUGS	42FGTFUGS	0.31	0.31	[3]
-	-	43DHT3CHTR	43DHT3CHTR	-	-	[3][8]
-	-	43DHT3CMSS	43DHT3CMSS	-	-	[3][8]
-	-	43DHT3FUGS	43DHT3FUGS	0.34	0.34	[3]
-	-	47SWS4FUGS	47SWS4FUGS	0.03	0.03	[3]
-	-	35SRU5FUGS	35SRU5FUGS	0.57	0.57	[3]
-	-	31KNHTFUGS	31KNHTFUGS	0.22	0.22	[3]
-	-	19PSAFUGS	19PSAFUGS	-	-	[3][8]
-	-	30AMSTFUGS	30AMSTFUGS	-	-	[3][8]
-	-	30CKRH1MSS	30CKRH1MSS	-	-	[3][8]
-	-	30CKRH2MSS	30CKRH2MSS	-	-	[3][8]
-	-	MSSILE	MSSILE	-	-	[3][8]

TOTAL PETROCHEMICALS USA C.
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Baseline Emissions - H_2S

Previous FIN	Previous EPN	New FIN	New EPN	2001 Actual tpy	2002 Actual tpy	Adjustment Reference
-	-	MSS_TA	MSS_TA	1.53	1.53	[3]
-	-	MSS_ATM	MSS_ATM	0.08	0.08	[3]
-	-	MSS_TKFLR	MSS_TKFLR	-	-	[3][8]
-	-	MSS_WGS	MSS_WGS	-	-	[3][8]
-	-	MSS_COGEN	MSS_COGEN	-	-	[3][8]
-	-	MSS_INCIN	MSS_INCIN	1.55	1.55	[3]
-	-	55OGTCLTWR	55OGTCLTWR	-	-	[3][8]
-	-	54GHTSUMP	54GHTCC	-	-	[3][8]
-	-	45DOCKV104	45V1CC	-	-	[3][8]
-	-	45DOCKV3A	45V3ACC	-	-	[3][8]
-	-	45DOCKV3B	45V3BCC	-	-	[3][8]
-	-	67SBOWSCC	67SBOWSCC	-	-	[3][8]
-	-	67SBSEWCC	67SBSEWCC	-	-	[3][8]
-	-	67GFOWSCC	67GFOWSCC	-	-	[3][8]
-	-	67GFSEWCC	67GFSEWCC	-	-	[3][8]
-	-	67VDUOWSCC	67VDUOWSCC	-	-	[3][8]
-	-	67SKIMCC	67SKIMCC	-	-	[3][8]

Adjustment Reference

1. Actual emissions for 2001 were obtained from Annual Emission Inventory Reports (2001) submittals.
2. Actual emissions for 2002 were obtained from Annual Emission Inventory Reports (2002) submittals.
3. Equipment started-up after the baseline period; therefore, permit allowable emissions have been substituted.
4. Flare gas recovery started-up after the baseline period; therefore, permit allowable emissions have been substituted. Since permit allowables capped 53MIDFLARE, 53SOUTHFLARE, and 41NORTHFLARE, adjustment is illustrated accordingly.
5. Authorized emissions have been used to adjust the emissions for 2001 and 2002 reporting years for all fugitive sources.
6. Emissions reported under both tank and vapor recovery system EPN. Therefore, tank emissions were removed.
7. These sources were omitted from the 2001 and/or 2002 emission inventories because the emissions were less than 1 tpy. They have been adjusted to the smaller of either their creditable allowables or 1 tpy.
8. This source is not a H_2S source.

ATTACHMENT 8

PAL46 Baseline Emissions in Excess of Current Allowables

Pollutant	Previous FIN	Previous EPN	New FIN	New EPN	1999 Actual tpy	2000 Actual tpy	2001 Actual tpy	2002 Actual tpy	Current Allowable Emissions Listed in EPN Summary
VOC	356	356	20GASLOAD	20GASFLARE	7.3	7.85	-	-	7.05
VOC	L153-A	153-A	45DOCKAPCV	45DOCK1LDG	7.51	-	-	-	6.56
VOC	T526	526	22TANK0526	22TANK0526	1.52	1.79	-	-	1.05
VOC	T591	591	22TANK0591	22TANK0591	15.69	26.63	-	-	0.41
VOC	T597	597	22TANK0597	22TANK0597	1.29	1.58	-	-	0.36
VOC	T598	598	22TANK0598	22TANK0598	1.29	1.58	-	-	0.36
VOC	T920	920	22TANK920	22TANK920	2.71	2.71	-	-	0.85
VOC	T2000	T2000	20TANK2000	20TANK2000	NA	0.07	-	-	0.03
VOC	-	-	22GASOILCAP	22GASOILCAP	.82	.82	-	-	0.25
VOC	-	-	22DIESELCAP	22DIESELCAP	15.23	15.23	-	-	14.5
VOC	-	-	22JETCAP	22JETCAP	.43	.43	-	-	0.38
NOx	347	347	55FCCURFGS	55FCCURFGS	231.85	74.18	-	-	159.43
NOx	356	356	20GASLOAD	20GASFLARE	2.80	2.80	-	-	1.04
NOx	805A	109	51DHT1-H1	51DHT1-H1	17.91	19.88	-	-	8.14
NOx	805B	121	51DHT1H-3	51DHT1H-3	7.80	7.78	-	-	5.59
NOx	812A	102	02ACU2H201	02ACU2H201	52.72	47.14	-	-	43.51
NOx	813A	120	52DHT2H-1	52DHT2H-1	12.25	21.51	-	-	
NOx	813C	325A 325B	52DHT2H-2	52DHT2H-2A/B	23.79	20.70	-	-	-
NOx	HDSCRA	191	17REFHTRS	17REFHTRS	197.06	167.64	-	-	130.93
NOx	ISOM A	299	16ISOMHTR	16ISOMHTR	16.32	12.47	-	-	36.82
NOx	PHDSCR	311	17REFREGEN	17REFREGEN	2.94	2.77	-	-	-
PM/PM10	812C	104	01ACU1202A	01ACU1202A	9.16	9.70	-	-	6.1
PM/PM10	812D	105	01ACU1202B	01ACU1202B	8.92	8.86	-	-	6.1
PM/PM10	COGENA	326	60COGENTRB	60COGENSTK	20.73	27.06	-	-	19.91
PM/PM10	F350	CAT-HOP	55FCCUFUGS	55FCCUCHOP	1.80	1.80	-	-	0.1
PM/PM10	F351	F351	67FPMCLTWR	67FPMCLTWR	147.30	147.30	-	-	-
PM/PM10	HDSCRB	190	17NHTHTRS	17NHTHTRS	5.48	4.66	-	-	4.14
PM/PM10	P701C	F149	02FWCLGTWR	02FWCLGTWR	42.94	42.94	-	-	-
PM/PM10	P805C	F146	67805CLTWR	67805CLTWR	46.49	46.49	-	-	-
PM/PM10	P807C	F150	08ALKCLTWR	08ALKCLTWR	33.95	33.95	-	-	-
PM/PM10	PATC-C	FATC-CT	02HDCLGTWR	02HDCLGTWR	12.48	12.48	-	-	-
PM/PM10	PCOGENC	FCOGEN-CT	67COGENCT	67COGENCT	8.99	8.99	-	-	-
PM/PM10	PCT11	F320	67NORTHCT	67NORTHCT	49.06	49.06	-	-	-
PM/PM10	PHDSCR	311	17REFREGEN	17REFREGEN	8.75	8.23	-	-	-
PM/PM10	-	-	58GSHDSCTR	58GSHDSCTR	14.98	14.98	-	-	-
PM/PM10	-	-	55OGTCLTWR	55OGTCLTWR	14.98	14.98	-	-	-
SO2	BTXB	193	04BTXH-52	04BTXH-52	-	1.82	1.11	-	0.84
SO2	HDSCRA	191	17REFHTRS	17REFHTRS	-	-	16.46	-	15.24
CO	356	356	20GASLOAD	20GASFLARE	30.02	32.83	-	-	8.86
CO	RSEB	309	10DEMEXH-4	10DEMEXH-4	-	16.46	-	-	15.38
H2S	PSRU	F311	33SRU3PIT	33SRU3PIT	-	-	-	0.02	.01
H2S	T1000	1000	38TANK1000	38TANK1000	-	-	.17	.17	0.05
H2S	T1001	1001	38TANK1001	38TANK1001	-	-	.28	.28	0.04

ATTACHMENT 9

AIR/JE-0005-H/CO

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

IN THE MATTER OF AN	§	**BEFORE THE**
ENFORCEMENT ACTION	§	
CONCERNING	§	
ATOFINA PETROCHEMICALS, INC.	§	**TEXAS NATURAL RESOURCE**
TNRCC AIR ACCOUNT	§	
NO. JE-0005-H	§	**CONSERVATION COMMISSION**

AGREED ORDER
DOCKET NO. 2002-0148-AIR-E

I. JURISDICTION AND STIPULATIONS

At its JUL 10 2002 agenda, the Texas Natural Resource Conservation Commission ("the Commission" or "TNRCC") considered this agreement of the parties, resolving an enforcement action regarding ATOFINA Petrochemicals, Inc. ("ATOFINA") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TNRCC, through the Field Operations Division, and ATOFINA appear before the Commission and together stipulate that:

1. ATOFINA owns and operates a petrochemical plant at 32nd Street and Highway 366 in Port Arthur, Jefferson County, Texas (the "Plant").

2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).

3. The Commission and ATOFINA agree that the Commission has jurisdiction to enter this Agreed Order, and that ATOFINA is subject to the Commission's jurisdiction.

4. ATOFINA received notice of the violations alleged in Section II ("Allegations") on or about August 28, 2001, November 4, 2001 and January 29, 2002.

5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by ATOFINA of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of Twenty Two Thousand Five Hundred Dollars ($22,500) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). ATOFINA has paid Eighteen Thousand Dollars ($18,000) of the administrative penalty and Four Thousand Dollars ($4,500) is deferred contingent upon ATOFINA's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If ATOFINA fails to timely and satisfactorily

comply with all requirements of this Agreed Order, the Executive Director may require ATOFINA to pay all or part of the deferred penalty.

7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.

8. The Executive Director of the TNRCC and ATOFINA have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.

9. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that ATOFINA has not complied with one or more of the terms or conditions in this Agreed Order.

10. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.

11. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Plant, ATOFINA is alleged to have:

1. Failed to maintain sulfur dioxide (SO_2) and hydrogen sulfide (H_2S) emission rates below the allowable emission limit at the Sulfur Recovery Tail Gas Thermal Oxidizer (EPN 125) during an upset which occurred on July 9, 2001, in violation of Air Permit 9195A PSD-TX-453, Special Condition 1; 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b)(2)(G), and 116.115(c); and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on July 26, 2001;

2. Failed to submit a copy of the final record of an upset to the TNRCC regional office no later than two weeks after the end of an upset when the information required in the final report differs from the information submitted in the intial report. ATOFINA submitted revised event duration and estimated quantities information on a final report submitted September 25, 2001 and an amended final report submitted October 9, 2001, for an upset at Compressor C-200 which ended on September 4, 2001, in violation of 30 TEX. ADMIN. CODE § 101.6(c) and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on October 5, 2001;

3. Failed to maintain emissions below the permitted rate from the south flare (EPN 142) during an upset at Compressor C-200 on September 3-4, 2001. According to the amended final report of the upset event submitted on October 9, 2001, 432 pounds (lbs) of carbon monoxide (CO) (46 lb/hr; 2.0 permitted), 60 lbs oxides of nitrogen (NOx)(6 lb/hr; 0.34 permitted), 19,224 lbs of sulfur dioxide

(SO_2)(2,078 lb/hr; 0.34 permitted), 65 lbs of volatile organic compounds (VOCs)(7 lb/hr; 2.3 permitted) and 208 lbs of hydrogen sulfide (H_2S)(22 lb/hr; none permitted) were released over 9 hours and 15 minutes, in violation of TNRCC Air Permit 18936/PSD-TX-762M2, General Condition 8; 30 TEX. ADMIN. CODE §§ 116.115(b)(2)(G) and 101.20(3), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on October 5, 2001;

4. Failed to prevent unauthorized emissions. During an upset on November 1, 2001, the north flare (EPN 307), which is designated for emergency use only, released 533.66 pounds (lbs) of carbon monoxide (CO), 62.24 lbs of oxides of nitrogen (NOx), 553.42 lbs of sulfur dioxide (SO_2), 6.0 lbs of hydrogen sulfide (H_2S), and 596.77 lbs of volatile organic compounds (VOCs) over a 9 hour period, in violation of TEX. HEALTH & SAFETY CODE § 382.085(a), as documented during a record review conducted on December 12, 2001; and

5. Failed to maintain an emission rate below the allowable emission limits. The south flare (EPN 142) has an emission limit of 2.0 pounds per hour (lb/hr) for CO, 0.34 lb/hr for NOx, 0.34 lb/hr for sulfur oxides (SO), and 2.3 lb/hr for VOCs. During an upset on November 1, 2001, the south flare released 59.97 lbs of CO, 30.04 lbs of NO_x, 93.52 lbs of SO_2, 1.01 lbs of H_2S, and 161.33 lbs of VOC emissions over a 9 hour period, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b) and 116.115(b)(2)(G), TNRCC Air Permit 18936/PSD-TX-762M2, General Condition 8, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on December 12, 2001.

III. DENIALS

ATOFINA generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TNRCC that ATOFINA pay an administrative penalty as set forth in Section I, Paragraph 6 above. The imposition of this administrative penalty and ATOFINA's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TNRCC" and shall be sent with the notation "Re: ATOFINA Petrochemicals, Inc., Docket No. 2002-0148-AIR-E" to:

Financial Administration Division, Revenues Section
Attention: Cashier's Office, MC 214
Texas Natural Resource Conservation Commission
P.O. Box 13088
Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon ATOFINA. ATOFINA is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.

3. This Agreed Order, issued by the Commission, shall not be admissible against ATOFINA in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

4. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to ATOFINA, or three days after the date on which the Commission mails notice of the Order to ATOFINA, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

For the Commission

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein.

Signature — Date: 4/22/02

Wouter Raemdonck — Refinery Manager

Name (Printed or typed)
Authorized Representative of
ATOFINA Petrochemicals, Inc.

Title

Margaret Hoffman — 4 June 02

Margaret Hoffman
Deputy Director
Office of Legal Services
Texas Natural Resource Conservation Commission

Date

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 18, 2002

CERTIFIED MAIL

Wouter Raemdonck, Refinery Manager
ATOFINA Petrochemicals, Inc.
P.O. Box 849
Port Arthur, Texas 77641-0849

RE: ATOFINA Petrochemicals, Inc.
TNRCC Docket No. 2002-0148-AIR-E; Account No. JE-0005-H
Agreed Order assessing administrative penalties

Enclosed is a copy of an order issued by the Commission.

Questions regarding the order should be directed to the Enforcement Coordinator or the Staff Attorney. If there are questions pertaining to the mailing of the order, then please contact Irma Salazar of the Texas Natural Resource Conservation Commission's Office of the Chief Clerk (MC 105) at (512) 239-1328.

Sincerely,

LaDonna Castañuela
Chief Clerk

LDC/is

Enclosure

cc: Garry Tidwell, Field Investigator, TNRCC Region 10
Laura Clark, Enforcement Coordinator, TNRCC Region 10