

Permit Alteration Source Analysis & Technical Review

Company	Albemarle Corporation	Permit Number	69A
City	Pasadena	Project Number	309799
County	Harris	Regulated Entity Number	RN100218247
Project Type	Revision	Customer Reference Number	CN600129589
Project Reviewer	Kevin Villalta		
Site Name	Albemarle Houston Plant		

Project Overview/Review Summary

Albemarle Corporation (Albemarle) owns and operates a monoethanolamine and diethanolamine plant (DF-1 Plant) in Pasadena, Harris County, Texas. On December 11, 2019, Albemarle submitted a New Source Review (NSR) Permit alteration application that requests compliance extensions to Special Conditions (SC) 5 (Ammonia Scrubber), 6-7 (Flare System), and 9 (Storage Tanks) in Permit No. 69A.

These conditions were either added or updated during the previous amendment and renewal project of Permit 69A (TCEQ Project No. 265482) as required by new BACT and recordkeeping boilerplate conditions that were not present before the project. These new conditions require the installation of monitoring equipment, establishment of recordkeeping/QA/QC systems, and periodic site inspections. However, Albemarle is unable to show compliance for these conditions because such equipment, protocols, and record systems were not in place after the permit issuance date (September 20, 2019) to verify compliance. The extension would provide Albemarle with enough time to install monitoring equipment (SC 6D), establish quality assurance/quality control (SC 5D), inspection (SC 7A, 7B), and/or recordkeeping (SC 9) systems and protocols. The request for an extension to June 30, 2020 was reasonable to provide time to meet these requirements.

A minor clarification to SC 5B was also added to elaborate which records are acceptable for compliance during periods of loading/unloading and nitrogen blowthroughs for storage tanks.

Revised/Additional Special Conditions

As a result of this revision, the permit special condition (SCs) are being revised as summarized below. The special condition numbers are shown based on the numbering in the permit before and after the amendment.

Original SC no.	New SC No.	Description of Change
5B	5B	Added clarification specifying which records are acceptable for tracking unloading/loading/nitrogen-blowthrough activities.
5C (2 nd Paragraph)	5D	Albemarle has stated that they do not need extension for all of 5C, thus the second paragraph (relating to QA/QC of scrubber emissions) was made into its own Paragraph/Section.
N/A	20	This condition references the conditions (5D, 6D, 7A, 7B, 9) that Albemarle requests an extension for. This condition also states the date when this exemption will expire.

The requested changes will not cause (i) a change in the method of control of emissions; (ii) a change in the character of emissions; or (iii) an increase in the emission rate of any air contaminant as specified in 30 TAC 116.116(c). Based on the reasons above, this permit alteration has been recommended for approval.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Mr. Doug Thompson, Mr. Sanjay Sampath
Contacted Via:	E-mail
Date of contact:	03/11/20
Other permit(s) or permits by rule affected by this action:	N/A
List permit and/or PBR number(s) and actions required or taken:	N/A

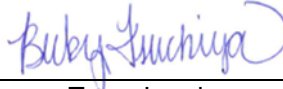
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03/16/20



03/17/2020

Project Reviewer
Kevin Villalta

Date

Team Leader
Becky Tsuchiya

Date