TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	160523	***Company Name:***	AMPAC Fine Chemicals Texas, LLC	***APD Reviewer:***	Nancy Akintan
Project No.:	313765	***Unit Name:***	Zach System La Porte Facility	***PBR No(s).:***	106.261, 106.262

GENERAL INFORMATION			
Regulated Entity No.:	RN105379556	**Project Type:**	Permit by Rule Application
Customer Reference No.:	CN603668617	**Date Received by TCEQ:**	March 18, 2020
City/County:	La Porte, Harris County	**Date Received by Reviewer:**	March 19, 2020
Physical Location:	914 S 16th St		

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mr. Dave Rao Plant Manager	**Phone No.:** **Fax No.:**	(281) 470-0976	**Email:**	DAVE.RAO@APFC.COM
Technical Contact/ Consultant Name and Title:	Mr. Christopher Coignet Managing Consultant	**Phone No.:** **Fax No.:**	(713) 621-4474	**Email:**	CHRISC@SOURCE-ENVIRONMENTAL.COM

GENERAL RULES CHECK	**YES**	**NO**	**COMMENTS**
Is confidential information included in the application?	X		Confidential information included
Has the PBR fee been paid?	X		Application fee: 461252 / 582EA000385318
Is this registration certified?	X		PI-7 CERT
Is this an APWL site?		X	
Are there any upstream or downstream affects associated with this registration?		X	
Is planned MSS included in the registration?		X	
Are there affected NSR or Title V authorizations for the project?	X		NSR Nos. 83364
Is each PBR > 25/250 tpy?		X	
Are PBR sitewide emissions > 25/250 tpy?	N/A		Site has been to public notice
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required?		X	Project emissions are below netting threshold
Do NSPS, NESHAP, or MACT standards apply to this registration?		X	
Does NOx Cap and Trade apply to this registration?		X	
Is the facility in compliance with all other applicable rules and regulations?	X		

DESCRIBE OVERALL PROCESS AT THE SITE

AMPAC Fine Chemicals Texas, LLC operates the LPE Production plant; a multipurpose organic synthetic facility comprised of reactor trains for the production of pharmaceutical intermediates.

DESCRIBE PROJECT AND INVOLVED PROCESS

AMPAC submitted this registration package to authorize the proposed ACC-536.1 production operations under 106.261 and 106.262. Because the ACC-536.1 production process is proprietary, this PBR registration contains “Confidential Information”.

The proposed ACC-536.1 production operations involve the introduction of raw chemical materials to the AMPAC facility’s reactors in order to produce medicinal/botanical intermediates that are subsequently shipped off-site for client consumption.

After being inerted, a reactor is conditioned with Tetrahydrofuran, then charged with Dimethylacetamide and agitated. A Karl Fischer analysis will be performed prior to adding Amino Alcohol. After agitating for a few minutes, Tetrahydrofuran is charged to the reactor as a dome rinse. The headspace is then followed by a charge of Diisopropylethylamine while maintaining temperature. After this, contents are then heated, stirred for a few hours and sampled for completion. After being deemed complete, the reactor is cooled to near freezing, while Chlorotrimethylsilane is gradually released into the reactor. Once complete, the reactor is charged with Methanol while maintaining temperature and stirred. Detailed project description on file.

All equipment that will be utilized during the ACC-536.1 production operations (which includes reactors, tanks, centrifuges, and dryers) are currently authorized under NSR Permit No. 83364. Emission control devices that will be used are either authorized by NSR Permit No. 83364 (as is the case for EPN 65: SCRUBBER) or by NSR Permit No 1862A (as is the case for EPN 53: Thermal Oxidizer). As such, this application does not seek the authorization of any process equipment. Rather, this application authorizes the process emissions resulting from the ACC-536.1 production operation. Emissions from the ACC-536.1 production operation will be controlled by AMPAC’s Scrubber (EPN 65) as well as ALTIVIA’s Thermal Oxidizer (EPN 53).

NSR Permit No. 1862A, which is held by a separate corporate entity (ALTIVIA), is held on-site. The AMPAC and ALTIVIA sites share a Single-Property Line Designation (“SPLD”). The thermal oxidizer emissions are being authorized by PBR Registration Number 160609 issued to ALTIVIA SPECIALTY CHEMICALS LLC.

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TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

PBR 106.261/262 Compliance Demonstration

- The emission point(s) associated with the facilities or changes to facilities are located at 700 ft from the nearest off-site receptor.
- The total new or increase emissions will comply with the applicable hourly and annual emission limits as represented in the table below.
- There are no changes to or addition of any pollution abatement equipment.
- Visible emissions to the atmosphere, from any point or fugitive source, do not exceed 5.0 percent opacity in any six-minute period.
- This registration is not for authorization for construction or to change a facility authorized under another section of this chapter or under standard permit.

PBR 106.262							
Air Contaminant	**L**	**D**	**K**	**Emission Limit**		**Actual Emissions**	
	mg/m^3	**ft**		**lb/hr**	**Tpy**	**lb/hr**	**tpy**
Tetrahydrofuran	150	700	54	2.77	5.0	0.0178	0.026962
N,N-Dimethylacetamide	35			0.6481	2.8388	0.000043	0.000065
Methoxytrimethylsilane,	50			0.9259	4.0555	0.002920	0.004420

PBR 106.261(3)				
	Emission Limit		**Actual Emissions**	
Air Contaminant	**lb/hr**	**tpy**	**lb/hr**	**tpy**
Methanol	1.00	4.38	0.002920	0.00440
TOTAL EMISSIONS:			0.02368	0.02790

SITE REVIEW / DISTANCE LIMIT	**Yes**	**No**	**Description/Outcome**	**Date**	**Reviewed by**
Site Review Required?		X			
PBR Distance Limits Met?	X		300 feet from the nearest property line and 700 feet to the nearest off-plant receptor	04/1/2020	As represented by the company

ESTIMATED EMISSIONS

EPN / Emission Source	**VOC**		**NOx**		**CO**		**PM_{10}**		**$PM_{2.5}$**		**SO_2**		**Other**	
	lbs/hr	**tpy**	**lbs/hr**	**tpy**	**lbs/hr**	**tpy**	**lbs/hr**	**tpy**	**lbs/hr**	**tpy**	**lbs/hr**	**tpy**	**lbs/hr**	**tpy**
65 / Scrubber	0.02	0.03												
TOTAL EMISSIONS (TPY):		**0.03**												

MAXIMUM OPERATING SCHEDULE:	**Hours/Day**						**Hours/Year**	**8760**

	TECHNICAL REVIEWER	**PEER REVIEWER**	**FINAL REVIEWER**
SIGNATURE:			
PRINTED NAME:	Ms. Nancy Akintan	Mr. Mark McDonald, Team Leader	Ms. Kristyn Campbell, Manager
DATE:	April 7, 2020	April 8, 2020	April 9, 2020