



Suncor Energy (U.S.A.) Inc.  
Commerce City Refinery  
5801 Brighton Blvd.  
Commerce City, Colorado 80022  
Tel (303) 286-5701  
Fax (303) 286-5702  
www.suncor.com

CDPHE Startup/Shutdown Reporting Form <sup>1-8</sup>	
<b>Suncor Representative</b>	Drew Leonard
<b>Date of E-Mail Notification</b>	Monday, June 08, 2020
<b>Time of E-Mail Notification</b>	6/8/20 9:00 AM
<b>Startup/Shutdown (specify)</b>	Startup
<b>Estimated Event Start Date and Time</b>	6/7/20 8:00 AM
<b>Estimated Event End Date and Time</b>	6/7/20 9:00 AM
<b>Operating Permit No.</b>	96OPAD120 - West Plant
<b>AIRS ID No.</b>	100 - H-25
<b>Condition of Permit, Regulation, or Standard Potentially Deviated From (e.g., Condition 25.1)</b>	20.1 - 15.68 lb/hr SO <sub>2</sub> (1-hr avg) 20.6 - 250 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Estimated Maximum Numeric Value of Deviation<sup>9</sup> (e.g., ppm, ppmc lb/hr, etc.)</b>	H-25 - 22.93 lb/hr SO <sub>2</sub> (1-hr avg) H-25 - 262 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Information Regarding Cause of Deviation<sup>10</sup></b>	Planned start-up of the No.1 SRU following maitnenance.

**Notes:**

<sup>1</sup>The periods of excess emissions that occurred during startup and/or shutdown were short and infrequent and could not have been prevented through careful planning and design.

<sup>2</sup>The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance.

<sup>3</sup>If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage.

<sup>4</sup>The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable.

<sup>5</sup>All possible steps were taken to minimize the impact of excess emissions on ambient air quality.

<sup>6</sup>All emissions monitoring systems were kept in operation (if at all possible).

<sup>7</sup>Suncor's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence.

<sup>8</sup>At all times, the facility was operated in a manner consistent with good practices for minimizing emissions.

<sup>9</sup>These are draft emissions estimates and are subject to revisions and/or updates. The final emissions will be reported on the quarterly excess emissions reports.

<sup>10</sup>Information regarding the cause of the deviation may change based on the results of pending investigations.



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CDPHE Startup/Shutdown Reporting Form <sup>1-8</sup>	
<b>Suncor Representative</b>	Drew Leonard
<b>Date of E-Mail Notification</b>	Tuesday, June 09, 2020
<b>Time of E-Mail Notification</b>	6/9/20 9:00 AM
<b>Startup/Shutdown (specify)</b>	Startup
<b>Estimated Event Start Date and Time</b>	6/8/20 2:00 PM
<b>Estimated Event End Date and Time</b>	6/8/20 4:00 PM
<b>Operating Permit No.</b>	96OPAD120 - West Plant
<b>AIRS ID No.</b>	100 - H-25
<b>Condition of Permit, Regulation, or Standard Potentially Deviated From (e.g., Condition 25.1)</b>	20.1 - 15.68 lb/hr SO <sub>2</sub> (1-hr avg) 20.6 - 250 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Estimated Maximum Numeric Value of Deviation<sup>9</sup> (e.g., ppm, ppmc lb/hr, etc.)</b>	H-25 - 19.62 lb/hr SO <sub>2</sub> (1-hr avg) H-25 - 279 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Information Regarding Cause of Deviation<sup>10</sup></b>	Planned start-up of the No.1 SRU following maitnenance.

**Notes:**

<sup>1</sup>The periods of excess emissions that occurred during startup and/or shutdown were short and infrequent and could not have been prevented through careful planning and design.

<sup>2</sup>The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance.

<sup>3</sup>If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage.

<sup>4</sup>The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable.

<sup>5</sup>All possible steps were taken to minimize the impact of excess emissions on ambient air quality.

<sup>6</sup>All emissions monitoring systems were kept in operation (if at all possible).

<sup>7</sup>Suncor's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence.

<sup>8</sup>At all times, the facility was operated in a manner consistent with good practices for minimizing emissions.

<sup>9</sup>These are draft emissions estimates and are subject to revisions and/or updates. The final emissions will be reported on the quarterly excess emissions reports.

<sup>10</sup>Information regarding the cause of the deviation may change based on the results of pending investigations.



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CDPHE Malfunction Reporting Form	
<b>Suncor Representative</b>	Jeff Wyman
<b>Date of E-Mail Notification</b>	Friday, June 12, 2020
<b>Time of E-Mail Notification</b>	9:00 AM
<b>Estimated Event Start Date and Time</b>	06/11/2020 7:00 PM
<b>Estimated Event End Date and Time</b>	06/12/2020 7:00 AM
<b>Operating Permit No.</b>	96OPAD120 - West Plant
<b>AIRS ID No.</b>	100 - H-25
<b>Condition of Permit, Regulation, or Standard Potentially Deviated From (e.g., Condition 25.1)</b>	20.1 - 15.68 lb/hr SO <sub>2</sub> (1-hr avg) 20.6 - 250 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Estimated Maximum Numeric Value of Deviation<sup>a</sup> (e.g., ppm, ppmc lb/hr, etc.)</b>	H-25 - 305.15 lb/hr SO <sub>2</sub> (1-hr avg) H-25 - 789 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Information Regarding Cause of Deviation<sup>b</sup></b>	This event is currently under investigation.

**Notes:**

<sup>a</sup>These are draft emissions estimates and are subject to revisions and/or updates. The final emissions will be reported on the quarterly excess emissions reports.

<sup>b</sup>Information regarding the cause of the deviation may change based on the results of pending investigations. The final deviation cause will be provided in the Malfunction Forms.

**File Location**

[Z:\400 Multi-Media\490 Exceedance Reports & Results\492 Permit Exceedances & Upset Reports](#)  
[\531.03 2012 Upsets\Malfunction Report Template](#)



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CDPHE Malfunction Reporting Form	
<b>Suncor Representative</b>	Drew Leonard
<b>Date of E-Mail Notification</b>	Monday, June 22, 2020
<b>Time of E-Mail Notification</b>	10:00 AM
<b>Estimated Event Start Date and Time</b>	6/18/20 7:00 PM
<b>Estimated Event End Date and Time</b>	6/20/20 1:00 PM
<b>Operating Permit No.</b>	96OPAD120 - West Plant
<b>AIRS ID No.</b>	100-H25
<b>Condition of Permit, Regulation, or Standard Potentially Deviated From (e.g., Condition 25.1)</b>	EPCRA 500 lb SO <sub>2</sub> RQ 20.1 - 15.68 lb/hr SO <sub>2</sub> (1-hr avg) 20.6 - 250 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg)
<b>Estimated Maximum Numeric Value of Deviation<sup>a</sup> (e.g., ppm, ppmc lb/hr, etc.)</b>	H-25 - 397.23 lb/hr SO <sub>2</sub> (1-hr avg) H-25 - 8,943 ppm SO <sub>2</sub> at 0% O <sub>2</sub> (12-hr avg) >500 lbs SO <sub>2</sub> - Exact amount being determined
<b>Information Regarding Cause of Deviation<sup>b</sup></b>	Shutdown of the Tail Gas Unit (TGU) for repairs.

**Notes:**

<sup>a</sup>These are draft emissions estimates and are subject to revisions and/or updates. The final emissions will be reported on the quarterly excess emissions reports.

<sup>b</sup>Information regarding the cause of the deviation may change based on the results of pending investigations. The final deviation cause will be provided in the Malfunction Forms.

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