(

Bryan W. Shaw, Ph.D., Chairman Buddy Garcia, Commissioner Carlos Rubinstein, Commissioner Mark R. Vickery, P.G., Executive Director



## **TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Protecting Texas by Reducing and Preventing Pollution

November 17, 2010

MR TIM MAY ROHM AND HAAS CHEMICALS LLC 1800 TIDAL RD DEER PARK TX 77536-2426

Permit by Rule Registration Number: Location/City/County: Project Description/Unit: Regulated Entity Number: Customer Reference Number: New or Existing Site: Affected Permit (if applicable): Renewal Date (if applicable): 93841 1900 Tidal Rd, Deer Park, Harris County Lone Star Facility RN100223205 CN602973604 Existing 27131 None receined

DEC 20 2010 ICECI JENTRALFILERICUA

Rohm and Haas Chemicals, LLC has certified the new emissions associated with the use of four (4) new raw materials (two monomers, a surfactant, and a biocide) to make one new product at the Lone Star Facility under Title 30 Texas Administrative Code §§ 106.261 and 106.262. The PBR will be referenced or incorporated in next amendment or renewal of NSR Permit No 27131. For rule information see:

http://www.tceq.state.tx.us/permitting/air/nav/numerical\_index.html

There will be no additional planned MSS emissions as a result of this project. The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

All analytical data generated by a mobile or stationary laboratory to support the compliance with an air permit must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory. For additional information regarding the laboratory accreditation program, please see the following Web site which includes the accreditation and exemption information:

http://www.tceq.state.tx.us/compliance/compliance\_support/qa/env\_lab\_accreditation.html

This certification is taken under the authority delegated by the Executive Director of the TCEQ. If you have questions, please contact Mr. Joe Shine at (512) 239-6595.

VOC

Sincerely,

Anne M. Inman, P.E., Manager Rule Registrations Section Air Permits Division

cc: Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena

Air Section Manager, Region 12 - Houston

Project Numbers: 160950, 27131

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • www.tceq.state.tx.us

Certified Emissions:

0.03 tpy

# TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	93841	Company Name:	Rohm and Haas Chemicals, LLC	APD Reviewer:	Mr. Joe Shine
Project No.:	160950	Unit Name:	Lone Star Facility	PBR No(s).:	106.261, 106.262

GENERAL INFORMATION								
<b>Regulated Entity No.:</b>	RN100223205	Project Type:	Permit by Rule Application					
Customer Reference No.:	CN602973604	Date Received by TCEQ:	October 21, 2010					
Account No.:	HG-0632-T	Date Received by Reviewer:	October 25, 2010					
City/County:	Deer Park, Harris County	Physical Location:	1900 Tidal Rd					

CONTACT INFORMATION									
Responsible Official/ Primary Contact Name and Title:	Mr. Tim May Responsible Care Leader	Phone No.: Fax No.:	281-228-8100	Email:	timmay@dow.com				
Technical Contact/ Consultant Name and Title:	Ms. Monique Bass Env. Air Permit Writer	Phone No.: Fax No.:	281-228-8079	Email:	mnbass@dow.com				

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?	X		Confidential information included and marked as such.
Are there affected NSR or Title V permits for the project?	X		NSR Permit No 27131 / The PBR will be referenced or incorporated in next amendment or renewal.
Is each PBR > 25/250 tpy?		x	
Are PBR sitewide emissions > 25/250 tpy?	N	IA	Facility has been to public notice.
Are there permit limits on using PBRs at the site?		x	L
Is PSD or Nonattainment netting required?		x	This site is in Harris County which is a Nonattainment county, but emissions are below the federal significance as major sources levels. This site is not one of the 28 named sources. Therefore, PSD and NA review and netting are not required.
Do NSPS, NESHAP, or MACT standards apply to this registration?		x	No NSPS, NESHAP, or MACT standards apply.
Does NOx Cap and Trade apply to this registration?		x	Site is in the HGA but Cap and Trade does not apply.
Is the facility in compliance with all other applicable rules and regulations?	x		In compliance with all other applicable rules and regulations.

#### DESCRIBE OVERALL PROCESS AT THE SITE

Rohm and Haas is registering the use of four (4) new raw materials to make one new product at their Lone Star Plant in Deer Park, Harris County.

Primary facilities at the plant are finished product storage area, the plant process building, maintenance shop, and a building housing the warehouse, plant offices and laboratory. The plant produces polymeric emulsions that are used in numerous product applications. These emulsions consist of microscopic solids suspended in water. Approximately twenty different products are manufactured at the plant using various mixtures of reactants. These products are used to manufacture water-based paints, traffic paint, adhesives, caulk, and other household and industrial products.

The polymeric emulsions are produced in one process unit. All of the products are manufactured in batch operations. The major raw materials used are acrylate monomers. Several major raw materials used at the facility are received by pipeline from R&H Texas and/or rail cars and are stored in dedicated tanks.

Once raw materials are transferred to the Process Building, they are typically pumped to either a mix tank for preliminary mixing with other raw materials and additives or directly into an emulsion tank where they are mixed with additives. From there, the raw materials are pumped to the reactor where the catalyst and activators are added to initiate the reaction. Once the reaction is essentially complete, the emulsion goes to a drain tank where additives may be introduced and the pH of the emulsion is adjusted. The products are shipped out of the facility by rail cars and tank trucks. Many of the raw materials are volatile, gases, to some degree at room temperature and will go into the atmosphere if not controlled in a closed vent system. Our plant has a closed vent system in place and emissions from the feed tanks, reactor, and drain tank are routed to a flare for abatement.

With this project, four new raw materials are being introduced into the batch process to produce one new product, ST-410. The four new products include two monomers, a surfactant, and a biocide. The speciation of these products can be found in the confidential section of this application within the calculations.

No new equipment will be added with this change and it will not produce any new fugitive components. The two monomers and a surfactant will be offloaded from a tote into the process feed tanks and then fed into the reactor system from the process feed tanks. After the reaction has occurred, the product will be transferred to a drain tank. The biocide will then be added to the drain tank and then the emulsion product will be loaded into transport vessels for external sale. All vents from the feed tank, reactor system, and drain tank system will be routed to the flare for abatement, EPN: LU-1.

#### DESCRIBE PROJECT AND INVOLVED PROCESS

Rohm and Haas Chemicals LLC has submitted PI-7CERT and supporting documentation for registration under PBR rules 106.261 Facilities (Emission Limitations) and 106.262 Facilities (Emission and Distance Limitations).

Feed tank and Reactor emissions are routed to a flare with 98% destruction efficiency.

There will be no additional planned MSS emissions as a result of this project.

The PBR will be referenced or incorporated in next amendment or renewal of NSR Permit No 27131.

# Hechnical Review: AIR PERMIT BY ROLE

Permit No.:	93841	Company Name:	Rohm and Haas Chemicals, LLC	APD Reviewer:	Mr. Joe Shine
Project No.:	160950	Unit Name:	Lone Star Facility	PBR No(s).:	106.261, 106.262

TECHNICAL	SUMMARY - I	DESCRIBE HOW THE PROJECT MEETS TH	E RULES					
PBR 106.261	Facilities (Emiss	ions Limitations)						
1. The facility facilities or	1. The facility will be located at least 100 feet from any recreational area or residence or other structure not occupied or used solely by the owner or operator of the facilities or the owner of the property upon which the facilities are located.							
2. N/A. There	are no new or in	creased emissions with the replacement of the facili	ity.					
3. Total new or	r increased emiss	ions, including fugitives, are less than or equal to 1.	0 lb/hr of any chemical not listed or referenced in Table 262. Chemicals:					
Sod	ium Laureth Sulf	fate						
• 2-Pi	openic Acid, 2-n	nethyl, 2-(dimethylamino) ethyl ester (DMAEMA)						
<ul> <li>Poly</li> </ul>	phosphoric Acid	l						
Met	hoxyphenol							
• 1,2	Benzisothianzoli	n-3-one						
• Zind	Pyrithione							
4. There shall I	be no changes to	or additions of any existing air pollution abatement	equipment. There will be no change in emissions routed to the incinerator.					
5. Visible emis	sions, except und	combined water, to the atmosphere from any point of	or fugitive source shall not exceed 5.0% opacity in any six-minute period.					
6. Emissions in	ncreases are < 5 t	py.						
7. P-7CERT ar	nd supporting doc	cumentation provided.						
PBR 106.262 H	Facilities (Emissi	ion and Distance Limitations)						
1. Facilities are	e located at least	100 ft from any off-plant receptor. (Actual: > 400 f	t)					
2. New increas	ed emissions are	emitted in a quantity less than 5 tpy or in a quantity	less than E.					
<ul> <li>Met</li> </ul>	hyl Methacrylate	(L = 34, D = 950, K = 35) E = 0.97 lb/hr Actual	increase: 0.005 lb/hr					
<ul> <li>Ving</li> </ul>	vl Acetate (L = 1:	5, D = 950, K = 35) $E = 0.43 \text{ lb/hr}$ Actual Increas	e: 0.012 lb/hr					
3. PI-7CERT a	nd supporting do	cumentation provided by company.						
4. NA, none of	the listed compo	ounds apply to this registration.						
5. There are no	changes or addit	tions of existing air pollution abatement equipment.						
6. Visible emis	sions will not exe	ceed 5% opacity in any six-minute period.						
COMMUNIC	ATION LOG	· · ·						
Date	Time	Name/Company	Subject of Communication					
11/3/10	11·45 am	Ms. Monique Bass / Rohm and Haas	(email) Sent to Ms. Bass					

11/3/10	11:45 am	Ms. Monique Bass / Rohm and Haas	<ul> <li>(email) Sent to Ms. Bass.</li> <li>I'm working on your application and have come across some information I was hoping you could provide for me.</li> <li>In the included Hourly and Annual emissions tables provided, there is no mention of the Vinyl Acetate. Could you please provide me with the calculations showing the increase in Ib/hr and tons/yr.</li> </ul>
11/9/10	5:00pm	Ms. Monique Bass / Rohm and Haas	(email) From Ms. Bass Vinyl acetate is noted in the calculations as a constituent in the QM-1326AP stream and is referenced as a "modified methacrylate monomer." This can be found in the short term and annual calculations.
11/16/10	11:30am	Ms. Monique Bass / Rohm and Haas	(phone and email) Reviewer could not find hours of operation used to calculate emissions.
11/16/10	1:25pm	Ms. Monique Bass / Rohm and Haas	(email) From Ms. Bass: The annual emissions were based on an annual operating time of 8,760 hours as the total throughput could be produced anytime within a year.

PBR Emission Limits			5	· · · · ·	· · ·	
Chemical	PBR Claimed	L, mg/m <sup>3</sup>	Emission Limit (E = L/K), lb/hr	Emission Limit tpy	Actual Emissions lb/hr	Actual Emissions tpy
Methyl Methacrylate	262	34 mg/m3	0.97 lb/hr	5 tpy	0.005 lb/hr	0.005 tpy
Vinyl Acetate	262	15 mg/m3	0.43 lb/hr	5tpy	0.012 lb/hr	0.017 tpy
Sodium Laureth Sulfate	261	-	l lb/hr	4.38 tpy		

# TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	93841	Company Name:	Rohm and Haas Chemi	cals, LLC	APD Reviewer:	Mr. Joe Shine		
Project No.:	160950	Unit Name:	Lone Star Facility			PBR No(s).:	106.261, 106.262	
2-Propenic A 2-(dimethylar (DMAEMA)	cid, 2-methyl, nino) ethyl ester	261		1 lb/hr	4.38 tpy	0.0014 1	o/hr	0.0013 tpy
Ethylene Glyc Dimethacryla	col te	261		1 lb/hr	4.38 tpy	0.001 lb	/hr	0.0001 tpy
Polyphosphor	ic Acid	261		1 lb/hr	4.38 tpy	<0.001	o/hr	0.0003 tpy
Methoxyphen	ol	261		1 lb/hr	4.38 tpy	<0.001 1	o/hr	<0.001 tpy
1,2 Benzisoth	ianzolin-3-one	261		l lb/hr	4.38 tpy	<0.001 li	o/hr	<0.001 tpy
Zinc Pyrithion	ie	261	-	1 lb/hr	4.38 tpy	<0.001 II	)/hr	<0.001 tpy

ESTIMATED EMISSIONS															
EPN / Emission Source	Specific VOC or	VOC		NOx		СО		PM10		PM 2.5		SO <sub>2</sub>		Other	
	Other Pollutants	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
LU-1 Feed Tank		0.01	0.02												
LU-1 Reactor		0.02	0.01											<u> </u>	
TOTAL E	MISSIONS (TPY):		0.03												
MAXIMUM OPERAT	ING SCHEDULE:	I	lours/D	ay		Days	Week		V	Veeks/Ye	ar		Hour	s/Year	8760

SITE REVIEW / DISTANCE LIMIT	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		X	Not required	November 3, 2010	Joe Shine
PBR Distance Limits Met?	Х		Meets minimum PBR distance limits.	November 3, 2010	Joe Shine

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:		Mustigen	fee Hard Gody.
PRINTED NAME:	Mr. Joe Shine	Ms. Julie Steger	Ms. Anne M. Inman, P.E., Manager
DATE:	November 16, 2010	November 17, 2010	November 17, 2010

BASIS OF PROJECT POINTS	POINTS
Base Points:	1.5
Project Complexity Description and Points: Communication:	0.25
Technical Reviewer Project Points Assessment:	1.75
Final Reviewer Project Points Confirmation:	

TCEQ IDA - Production

11/17/2010	NSR IMS - PROJEC	T RECORE	)	
PROJECT#: 160950 F RECEIVED: 10/21/2010 F RENEWAL: PROJECT ADMIN NAME: / PROJECT TECH NAME: LO	PERMIT#: 93841 PROJTYPE: INITIAL AUTHORIZE USE OF NE ONE STAR FACILITY	STATUS: PE AUTHTYPE: EW RAW MAT	ENDING PBR ERIALS	DISP CODE: <u>C</u> ISSUED DT: <u>IU[17](1)</u> 1.75
Assigned Team: RULE RI	EG SECTION			J1.4
STAFF ASSIGNED TO PRO OYLER , TONI SHINE , JOE	OJECT: - REVIEWR1 - REVIEW EN	_2 - NG -	AP INITIAL REVIEV	N
CUSTOMER INFORMATIC ISSUED TO: ROHM AND H COMPANY NAME: Rohm a CUSTOMER REFERENCE	N (OWNER/OPERATOR AAS CHEMICALS LLC and Haas Chemicals, LLC NUMBER: CN60297360	R DATA) C 04		
REGULATED ENTITY/SITE REGULATED ENTITY NUM PERMIT NAME: ROHM AN	E INFORMATION MDER RN100223205 ID HAAS TEXAS DEER F	PARK PLANT	0000T 100032T	· · · · · · · · · · · · · · · · · · ·
REGULATED ENTITY LOC REGION 12 - HOUSTON	ATION: 1900 TIDAL RD NEAR CITY: I	DEER PARK	COUNTY:	HARRIS
CONTACT DATA				
CONTACT NAME: MR TIM JOB TITLE: RESPONSIBLE MAILING ADDRESS: 1800 PHONE: (281) 228-8100 Ex FAX: (281) 228-3162 Ext: 0	MAY CO E CARE LEADER OF TIDAL RD , DEER PARK rt: 0	ONTACT ROL RGANIZATION K, TX, 77536-2	E: RESPONSIBLE O I: ROHM AND HAAS 426	FFICIAL CHEMICALS LLC
CONTACT NAME: MS MON JOB TITLE: ENVIRONMEN MAILING ADDRESS: 1800 PHONE: (281) 228-8079 Ex FAX: (281) 228-3162 Ext: 0	VIQUE BASS TAL AIR PERMIT WRITE TIDAL RD , DEER PARK :t: 0	CONT. ER ORGA (, TX, 77536-24	ACT ROLE: TECHNI NIZATION: ROHM A 426	CAL CONTACT ND HAAS CHEMICALS LLC
PROJECT NOTES: 11/17/2010 THE PBR V NSR PERM	WILL BE REFERENCED MIT NO 27131.		RATED IN NEXT AI	MENDMENT OR RENEWAL OF

PERMIT NOTES

http://prsprd2.tceq.state.tx.us/ida/index.cfm?fuseaction=nsrproject.project\_report&proj\_i... 11/17/2010

## TCEQ IDA - Production





10/27/2010 THE PERMIT WAS MOVED FROM RN104789474.

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FEE: Reference 105367	Fee Receipt Numbe 582EA000079598	er Amount 450.00	Fee Receipt Da 10/18/2010	ate Fee Payr ePAY	nent Type	
TRACKING EI	EMENTS:					
TE Name				Start Date	Complete Date	
APIRT RECE	EIVED PROJECT (DAT	E)		10/21/2010		
APIRT TRAN	ISFERRED PROJECT	TO TECHNICAL	STAFF (DATE)	10/21/2010		
CENTRAL R	EGISTRY UPDATED			10/21/2010	10/21/2010	
PROJECT R	ECEIVED BY ENGINE	ER (DATE)		10/25/2010		
ENGINEER I	NITIAL REVIEW COM	PLETED (DATE)		11/02/2010		
DEFICIENCY	CYCLE			11/03/2010	11/09/2010	
DEFICIENCY	CYCLE			11/16/2010	11/16/2010	
PEER / MAN	AGER REVIEW PERIC	DD		11/16/2010	11/17/2010	
UNIT TYPES: Project Unit	<u>Type:</u>					
PROJECT RU	LES:				_	
Unit Desc			Rule Desc	Request Type	On Application	Approve
FACILITIES (	EMISSION LIMITATIO	NS)	106.261 -	ADD	Y	APPROVE
FACILITIES ( LIMITATIONS	EMISSION AND DIST. 5)	ANCE	106.262 -	ADD	Y	APPROVE
PERMIT RULE	S:					
Unit Desc	Rule Desc Start I	Date End Date	9			
PROJECT ATT Attributes CERT_PI_7	RIBUTES: Value					

http://prsprd2.tceq.state.tx.us/ida/index.cfm?fuseaction=nsrproject.project\_report&proj\_i... 11/17/2010

CEQ IDA - Production	1
10/21/2010NSR IMS - PROJECT RECORD	
PROJECT#: 160950       PERMIT#: 93841       STATUS: PENDING       DISP CODE:         RECEIVED: 10/21/2010       PROJTYPE: INITIAL       AUTHTYPE: PBR       ISSUED DT:         RENEWAL:       PROJECT ADMIN NAME: AUTHORIZE USE OF NEW RAW MATERIALS       PROJECT TECH NAME: LONE STAR FACILITY	
Assigned Team: RULE REG SECTION	
STAFF ASSIGNED TO PROJECT:         OYLER, TONI       - REVIEWR1_2 -       AP INITIAL REVIEW         TEAM LEADER, RR       - REVIEW ENG -       RULE REG SECTION	1 Hour
CUSTOMER INFORMATION (OWNER/OPERATOR DATA) ISSUED TO: ROHM AND HAAS CHEMICALS LLC COMPANY NAME: Rohm and Haas Chemicals, LLC CUSTOMER REFERENCE NUMBER: CN602973604	Ozone
REGULATED ENTITY/SITE INFORMATION REGULATED ENTITY NUMBER: RN 10023325 ACCOUNT: PERMIT NAME: ROHM AND HAAS LONE STAR PLANT	TRN: 403 404
REGULATED ENTITY LOCATION: 1800 TIDAL RD ~ REGION 12 - HOUSTON NEAR CITY: DEER PARK COUNTY: HARRIS	
CONTACT DATA CONTACT NAME: MR TIM MAY CONTACT ROLE: RESPONSIBLE OFFICIAL JOB TITLE: RESPONSIBLE CARE LEADER ORGANIZATION: ROHM AND HAAS CHEMICALS LLC MAILING ADDRESS: 1800 TIDAL RD, DEER PARK, TX, 77536-2426 PHONE: (281) 228-8100 Ext: 0 FAX: (281) 228-3162 Ext: 0 EMAIL:TMMAY@DOW.COM	Z
CONTACT NAME: MS MONIQUE BASS JOB TITLE: ENVIRONMENTAL AIR PERMIT WRITER MAILING ADDRESS: 1800 TIDAL RD , DEER PARK, TX, 77536-2426 PHONE: (281) 228-8079 Ext: 0 FAX: (281) 228-3162 Ext: 0 EMAIL:MNBASS@DOW.COM	
FEE: Reference Fee Receipt Number Amount Fee Receipt Date Fee Payment Type 105367 582EA000079598 450.00 10/18/2010 ePAY	
TRACKING ELEMENTS:       Start Date       Complete Date         TE Name       Start Date       Complete Date         APIRT RECEIVED PROJECT (DATE)       10/21/2010       10/21/2010         APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)       10/21/2010       10/21/2010         CENTRAL REGISTRY UPDATED       10/21/2010       10/21/2010         DEFICIENCY CYCLE       ENGINEER INITIAL REVIEW COMPLETED (DATE)       PEER / MANAGER REVIEW PERIOD         PEER / MANAGER REVIEW PERIOD       PROJECT RECEIVED BY ENGINEER (DATE)       PATE	
PROJECT RULES:	

**)**zone TRV: 403980 X1: 404593

http://prs.tceq.state.tx.us/ida/index.cfm?fuseaction=nsrproject.project\_report&... 10/21/2010

Voucher Detail Voucher 105367

The voucher status has been updated.

- Transaction Information	
Voucher Number:	105367
Trace Number:	582EA000079598
Date:	10/18/2010 02:17 PM
Payment Method:	CC - Authorization 0000025555
Amount:	\$450.00
Fee Code:	PBR
<b>Fee Type:</b>	PERMIT BY RULE - NOT SMALL BUSINESS, CITY OR ISD
ePay Actor:	MONIQUE BASS
Actor Email:	MNBASS@DOW.COM
IP:	204.136.184.10

- Payment Contact Information ----

Name:	MONIQUE BASS
Company:	THE DOW CHEMICAL COMPANY
Address:	1900 TIDAL ROAD, DEER PARK, TX 77536
Phone:	281-228-8079

#### - Site Information ------

RN:	RN104789474
Site Name:	ROHM AND HAAS CHEMICALS LLC
Site Address:	1800 TIDAL ROAD, DEER PARK, TX 77536
Site Location:	1800 TIDAL ROAD DEER PARK TX

-Customer Information-

CN:	CN602973604
<b>Customer Name:</b>	ROHM AND HAAS CHEMICALS LLC
<b>Customer Address:</b>	1800 TIDAL ROAD, DEER PARK, TX 77536

-USAS Status-

USAS Status: RECEIVED USAS Date: 10/20/2010

-Voucher Status -Status Staff

Comment

Start End

APPLIED TOYLER REGISTRATION 93841, PROJ 160950 10/21/2010

Change Status Cancel



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### Texas Commission on Environmental Quality Form PI-7-CERT Certification and Registration for Permits by Rule (Page 1)

I. REGISTRANT INFORMAT	ION			
A. TCEQ Customer Reference	Number:	CN- 602973604		
TCEQ Regulated Entity Nu	ımber:	RN- <del>104789474</del>	002233	105
Note: If "NO," CN or RN number was available in Step II of the submittal pro	entered above; pleas cess.	se fill out the require	d Core Data	Form, which will be
<b>B.</b> Company or Other Legal C	ustomer Name: Rohr	n and Haas Chemica	ls, LLC	
Company Official Contact	Name: Tim May			
Title: Responsible Care® I	Leader			
Mailing Address: 1800 Tid	al Road			
City: Deer Park	State: Texas		ZIP Code:	77536
Phone: 281-228-8100	Fax: 281-228-3162		E-mail: tm	may@dow.com
C. Technical Contact Name: N	Aonique Bass			
Title: Environmental Air P	ermit Writer			
Company: Rohm and Haas	Chemicals, LLC			
Mailing Address: 1800 Tid	al Road			
City: Deer Park	State: Texas		ZIP Code:	77536
Phone: 281-228-8079	Fax: 281-228-3162	62 E-mail: mnbass@dow.com		
<b>D.</b> Facility Location Informati	on - Street Address:	1800 Tidal Road		
If "NO," street address, provide writter	n driving directions to	o the site: (attach de	scription if a	dditional space is needed)
City: Deer Park	County: Harris		ZIP Code:	77536
H. FACILITY AND SITE INFO	RMATION		<b>.</b>	
A. Name and Type of Facility	: Lone Star			Permanent Portable
B. PBR claimed under 30 TA	C § 106 (List all):		<b>^</b>	- · · · · · · · · · · · · · · · · · · ·
§ 106.261		§ 106.		
§ 106.262 § 106.				
§ 106.4 § 106.				
Are you claiming a historical standard exemption or PBR?				
If "YES," enter effective date(s) and rule number(s) in the spaces provided below.				
	- <del> ,</del> '			· · · · · · · · · · · · · · · · · · ·

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TCEQ

## Texas Commission on Environmental Quality Form PI-7-CERT Certification and Registration for Permits by Rule (Page 2)

II. FACILITY AND SITE INFORMATION (cd	II. FACILITY AND SITE INFORMATION (continued)					
C. Is there a previous Standard Exemption or I	PBR for the	facility in this re	gistration?	YES NO		
If "YES," enter registration number(s) and	l rule numbe	r(s) in the spaces	s provided below.			
106.261	106.4	73				
106.262	106.4	75, 106.495				
D. Are there any other facilities at this site wh Exemption or PBR?	hich are <b>aut</b>	horized by an A	ir Standard	YES 🗌 NO		
If "YES," enter registration number(s) and	l rule numbe	r(s) in the space.	s provided below.			
Multiple						
E. Are there any other air preconstruction p	ermits at th	is site?		🖾 YES 🗌 NO		
If "YES," enter permit number(s) in the spo	aces provide	ed below.				
Multiple						
Are there any other air preconstruction perr with this project?	nits at this s	ite that would be	directly associated	d ⊠ YES 🗌 NO		
If "YES," enter permit number(s) in the spe	aces provide	d below.				
NSR-27131						
F. Is this facility located at a site which is requ Operating Permit (FOP) pursuant to 30 TA	uired to obta C Chapter 1	in a Federal 22?	YES 🗌 NO 🗌	To be determined		
If the site currently has an existing federal	operating p	ermit, enter the p	ermit number.	O-02237		
Check the requirements of 30 TAC Chapte	r 122 that w	ill be triggered if	this certification i	s accepted.		
Initial Application for an FOP Significant	t Revision fo	or an SOP	] Minor Revision	for an SOP		
Operational Flexibility/off Permit Notification for a	n SOP	Revision for GO	Р			
To be Determined None						
Identify the type(s) issued and/or FOP application(s) submitted/pending for the site. (Check all that apply)						
SOP GOP GOP application/revision application: Submitted or under APD review.						
N/A SOP application/revision application: submitted or under APD review.						
<b>G.</b> TCEQ Account Identification Number (if $k$	mown):	HG-0632-T		_		



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## Texas Commission on Environmental Quality Form PI-7-CERT Certification and Registration for Permits by Rule (Page 3)

III.	FE	E INFORMATION				
	See Section VI. for address to send fee or go to <u>www6.tceq.state.tx.us/epay</u> to pay online.					
	<b>A</b> .	Is this certification to solely establish a federally enforceable emission limit and not authorize any new facilities?	🗌 YES 🖾 NO			
		If "YES," than no fee is required.				
		If "NO," then go to Section III.B.				
	B.	If "YES," to any of the following three questions, a \$100 fee is required. Otherwise, a \$45	<b>0</b> fee is required.			
-		Does this business have less than 100 employees?	🗌 YES 🖾 NO			
		Does this business have less than 1 million dollars in annual gross receipts?	🗌 YES 🛛 NO			
		Is this registration submitted by a governmental entity with a population of less than 10,000?	🗌 YES 🛛 NO			
	C.	Enter the check, money order, or transaction number. Voucher #105367				
		Enter the individual or company name printed on the check.				
		Fee amount (spell out): Four Hundred Fifty Dollars	\$ 450.00			
		Was fee <b>Paid</b> online?	YES 🗌 NO			
IV.	SE	LECTED FACILITY REVIEWS ONLY—TECHNICAL INFORMATION				
Note: I registra	f cl tion	aiming one of the following PBRs, complete this section, then skip to Section VI., "Submite" below:	itting your			
Animal Storage	Fe an	eding Operations § 106.161, Livestock Auction Facilities § 106.162, Saw Mills § 106.223, d Drying § 106.283, Auto Body Refinishing Facilities § 106.436, and Air Curtain Inciner	Grain Handling, ator § 106.496			
	А.	Is the applicable PBR checklist attached which shows the facility meets all general and specific requirements of the PBR(s) being claimed?	🗌 YES 🗌 NO			
	В.	Distance from this facility's emission release point to the nearest property line:	feet			
		Distance from this facility's emission release point to the nearest off-property structure:	feet			
V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS Registrants must be in compliance with all applicable state and federal regulations and standards to claim a PBR.						
	А.	Is confidential information submitted and properly marked "CONFIDENTIAL" with this registration?	🛛 YES 🗌 NO			
	B.	Is a process flow diagram or a process description attached?	YES 🗌 NO			
	C.	Are emissions data and calculations for this claim attached?	YES 🗌 NO			



## Texas Commission on Environmental Quality Form PI-7-CERT Certification and Registration for Permits by Rule (Page 4)

#### V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS

Registrants must be in compliance with all applicable state and federal regulations and standards to claim a PBR.

D. Is information attached showing how the general requirements (30 TAC § 106.4) of the PBR is met for this Registration? (PBR checklists may be used, but are optional)

Note: Please be reminded that if the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under **30 TAC Chapter 101**, **Subchapter H**, **Division 3**, the owner/operator of these facilities must possess  $NO_x$  allowances equivalent to the actual  $NO_x$  emissions from these facilities.

E.	Is information attached showing how the <b>specific PBR</b> requirements are met for this registration? ( <i>PBR checklist may be used, but are optional</i> )	🛛 YES 🗌 NO
F.	Distance from this facility's emission release point to the nearest property line:	219 feet

Distance from this facility's emission release point to the nearest off-property structure:

Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the technical review or at the request of the TCEQ Regional Office or local air pollution control program during an investigation.

#### VI. SIGNATURE FOR CERTIFICATION AND REGISTRATION

The signature below indicates that the Responsible Official has knowledge of the facts herein set forth and that the same are true, accurate, and complete to the best of my knowledge and belief. By this signature, the maximum emission rates listed on this certification reflect the maximum anticipated emissions due to the operation of this facility and all representations in this certification of emissions are conditions upon which the facilities and sources will operate. It is understood that it is unlawful to vary from these representations unless the certification is first revised. The signature certifies that to the best of the Responsible Official's knowledge and belief, the project will satisfy the conditions and limitations of the indicated exemption or permit by rule and the facility will operated in compliance with all regulations of the Texas Commission on Environmental Quality and with Federal U.S. Environmental Protection Agency regulations governing air pollution. The signature below certifies that, based on information and belief formed after reasonable inquiry, the statements and information above and contained in the attached document(s) are true, accurate, and complete. **If you questions on how to fill out this form or about air quality permits**. **Please call (512) 239-1250**. *Individuals are entitled to request and review their personal information that the agency gathers on its forms*. *They may also have any errors in their information corrected*. *To review such information, call (512) 239-3282*.

SIGNATURE:	Tim Man	0/18/2010
	(ORIGINAL SIGNATURE REQUIRED)	DATE

950 feet



Sincerely,

Tim Mav

Responsible Care® Leader The Dow Chemical Company Certified Mail 7010 0780 0000 9815 0354-TCEQ Austin 7010 0780 0000 9815 0361-TCEQ Houston 7010 0780 0000 9815 0378-HCPCD 7010 0780 0000 9815 0385-MC 214 Austin

#### Lone Star Facility Process Description:

The Rohm and Haas Lone Star Plant is located in the city of Deer Park, Texas at 1800 Tidal Road. The Plant is operated independently of the Rohm and Haas Texas Plant. The Plant is constructed on a parcel of approximately 13 acres of land leased from Rohm and Haas Texas. Primary facilities are finished product storage area, the plant process building, maintenance shop, and a building housing the warehouse, plant offices, and laboratory.

The Lone Star Plant produces polymeric emulsions that are used in numerous product applications. These emulsions consist of microscopic solids suspended in water. Approximately twenty different products are manufactured at the plant using various mixtures of reactants. These products are used to manufacture water-based paints, traffic paint, adhesives, caulk, and other household and industrial products.

The polymeric emulsions are produced in one process unit. All of the products are manufactured in batch operations. The major raw materials used are acrylate monomers. Several major raw materials used at the facility are received by pipeline from R&H Texas and/or rail cars and are stored in dedicated tanks.

Once raw materials are transferred to the Process Building, they are typically pumped to either a mix tank for preliminary mixing with other raw materials and additives or directly into an emulsion tank where they are mixed with additives. From there, the raw materials are pumped to the reactor where the catalyst and activators are added to initiate the reaction. Once the reaction is essentially complete, the emulsion goes to a drain tank where additives may be introduced and the pH of the emulsion is adjusted. The products are shipped out of the facility by rail cars and tank trucks. Many of the raw materials are volatile, gases, to some degree at room temperature and will go into the atmosphere if not controlled in a closed vent system. Our plant has a closed vent system in place and emissions from the feed tanks, reactor, and drain tank are routed to a flare for abatement.

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Attachments: Company Confidential Non-Confidential

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Air Section Manager -Region 12 Bud Karachiwala – HCPCD Revenue Section - MC 214

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Certified Mail 7010 0780 0000 9815 0354-TCEQ Austin 7010 0780 0000 9815 0361-TCEQ Houston 7010 0780 0000 9815 0378-HCPCD 7010 0780 0000 9815 0385-MC 214 Austin

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#### **Project Description:**

With this project, four new raw materials are being introduced into the batch process to produce one new product, ST-410. The four new products include two monomers, a surfactant, and a biocide. The speciation of these products can be found in the confidential section of this application within the calculations.

No new equipment will be added with this change and it will not produce any new fugitive components. The two monomers and a surfactant will be offloaded from a tote into the process feed tanks and then fed into the reactor system from the process feed tanks. After the reaction has occurred, the product will be transferred to a drain tank. The biocide will then be added to the drain tank and then the emulsion product will be loaded into transport vessels for external sale. All vents from the feed tank, reactor system, and drain tank system will be routed to the flare for abatement, EPN: LU-1.

The associated emissions calculations have been summarized on Table 1A located in the corresponding documentation. Based on the constituents of the chemicals used, PBR 106.261 and 106.262 are being used to authorize this change.

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Overall Emissions by Source

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TABLE 1A					
			Short Term	Annual	
	Source		Emissions	Emissions	
EPN	Description	Chemical	(lb/hr)	(TPY)	
LU-1	Feed Tank	VOC	0.01	0.02	
LU-1	Reactor	VOC	0.02	0.01	
	Total		0.03	0.03	

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#### Texas Commission on Environmental Quality Permit by Rule Applicability Checklist Title 30 Texas Administrative Code § 106.4

The following checklist was developed by the Texas Commission on Environmental Quality (TCEQ), <u>Air Permits Division</u>, to assist applicants in determining whether or not a facility meets all of the applicable requirements. Before claiming a specific Permit by Rule (PBR), a facility must first meet all of the requirements of <u>Title 30 Texas Administrative Code § 106.4</u> (30 TAC § 106.4), "Requirements for Permitting by Rule." Only then can the applicant proceed with addressing requirements of the specific Permit by Rule being claimed.

The use of this checklist is not mandatory; however, it is the responsibility of each applicant to show how a facility being claimed under a PBR meets the general requirements of 30 TAC § 106.4 and also the specific requirements of the PBR being claimed. If all PBR requirements cannot be met, a facility will not be allowed to operate under the PBR and an application for a construction permit may be required under 30 TAC § 116.110(a).

Registration of a facility under a PBR can be performed by completing <u>Form PI-7</u> (Registration for Permits by Rule) or <u>Form PI-7-CERT</u> (Certification and Registration for Permits by Rule). The appropriate checklist should accompany the registration form. Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the question number. The PBR forms, tables, checklists and guidance documents are available from the TCEQ, Air Permits Division Web site at: <u>www.tceq.state.tx.us/permitting/air/nav/air\_pbr.html</u>.

1. 30 TAC § 106.4(a)(1) & (4): Emission limits				
List emissions in tpy for each facility (add additional pages or table if needed): $SO_2 = \_ PM_{10} = \_ VOC = 0.03 NO_x = \_ CO = \_ Other \_ = \_ Other \_ = \_ SO_2 = \_ PM_{10} = \_ VOC = \_ NO_x = \_ CO = \_ Other \_ Other \_ = \_ Other \_ = \_ Other \_ = \_ Other \_ Other \_ = \_ Other \_ = \_ Other \_ = \_ Other \_ = \_ Other \_ Other \_ Other \_ = \_ Other \_ Other \_ Other \_ Other \_ = \_ Other \_$				
Total 0.03				
<ul> <li>Are the SO<sub>2</sub>, PM<sub>10</sub>, VOC, or other air contaminant emissions claimed for each facility in this PBR submittal less than  YES NO 25 tpy?</li> <li>Are the NO<sub>x</sub> and CO emissions claimed for each facility in this PBR submittal less than 250 tpy?</li> <li>If the answer to both is "Yes," continue to the question below. If the answer to either question is "No," a PBR cannot be delived</li> </ul>				
Has any facility at the property had public notice and opportunity for comment under 30 TAC Section 116 for a regular $\checkmark$ YES $\square$ NO permit or permit renewal? (This does not include public notice for voluntary emission reduction permits, grandfathered existing facility permits, or federal operating permits.)				
<ul> <li>If the site has had no public notice, please answer the following:</li> <li>Are the SO<sub>2</sub>, PM<sub>10</sub>, VOC, or other emissions claimed for all facilities in this PBR submittal less than 25 tpy?</li> <li>Are the NO<sub>x</sub> and CO emissions claimed for all facilities in this PBR submittal less than 250 tpy?</li> <li>If the answer to both questions is "Yes," continue to Section 2.</li> <li>If the answer to either question is "No," a PBR cannot be claimed. A permit will be required under Chapter 116.</li> </ul>				
2. 30 TAC § 106.4(a)(2): Nonattainment check				
<ul> <li>Are the facilities to be claimed under this PBR located in a designated ozone nonattainment county?</li> <li>If "Yes," please indicate which county by checking the appropriate box to the right. (Marginal) - Hardin, Jefferson, and Orange counties (BPA) (Moderate) - Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties (HGA) (Moderate) - Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant counties (DFW)</li> <li>If "Yes," to any of the above, continue to the next question. If "No." continue to Section 3.</li> </ul>	<ul> <li>✓ YES □ NO</li> <li>□ BPA</li> <li>✓ HGA</li> <li>□ DFW</li> </ul>			

Permit by Rule General Applicability Checklist 30 TAC § 106.4

<ul> <li>Does this project trigger a nonattainment review? To determine the answer, review the information below:</li> <li>Is the project's potential to emit (PTE) for emissions of VOC or NO<sub>x</sub> increasing by 100 tpy or more? <i>PTE is the maximum capacity of a stationary source to emit any air pollutant under its worst-case physical and</i> <i>operational design unless limited by a permit rule, or made federally enforceable by a certification</i></li> </ul>	∐YES ØNO			
<ul> <li>Is the site an existing major nonattainment site and are the emissions of VOC or NO<sub>x</sub> increasing by 40 tpy or more?</li> </ul>	□YES 🖉 NO			
If needed, attach contemporaneous netting calculations per nonattainment guidance. Additional information can be found at: <u>www.tceq.state.tx.us/permitting/air/forms/newsourcereview/tables/nsr_table8.html</u> and <u>www.tceq.state.tx.us/permitting/air/nav/air_docs_newsource.html</u>				
If "Yes," to any of the above, the project is a major source or a major modification and a PBR may not be used. A Nonattainment Permit review must be completed to authorize this project. If "No," continue to Section 3.				
3. 30 TAC § 106.4(a)(3): Prevention of Significant Deterioration (PSD) check				
<ul> <li>Does this project trigger a review under PSD rules? To determine the answer, review the information below:</li> <li>Are emissions of any regulated criteria pollutant increasing by 100 tpy of any criteria pollutant at a named source?</li> <li>Are emissions of any criteria pollutant increasing by 250 tpy of any criteria pollutant at an unnamed source?</li> <li>Are emissions increasing above significance levels at an existing major site?</li> </ul>	☐ YES ØNO ☐ YES ØNO ☐ YES ØNO			
PSD information can be found at: <u>www.tceq.state.tx.us/permitting/air/forms/newsourcereview/tables/nsr_table9.html</u> and <u>www.tceq.state.tx.us/permitting/air/nav/air_docs_newsource.html</u>				
If "Yes," to any of the above, a PBR may not be used. A PSD Permit review must be completed to authorize the project. If "No," continue to Section 4.				
4. 30 TAC § 106.4(a)(6): Federal Requirements				
<ul> <li>Will all facilities under this PBR meet applicable requirements of Title 40 Code of Federal Regulations (40 CFR) Part 60, New Source Performance Standards (NSPS)? If "Yes," which Subparts are applicable?: This project does not trigger or initiate any new NSPS requirements.</li> </ul>	□ yes □no ✔n/a			
<ul> <li>Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable Control Technology (MACT) standards? If "Yes," which Subparts are applicable?: <u>This project does not trigger or initiate any new MACT requirements.</u></li> </ul>	□yes □no √n/a			
<ul> <li>Will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAPs)? If "Yes," which Subparts are applicable?: This project does not trigger or initiate any new NESHAP requirements.</li> </ul>	□yes □no ✔n/a			
If "Yes" to any of the above, please attach a discussion of how the facilities will meet any applicable standards.				
5. 30 TAC § 106.4(a)(7): PBR prohibition check				
Are there any air permits at the site containing conditions which prohibit or restrict the use of PBRs?	YES NO			
If "Yes," PBRs may not be used or their use must meet the restrictions of the permit. A new permit or permit amendment may be required. List permit number(s):				
If "No," continue to Section 6.				

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#### Permit by Rule General Applicability Checklist 30 TAC § 106.4

6.	30 TAC § 106.4(a)(8): NO <sub>x</sub> Cap and Trade			
• If "	Is the facility located in Harris, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller Coun (Yes, " answer the question below. If "No," continue to Section 7.	ty? ₽YES □NO		
•	• Will the proposed facility or group of facilities obtain required allowances for NO <sub>x</sub> if they are subject to 30 TAC Chapter 101, Subchapter H, Division 3 (relating to the Mass Emissions Cap and Trade Program)?			
7.	Highly Reactive Volatile Organic Compounds (HRVOC) check			
• • •	Is the facility located in Harris County? If "Yes," answer the next question. If "No," skip to the box below. Will the project be constructed after June 1, 2006? If "Yes," answer the next question. If "No," skip to the box below. Will one or more of the following HRVOC be emitted as a part of this project?	YES NO YES NO YES NO		
If "	Yes, " complete the information below:       lb/hr       tpy         • 1,3-butadiene			
• If ' If '	Is the facility located in Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County? 'Yes," answer the next question. If "No," the checklist is complete. Will the project be constructed after June 1, 2006? 'Yes," answer the next question. If "No," the checklist is complete. Will one or more of the following HRVOC be emitted as a part of this project?	□YES ☑NO □YES □NO □YES □NO		
If '	Yes," complete the information below: <u>lb/hr</u> <u>tpy</u> • ethylene			

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## Title 30 Texas Administrative Code § 106.261 Permit By Rule (PBR) Checklist Facilities (Emission Limitations)

The following checklist is designed to help you confirm that you meet Title 30 Texas Administrative Code § 106.261 (30 TAC § 106.261) requirements. If you do not meet all the requirements, you may alter the project design or operation in such a way that all the requirements of the PBR are met or you may obtain a construction permit. The PBR forms, tables, checklists and guidance documents are available from the Texas Commission on Environmental Quality (TCEQ), Air Permits Division Web site at, www.tceq.state.tx.us/nav/permits/air\_permits.html.

СН	CHECK THE MOST APPROPRIATE ANSWER				
	Is a description or checklist of how this claim meets the gen 30 TAC § 106.4 attached?	s in YES NO N/A			
b1	Is this claim for construction of a facility authorized in ano a standard permit is in effect? If "YES," this PBR cannot project	ther section of this chapter or for wh be used to authorize emissions from	$\frac{1}{the} \square YES \square NO \square N/A$		
b2	2 Is this claim for any change to any facility authorized under another section of this chapter or authorized under a standard permit? If "YES," this PBR cannot be used to authorize emissions from the project □ YES □ NO □N/A				
al	Are facilities or changes located at least 100 feet from any structure not occupied or used solely by the owner or oper property upon which the facilities are located?	y recreational area or residence or ot ator of the facilities or the owner of	ther the $\bigvee$ YES $\square$ NO $\square$ N/A		
a2	Are total new or increased emissions, including fugitives, l (lb/hr) and ten tons per year of the following materials (che	ess than or equal to 6.0 pounds per heck all that apply):	our YES NO NA		
	acetyleneargonbutanecrude oilcarbon monoxidecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanecyclohexanepropaneethanolethyl etherethyl etherpropyl alcoholethylenerefinery petroleum fractions (except for pyrolysis naphthas an fluorocarbons Numbers 11, 12, 13, 14, 21, 22, 23, 113, 114,	<ul> <li>propyl ether</li> <li>sulfur dioxide</li> <li>alumina</li> <li>calcium carbonate</li> <li>calcium silicate</li> <li>cellulose fiber</li> <li>cement dust</li> <li>glycerin mist</li> <li>gypsum</li> <li>iron oxide dust</li> <li>kaolin</li> </ul>	limestone         magnesite         marble         pentaerythritol         plaster of paris         silicon         silicon carbide         starch         sucrose         zinc stearate         zinc oxide		
a3	a3 Are total new or increased emissions, including fugitives, less than or equal to 1.0 lb/hr of any chemical having a limit value (L) greater than 200 milligrams per cubic meter (mg/m <sup>3</sup> ) as listed and referenced in Table 262 of 30 TAC § 106.262 of this title (relating to Facilities (Emission and Distance Limitations)? List chemical:				
	Are total new or increased emissions, including fugitives, less than or equal to 1.0 lb/hr of any chemical not listed or referenced in Table 262? List chemical: See Attach. B				
	Are total new or increased emissions, including fugitives, of a chemical with a limit value of less than 200 mg/m <sup>3</sup> ? If "Yes" the authorization of the chemical is not allowed under this section. We suggest you use 30 TAC  106.262 to authorize the emissions, if applicable.				

TCEQ - 10121 [Revised 10/04] PBR Checklist for Facilities (Emission Limitations) This form for use by facilities subject to air quality permit requirements and may be revised periodically. [APDG 5018v4]



#### Title 30 Texas Administrative Code § 106.261 Checklist

a5 Will point a6 Are e	there be any visible emissions, except uncombined water, emitted to the atmosphere from any or fugitive source in amounts greater than 5.0% opacity in any six-minute period?	□yes ☑no □n/a
a6 Are e		
Form shall value	emission increases five tons per year or greater? If "YES," this checklist must be attached to a PI-7 within ten days following the installation or modification of the facilities. The notification include a description of the project, calculations, data identifying specific chemical names, limit es, and a description of pollution control equipment, if any.	□yes ☑no □n/a
a7 Are e Form name	emission increases less than five tons per year? If "YES," this checklist must be attached to a n PI-7 and include a description of the project, calculations, data identifying specific chemical es, limit values, and a description of pollution control equipment, if any. (pick one):	₽YES □NO□N/A
	Within ten days following the installation or modification of the facilities. The notification shall include a description of the project, calculations, data identifying specific chemical names, limit values, and a description of pollution control equipment, if any; or By March 31 of the following year summarizing all uses of this permit by rule in the previous calendar year.	

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### Title 30 Texas Administrative Code § 106.262 Permit by Rule (PBR) Checklist Facilities (Emission and Distance Limitations)

The following checklist is designed to help you confirm that you meet Title 30 Texas Administrative Code § 106.262 (30 TAC § 106.262) requirements. If you do not meet all the requirements, you may alter the project design or operation in such a way that all the requirements of the PBR are met or you may obtain a construction permit. The PBR forms, tables, checklists and guidance documents are available from the Texas Commission on Environmental Quality (TCEQ), Air Permits Division Web site at, www.tceq.state.tx.us/nav/permits/air\_permits.html.

CHECK THE MOST APPROPRIATE ANSWER					
Is a description or chec of PBRs in 30 TAC § 1	klist of how this claim meets the generation of the generation of the sense of the	al requirements for the use	🗹 YES	NO	□ N/A
b1. Is this claim for constru- or for which a standard <i>authorize emissions fro</i>	ection of a facility authorized in anothe permit is in effect? If "YES," this PBI m the project.	ion of a facility authorized in another section of this chapter ermit is in effect? If "YES," this PBR cannot be used to the project.			<b>D</b> N/A
b2. Is this claim for any ch or authorized under a s <i>emissions from the proj</i>	iy change to any facility authorized under another section of this chapter er a standard perm? If "YES," this PBR cannot be used to authorize e project.			⊠ NO	🗆 N/A
c. Is the facility authorize If "YES," subsection (a chemicals at the facility	Is the facility authorized under another section of this chapter or under a standard permit? If "YES," subsection (a)(2) and (3) of this section may be used to qualify the use of other chemicals at the facility.			M NO	🗆 N/A
a1. Are facilities or chang or other structure not of the owner of the proper	hanges located at least 100 feet from any recreational area or residence not occupied or used solely by the owner or operator of the facilities or roperty upon which the facilities are located?			🗖 NO	🗖 N/A
a2. Are new or increased emissions, including fugitives, emitted in a quantity less than five tons per year or in a quantity less than E as determined by using the equation E=L/K? See Table 262 Figures 1 and 2. If "YES," the notification shall include a description of the project, calculations for all emissions being claimed under this PBR:			🗹 YES	🗖 NO	🛛 N/A
Chemical: Methyl Methacrylate L value: _34 D:950			K	:35	
Chemical: Vinyl Acetate         L value: 15         D:950			K	:35	
a3. Is this checklist attached to a Form PI-7 within ten days following the installation or modification of the facilities? If "YES," the notification shall include a description of the project, calculations, and data identifying specific chemical names, L values, and a description of pollution control equipment, if any.				🗖 N/A	
a4. Are one or more of the that apply) If "YES," a	ne following chemicals handled for the transformer the following four questions.	nis registration? (Check all	🗖 YES	Ø NO	🛛 N/A
<ul> <li>acrolein</li> <li>allyl chloride</li> <li>ammonia (anhydrous)</li> <li>arsine</li> <li>boron trifluoride</li> <li>bromine</li> <li>carbon disulfide</li> <li>chlorine dioxide</li> <li>chlorine trifluoride</li> <li>chloroacetaldehyde</li> <li>chloropicrin</li> <li>chloroprene</li> </ul>	<ul> <li>diazomethane</li> <li>diborane</li> <li>diglycidyl ether</li> <li>dimethylhydrazine</li> <li>ethyleneimine</li> <li>ethyl mercaptan</li> <li>fluorine</li> <li>formaldehyde (anhydrous)</li> <li>hydrogen bromide</li> <li>hydrogen chloride</li> <li>hydrogen fluoride</li> <li>hydrogen fluoride</li> <li>hydrogen selenide</li> </ul>	<ul> <li>hydrogen sulfide</li> <li>ketene</li> <li>methylamine</li> <li>methyl bromide</li> <li>methyl hydrazine</li> <li>methyl isocyanate</li> <li>methyl mercaptan</li> <li>nickel carbonyl</li> <li>nitric acid</li> <li>nitric oxide</li> <li>nitrogen dioxide</li> <li>oxygen difluoride</li> </ul>	<ul> <li>ozone</li> <li>pentaba</li> <li>perchla</li> <li>perchla</li> <li>phosge</li> <li>phosph</li> <li>phosph</li> <li>seleniu</li> <li>hexaflu</li> <li>liquefie</li> <li>sulfur p</li> <li>telluriu</li> </ul>	orne promethyl n pryl fluoride ine ine iorus trichlo m ioride stibir ed sulfur di pentafluorio im hexafluo	nercaptan e oride ne oxide l oride



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### Title 30 Texas Administrative Code § 106.262 Permit by Rule (PBR) Checklist Facilities (Emission and Distance Limitations)

CHECK THE MOST APPROPRIATE ANSWER					
Are froi	Are all facilities are located at least 300 feet from the nearest property line and 600 feet from any off-plant receptor?			🛛 NO	☑ N/A
Are auti equ	Are the cumulative amount of any of the following chemicals resulting from one or more authorizations under this section (but not including permit authorizations) less than or equal to 500 pounds on the plant property?			□ NO	☑ N/A
Are the Reg	Are all listed chemicals handled only in unheated containers operated in compliance with the United States Department of Transportation regulation (49 Code of Federal Regulation, Parts 171-178)?			🛛 NO	☑ N/A
Are	e any changes to or add	litions of any existing air pollution abatement equipment?	<b>U</b> YES	<b>N</b> NO	⊠ N/A
a5. Are	there any changes to	or additions of any existing air pollution abatement equipment?	<b>U</b> YES	Ø NO	🖸 N/A
a6. Wi froi per	a6. Will there be any visible emissions, except uncombined water, emitted to the atmosphere from any point or fugitive source in amounts greater that 5.0% opacity in any six-minute period?		<b>U</b> YES	⊠ NO	🗆 N/A
<b>D</b> , 1	Feet K				
100	326	E=maximum allowable hourly emission, and never to exceed 6	pounds per	hour.	
200	200				
300	) 139				
400	) 104				
600	) 65				
700	) 54				
800	) 46	K=value from the table on this page. (interpolate intermediate	values)		
900	) 39				
1,000	34				
2,000	14	D=distance to the nearest off-plant receptor			
3,000	or more 8				

**TABLE 262** 

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### LIMIT VALUES (L) FOR USE WITH EXEMPTIONS FROM PERMITTING § 106.262

The values are not to be interpreted as acceptable health affects values relative to the issuance of any permits under Chapter 116 of this title (relating to Control of Air Pollution by Permits for new Construction or Modification).

<u>Compound</u> Acetone	Limit (L) Milligrams Per Cubic Meter 590.
Acetaldehyde	9.
Acetone	4.
Acetonitrile	34.
Acetylene	2662.
N-Amyl Acetate	2.7
Sec-Amyl Acetate	1.1
Benzene	3.
Beryllium and Compounds	0.0005
Boron Trifluride, as HF	0.5
Butyl Alcohol,	76.
Butyl Acrylate	19.
Butyl Chromate	0.01
Butyl Glycidyl Ether	30.
Butyl Mercaptain	0.3
Butyraldehyde	1.4
Butyric Acid	1.8
Butyronitrile	22.
Carbon Tetrachloride	12.
Chloroform	10.
Chlorophenol	0.2
Chloroprene	3.6
Chromic Acid	0.01
Chromium Metal, Chromium II and III Compounds	0.1
Chromium VI Compounds	0.01
Coal Tar Pitch Volatiles	0.1
Creosote	0.1
Cresol	0.5
Cumene	50.
Dicyclopentadiene	3.1
Diethylaminoethanol	5.5
Diisobutyl Ketone	63.9
Dimethyl Aniline	6.4
Dioxane	3.6

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## C

$\checkmark$	$\checkmark$
<u>Compound</u>	Limit (L) Milligrams Per Cubic Meter 8 4
Ethyl Acrulate	0.5
Ethylene Dibromide	0.38
Ethylene Glycol	26
Ethylene Glycol Dinitrate	0.1
Ethylidene 2-norbornene 5-	7
Ethyl Mercantan	0.08
Ethyl Sulfide	1.6
Glycolonitrile	5
Halothane	16
Hentane	350
Heyanediamine 1.6	0.32
Hydrogen Chloride	1
Hydrogen Eluoride	0.5
Hydrogen Sulfide	1.1
Icoamy! A cetate	133
	15
Isobutyronitrile	22
Kenone	0.001
Kerosene	100
Malononitrile	8
Mesityl Oxide	40
Methyl Acrylate	5.8
Methyl Amyl Ketone	9.4
Methyl-T-Butyl Ether	45
Methyl Butyl Ketone	4
Methyl Disulfide	2.2
Methylenebis (2-chloroaniline) (MOCA)	0.003
Methylene Chloride	26.
Methyl Isoamyl Ketone	5.6
Methyl Mercaptan	0.2
Merthyl Methacrylate	34.
Methyl Propyl Ketone	530.
Methyl Sulfide	0.3
Mineral Spirits	350.
Naphtha	350.
Nickel, Inorganic Compounds	0.015
Nitroglycerine	0.1

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Compound	Limit (L) Milligrams Per Cubic Meter
Nitropropane	5.
Octane	350.
Parathion	0.05
Pentane	350.
Perchloroethylene	33.5
Petroleum Ether	350.
Phenyl Mercaptan	0.4
Propionitrile	14.
Propyl Acetate	62.6
Propylene Oxide	20.
Propyl Mercaptan	0.23
Silica-amorphous-precipitated, silica gel	4.
Silicon Carbide	4.
Stoddard Solvent	350.
Styrene	21.
Succiononitrile	20.
Tolidin	0.02
Trichloroethylene	135.
Trinethylamine	0.1
Valeric Acid	0.34
Vinyl Acetate	15.
Vinyl Chloride	2.

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NOTE: The time weighted average (TWA) threshold Limit Value (TLV) published by the American Conference of Governmental Industrial Hygienists (AGGIH), in its TLVs and BEIs guide (1997 Edition) shall be used for compounds not included in the table. The Short Term Exposure Level (STEL) or Ceiling Limit (annotated with a "C") published by the ACGIH shall be used for compounds that do not have a published TWA TLV. This section cannot be used if the compound is not listed in the table or does not have a published TWA TLV, STEL, or Ceiling Limit in the ACGIH TLVs and BEIs guide.