



**Shell Oil Products US**

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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

Martinez Refinery  
PO Box 711  
Martinez, CA 94553-0071  
Tel (925) 313-3000  
Fax (925) 313-3065

**CERTIFIED MAIL**

January 20, 2012

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
Attn: Title V Reports

**Subject: Semi-Annual Title V Deviation Summary Report  
July 1, 2011 – December 31, 2011**

Dear Mr. Bateman:

Please find Shell Oil Products US, Martinez Refinery's Semi-Annual Title V Deviation Summary report for the period of July 1, 2011 through December 31, 2011. This report includes a summary of the inoperable monitors for the second half of 2011.

The refinery's Responsible Official, Paul Gabbard, has signed the reports.

If you have any questions regarding this matter, please contact Kathy Wheeler at (925) 313-3722.

Sincerely yours,

Teresa Makarewicz  
Manager, Health, Safety, Security and Environmental Affairs Department  
Shell Oil Products US, Martinez Refinery

Attachments

BAAQMD Title V Permit  
6 Month Deviation Summary Report

From 7/1/2011 to 12/31/2011

**A0011 Shell Oil Products US Martinez Refinery**

Facility Address:

3485 Pacheco Blvd

Mailing Address

PO Box 711

City: Martinez

City: Martinez

State: CA

State: CA

Zip Code: 94553-0071

Zip Code: 94553-0071

Contact: Liz Rosales

Title: Environmental Speciali

Phone: (925) 313-3857

*Title V deviations for the reporting period are summarized below:*

Event Started: 7/8/2011 1:00 AM

Stopped: 7/8/2011 2:00 AM

Ongoing Event

Source Number: 4180

Abatement Device : A4180

Emission Point:

May have resulted in a violation of:

Permit:

AQMD: Regulation 9 Rule 1 Section 30

Other:

Event Description: SRU 4 Stack SO2 analyzer18A601 showed an indicated excess of > 250 ppm avg in the 1am clock hour.

Probable Cause: SO2 increased suddenly while slowly warming up the SRU 4 sulfur pit spare educator after putting it back on line after normal maintenance.

Corrective actions or preventative steps taken: The educator was quickly re-isolated.

Event Started: 7/10/2011 5:00 AM  
 Stopped: 7/10/2011 6:00 AM  Ongoing Event

Source Number: 4180  
 Abatement Device : A4180  
 Emission Point:

May have resulted in a violation of :  
 Permit: \_\_\_\_\_  
 AQMD: Regulation 9 Rule 1 Section 30  
 Other: \_\_\_\_\_

Event Description: SRU 4 Stack SO2 analyzer 18A1601 showed an indicated excess of > 250 ppm SO2 hour average in the 5am clock hour

Probable Cause: The excess occurred when trying again to place the sulfur pit spare eductor back on line after preventative maintenance.

Corrective actions or preventative steps taken: The eductor was taken back offline and the procedure re-evaluated to determine how to install the eductor and another excess.

Event Started: 7/11/2011 12:00 PM  
 Stopped: 7/11/2011 12:00 PM  Ongoing Event

Source Number: 32102  
 Abatement Device : \_\_\_\_\_  
 Emission Point: \_\_\_\_\_

May have resulted in a violation of :  
 Permit: \_\_\_\_\_  
 AQMD: \_\_\_\_\_  
 Other: 40 CFR Part 60 NSPS GGG

Event Description: Shell conducts voluntary internal audits on a quarterly basis in order to continuously improve our LDAR program. During the 2nd Qtr 2011 audit, 14 open ended lines were discovered. All of the open ended lines have been capped or plugged.

Probable Cause: We continue to investigate the cause for lines being left open ended.

Corrective actions or preventative steps taken: All of the open ended lines were capped or plugged. We continue to voluntarily audit our program to ensure continuous improvement and believe it is important to continue to audit in order to maintain a robust LDAR program. The importance of closing any open ended line is emphasized with operations, maintenance and project personnel. With several hundred thousand components in the refinery, it is a continuous auditing effort to ensure all open-ended lines are closed.

Event Started: 7/13/2011 1:10 AM  
 Stopped: 7/13/2011 1:13 AM  Ongoing Event

Source Number: 1A1471  
 Abatement Device : \_\_\_\_\_  
 Emission Point: \_\_\_\_\_

May have resulted in a violation of :  
 Permit: \_\_\_\_\_  
 AQMD: Regulation 9 Rule 2 Section 30  
 Other: \_\_\_\_\_

Event Description: Mt. View H2S Ground Level Monitor 1A11471, showed an indicated excess of 60 ppb in a 3 min average.

Probable Cause: The excess occurred during a sudden flaring event at the LOP flare due to the uncontrolled shutdown of several units due to an instrumentation problem.

Corrective actions or preventative steps taken: The units were isolated and the flaring stopped.

Event Started: 7/23/2011 2:10 AM  
Stopped: 7/23/2011 6:38 PM

Ongoing Event

Source Number: 2002  
Abatement Device : A100  
Emission Point:

May have resulted in a violation of :  
Permit: Condition #4288 Section 5  
AQMD: Regulation 8 Rule 44 Sec 304  
Other:

Event Description: Pressure Vacuum Valve SPV13 on Berth 2 malfunctioned during loading of a ship which allowed a release to the atmosphere instead of going through the MVR Thermal Oxidizer. SPV13 pressure never reached relief pressure setting so true relief of valve is not indicated.

Probable Cause: Valve malfunctioned allowing ship vapors to vent to atmosphere.

Corrective actions or preventative steps taken: The valve was replaced and an investigation begun to determine what caused the failure.

Event Started: 8/4/2011 1:00 AM  
Stopped: 8/4/2011 2:00 AM

Ongoing Event

Source Number: 4180  
Abatement Device : A4180  
Emission Point:

May have resulted in a violation of :  
Permit:  
AQMD: Regulation 9 Rule 1 Section 30  
Other:

Event Description: SRU 4 Stack SO2 analyzer 18A1601 showed an indicated excess of > 250 ppm SO2 hour average in the 1am clock hour

Probable Cause: An upset occurred in SRU 4 due to changes in acid gas feed composition from Nitrogen purging of Sour Water Stripper #6. While addressing this upset the main air valve to SRU 4 was incorrectly adjusted causing the unit to go extremely SO2 rich and overwhelming the treating capacity of SCOT-4.

Corrective actions or preventative steps taken: The mistake in the air valve position was recognized and corrected (within 10 minutes) but the stack SO2 had spiked high enough to exceed the hourly average.

Event Started: 7/31/2011 3:00 AM  
Stopped: 7/31/2011 8:00 AM

Ongoing Event

Source Number: 4161  
Abatement Device : A4161  
Emission Point:

May have resulted in a violation of :  
Permit: 12271 Part 20  
AQMD:  
Other:

Event Description: Air Products Hydrogen Plant 3 (Source #4160) reported an indicated NOx excess greater than the permit limit of 10 ppm 3 hour average when a control power fuse had blown causing power failure of the heater to the ammonia system for the SCR

Probable Cause: The blown fuse caused the loss of power to the ammonia heater.

Corrective actions or preventative steps taken: The fuse was replaced and the NOx brought back under control.

Event Started: 8/14/2011 5:50 PM  
Stopped: 8/14/2011 7:50 PM

Ongoing Event

Source Number: 4031  
Abatement Device : A4141  
Emission Point:

May have resulted in a violation of :  
Permit: Title V Condition 12271 part 35  
AQMD:  
Other:

Event Description: HIGHT Heater F-14012 (S#4031) exceeded the 10 ppm 3 hour average Title V NOX limit. The excess was not reported within the 96 hour reporting deadline.

Probable Cause: Insufficient ammonia was added by the board operator to the SCR to maintain compliance with the NOX limit. The operator failed to report the excess. The violation was identified when the monthly compliance reports were generated for August.

Corrective actions or preventative steps taken: Additional ammonia was added to bring the NOx into compliance. The operator has received additional training on the job expectations and requirements.

Event Started: 9/17/2011 8:40 PM  
Stopped: 9/18/2011 12:00 AM

Ongoing Event

Source Number: 4190  
Abatement Device : A4190  
Emission Point:

May have resulted in a violation of :  
Permit: 12271 Part 24b  
AQMD:  
Other:

Event Description: COGEN's exceeded their SO2 daily mass emissions limit of 458 lbs.

Probable Cause: This is a mass emission limit on SO2 over both COGENs. The SO2 emissions are calculated based on the measured SO2 concentration in the stack gas and the stack gas flow. An alarm was set on the calculated total SO2 to let the operator know if they were running close to the limit. However, by the time the operator received an alarm that the COGENs were going to exceed the allowed SO2 limit, it was too late to make enough of a change in operation to stay in compliance. There was not enough time provided to the operator to react to the alarm before the limit was exceeded.

The alarm strategy was reviewed and revised to provide an hourly rate of SO2 being emitted that will provide plenty of advance notice for operations to make changes in operation to ensure compliance with the limit.

Event Started: 9/26/2011 1:34 PM  
Stopped: 9/26/2011 1:43 PM

Ongoing Event

Source Number: 1509  
Abatement Device : A13  
Emission Point:

May have resulted in a violation of :  
Permit:  
AQMD: Regulation 6 Rule 1  
Other: 40 CFR 60.102(2)

Event Description: COB #2 analyzer 9A12531 showed an indicated excess of greater than 1 Ringelmann for more than 3 minutes in a clock hour during the 1:00 pm hour during a District-observed test to determine the cause for rain-induced opacity events.

Probable Cause: Water was applied to the ducting leading to CO Boiler 2 stack to simulate a heavy rain event.

Corrective actions or preventative steps taken: As soon as excess opacity was observed visually and on the monitor, the test was halted. Less than 10 gallons of water was applied over a 30 second period but the opacity event lasted for close to 9 minutes.

Event Started: 10/3/2011 11:00 PM  
Stopped: 10/4/2011 12:59 AM  Ongoing Event

Source Number: 1432  
Abatement Device : A1431  
Emission Point:

May have resulted in a violation of :  
Permit:  
AQMD: Regulation 9 Rule 1 Section 30  
Other:

Event Description: SRU 2 SO2 analyzer 8 AI 0849 showed an indicated excess of greater than 250 ppm in a clock hour from 10/3 2300 to 10/4 0059. ( 2 hours).

Probable Cause: The SO2 exceeded when SCOT 2 tripped offline due to loss of the fire eyes that provide flame detection for the heater. Restart of the heater was delayed while the problem with the fire eyes was investigated.  
Corrective actions or preventative steps taken: Once the problem with the fire eyes was determined and mitigated, the heater was able to stay online and the SO2 came back to normal levels.

Event Started: 10/6/2011 1:27 PM  
Stopped: 10/6/2011 1:30 PM  Ongoing Event

Source Number: 1507  
Abatement Device : A12  
Emission Point:

May have resulted in a violation of :  
Permit:  
AQMD: Regulation 6 Rule 1  
Other:

Event Description: COB #1 Opacity analyzer 9A 2529 showed an indicated excess of greater than 1 Ringelmann for 3 minutes in a clock hour during the 1300 hour.

Probable Cause: There was a reduction in power level to the precipitator fields but no conclusive cause for the power dip could be determined. Process conditions were normal and steady at the time.  
Corrective actions or preventative steps taken: The opacity quickly returned to normal levels but had already exceeded the limit.

Event Started: 10/6/2011 1:28 PM  
Stopped: 10/6/2011 1:33 PM  Ongoing Event

Source Number: 1512  
Abatement Device : A14  
Emission Point:

May have resulted in a violation of :  
Permit:  
AQMD: Regulation 6 Rule 1  
Other:

Event Description: COB #3 Opacity analyzer 9A 2533 showed an indicated excess of greater than 1 Ringelmann for 3 minutes in a clock hour during the 1300 hour.

Probable Cause: There was a reduction in power level to the precipitator fields but no conclusive cause for the power dip could be determined. Process conditions were normal and steady at the time.  
Corrective actions or preventative steps taken: The opacity quickly returned to normal levels but had already exceeded the limit.

Event Started: 10/5/2011 12:00 PM  
Stopped: 10/5/2011 12:00 PM  Ongoing Event

Source Number: 32102  
Abatement Device :  
Emission Point:

May have resulted in a violation of :  
Permit: \_\_\_\_\_  
AQMD: \_\_\_\_\_  
Other: 40 CFR Part 60 NSPS Subpart \_\_\_\_\_

Event Description: Shell conducts voluntary internal audits on a quarterly basis in order to continuously improve our LDAR program. During the 3rd Quarter 2011 audit, 39 open ended lines were discovered. All of the open ended lines have been capped or plugged.

Probable Cause: Many of the open-ended lines that are found appear to be historic, i.e. original equipment installed many years ago without caps, plugs or double block valves. Corrective actions or preventative steps taken: Some of the open ends are due to missing caps that were either not properly replaced or vibrated off. Shell continues to actively investigate the cause of all open ends in order to eliminate them.

All of the open ended lines were capped, plugged or had the second valve closed. We continue to voluntarily audit our program to ensure continuous improvement and believe it is important to continue to audit in order to maintain a robust LDAR program. The importance of closing any open ended line is emphasized with operations, maintenance and project personnel.

**Certification Statement**

I certify under penalty of law that based on the information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

x *Paul D Gabbard* Paul D Gabbard General Mgr Date 1/18/12  
Signature of Responsible Official Print Name Title

BAAQMD Title V Permit  
6 Month Monitoring Report

From 7/1/2011 to 12/31/2011

<b>A0011 Shell Oil Products US Martinez Refinery</b>	
Facility Address: 3485 Pacheco Blvd	Mailing Address PO Box 711
City: Martinez State: CA ZIP Code: 94553-0071	City: Martinez State: CA zip Code: 94553-0071
Contact: Liz Rosales	Title: Environmental Specialist Phone: (925) 313-3857

Imperable monitors as defined by BAAQMD Regulations 1-522 and 1-523 for the reporting period are summarized below:

Started	Stopped	Source (S#)	Abatement Device (A#)	Emission Point (P#)	Fuel	CEM	GLM	Gas	Parameter	NOx	SO2	CO	H2S	TSS	NH3	O2	CO2	H2O	LTA	Leak	Steam	Flow	Wind Dir	Speed	plf	Temp	VOC	Gauge			
7/4/2011 9:55 AM	7/5/2011 12:38 PM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Event Description: HP2-F-104 O2 analyzer 15 AI 661 was out of service due to problems with the NOx analyzer 15 AI 660.																															
7/4/2011 9:55 AM	7/12/2011 1:00 PM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: HP2-F-104 NOx analyzer 15 AI 660 went bad (burned out multiple ozonator boards and transformers) so the analyzer was removed and a spare was installed. The spare was calibrated twice for accuracy, but will remain out of service until the analyzer can be verified by the Air District as valid. Air District has been notified and they will be out the week of 7/11 to certify the analyzer.																															
7/20/2011 7:35 AM	7/21/2011 3:25 PM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: Chimney 2 NOx and O2 Analyzers (10A2680 and 10A2681) did not calibrate within 24 hours due to a programming glitch. Technicians initiated the auto calibration. Downtime is from the last auto-cal.																															
7/28/2011 10:05 AM	8/3/2011 7:30 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: Refinery Fuel Gas Blend Drum TRS analyzer 09A 2825 is out of service for preventative maintenance and awaiting parts. Replaced columns, adjusted flows and calibrated.																															
7/28/2011 10:05 AM	8/3/2011 7:30 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: Refinery Fuel Gas Blend Drum H2S analyzer 09A 2831 is out of service for preventative maintenance and awaiting parts. Replaced columns, adjusted flows and calibrated.																															
7/28/2011 11:35 AM	8/4/2011 9:15 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: Cogen Gas Turbine #1 NOx analyzer 66A1 0417 will be out of service to replace our current NOx Model 951A with Model 951C. This new analyzer will not be called back into service until the completion of CD/CE, RATA and BAAQMD certification.																															
8/9/2011 10:00 AM	8/17/2011 9:20 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: FXG H2S analyzer 14A 1251 will be out of service for several days for preventative maintenance. This will be it's annual rebuild of the analyzer with warm-up and calibration once maintenance is completed.																															
9/1/2011 5:10 PM	9/13/2011 4:35 PM					<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Event Description: Wheat Mill Station Wind Speed parametric 1S4582 is out of service greater than 24 hours. Cause is under investigation.																															



Started	Stopped	Source (SID)	Abatement Device (A#)	Emission Point (P#)	Fuel	CEM	GLM	Gas	Parameter	NOx	SO2	CO	H2S	TRS	NH3	O2	CO2	H2O	LTJA	Quachiv	Lead	Steam	Flow	Wind Dir.	Wind Speed	pH	Temp.	YOC	Gauge Press.		
9/12/2011 10:30 AM	9/13/2011 3:50 PM					<input type="checkbox"/>	<input checked="" type="checkbox"/>																								
Event Description: RFG BTU analyzer 9A3832 along with Gas Gravity analyzer 9A2942 are out of service greater than 24 hours due to a component failure while calibrating. (Correction made in Gas Gravity analyzer #)																															
9/29/2011 5:00 PM	10/1/2011 12:10 PM					<input checked="" type="checkbox"/>	<input type="checkbox"/>																								
Event Description: RFG H2S analyzer 9A 1610 was out of service greater than 24 hours due to maintenance on the flare line.																															
9/29/2011 5:00 PM	10/1/2011 7:40 PM					<input type="checkbox"/>	<input type="checkbox"/>																								
Event Description: BTU analyzer 9A 2716 was out of service for greater than 24 hours for flare line maintenance.																															
10/9/2011 8:55 AM	10/10/2011 10:30 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>																								
Event Description: COGEN 2 SO2 analyzer 66A G14 was out of control for greater than 24 hours. Found plugged air treaters. Cleaned, blew system back, adjusted flows and recalibrated.																															
10/9/2011 8:55 AM	10/10/2011 10:30 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>																								
Event Description: COGEN 2 NOx analyzer 66A G17 was out of control for greater than 24 hours. Found plugged air treaters. Cleaned, blew back system, adjusted flow and recalibrated.																															
12/22/2011 9:00 AM	12/5/2011 8:00 AM					<input checked="" type="checkbox"/>	<input type="checkbox"/>																								
Event Description: COB #2 Opacity analyzer 9A 2531 chart recorder jammed and did not record. Repaired and returned to service today.																															

Certification Statement

I certify, under penalty of law that based on the information and belief formed after reasonable inquiry, the statements and information in this document and in all attachments and other materials are true, accurate, and complete.

Signature of Responsible Official: *Paul M. DeBenedictis* Print Name: *Paul M. DeBenedictis*

Title: *General Mgr.* Date: *1/18/12*