Kathleen Hartnett White, Chairman Larry R. Soward, Commissioner H. S. Buddy Garcia, Commissioner Glenn Shankle, Executive Director





TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 6, 2007

MR TODD M. SALERNO NAR PVOH OPERATION LEADER CELANESE LTD PO BOX 58971 HOUSTON TX 77258-8971

Re: Off-Permit/Operational Flexibility Notification Acknowledgment Permit Number: O2308 Houston Site Pasadena Plant Pasadena, Harris County Regulated Entity Number: RN103012183 Customer Reference Number: CN600130850 Account Number: HX-2763-T

Dear Mr. Salerno:

The Texas Commission on Environmental Quality (TCEQ) has received your notification dated February 22, 2007, in accordance with Title 30 Texas Administrative Code § 122.222 (30 TAC § 122.222) for the above-referenced permit.

Based on an evaluation of the submitted information, we have determined that the action described in the notification satisfies the criteria specified in 30 TAC § 122.222. Please maintain a copy of this letter and all related documentation with your Title V Federal Operating Permit (FOP).

Please note that the above-referenced permit was not changed or revised in response to your notification. It is the applicant's responsibility to submit all required information as indicated in 30 TAC § 122.132, including information describing the changes addressed in the Form OP-Notify (Off-Permit/Operational Flexibility Notification) with the renewal application in order to incorporate the changes resulting from the notification. Although the FOP document has not been updated or revised at this time, please note that the applicable requirements are enforceable as indicated in 30 TAC § 122.143(6).

In addition, it is the applicant's responsibility to notify the U.S. Environmental Protection Agency (EPA) Region 6 regarding off-permit/operational flexibility notification requirements as indicated in 30 TAC § 122.222(c). If you have not already done so, notify the EPA Region 6 at the following address:

Mr. Todd M. Salerno Page 2 April 6, 2007

> Air Section Chief (6PD-R) Region 6 U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Your cooperation in this matter is appreciated. If you have any questions concerning this off-permit/operational flexibility action, please contact Ms. Christina Sweat at (512) 239-2057 or csweat@tceq.state.tx.us.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Jesse E. Chacon, P.E., Manager
 Operating Permit Section
 Air Permits Division
 Texas Commission on Environmental Quality

JEC/CS/cjj

cc: Ms. Deborah E. Pickering, Senior Environmental Engineer, Celanese, Ltd., Houston Ms. Natalie D. Smith, Operations Manager, Celanese, Ltd., Houston Ms. Kathy Perez-Ashton, Chief Health Inspector, Health Department, City of Pasadena Pasadena
Mr. Badruddin (Bud) Karachiwala, Director, Pollution Control Department, Harris County Public Health and Environmental Services, Pasadena
Air Section Manager, Region 12 - Houston Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6-Dallas

Project Number: 10117

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APR 1 0 2007 CENTRAL FILE ROOM

HX 2743T/2308

* Buddy Garcia, Chairman Larry R. Soward, Commissioner Glenn Shankle, Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 30, 2007

MR TODD M SALERNO NAR PVOH OPERATION LEADER CELANESE LTD PO BOX 58971 HOUSTON TX 77258-8971

Re: Off-Permit/Operational Flexibility Notification Acknowledgment Permit Number: O2308 Houston Site Pasadena Plant Pasadena, Harris County Regulated Entity Number: RN103012183 Customer Reference Number: CN600130850 Account Number: HX-2763-T

Dear Mr. Salerno:

The Texas Commission on Environmental Quality (TCEQ) has received your notification dated July 10, 2007, in accordance with Title 30 Texas Administrative Code § 122.222 (30 TAC § 122.222) for the above-referenced permit.

Based on an evaluation of the submitted information, we have determined that the action described in the notification satisfies the criteria specified in 30 TAC § 122.222. Please maintain a copy of this letter and all related documentation with your Title V Federal Operating Permit (FOP).

Please note that the above-referenced permit was not changed or revised in response to your notification. It is the applicant's responsibility to submit all required information as indicated in 30 TAC § 122.132, including information describing the changes addressed in the Form OP-Notify (Off-Permit/Operational Flexibility Notification) with the renewal application in order to incorporate the changes resulting from the notification. Although the FOP document has not been updated or revised at this time, please note that the applicable requirements are enforceable as indicated in 30 TAC § 122.143(6).

Mr. Todd M. Salerno Page 2 October 30, 2007

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In addition, it is the applicant's responsibility to notify the U.S. Environmental Protection Agency (EPA) Region 6 regarding off-permit/operational flexibility notification requirements as indicated in 30 TAC § 122.222(c). If you have not already done so, notify the EPA Region 6 at the following address:

Air Section Chief (6PD-R) Region 6 U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Your cooperation in this matter is appreciated. If you have any questions concerning this off-permit/operational flexibility action, please contact Ms. Bonnie Barrera at (512) 239-1931 or Bbarrera@tceq.state.tx.us.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Jesse E. Chacon, P.E., Manager Operating Permit Section Air Permits Division Texas Commission on Environmental Quality

JEC/BB/ssl

cc: Ms. Deborah E. Pickering, Senior Environmental Engineer, Celanese, Ltd., Houston Ms. Natalie D. Smith, Operations Manager, Celanese, Ltd., Houston Chief Health Inspector, Health Department, City of Pasadena, Pasadena Director, Pollution Control Department, Harris County Public Health and Environmental Services, Pasadena Air Section Manager, Region 12 - Houston Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6-Dallas

Project Number: 10941

9-19 Air Permits Division Correspondence Routing Slip Date Due to Proofer: Permit No: 2308 Company: Celanese LTD Project No: 10941 Admin. Project #: 36361 Processing/Approval Request/Information □ GSR □ NSR STitle Y □ Banking Approval/signature: Initinis Date Latter/Correspondence Type: Op - notify accept Letter Doc No: 47122 XPR Latter Doc. No.: Cond Doc No: 2007 Engineer B Barriera 107 Team Leader Section Manager Maert Doc No: Steve Hagle Permit Doc No: Tech SummaryNa.: **Richard Hyde** SOB Doc. No: Dan Eden SOB To Be Mailed 🛛 Yes D No Executive Director Public Notice D Yes D-No ED Agenda: ' Action Type: Major source D Minor Source Regulated Entity Number: 103012183 Day 4: Day 14:___ Customer Reference Number: Latitude: High Profile: D Yes D No Longitude: Data Entry Due Date: Admin. Penalty Due? <u>Initials</u> 9/13/07 Comments/Special Instructions DYes X-No DYES DNO Section Manager Approval: Admin Process Initials Date 4 **V616** Date To Admin. 1310 To Proofer From Proofer To Engineer Signed Returned Mailed Ms. Natalie Smith Ms. Deborah Pickering Operations Mgr. Sr. Env. Engineer Celanese Ltd Celanese Ltd. P.O. Box 58971 P.O. Box 58971 77758 LIMI CLAM 1....Lm 77750

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e V	Pasado	ena Plant	Celanese LTD 1423 Highway 225 Pasadena, TX 77500 Mailing Address: P.O. Box 58971 Houston, TX 77258 Telephone: 713-456	8-8971 OP-NOTIFY				
	July 10, 2007		Director	Roych	RECEIVED JUL 12 2007			
	Mr. Glenn Shankle, Executive Director Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087			RECEIVED	RECEIVED			
	Re:	§30 TAC 122.222 Off Celanese, Ltd. (Pasade Pasadena, Harris Cour TCEQ Air Account N CN600130850; RN10	ena Plant) nty fo.: HX-2763-T	nforcienation Division	RECEIVED JUL 1 3 2007 COMPLIANCE & ENFORCEMENT			

Dear Mr. Shankle:

Celanese Ltd (Celanese) submits this notification, in accordance with §30 TAC 122.222(k), for changes at the Pasadena Plant authorized by permit-by-rule. Changes associated with the current permit-by-rule action will not add or change the applicability for the existing tank 900-60.01. The required information for the proposed change is included on the enclosed OP-NOTIFY.

Description of the Change:

The §30 TAC 106.472 Permit-By-Rule action seek to authorize the storage of wastewater of the storage tank TK-60.01. There are no increases to production rates or changes to any other equipment than listed above as part of the change of service.

Should you have any questions concerning this notification, please contact Darren Hubbard of my staff at (713) 456-1504.

ole HRB

Robert Berger Site Director



Pasadena Plant

Celanese LTD 1423 Highway 225. Pasadena, TX 77506 Mailing Address: P.O. Box 58971 Houston, TX 77258-8971



Telephone: 713-456-1500

cc: Director

Harris County Public Health and Environmental Services 2223 West Loop South Houston, Texas 77027

Regional Director TCEQ Region 12 Office 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

Chief Health Inspector (Health Department) The City of Pasadena P.O. Box 672 Pasadena, Texas 77501

Mr. Mike Michaud U.S. Environmental Protection Agency, Region 6 Air/Toxics and Inspection Coordination Branch (6EN-A) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by 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 for the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION								
A. Account No.:	HX-2763-T	В.	RN:	RN103012183	C. CN:	CN600130850		
D. Permit No.:	D. Permit No.: O-02308 E. Project No.:							
F. Area Name: Pasadena Plant								
G. Company Name:				Celanese Ltd.				
II. CERTIFICATION	TYPE (Please mark the ap	propr	iate box _l	[es])				
A. 🗖 Responsible Offici	al:							
B. Duly Authorized R	epresentative:							
C. Designated Repres	entative (Title IV acid rain s	ources	s only):					
D. Alternate Designat	ed Representative (Title IV a	acid ra	in sourc	es only):				
III. SUBMITTAL TYP	E (Place an "X" in the app	ropria	ite box)	(Only <u>one</u> response can	be accepted pe	er form)		
SOP/TOP Initial I	Permit Application			Update to	Permit Applica	tion		
GOP Initial Permi	t Application			✓ Other	OP-N	NOTIFY		
Permit Revision,	Renewal, or Reopening							
IV. CERTIFICATIO	ON OF TRUTH, ACCUP	ACY	, AND (COMPLETIENIESS				
This certification does no	t extend to information whi	ch is d	lesignate	d by the TCEQ as infor	mation for refe	erence only.		
		rtify th	nat I am t	he DAR	and t	hat, based on information		
(Name printed or typed	9			(RO, DAR, DR, and	(or ADR)			
	asonable inquiry, the statem e true, accurate, and comple		nd inforr	nation dated during the	time period in l	IV.1. below, OR on a specific		
Note: Enter EITHER a 1	'ime Period OR Specific D	ate(s)	for each	certification.				
1. Time Period:	From <u>Start Date</u> *		d Date*					
OR	Start Date*	En	nd Date*					
	7/10/2007							
2. Specific Dates:	Date 1* Date 2*	Date	3* D	Date 4* Date 5*	Date 6* D	Date 7* Date 8*		
* The start and end dates of the "Time Period," or "Specific Dates" 2-8, should only be completed when the box for "Update to Permit Application" in Section III of this form, is marked or a submittal package has multiple dates recorded in the documentation. A Time Period may not be used if the "Submittal Type" in Section III of this form, is "Other" and the specific material being certified is an "Annual Compliance Certification," a "Monitoring Report," "Progress Report," "Deviation Report," or "Test Report."								
Signature: Signature Date: 7/10/2007								
	Title: Site Leader							
Title:								

TCEQ-10009 [Revised 10/04] OP-CRO1 - This form for use by facilities subject to air quality permit requirements and may be revised periodically (APDG 5149v7)



Form OP-NOTIFY Notification of Off-Permit/Operational Flexibility Action Federal Operating Permit Program

The TNRCC requires that a Core Data Form be submitted on all incoming registrations unless a Regulated Entity and Customer Reference Number has been issued by the TNRCC and no core data information has changed. If a Regulated Entity or Customer Reference Number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TNRCC Web site at, www.tnrcc.state.tx.us/permitting/projects/cr/.

Date: 7/10/2007 Company Name: Celanese Ltd		
Site Name: Pasadena Plant		Permit No. O-02308

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	7/10/2007	TK60.01	Permit-by-rule 106.472 authorizes 2.53 tpy VOC and 3.43 tpy Methyl Acetate from the wastewater tank. There are no changes to the tank applicable requirements as a result of this action.
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Celanese LTD 1423 Highway 225. Pasadena, TX 77506 Mailing Address: P.O. Box 58971 Houston, TX 77258-8971

Telephone: 713-456-1500

February 22, 2007

Mr. Glenn Shankle, Executive Director TCEQ P.O. Box 13087 Austin, Texas 78711-3087

Re: §30 TAC 122.222 Off-Permit Changes Notification Polyvinyl Alcohol Unit Celanese Ltd., Pasadena Plant Pasadena, Texas TCEQ Air Account No. HX-2763-T CN600130850 RN103012183 FOP Permit Number: O-02308



Dear Mr. Shankle:

Celanese Ltd. submits this notification, in accordance with §30 TAC 122.222(k), for changes in the Polyvinyl Alcohol Unit authorized by permit-by-rule. The required information for the proposed change is included on the enclosed OP-NOTIFY.

Description of the Change:

Permit-by-rule 106.475 authorizes emissions associated with storage tanks storing VOC material. This permit-by-rule authorizes emission both hourly and annual increases of NOx, CO, and VOC associated with vapors routed to a boiler and flare system. Annual increases are 1.38 lb/hr and 0.52 tons per year VOC, 0.02 lb/hr and 0.01 tons per year CO, and <0.01 lb/hr and <0.01 tons per year NOx. Celanese is adding one additional requirement and will comply with 40 CFR 60.112b(b)(1).

Permit-by-rule 106.452 authorizes emissions from an enclosed abrasive cleaning machine. PM emissions from these activities are estimated at 0.08 tons per year. The PBR action will not add or change any applicable requirements or special terms in conditions in the current permit.

Should you have any questions concerning this notification, please contact Darren Hubbard of my staff at (713) 456-1504.

Sincerely,

Todd Salerno Operations Manager

RECEIVED MAR 12 2007 AIR & WASTE APPLICATIONS TEAM

Enclosures

Celanese LTD 1423 Highway 225. Pasadena, TX 77506 Mailing Address: P.O. Box 58971 Houston, TX 77258-8971



Telephone: 713-456-1500

cc: Mr. Mike Michaud U.S. Environmental Protection Agency, Region 6 Air/Toxics and Inspection Coordination Branch (6EN-A) 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

> Mr. Jesse Chacon, MC 163 TCEQ Air Permits Division, Operating Permits Section P.O. Box 13087 Austin, Texas 78711-3087

Air Section Manager TCEQ, Region 12

Mr. Rob Barrett, Director Harris County Pollution Control Department

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HAR 12 2007 AIR & WASTE APPLICATIONS TEAM



Form OP-NOTIFY Notification of Off-Permit/Operational Flexibility Action **Federal Operating Permit Program**

The TNRCC requires that a Core Data Form be submitted on all incoming registrations unless a Regulated Entity and Customer Reference Number has been issued by the TNRCC and no core data information has changed. If a Regulated Entity or Customer Reference Number has been issued, then the number must be noted on the request or applicable form. For more information regarding the Core Data Form, call (512) 239-5175 or go to the TNRCC Web site at, www.tnrcc.state.tx.us/permitting/projects/cr/.

Date: 2/22/2007 Company Name: Celanese Ltd		
Site Name: Pasadena Plant		Permit No. O-02308

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	2/22/2007	GRP-PTKS	Permit-by-rule 106.475 authorizes emissions associated with storage tanks storing VOC material. This permit-by-rule authorizes emission both hourly and annual increases of NOx, CO, and VOC associated with vapors routed to a boiler and flare system. Annual increases are 1.38 lb/hr and 0.52 tons per year VOC, 0.02 lb/hr and 0.01 tons per year CO, and <0.01 lb/hr and <0.01 tons per year NOx. Celanese is adding one additional requirement and will comply with 40 CFR 60.112b(b)(1).
OFFPMT	2/22/2007	Sitewide	Permit-by-rule 106.452 authorizes emissions from an enclosed abrasive cleaning machine. PM emissions from these activities are estimated at 0.08 tons per year. The PBR action will not add or change any applicable requirements or special terms in conditions in the current permit.
		·····	

APPLICATIONS TE TINRCC-XXXXX (Rev. MM-DD-YYYY) OP-3 Instructions - These forms are for use by sources subject to the Federal Operating Permit Program and are subject to revision. [AOPE

Federal Operating Permit Program and are subject to revision. [AOPDG95A/XXXX-v1]



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by 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 for the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFO	ORMATION									
A. Account No.:	HX-2763-T	B. R N:	RN103012183	C. CN:	CN600130850					
D. Permit No.:	O-02308	E. Project	No.:							
F. Area Name: Pasadena Plant										
G. Company Name:	G. Company Name: Celanese Ltd.									
	YPE (Please mark the app	ropriate box	[es])							
A. Responsible Official:	:									
B. Duly Authorized Rep	resentative:									
C. Designated Represent	tative (Title IV acid rain sou	urces only):	·······							
	Representative (Title IV ac.									
TIL SUBMITTAL TYPE	(Place an "X" in the appro	priate box)	(Only <u>one</u> response can	be accepted	per form)					
SOP/TOP Initial Per	mit Application		Update to 1	Permit Applie	cation					
GOP Initial Permit A	Application	. <u> </u>	Other	OP	P-NOTIFY					
	enewal, or Reopening									
	N OF TRUTH, ACCURA									
	extend to information which	is designated	d by the TCEQ as infor	mation for re	eference only.					
I, Todd M. S	alerno, certi	fy that I am t		and	I that, based on information					
(Name printed or typed)			(RO, DAR, DR, and/							
and belief formed after rease date(s) in IV.2. below, are tr	onable inquiry, the statemen rue, accurate, and complete:	its and inform	nation dated during the	time period in	n IV.1. below, OR on a specific					
	•				RECEIVED					
Note: Enter EITHER a Tim	le Perioa OK specific Dai	?(s) for eacn	certification.							
1. Time Period:	From to	End Date*	_		MAR 12 2007					
OR					AIR & WASTE					
2. Specific Dates:	2/23/2007				APPLICATIONS TEAM					
Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*										
* The start and end dates of the "Time Period," or "Specific Dates" 2-8, should only be completed when the box for "Update to Permit Application" in Section III of this form is marked as a submitted sections has multiple date.										
Permit Application" in Section III of this form, is marked or a submittal package has multiple dates recorded in the documentation. A Time Period may not be used if the "Submittal Type" in Section III of this form, is "Other" and the specific material being										
certified is an "Annual Compliance Certification," a "Monitoring Report," "Progress Report," "Deviation Report," or "Test Report."										
Signature:	Take		Signature		2/23/2007					
Title:										

TCEQ-10009 [Revised 10/04] OP-CRO1 - This form for use by facilities subject to air quality permit requirements and may be revised periodically (APDG 5149v7)