

Air Pollutant Watch List Project

<http://www.tceq.state.tx.us/implementation/tox/AirPollutantMain/APWL.html>
(see back)

Technical Operating Procedure

Subject: Air Pollutant Watch List (APWL) Awareness **Date:** July 29, 2008

Authority: Verbal direction of division director.

Responsible Section (maintain/coordinate procedure): TPS

Purpose: Increase permit reviewer awareness of:

- areas of concern,
- pollutants of concern, and
- facilities located in the APWL area of concern.

Process:

- APIRT will deliver project folders to ADMT for all case-by-case permit projects (non standard permit or permit by rule).
- APIRT will insert a yellow sheet in the folder if the project is a Houston Air Toxics Project. The Houston Air Toxic project is a special initiative to address pollution issues in Region 12. An agency workgroup developed a list that contains specific facilities and Registered Entity Numbers that may be in APWL areas in Region 12 as well as other facilities in areas identified by mobile monitoring as potential watch list candidates. The workgroup coordinates on these projects before final action.
 - The Houston Air Toxics list is located at J:\everyone\APD Technical and Permit Processing\Houston Air Toxics\March 2008 Update .
- ADMT will process property lines as usual. If the application is in an APWL area of concern, ADMT will insert a blue sheet in the folder if the project is an Air Pollutant Watch List Project before passing the folder on to the appropriate operational section. The blue sheet alerts the permit reviewer that the Modeling and Effect Review Applicability flowchart Step 3 may apply.
 - The area of concern for an APWL area is located on the website at <http://www.tceq.state.tx.us/implementation/tox/AirPollutantMain/APWL.html>
- The project folder may contain both a yellow and a blue sheet.

HOUSTON
AIR TOXICS
PROJECT

Brenda O'Brien - Fwd: Houston Air Toxics

From: Lisa Mason
To: O'Brien, Brenda
Date: 5/6/2011 9:57 AM
Subject: Fwd: Houston Air Toxics

>>> Lisa Mason 5/6/2011 9:51 AM >>>

TPC Group LLC

CN603436122

RN100219526

Revision

Project 165538

Permit Number 1341A

Emission decreases due to the removal of Boiler 4

Lisa Mason

Team Leader

Air Permits Initial Review Team

Business Program Section

Air Permits Division

512-239-3075

lisa.mason@tceq.texas.gov

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AINDA / H60562P 12W 100219526 / 1341A / PA

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

February 2, 2012

MS GERI SHOOP
STAFF ENVIRONMENTAL ENGINEER
TPC GROUP LLC
8600 PARK PLACE BLVD
HOUSTON TX 77017

Re: Cancellation of Air Quality Permit Number: 1341A
Customer Number: CN603624289
Regulated Entity Number: RN100219526

RECEIVED

FEB 07 2012

TCEQ
CENTRAL FILE ROOM

Dear Ms. Shoop:

We are in receipt of your letter received December 18, 2011, regarding the facility listed above. We understand that these sources have been permanently shutdown. Accordingly, Permit Number 1341A has been voided and our records have been updated to reflect this change.

Permit Number: 1341A
County: Harris
Permittee/Registrant: TPC Group LLC

Thank you for informing us of the cancellation. If you have any questions regarding this letter, please feel free to contact me at (512) 239-1274.

Sincerely,

A handwritten signature in black ink, appearing to be "JH", written over a horizontal line.

Joanna Hunsberger
Air Permits Initial Review Team (MC-161)
Air Permits Division

cc: Bureau Chief Pollution Control & Prevention, Environmental Health Division, Houston
Department of Health and Human Services, Houston
Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena
Air Section Manager, Region 12 - Houston
TCEQ Central Records (MC-198)



02/02/2012 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 174114 PERMIT#: STATUS: COMPLETE DISP CODE: _____
RECEIVED: 12/18/2011 PROJTYPE: VOIDPMT AUTHTYPE: ISSUED DT: 02/02/2012
RENEWAL:

PROJECT ADMIN NAME: VOID PERMIT 1341A
PROJECT TECH NAME: HOUSTON PLANT

STAFF ASSIGNED TO PROJECT:

HUNSBERGER , JOANNA - REVIEWR1_2 - AP INITIAL REVIEW

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: TPC GROUP LLC
COMPANY NAME: TPC Group LLC
CUSTOMER REFERENCE NUMBER: CN603624289

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN100219526 ACCOUNT: HG0562P
PERMIT NAME:

REGULATED ENTITY LOCATION: 8600 PARK PLACE BLVD
REGION 12 - HOUSTON NEAR CITY: HOUSTON COUNTY: HARRIS

PROJECT NOTES:

02/02/2012 REVIEWER RECEIVED PROJECT 2/2/2012
02/02/2012 VOID PERMIT1341A GERI SHOOP STAFF ENVIRONMENTALENGINEER 5600 PARK PLACE BLVDHOUSTON
TEXAS 77017 (713)-475-7422
02/02/2012 VOID LTR DOC#-12776

PERMIT NOTES:

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	12/20/2011	



RECEIVED
DEC 19 2011
AIR PERMITS DIVISION



Corporate Offices
5151 San Felipe, Suite 800
Houston, Texas 77056
713.627.7474

Baytown Operations
4604 West Baker Road
Baytown, Texas 77523
281.424.2551

Houston Operations
8600 Park Place Boulevard
Houston, Texas 77017
713.477.9211

Port Neches Operations
2102 Spur 136
Port Neches, Texas 77651
409.724.4977

www.tpcgrp.com

December 15, 2011

CERTIFIED MAIL NO. 7007 1490 0000 4467 1455

RETURN RECEIPT REQUESTED

Texas Commission on Environmental Quality
Air Permits Initial Review Team
PO Box 13087
Austin, TX 78711-3087

Re: TPC Group, LLC
Customer Reference No. CN603436122
Regulated Entity No. RN100219526
NSR Permit No. 1341A

To Whom it May Concern,

TPC Group LLC (TPC) is requesting to void NSR Permit 1341A. This permit currently contains only one source, Boiler No. 2 (EPN EP-H2). Boiler No. 2 was permanently shutdown in June 2009.

If you should have any questions or require anything further related to this information, please contact me at 713-475-7422 or Geri.Shoop@TPCGRP.com.

Sincerely,

Geri Shoop
Staff Environmental Engineer

prj 174114

**APIRT**

DEC 20 2011

Texas Commission on Environmental Quality
NSR Air Permit/Registration Void Request Worksheet**RECEIVED**

DEC 19 2011

AIR PERMITS DIVISION

I. APPLICANT INFORMATION		
Current Owner: TPC Group LLC		
Company Contact Name: Geri Shoop		Title: Staff Environmental Engineer
Company Contact Mailing Address: 8600 Park Place Blvd		
City: Houston	State: TX	ZIP Code: 77017
Phone: 713-475-7422	Fax: 713-475-7463	E-mail: Geri.Shoop@tpcgrp.com
TCEQ Regulated Entity Number: RN100219526		
Effective Date of Voidance: January 1, 2012		
II. REGISTRATIONS/PERMITS TO VOID (list each registration/permit number)		
NSR 1341A		
III. REASON FOR VOID		
<input type="checkbox"/> Consolidation <input type="checkbox"/> Time Expired <input type="checkbox"/> Plant Dismantled		
<input checked="" type="checkbox"/> Other: Sources permanently shutdown		
IV. AUTHORIZATION SIGNATURE		
I, <u>Charles (Kirk) Johnson</u> , certify that I am the responsible official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete. I further understand that any permits voided at my request will not be eligible for reactivation.		
Signature:		Date: 12/15/11
Title: Plant Manager		

12/20/2011 -----NSR IMS - PROJECT RECORD -----

PROJECT#: 165538 **PERMIT#:** 1341A **STATUS:** COMPLETE **DISP CODE:** _____
RECEIVED: 05/05/2011 **PROJTYPE:** REVISION **AUTHTYPE:** CONSTRUCT **ISSUED DT:** 05/11/2011
RENEWAL: 10/23/2017

PROJECT ADMIN NAME: EMISSION DECREASES DUE TO THE REMOVAL OF BOILER 4
PROJECT TECH NAME: EMISSION DECREASES DUE TO THE REMOVAL OF BOILER 4

Assigned Team: COMB/COAT SECTION

STAFF ASSIGNED TO PROJECT:

O'BRIEN , BRENDA - REVIEWR1_2 - AP INITIAL REVIEW
MILLS-JURACH , KRISTI - REVIEW ENG - COMB/COAT TEAM 2

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: TEXAS PETROCHEMICALS LLC
COMPANY NAME: TPC Group LLC
CUSTOMER REFERENCE NUMBER: CN603436122

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN100219526 **ACCOUNT:** HG0562P
PERMIT NAME: TEXAS PETROCHEMICALS HOUSTON FACILITY

REGULATED ENTITY LOCATION: 8600 PARK PLACE BLVD
REGION 12 - HOUSTON **NEAR CITY:** HOUSTON **COUNTY:** HARRIS

CONTACT DATA

CONTACT NAME: MS GERI SHOOP **CONTACT ROLE:** RESPONSIBLE OFFICIAL
JOB TITLE: STAFF ENVIRONMENTAL ENGINEER **ORGANIZATION:** TPC GROUP LLC
MAILING ADDRESS: 8600 PARK PLACE BLVD , HOUSTON, TX, 77017-2513
PHONE: (713) 475-7422 Ext: 0
FAX: (713) 475-7463 Ext: 0
EMAIL: GERI.SHOOP@TPCGRP.COM

PROJECT NOTES:

05/06/2011 DFC 05/06/2011

PERMIT NOTES:

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	05/05/2011	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	05/06/2011	
CENTRAL REGISTRY UPDATED	05/06/2011	05/06/2011
PROJECT RECEIVED BY ENGINEER (DATE)	05/06/2011	
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)	05/06/2011	
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)	05/09/2011	
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)	05/09/2011	



05/09/2011 -----NSR IMS - PROJECT RECORD-----

PROJECT#: 165538 PERMIT#: 1341A STATUS: PENDING
RECEIVED: 05/05/2011 PROJTYPE: REVISION AUTHTYPE: CONSTRUCT
RENEWAL: 10/23/2017

DISP CODE:

ISSUED DT: 5/11/11

PROJECT ADMIN NAME: EMISSION DECREASES DUE TO THE REMOVAL OF BOILER 4
PROJECT TECH NAME: EMISSION DECREASES DUE TO THE REMOVAL OF BOILER 4

Assigned Team: COMB/COAT SECTION

STAFF ASSIGNED TO PROJECT:

OBRIEN, BRENDA - REVIEWR1_2 - AP INITIAL REVIEW
MILLS-JURACH, KRISTI - REVIEW ENG - COMB/COAT TEAM 2

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: TEXAS PETROCHEMICALS LLC
COMPANY NAME: TPC Group LLC
CUSTOMER REFERENCE NUMBER: CN603436122

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN100219526 ACCOUNT: HG0562P
PERMIT NAME: TEXAS PETROCHEMICALS HOUSTON FACILITY

REGULATED ENTITY LOCATION: 8600 PARK PLACE BLVD
REGION 12 - HOUSTON NEAR CITY: HOUSTON COUNTY: HARRIS

CONTACT DATA

CONTACT NAME: MS GERI SHOOP CONTACT ROLE: RESPONSIBLE OFFICIAL
JOB TITLE: STAFF ENVIRONMENTAL ENGINEER ORGANIZATION: TPC GROUP LLC
MAILING ADDRESS: 8600 PARK PLACE BLVD, HOUSTON, TX, 77017-2513
PHONE: (713) 475-7422 Ext: 0
FAX: (713) 475-7463 Ext: 0
EMAIL: GERI.SHOOP@TPCGRP.COM

PROJECT NOTES:

05/06/2011 DFC 05/06/2011

PERMIT NOTES:

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	05/05/2011	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	05/06/2011	
CENTRAL REGISTRY UPDATED	05/06/2011	05/06/2011
PROJECT RECEIVED BY ENGINEER (DATE)	05/06/2011	
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)	05/06/2011	
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)	05/09/2011	
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)	05/09/2011	
FINAL PACKAGE REWORK CYCLE		

RECEIVED

JUN 30 2011

TCEQ
CENTRAL FILE ROOM

Permit Alteration Source Analysis & Technical Review

Company	TPC Group LLC	Permit Number	1341A
City	Houston	Project Number	165538
County	Harris	Account Number	HG-0562-P
Project Type	Revision	Regulated Entity Number	RN100219526
Project Reviewer	Ms. Kristi Mills-Jurach	Customer Reference Number	CN603436122
Site Name	Emission Decreases Due To the Removal of Boiler 4		

Project Overview

In 2007, TPC permanently removed Boiler No. 4 (EPN EP-H4) from service. The MAERT limits and conditions associated with this source are being removed to ensure that the reductions associated with this shutdown are federally enforceable.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	59.52	27.67	-31.85
PM ₁₀	59.52	27.67	-31.85
VOC	36.77	17.09	-19.68
NO _x	1245.89	269.9	-975.99
CO	571.28	265.51	-305.77
SO ₂	222.86	103.8	-119.06

Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	12	NA	No reviewed required; documenting shutdown
City:	Houston	NA	No reviewed required; documenting shutdown
County:	Harris	NA	No reviewed required; documenting shutdown
Toxicology:		NA	
Compliance:		Kristi Mills-Jurach	
Legal:		No pending legal actions	
Comment resolution and/or unresolved issues:			

Review Summary

In 2007, TPC permanently removed Boiler No. 4 (EPN EP-H4) from service. The MAERT limits and conditions associated with this source are being removed to ensure that the reductions associated with this shutdown are federally enforceable. There are no other changes to equipment or operations associated with this alteration request.

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	No	Type of Modeling:	NA
Will GLC of any air contaminant cause violation of NAAQS?			
Is this a sensitive location with respect to nuisance?			
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?			
Additional site/land use information:			

No modeling was required since alteration is documenting a permanent shutdown only.



Permit Alteration
Source Analysis & Technical Review

Permit No. 1341A
Page 2

Regulated Entity No. RN100219526

Permit Concurrence and Related Authorization Actions

Is the applicant is in agreement with special conditions?	Yes
Company representative(s):	Geri Shoop
Contacted Via:	Email
Date of contact:	May 10, 2011
Other permit(s) or permits by rule affected by this action:	None
List permit and/or PBR number(s) and actions required or taken:	NA

 05/10/11
Project Reviewer Date

 5/10/11
Team Leader/Section Manager/Backup Date

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

May 11, 2011

MS GERI SHOOP
STAFF ENVIRONMENTAL ENGINEER
TPC GROUP LLC
8600 PARK PLACE BLVD
HOUSTON TX 77017-2513

Re: Permit Alteration
Permit Number: 1341A
Emission Decreases Due To the Removal of Boiler 4
Houston, Harris County
Regulated Entity Number: RN100219526
Customer Reference Number: CN603436122
Account Number: HG-0562-P

Dear Ms. Shoop:

This is in response to your letter received May 5, 2011, requesting alteration of the conditions and maximum allowable emission rates table (MAERT) of the above-referenced permit. We understand that you are removing authorization for Boiler No. 4 (EPN EP-H4) since this source was permanently shut down in 2007.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Number 1341A is altered. Enclosed are the altered permit conditions and MAERT to replace those currently attached to your permit. Please attach these to your permit.

No planned maintenance, startup, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

Ms. Geri Shoop
Page 2
May 11, 2011

Re: Permit Number: 1341A

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

www.tceq.texas.gov/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Ms. Kristi Mills-Jurach at (512) 239-1261 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/KM/

Enclosure

cc: Bureau Chief of Air Quality Control, Health and Human Services Department, City of
Houston, Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Air Section Manager, Region 12 - Houston

Project Number: 165538

SPECIAL CONDITIONS

Permit Number 1341A

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emissions Sources - Maximum Allowable Emissions Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the Special Conditions.
2. Fuel for the boiler identified as Emission Point Number (EPN) EP-H2 shall be limited to natural gas, plant fuel gas, and No. 2 fuel oil. Use of any fuel other than those listed will require modification of this permit. (05/11)
 - A. The natural gas fuel shall contain no more than 0.25 grain of hydrogen sulfide (H_2S) and 5 grains total sulfur per 100 dry standard cubic foot (dscf).
 - B. The fuel oil shall contain no more than 0.3 weight percent sulfur. All liquid fuels shall be first run refinery grade and shall not consist of a blend containing waste oils or solvents.
 - C. Firing of fuel oil shall be limited to a total of 20,000 pounds of fuel oil per hour for the boiler or 175,200,000 pounds of fuel oil per year, rolling consecutive 12-month basis. (05/11)
 - D. Upon request by the Executive Director of the TCEQ or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel(s) utilized in this facility or shall allow air pollution control agency representatives to obtain a sample for analysis.
3. Opacity from the boiler shall not exceed 20 percent averaged over a 6 minute period, as determined by EPA Reference Method 9, except for those periods described in Title 30 Texas Administrative Code (30 TAC) § 111.111(a)(1)(B). (05/11)
4. The permit holder shall install and operate fuel flow meters to measure and record the fuel usage for the boiler. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 5 percent. In lieu of monitoring fuel flow, the permit holder may monitor stack exhaust flow using the flow monitoring specifications of Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix B, Performance Specification 6 or 40 CFR Part 75, Appendix A. (10/07) (05/11)
5. Boiler BLR-2 (EPN EP-H2) shall operate with flue gas recirculation and when firing natural gas and/or plant fuel gas; hourly and annual NO_x emissions from Boiler BLR-2 shall not exceed 0.08 lb NO_x /MMBtu. (10/07) (05/11)
6. Records of boiler operating hours shall be made and maintained on-site for at least a two-year period (rolling retention basis) and shall include at least the following:

SPECIAL CONDITIONS

Permit Number 1341A

Page 2

- A. The hours of operation when firing fuel oil.
- B. The quantity, in pounds, of fuel oil fired per hour of boiler operation, and totaled monthly and annually (rolling consecutive 12-month basis).

Records shall be made available to members of the TCEQ staff or any other air pollution control program with jurisdiction.

- 7. Compliance with the emission limits in the table referenced in Special Condition No. 1 shall be demonstrated by the records required by this permit and the permit application representations.

Dated: May 11, 2011

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 1341A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
CASE I: Firing Natural Gas/Plant Fuel Gas				
EP-H2	447 MMBtu/hr Boiler	NO _x	35.74	136.45
		CO	36.79	140.46
		VOC	2.41	9.2
		PM ₁₀	3.33	12.71
		SO ₂	0.26	1
CASE II: Firing Natural Gas/Plant Fuel Gas and Fuel Oil				
EP-H2	447 MMBtu/hr Boiler	NO _x	34.95	133.45
		CO	32.75	125.05
		VOC	2.07	7.89
		PM ₁₀	3.92	14.96
		SO ₂	26.92	102.8

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO_x - total oxides of nitrogen

SO₂ - sulfur dioxide

PM₁₀ - total particulate matter equal to or less than 10 microns in diameter

CO - carbon monoxide

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.

Date: May 11, 2011

Current

SPECIAL CONDITIONS

Permit Number 1341A

1. This permit authorizes emissions only from those points listed in the attached tables entitled "Emissions Sources - Maximum Allowable Emissions Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the Special Conditions.
2. Fuel for the boilers identified as Emission Point Numbers (EPNs) EP-H2 and EP-H4 shall be limited to natural gas, plant fuel gas, and No. 2 fuel oil. Use of any fuel other than those listed will require modification of this permit.
 - A. The natural gas fuel shall contain no more than 0.25 grain of hydrogen sulfide (H_2S) and 5 grains total sulfur per 100 dry standard cubic foot (dscf).
 - B. The fuel oil shall contain no more than 0.3 weight percent sulfur. All liquid fuels shall be first run refinery grade and shall not consist of a blend containing waste oils or solvents.
 - C. Firing of fuel oil shall be limited to a total of 20,000 pounds of fuel oil per hour for any boiler or combination of boilers up to and including all two boilers, or 175,200,000 pounds of fuel oil per year, rolling consecutive 12-month basis.
 - D. Upon request by the Executive Director of the TCEQ or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel(s) utilized in this facility or shall allow air pollution control agency representatives to obtain a sample for analysis.
3. Opacity from the boilers shall not exceed 20 percent averaged over a 6 minute period, as determined by EPA Reference Method 9, except for those periods described in Title 30 Texas Administrative Code (30 TAC) § 111.111(a)(1)(B).
4. The permit holder shall install and operate fuel flow meters to measure and record the fuel usage for each boiler. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 5 percent. In lieu of monitoring fuel flow, the permit holder may monitor stack exhaust flow using the flow monitoring specifications of Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix B, Performance Specification 6 or 40 CFR Part 75, Appendix A. (10/07)
5. Boiler BLR-2 (EPN EP-H2) shall operate with flue gas recirculation and when firing

SPECIAL CONDITIONS

Permit Number 1341A

Page 2

natural gas and/or plant fuel gas; hourly and annual NOx emissions from Boiler BLR-2 shall not exceed 0.08 lb NOx/MMBtu. The annual NOx emissions from the Boiler BLR-4 (EPN EP-4) shall not exceed RACT Final Control Plan limit of 0.248 lb NOx/MMBtu. (10/07)

6. For each boiler, records of boiler operating hours shall be made and maintained on-site for at least a two-year period (rolling retention basis) and shall include at least the following:
 - A. The hours of operation when firing fuel oil.
 - B. The quantity, in pounds, of fuel oil fired per hour of boiler operation, and totaled monthly and annually (rolling consecutive 12-month basis).

Records shall be made available to members of the TCEQ staff or any other air pollution control program with jurisdiction.

7. Compliance with the emission limits in the table referenced in Special Condition No. 1 shall be demonstrated by the records required by this permit and the permit application representations.

Dated October 23, 2007

Current

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Number 1341A

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for a permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates*	
			lb/hr	TPY
CASE I: Firing Natural Gas/Plant Fuel Gas				
EP-H2	447 MMBtu/hr Boiler	NO _x	35.74	136.45
		CO	36.79	140.46
		VOC	2.41	9.20
		PM ₁₀	3.33	12.71
		SO ₂	0.26	1.00
EP-H4	447 MMBtu/hr Boiler	NO _x	123.53	488.81
		CO	37.06	162.32
		VOC	2.43	10.63
		PM ₁₀	3.35	14.69
		SO ₂	0.26	1.16

CASE II: Firing Natural Gas/Plant Fuel Gas and Fuel Oil

EP-H2	447 MMBtu/hr Boiler	NO _x	34.95	133.45
		CO	32.75	125.05
		VOC	2.07	7.89
		PM ₁₀	3.92	14.96
		SO ₂	26.92	102.80
EP-H4	447 MMBtu/hr Boiler	NO _x	111.23	487.18

CO	32.75	143.45
VOC	2.07	9.05
PM ₁₀	3.92	17.16
SO ₂	26.90	117.90

Permit Number 1341A

Page 2

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO_x - total oxides of nitrogen
SO₂ - sulfur dioxide
PM₁₀ - particulate matter equal to or less than 10 microns in diameter.
CO - carbon monoxide

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day____ Days/week____ Weeks/year____ or Hrs/year 8,760

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated October 23, 2007

From: "Shoop, Geri A." <Geri.Shoop@tpcgrp.com>
To: Kristi Mills-Jurach <Kristi.Mills-Jurach@tceq.texas.gov>
CC: Stephen Sexton <stephen@sageenvironmental.com>
Date: 5/10/2011 6:46 AM
Subject: RE: TPC (1341a) - Draft conditions and MAERT

Kristi,

I have reviewed the attachments you sent and agree with the changes to remove Boiler 4. Please let me know if you require anything further to complete processing of this alteration.

Thanks.

Geri Shoop
Staff Environmental Engineer - HNO
TPC Group | www.tpcgrp.com
Office: 713.475.7422 | Cell: 281.352-2200 | Fax: 713-475-7463
8600 Park Place Blvd | Houston, Texas 77017

-----Original Message-----

From: Kristi Mills-Jurach [mailto:Kristi.Mills-Jurach@tceq.texas.gov]
Sent: Monday, May 09, 2011 9:47 AM
To: Shoop, Geri A.
Cc: Stephen Sexton
Subject: TPC (1341a) - Draft conditions and MAERT

Geri, attached are the draft conditions and MAERT reflecting the shutdown of Boiler No. 4 in permit 1341a. Please let me know if you concur.

We will be altering permit 46307 to remove those sources once the permit is amended for the MSS conditions (in signature chain now).

Kristi

Kristi Mills-Jurach, P.E.
TCEQ Air Permits Division
Phone: (512) 239-1261
Fax: (512) 239-1300

From: Lisa Mason
To: Thomas, Carolyn
Date: 5/5/2011 9:09 AM
Subject: Fwd: TPC Phoenix Permit Alterations to NSRs 1341A and 46307
Attachments: TPC NSR 46307 Alteration to remove Dehydro 1 sources.pdf; TPC NSR 1341A Alteration to remove Boiler 4.pdf

>>> Kristi Mills-Jurach 5/5/2011 8:55 AM >>>

Lisa, per Steven Hagood, could you please assign these alteration requests to the Comb/Coat team. Please let me know if you have any questions.

Kristi

>>> "Shoop, Geri A." <Geri.Shoop@tpcgrp.com> 5/5/2011 8:39 AM >>>

Kristi,

As we have previously discussed, TPC is submitting the attached alteration requests to remove shutdown sources from their respective NSR permits to ensure federal enforceability of the emissions decreases claimed as part of the Phoenix permit netting. A hard copy of these requests will be sent to the TCEQ Air Permits Initial Review Team.

If you have any questions about this submittal, please do not hesitate to contact me. Thanks.

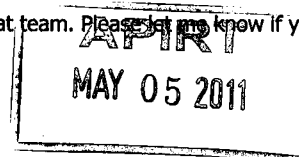
Geri Shoop

Staff Environmental Engineer - HNO

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www.tpcgrp.com

May 5, 2011

VIA EMAIL

Texas Commission on Environmental Quality
Air Permits Initial Review Team, MC-161
12100 Park 35 Circle
Austin, TX 78753

RECEIVED
MAY 09 2011
AIR PERMITS DIVISION

Re: TPC Group LLC,
Houston Plant
Account No.: HG-0562-P
Customer No.: CN603436122
Regulated Entity No.: RN100219526
NSR Permit No 1341A

To Whom It May Concern:

TPC Group is submitting this request to remove a source from the above referenced NSR permit. Specifically, TPC requests the removal of specific terms, conditions and emissions limits associated with Boiler No. 4 (EPN-EP-H4). This source was permanently shutdown in 2007.

TPC considers this request to be consistent with an alteration as allowed under Title 30 of the Texas Administrative Code (30 TAC) §116.116(C) as there is no change in the physical method of control, character of emissions and there will be no increase in emissions rates of any air contaminant associated with this request.

We appreciate your timely review and processing of this request. Should have any questions or require additional information regarding this request, please contact me at 713-475-7422 or at Geri.Shoop@TPCGRP.com.

Sincerely,

TPC Group LLC

Geri Shoop
Staff Environmental Engineer