

OPERATING PERMIT - TECHNICAL SUMMARY
SITE OPERATING PERMIT - SOP
MINOR REVISION

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|---------------------|--------------------|-------------------|--|
| Permit #: | 02164 | Company: | Chevron Phillips Chemical Company, L.P. |
| Project #: | 10186/10187 | Site: | Philtex-Ryton Complex |
| Account #: | HW-0013-C | Application Area: | Philtex Plant |
| Regulated Entity #: | RN102320850 | Customer #: | CN600303614 |
| Region: | 1 | County: | Hutchinson |
| SIC Code: | 2869 | SIC Name: | Industrial Organic Chemicals |

Permit Reviewer: **Chuck Lowary**

PERMIT INFORMATION

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|--|-----------|
| Was confidential information submitted? | No |
| Are any permits being reviewed for New Source Review action? | No |
| Is the application subject to acid rain permitting? | No |

SITE INFORMATION

Physical Location: Approx 2 Miles NE of Borger on State Highway Spur 119
Nearest City: Borger
Major Pollutants: VOC, SO₂, HAPS, CO, OTHER H₂S
Additional FOPs: O2165

PROJECT SUMMARY

Phillips Petroleum Co., Philtex Plant is a Chemical Manufacturing facility subject to the Federal Operating Permit process. Significant emissions at the site include storage tanks, synthesis equipment, materials recovery equipment, and furnaces, which are subject to State and/or Federal Regulations. None of the emission units at the facility are subject to Compliance Assurance Monitoring/Periodic Monitoring and are identified along with other applicable requirements. The permit includes Site-wide Terms and Conditions, which were identified using information provided by the applicant in the Unit Specific Terms and Conditions, which were identified using information provided by the applicant in various forms (Forms OP-SUM and OP-REQ3).

REVISION DESCRIPTION

The minor revision updates MACT EEEE applicability for two tanks (T-95-4067, T-95-4069). Also rolling in operational flexibility request (project 10187) concerning NSR permit amendment with no increase in emissions.

PROCESS DESCRIPTION

The process at the Philtex-Ryton plant is as follows:

Polyphenylene sulfide (proprietary trade name "Ryton") is produced by combining

p-dichlorobenzene (p-DCB, DCB) with sodium hydrosulfide (NaSH) in a series of reactions also involving caustic (NaOH) and N-methyl pyrrolidone (NMP). Salt (NaCl) is a byproduct of the reaction. This is washed from the polymer and disposed via deepwell injection with "Rytbrine" equipment (tanks, filters, pumps). The washed polymer is dried and sent to further processing and/or boxing. Collectively, the synthesis equipment is lumped under the Title V process name "PRORYTSYN".

After the final polymerization step (but before washing and drying), unreacted feedstocks are flashed to recovery equipment, collectively referred to as "PRORYTREC". Here, NMP and DCB are recovered and returned to storage for reuse.

Heat for the synthesis and recovery processes is provided by two small natural gas-fired furnaces using heat transfer oil. Ryton also has a dedicated cooling tower.

The Ryton product can be further processed by curing and/or pelletizing. Final product, in the form of powder or pellets, is placed in boxes or similar packaging for shipment to customers.

TECHNICAL REVIEW

The draft permit was submitted to the applicant on (date): 06/18/2007

Did the applicant comment on the draft permit? Yes

If yes briefly describe the comments and the changes made to the draft permit (if applicable).

Applicant requested update of SOP Index #s.

MANUAL CHANGES TO PERMIT - Permit reviewer manually determined tank applicability for MACT EEEE based on tank attributes and also manually added a 30 TAC Chapter 113 ST&C for MACT EEEE.

EMISSIONS BANKING AND TRADING PROVISIONS (Pursuant to 30 TAC Chapter 101, Subchapter H)

Is the site/permit area located in the Houston/Galveston ozone non-attainment area (as defined in 30 TAC Chapter 101, §101.1): No

STATEMENT OF BASIS

A Statement of Basis sets forth the legal and factual basis for the permit conditions.

The Statement of Basis was prepared on: 06/18/2007

The Statement of Basis GroupWise Document #(OPDP Database): 46014

PUBLIC ANNOUNCEMENT/EPA REVIEW

Posting Date: 06/26/2007

Did the public comment on the working draft permit? No (although CCO database indicated one comment had been received, a telecon with Marisa Weber (CCO Comments Team) indicated none were received).

Beginning of the EPA Review Period: 06/26/2007

Did the EPA comment on the proposed permit? No

PUBLIC PETITION PERIOD/FINAL STATE ACTION

Effective permit issuance date: 08/24/2007

Chuck Lowary, P.E.

Permit Reviewer

Operating Permits Section

Air Permits Division

Javier Maldonado, P.E.
Team Leader
Operating Permits Section
Air Permits Division

ATTACHMENTS

IMS Tracking Elements
Communication Log
Administrative Data

IMS TRACKING ELEMENTS

Project Number: 10186
Permit Number: O02164

Project Type: STREAMLINED REVISION
Permit Type: SOP

Company: CHEVRON PHILLIPS CHEMICAL COMPANY LP
Site: PHILTEX-RYTON COMPLEX
Account Number: HW-0013-C
Regulated Entity RN: RN102320850
SIC: 2869

| <u>Assign Date</u> | <u>Last Name</u> | <u>First Name</u> | <u>Project Role</u> | <u>Phone Number</u> |
|--------------------|------------------|-------------------|---------------------|---------------------|
| 04/26/2007 | LOWARY | CHUCK | REVIEW ENG | (512) 239-1263 |

| <u>Stage</u> | <u>Start Date</u> | <u>Complete Date</u> | <u>Tracking Element</u> | <u>Type</u> |
|--------------|-------------------|----------------------|---|-------------------|
| IS | 03/29/2007 | | DATE INITIAL INFO/APPL/REQUEST RECEIVED BY TCEQ | STANDARD EVENT |
| IS | 03/29/2007 | | DATE PAR RECEIVED PROJECT | STANDARD EVENT |
| IS | 04/04/2007 | | DATE PAR TRANSFERRED PROJECT TO APD | STANDARD EVENT |
| TR | 04/26/2007 | | DATE PROJECT RECEIVED BY ENGINEER | STANDARD EVENT |
| TR | 06/12/2007 | 06/15/2007 | TECHNICAL REVIEW PERIOD | STANDARD ACTIVITY |
| TR | 06/18/2007 | 06/20/2007 | WORKING DRAFT PERMIT REVIEW BY APPLICANT | STANDARD ACTIVITY |
| PA | 06/21/2007 | 06/21/2007 | SECTION MNGR REVIEW OF NPPPA PACKAGE | STANDARD ACTIVITY |
| PA | 06/21/2007 | 06/21/2007 | TEAM LEADER REVIEW OF NPPPA PACKAGE | STANDARD ACTIVITY |
| EPA | 06/26/2007 | 08/11/2007 | EPA REVIEW PERIOD | STANDARD ACTIVITY |
| PA | 06/26/2007 | 07/26/2007 | PUBLIC ANNOUNCEMENT PERIOD | STANDARD ACTIVITY |
| PA | 07/22/2007 | | DATE NPPPA DUE TO TEAM LEADER | STANDARD EVENT |
| FSA/PPP | 08/14/2007 | 08/15/2007 | SECTION MANAGER REVIEW OF FINAL ACTION | STANDARD ACTIVITY |
| FSA/PPP | 08/14/2007 | 08/14/2007 | TEAM LEADER REVIEW OF FINAL ACTION | STANDARD ACTIVITY |
| FSA/PPP | 08/24/2007 | | DATE OF EFFECTIVE / ISSUED PERMIT / AUTHORIZATION | STANDARD EVENT |
| WPO-FINAL | 08/24/2007 | | WPO 09 - DATE LETTER MAILED | OPTIONAL EVENT |
| FSA/PPP | 09/06/2007 | | DATE PROJECT COMPLETED | STANDARD EVENT |

COMMUNICATION LOG

| Company Name | Application Area | Air Account Number | Regulated Entity Number | IMS Project Number |
|---|-------------------------|---------------------------|--------------------------------|---------------------------|
| Chevron Phillips Chemical Company, L.P. | Philtex Plant | HW-0013-C | RN102320850 | 10186 |

| Contact | Title | Phone or E-Mail | Date | Notes |
|----------------|---------------------------------|-----------------------------------|-------------|---|
| John Edgington | Senior Environmental Specialist | (806) 275-5730 edginjm@cpc.com | 06/15/2007 | Clarified unit nomenclature. Confirmed rolling in operational flexibility request. |
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ADMINISTRATIVE DATA

Responsible Official: Rick L. Roberts
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Permit Consultant: n/a