

AIR NSR\_103919817-019027\_PA\_20150407\_INVESTIGATION\_231168  
**Texas Commission on Environmental Quality**  
**Investigation Report**

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**Customer: Chevron Phillips Chemical Company LP**  
**Customer Number: CN600303614**

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**Regulated Entity Name: CHEVRON PHILLIPS CHEMICAL CEDAR BAYOU PLANT**

**Regulated Entity Number: RN103919817**

**Investigation #** 1241662

**Investigator:** ABAYOMI DEDEKE

**Conducted:** 04/07/2015 -- 04/07/2015

**Incident Numbers**

**Site Classification** MAJOR SOURCE

**NAIC Code:** 325211

**SIC Code:** 2821

**NAIC Code:** 325110

**SIC Code:** 1629

**NAIC Code:** 325199

**SIC Code:** 2869

**SIC Code:** 1611

**Program(s):** AIR NEW SOURCE PERMITS

**Investigation Type:** Site Assessment File Review

**Location:** 9500 INTERSTATE 10 E EXIT 796

**Additional ID(s):** HG0310V  
19027

**Address:** ,  
, ,

**Local Unit:** REGION 12 - HOUSTON

**Activity Type(s):** PMSI116IH - AIR PMSI116IH - IN  
HOUSE CH 116 PERMIT SITE  
REVIEW

**Principal(s):**

**Role**

**Name**

RESPONDENT

CHEVRON PHILLIPS CHEMICAL COMPANY LP

**Contact(s):**

**Role**

**Title**

**Name**

**Phone**

Regulated Entity  
Contact

ENVIRONMENT  
ENGINEER

MS KRISHA MEHTA

Work (281) 421-6594

**Other Staff Member(s):**

**Role**

**Name**

QA Reviewer  
Supervisor

AMY MESSICK  
AMY MESSICK

**Associated Check List**

**Checklist Name**

AIR PERMIT SITE REVIEW

**Unit Name**

chevronphillips

**Investigation Comments:**

INTRODUCTION / INVESTIGATION SUMMARY  
Introduction

RECEIVED  
NOV 2 1 2015  
TCEQ  
CENTRAL FILE ROOM

## CHEVRON PHILLIPS CHEMICAL CEDAR BAYOU PLANT - BAYTOWN

4/7/2015 Inv. # - 1241662

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On March 30, 2015, the Texas Commission on Environmental Quality (TCEQ) Houston Regional Office received a Request for Comments (RFC) from the TCEQ Air Permits Division (APD) for Permit # 19027 for Chevron Phillips Chemical Co – Cedar Bayou Plant (APD Project No. 231168 & 231295).

### Narrative

On April 7, 2015, Mr. Abayomi Dedeké of the TCEQ conducted an in-house review of the draft permit amendment and renewal for Permit # 19027.

A response was sent to the permit writer via e-mail on April 7, 2015. A copy of the response can be found in Attachment 1.

### Exit Interview

An exit interview with Chevron Phillips Chemical Co – Cedar Bayou Plant was not conducted during this permit review process.

## GENERAL FACILITY AND PROCESS INFORMATION

### Process Description

Chevron Phillips Chemical Co – Cedar Bayou Plant is a chemical plant that uses fluidized bed technology to produce both linear low-density and high-density polyethylene.

## BACKGROUND

### Current Enforcement Actions

Comments from regional staff regarding current enforcement actions are included in Attachment 1, if applicable.

### Agreed Orders, Court Orders, and Other Compliance Agreements

Comments from regional staff regarding Agreed Orders, Court Orders, and other Compliance Agreements are included in Attachment 1, if applicable.

### Complaints

Comments from regional staff regarding any complaints are included in Attachment 1, if applicable.

### Prior Enforcement Issues

Comments from regional staff regarding any prior enforcement issues are included in Attachment 1, if applicable.

## ADDITIONAL INFORMATION / RECOMMENDATIONS

### Conclusions and Recommendations

Comments from regional staff regarding applicability and enforceability are included in Attachment 1.

### Additional Issues

Additional issues are included in Attachment 1, if applicable.

### List of Report Attachments

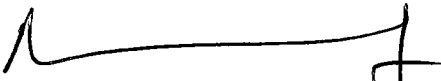
1. Request for Comments Form, sent from APD.

**No Violations Associated to this Investigation**

**CHEVRON PHILLIPS CHEMICAL CEDAR BAYOU PLANT - BAYTOWN**

**4/7/2015 Inv. # - 1241662**

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Signed   
\_\_\_\_\_  
Environmental Investigator

Date 4/9/15

Signed   
\_\_\_\_\_  
Supervisor

Date 4/9/15

**Attachments: (in order of final report submittal)**

\_\_\_ Enforcement Action Request (EAR)

\_\_\_ Maps, Plans, Sketches

\_\_\_ Letter to Facility (specify type) : \_\_\_\_\_

\_\_\_ Photographs

Investigation Report

\_\_\_ Correspondence from the facility

\_\_\_ Sample Analysis Results

☒ Other (specify) :

\_\_\_ Manifests

See above

\_\_\_ Notice of Registration

# **TCEQ**

## **Region 12**



### **Attachment 1** **Request for Comments Form**

**Customer: Chevron Phillips Chemical Company**  
**CN600303614**

**Chevron Phillips Chemical Cedar Bayou**  
**RN103919817**

**Investigation No.: 1241662**  
**Investigation Date: 04/07/2015**  
**Investigator: Abayomi Dedeke**

**Number of Pages: 3**

**Request for Comments -- Site Review  
TCEQ -- Air Permits Division  
Phone: (512) 239-1250  
Fax: (512) 239-1300**

**Submitted by: Air Permits Initial Review Team**

**TO: Region: 12**

**City: Baytown**

**County: Harris**

**Date Request Submitted: March 30, 2015**

**Date Response Requested:**

**Comments: Deadline is 45 days for MSS-type reviews, 21 calendar days for all others, from the Date Request Submitted. Section Manager approval is required for responses requested sooner than those deadlines. MSS = an NSR application for Planned Maintenance, Start-up, or Shutdown emissions in accordance with 30 TAC Chapter 101.**

**Date Application Received by Air Permit Initial Review Team: March 17, 2015**

**REGIONAL OFFICES: Please return comments to the appropriate Permitting Team Leader indicated on the following page ASAP, but no later than deadline established above. Permit disposition will proceed after comments are received or after the comments deadline has passed.**

**REQUESTED PERMIT ACTION:**

<b>MSS Construction</b>	<b>MSS Amendment</b>	<b>Revision</b>
<b>Construction</b>	<b>X Amendment</b>	<b>Other</b>
<b>X Renewal</b>	<b>Renewal Abbreviated Review</b>	

**Project No.: 231168 & 231295**

**PERMIT No.: 19027**

**TCEQ Account No (if applicable): HG-0310-V**

**Regulated Entity No.: RN103919817**

**Customer No.: CN600303614**

**Company Name: Chevron Phillips Chemical Company LP**

**Plant Name: Chevron  
Phillips Chemical Co - Cedar  
Bayou Plant**

**City: Baytown**

**County: Harris**

**Location: 9500 Interstate 10 E**

**Unit Name: Polyethylene Unit 1796**

**Technical Contact: Krisha Mehta**

**Phone: (281) 421-6594**

**Local Program Applicable?: X Yes      No      Local Programs: Harris**

**Note: For sites in a region that has a local program with jurisdiction, MSS projects for those sites will be reviewed by regional offices only.**

Investigation Type: RFC  
Air Account NO: HG0310V  
Attachment: 1  
Page 1 of 3

**Request for Comments -- Site Review  
RESPONSE**

**PLEASE SEND COMMENTS TO THE PERSON IDENTIFIED BELOW. (To avoid delays, please do not send this back to the Air Permits Initial Review Team.):**

	To: Bonnie Evridge - Air Permits Division – Austin (M/C)	E-Mail: <u>Bonnie Evridge</u>	Phone: (512) 239-5222
	To: Ann Mosher - Air Permits Division – Austin (M/A)	E-Mail: <u>Ann Mosher</u>	Phone: (512) 239-3753
	To: Joseph Janecka - Air Permits Division - Austin (Comb/Coat)	E-Mail : <u>Joseph Janecka</u>	Phone: (512) 239-1353
X	To: Rick Goertz / Daniel Smothers - Air Permits Division - Austin (Chem)	E-Mail : <u>Rick Goertz / Daniel Smothers</u>	Phone: (512) 239-5606 / 1664

	To:	E-Mail:	Phone:	Fax: (512) 239-1300
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FROM: Region: 12	City: Baytown	County: Harris
	Compliance:	Legal:

Copy of Application Received by your Office: X YES    NO

Date Received: **03/19/2015**

**PERMIT No. 19027**

**PROJECT No. 231168 & 231295**

**TCEQ ACCOUNT NUMBER: HG-0310-V**

**Company Name: Chevron Phillips Chemical Company LP**

Investigator's/Compliance Officer's Name (Please Print): **Abayomi Dedeke**

Organization: TCEQ R12	Phone: (713) 767 3668
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Comments Deadline: <b>04/20/2015</b>	Investigation Type: <u>RFC</u>
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Date of Last Site Visit:	Air Account NO: <u>HG 0310V</u>
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<b>SITE INFORMATION:</b>	Attachment: <u>1</u>
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Nuisance/Odor Potential: <u>  </u> Low <u>X</u> Moderate <u>  </u> High	Page <u>2</u> of <u>3</u>
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Existing Odor Problem: <u>  </u> Yes <u>X</u> No (If yes, provide details)	
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Hazard Potential: <u>  </u> Low <u>X</u> Moderate <u>  </u> High	
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Surrounding Land Use:

School within 3,000 feet? <u>  </u> Yes <u>X</u> No	Distance (feet):	School Name:
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Distance to Nearest Off-Property Receptor: 292 feet	
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Receptor Type: Industrial	
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Distance from unit to nearest property line: 55 feet	
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Describe area surrounding the site (agriculture, industrial, residential):	Industrial
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**NOV/NOE INFORMATION (concerning affected process unit):**

Type of Site:    New X Existing

NOV Issued? <u>X</u> No <u>  </u> Yes	Date: NA
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Type of Violation: NA	NA
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Was there an NOE for this site?: <u>  X  </u> No <u>      </u> Yes	Date: NA
Please provide any information the permit engineer needs concerning the current NOV, violation, or NOE status	NA
Summarize any recent complaints related to this facility including complaint type and CCEDS number:	NA
Recommendation based on Compliance History: (*For Compliance Use Only)	
Proceed with Permit Review <input checked="" type="checkbox"/> Additional Provisions <input type="checkbox"/> Deny Permit <input type="checkbox"/> Update Application <input type="checkbox"/>	
<b>SITE REVIEW:</b>	
In light of the proximity of sensitive receptors and the surrounding land use, please discuss any concerns you have concerning a facility of this type locating at the proposed site.	
<b>MSS Specific Notes:</b>	
The following MSS activities in the application are insufficient or inconsistent with our knowledge of MSS at the facility, and why:	
The following activities are typically considered planned MSS and are not found in the application. These activities should be added or addressed:	

Investigation Type: RFC  
 Air Account NO: HG0310V  
 Attachment: 1  
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