

# ECOSERVICES

Eco Services Operations Corp  
Baytown Plant

March 17, 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



Troy - 26022  
P. 1610  
SOS. SOP. NRE  
CT

## 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 is hereby submitting a notification of off-permit changes to their Title V permit, issued by the TCEQ on August 3, 2016. Eco Services is requesting the incorporation of the following emission units authorized under Title 30 of the Texas Administrative Code (30 TAC) 106 which do not require registration with the TCEQ:

- Temporary Compressors/Pumps/Engines and Dry Abrasive Blasting Activities under Permit by Rule (PBR) §106.263 – Routine Maintenance, Start-up and Shutdown of Facilities, and Temporary Maintenance Facilities
- Wet Blasting Activities under PBR §106.451 – Wet Blast Cleaning
- A Remote Reservoir Cleaner under PBR §106.454 – Degreasing Units
- Portable and Emergency Engines under PBR §106.511 – Portable and Emergency Engines and Turbines

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)

Baytown Plant  
3439 Park St  
Baytown, Texas 77520

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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*

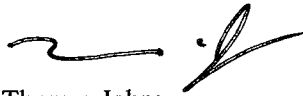
This notification does not add to or modify the permit shield.

*(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

Baytown Plant  
3439 Park St  
Baytown, Texas 77520

Cent letter 7016 0750 0000 8350 6961

**ATTACHMENT 1**

**Form OP-CRO1**

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Form OP-CRO1


AIR PERMITS DIVISION

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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.

<b>I. Identifying Information</b>					
RN: RN100211317		CN: CN605004464		Account No.: HG-0696-Q	
Permit No.: O1610			Project No.:		
Area Name: Baytown Plant			Company Name: Eco Services Operations Corp		
<b>II. Certification Type</b> (Please mark the appropriate box)					
<input type="checkbox"/> Responsible Official			<input checked="" type="checkbox"/> Duly Authorized Representative		
<b>III. Submittal Type</b> (Please mark the appropriate box) (Only one response can be accepted per form)					
<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>					
<b>IV. Certification of Truth</b>					
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> (Certifier Name printed or typed) (RO or DAR)					
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:					
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).					
Time Period: From _____ to _____ Start Date End Date					
Specific Dates: <u>3/17/2017</u> Date 1 Date 2 Date 3 Date 4 Date 5 Date 6					
Signature: 			Signature Date: <u>03/17/17</u>		
Title: <u>Plant Manager</u>					

**ATTACHMENT 2**

**Form OP-NOTIFY**

MAR 20 2017  
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Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Notification of Off-Permit/Operational Flexibility Action  
Form OP-NOTIFY

Date: 03/17/2017	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	3/17/17	DEGREASER	Add new emission unit – Solvent Degreaser
OFFPMT	3/17/17	WETBLAST	Add new emission unit – Wet Abrasive Blasting
OFFPMT	3/17/17	DRYBLAST	Add new emission unit for maintenance purposes – Dry Abrasive Blasting
OFFPMT	3/17/17	MSENGD	Add new emission unit for maintenance purposes – Temporary Diesel Engines
OFFPMT	3/17/17	MSENGG	Add new emission unit for maintenance purposes – Temporary Gasoline Engines
OFFPMT	3/17/17	511ENGD	Add new emission unit – Diesel Engines
OFFPMT	3/17/17	511ENGG	Add new emission unit – Gasoline Engines
	OK		106,263/451/454/511 → NRR ✓

# ECOSERVICES

Eco Services Operations LLC  
P.O. Box 3331  
Baytown, Texas 77522-3331

**CERTIFIED MAIL®**



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Air Permits Initial Review Team  
TCEQ mail code 161, Building C,  
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12100 Park 35 Circle  
Austin, TX 78753