

ECOSERVICES

Eco Services Operations Corp
Baytown Plant

March 24, 2017

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
Mail Code 161, Building C, Third Floor
12100 Park 35 Circle
Austin, Texas 78753

RE: Title V Off-Permit Action – Permit By Rule
Eco Services Operations Corp – Baytown Plant
Customer Reference Number (CN) 605004464
Regulated Entity Reference Number (RN) 100211317
Account No. HG-0696-Q
Operating Permit: O1610

To Whom It May Concern:

Eco Services Operations Corp. (Eco Services) owns and operates a sulfuric acid manufacturing plant in Baytown (Baytown Plant). The Baytown Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) Account Number HG-0696-Q. Eco Services has a TCEQ Customer Reference Number CN605004464 and the Baytown Plant is registered with a Regulated Entity Number RN100211317.

Eco Services submitted a Permit by Rule (PBR) application to authorize four Scrubber Liquor Storage Tanks (Emission Point Number (EPN) EMSCRBSTK, Facility Identification Number [FIN] T-453A, T-453B, T-453C, T-453D), associated fugitive components (EPN FUG-AML), and tests to change the composition of scrubber liquor to make it more marketable for sales. Eco Services authorized these under Title 30 of the Texas Administrative Code (30 TAC) 106:

- PBR §106.261 – Facilities (Emission Limitations)
- PBR §106.472 – Organic and Inorganic Liquid Loading and Unloading

Aside from the PBR authorizations being claimed, the proposed project does not trigger new site-wide or unit specific applicable requirements; and there is no change to the existing applicable requirements. Eco Services is submitting this letter to notify TCEQ and the United States Environmental Protection Agency (U.S. EPA) of off-permit changes at the Baytown Plant. This submittal includes the following information:

- Description of off-permit changes
- Form OP-CRO1 (Attachment 1)
- Form OP-NOTIFY (Attachment 2)

AIR PERMITS DIVISION

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DESCRIPTION OF OFF-PERMIT CHANGES

The activities associated with this project meet the applicable requirements set forth in 30 TAC §122.222(k) for off-permit changes as described below. Rule language is included in italics.

(k) An off-permit change may be made at a site, when the following conditions are met:

(1) The change shall meet all applicable requirements and shall not violate any existing permit term or condition;

The project will meet applicable requirements and does not violate existing permit terms or conditions.

(2) The permittee shall provide written notice to the executive director and the EPA administrator concurrent with each such change, except for changes that qualify as insignificant activities. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change;

Eco Services is submitting this written notification to both TCEQ and the U.S. EPA.

(3) The change shall not qualify for the permit shield under §122.148; and

This notification does not add to or modify the permit shield.

(4) The permittee shall keep a record of any off-permit changes with the permit.

Eco Services will keep a record of this change.

If you have any questions regarding this submittal or require additional information about this permit amendment application, please feel free to contact me at (281) 691-6508.

Sincerely,
Eco Services Operations Corp.



Thomas Johns
Plant Manager

Attachments

cc: Trinity Consultants
TCEQ Region 12
EPA Region 6



ATTACHMENT 1

Form OP-CRO1

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APERT

**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: RN100211317		CN: CN605004464		Account No.: HG-0696-Q	
Permit No.: O1610			Project No.: 263838		
Area Name: Baytown Plant			Company Name: Eco Services Operations Corp		
II. Certification Type <i>(Please mark the appropriate box)</i>					
<input type="checkbox"/> Responsible Official			<input checked="" type="checkbox"/> Duly Authorized Representative		
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>					
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application			
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening			
<input checked="" type="checkbox"/> Other: <u>Off-Permit Changes</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>Thomas Johns</u> certify that I am the <u>DAR</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: <u>03/24/2017</u> _____ _____ _____ _____ _____ _____ <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: _____			Signature Date: <u>03/24/17</u>		
Title: <u>Plant Manager</u>					

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ATTACHMENT 2

Form OP-NOTIFY

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Texas Commission on Environmental Quality
Federal Operating Permit Program
Notification of Off-Permit/Operational Flexibility Action
Form OP-NOTIFY

Date: 03/24/2017	Company Name: Eco Services Operations Corp
Site Name: Baytown Plant	Permit No.: O1610

Action Type	Date of Change	Emission Units Affected	Description of Change (Include deletions/additions in: amount of emissions, types of pollutants emitted, and/or applicable requirements)
OFFPMT	03/31/2017	EMSCRUBSTK	Add new emissions from tanks T-453A, T-453B, T-453C, and T-453D
OFFPMT	03/31/2017	T-453A	Add new emission unit – Tank 453A
OFFPMT	03/31/2017	T-453B	Add new emission unit – Tank 453B
OFFPMT	03/31/2017	T-453C	Add new emission unit – Tank 453C
OFFPMT	03/31/2017	T-453D	Add new emission unit – Tank 453D
OFFPMT	03/31/2017	FUG-AML	Add new emission unit
	OK		106.261 / 472 → 144793 → 2/2 / 17 ✓