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Date:	10/8/2019 12:00AM
Title:	Deviation
Tertiary ID	

AirCP-10 2525987-RP-80191008 - Deviation



October 08, 2019

Ms. Nicole Bealle, Regional Director
C/O Air Section Manager
TCEQ Region 12
5425 Polk St., Ste. H
Houston, Texas 77023-1452

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OCT 16 2019

TCEQ
CENTRAL FILE ROOM
Shell Pipeline Company LP
HSSE
150 N. Dairy Ashford Rd.
Building A2
Houston, Texas 77079
Tel (832) 748-0225

Email [REDACTED]

Re: Shell Pipeline Company LP – Colex Terminal
CN600123996; RN102525987
Account No. HG-0660-O
Federal Operating Permit No. O-2758
Permit Compliance Certification for Period of 09/27/2018 through 09/26/2019
Semiannual Deviation Report for Period of 03/27/2019 through 09/26/2019

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OCT 08 2019

REGION 12

Dear Sir/Madam:

Shell Pipeline Company LP (Shell) – Colex Terminal is permitted under Operating Permit No. O-2758 issued on June 11, 2015. As required by 30 TAC §122.146, Shell is submitting the Permit Compliance Certification for reporting period September 27, 2018 through September 26, 2019. Shell has consolidated the semiannual monitoring and deviation report required by 30 TAC §122.145 with this report. The semiannual reporting period covers March 27, 2019 through September 26, 2019. Please find the attached forms, TCEQ-10101, TCEQ-10490, and TCEQ-10009, which demonstrates the report contents have been met.

Please note that a deviation is included from the reporting period September 27, 2017 through September 26, 2018 on the Deviation Report Form. This is included in response to NOV Investigation No. 1540578/Track No. 707510.

The original and a copy are being provided. Should you have any questions or need additional information, please contact me at (832) 748-0225.

Regards,
Shell Pipeline Company LP

David Mulkey
Sr. Environmental Advisor

Enc: As Stated

cc: US EPA, Region 6, Air Enforcement Branch ECDA, 1201 Elm Street, Suite 500, Dallas, Texas
75270-2102

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information					
RN: 102525987		CN: 600123996		Account No.: HG-0660-O	
Permit No.: O-2758			Project No.:		
Area Name: Colex Terminal Pasadena			Company Name: Shell Pipeline Company LP		
II. Certification Type <i>(Please mark the appropriate box)</i>					
☒ Responsible Official			☐ Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
☐ SOP/TOP Initial Permit Application		☐ Update to Permit Application			
☐ GOP Initial Permit Application		☐ Permit Revision, Renewal, or Reopening			
☒ Other: <u>Title V Semi-Annual Deviation Report and Annual Compliance Certification</u>					
IV. Certification of Truth					
This certification does not extend to information which is designated by the TCEQ as information for reference only.					
I, <u>Peyton Ross</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>					
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:					
<i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>					
Time Period: From _____ to _____ <i>Start Date</i> <i>End Date</i>					
Specific Dates: _____ <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i>					
Signature: <u>J. Peyton Ross</u>			Signature Date: <u>10/7/19</u>		
Title: <u>Asset Operations Manager – Onshore</u>					



**Texas Commission on Environmental Quality
Federal Operating Permit Form
Permit Compliance Certification – PCC (Part 1)**

Permit Holder Name	Shell Pipeline Company LP	Customer Number	CN600123996
Area Name	Colex Terminal Pasadena	Account Number	HG-0660-O
Operating Permit Number	O - 2758	Report Submittal Date	10/08/2019
Certification Period Start Date	9/27/2018	End Date	9/26/2019

I. Certification of Continuous Compliance with Permit Terms and Conditions (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	☒	☐

II. Summary of Deviations (Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Response:	
	Yes	No
A. Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. <i>Important Note:</i> If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.	☒	☐
B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.	☒	☐



**Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC – Monitoring Options Selected (Part 3)**

Permit Holder Name	Shell Pipeline Company LP	Customer Number	CN600123996
Area Name	Colex Terminal Pasadena	Account Number	HG-0660-O
Operating Permit Number	O-2758	Report Submittal Date	10/08/2019
Certification Period Start Date	9/27/2018	End Date	9/26/2019

ID Number		Regulatory Requirement (Rule or Permit No. and Prov.)	Pollutant Monitored	SOP or GOP Index Number	Monitoring Option Used	Dates		Description/Comments
Unit ID	Group ID				Specific Citation	Begin	End	
NA								



**Texas Commission on Environmental Quality
Federal Operating Permit Form
PCC - Previous Deviation Reports (Part 2)**

Permit Holder Name	Shell Pipeline Company LP	Customer Number	CN600123996
Area Name	Colex Terminal Pasadena	Account Number	HG-0660-O
Operating Permit Number	O-2758	Report Submittal Date	10/08/2019
Certification Period Start Date	9/27/2018	End Date	9/26/2019

Identification of Deviation Reports Submitted During the Certification Period

(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
4/15/19	Title V Semiannual Deviation Report – First six-month	TCEQ Region 12	Y
10/23/18	PCC & Semiannual Deviation Report - Second six-month	TCEQ Region 12	Y
4/15/19	Semiannual Report for 40 CFR 63 Subpart BBBBBB	EPA Region 6 TCEQ Region 12	Y
10/23/18	Semiannual Report for 40 CFR 63 Subpart BBBBBB	EPA Region 6 TCEQ Region 12	Y
10/08/19	Title V Semiannual Deviation Report – Second six-month (included with this submittal)	TCEQ Region 12	Y



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)**

Permit Holder Name		Shell Pipeline Company LP				Customer Number	CN600123996
Area Name		Colex Terminal Pasadena				Account Number	HG-0660-O
Report Period Start Date	3/27/2019	Report Period End Date	9/26/2019	Operating Permit Number	O-2758	Report Submittal Date	10/08/2019

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
NA	NA	FOP ST&C 9	VOC	NSR Permit 16 SC 13	Standard	NA	Permit	Monthly

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
		Start		End							
		Date	Time	Date	Time						
1	NA	9/27/2017	00:00	10/31/2017	24:00	1	The monthly weighted RVP average exceeded the limit in the RVP schedule contained in SC 13 of NSR Permit 16.	Shell obtained a modification of NSR Permit 16 on April 18, 2019 which revised SC 13. The revised requirement now reflects the correct RVP schedule contained in 40 CFR 80.27(a)(2) for the ultimate delivery locations for the gasoline stored at Colex. In addition, Colex is exempt from the requirements of this condition if it meets the requirements of 40 CFR 80.27(a)(2)(ii). At no point did Shell exceed the permitted emissions for any tanks at the facility.			
Total Deviations:						1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? ☐ YES ☒ NO				



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form**

Form Dev Rep (Part 2)

30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name		Shell Pipeline Company LP				Customer Number	CN600123996
Area Name		Colex Terminal Pasadena				Account Number	HG-0660-O
Report Period Start Date	3/27/2019	Report Period End Date	9/26/2019	Operating Permit Number	O-2758	Report Submittal Date	10/08/2019

Operating Permit Requirement for Which Deviations are Being Reported

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
NA	NA	FOP ST&C 2	VOC	30 TAC 101.201	Standard	NA	Permit	Annual

Dev Item No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
	Start		End							
	Date	Time	Date	Time						
1	6/13/2019	08:30	6/13/2019	10:30	1	LOPC- During pumping of the residuals out of tank TP-205 (diesel) into vac boxes, the crew cleaning the tank accidentally overflowed one of the vac boxes and spilled a mixture of diesel/water to the parking lot and ground. The mixture was comprised of approximately 19.9 gallons of diesel with the remainder being water. None of the liquids made it off site or to water.	The crew immediately stopped work and started cleanup activity. The liquid was vacuumed up by the vac truck operator. The responsible party is a 3rd party HydroChemPCS. The cleanup was completed, and no reportable quantity was exceeded.			
Total Deviations:					1	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	☐ YES ☒ NO			



**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 3)**

AIR CO/102525987/RP

OPTIONAL

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N
NA			

ORIGIN ID: MIFA (281) 397-9016
JAMES SMITH
CK ASSOCIATES
616 FM 1980
575
HOUSTON, TX 77080
UNITED STATES US

SHIP DATE: 07OCT19
ACTWGT:
CAD: 308600009/INET4182

BILL CREDIT CARD

TO **MS. NICOLE BEALLE**

TCEQ - REGION 12

5425 POLK STREET

STE. H

HOUSTON TX 77023

REF: (713) 767-3500

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REGION 12

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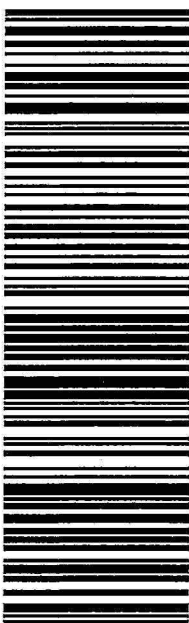


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