PERMIT by RULE TECHNICAL REVIEW

Company: Evans Houston Corporation, Houston, Texas

Registration Number: X Record Number: 75428 Account ID No. HG-0922-H

<u>Contact Name:</u> Mr. Brian Ameen, Company Environmental Manager <u>Telephone Number:</u> (281) 456-5146 <u>Fax Number:</u> (281) 456-8978

<u>Description/Name of Facilities and Processes Claimed:</u> This registration request is concerning the proposed repackaging of Dimethylacetamide and Palatinol TOTM-1 at Evans Houston Corporation's drum loading facility located at 10521 Sheldon Road in the City of Houston, Harris County, Texas. *Neither of these two compounds are listed in the 40 CFR 261 Appendix VIII.*

Evans Houston Corporation proposes to repackage (both) Dimethylacetamide and Palatinol TOTM-1 under Permit by Rule 472. This compounds enters the facility via tank trucks and/or rail cars. Stainless steel flex hoses are attached to the delivery vehicle. Nitrogen is used to pressurize the vessel and push the compound form the vessel through the fixed piping to the loading station for repackaging in to 55 gallon drums. All collected loading/repackaging vapors (Fill Plant Fugitive Vapors) are routed to the control devices specified in Permit No. 20900 (Fill Plant Incinerator). The vapor recovery efficiency is 99 percent while the incinerator efficiency is 99.9 percent.

Dimethylacetamide has a molecular weight of 87.1, has a vapor pressure of 0.0255 psia, and has an initial boiling point of 330 degrees F (meets 106.472, subpart 9).

Palatinol TOTM-1 has a molecular weight of 546.8, has a vapor pressure of 0.0031 psia, and has an initial boiling point of 545 degrees F (meets 106.472, subpart 9).

Approximately 600,000 55-barrel drums are estimated to be loaded yearly at a maximum hourly loading rate of 245 per hour. A loading saturation factor of 0.5 has been used in estimating emissions.

<u>Sources/Emissions/Control Summary:</u> The routine emissions associated with the handling of Dimethylacetamide have been estimated at 0.0003 pounds per hour (0.0042 tons per year) vapors escaped during loading operations and 0.0003 pounds per hour (0.0004 tons per year) are estimated after incineration in the specified (incinerator) control device operating under Permit No. 20900. If aggregating Dimethylacetamide, in tons per year estimations (which have been customarily done by the NSR in the past requests), the routine emissions (vapors + incinerator) are estimated at 0.0046 tons per year Dimethylacetamide.

The routine emissions associated with the handling of Palatinol TOTM-1 have been estimated at 0.0024 pounds per hour (0.0031 tons per year) vapors escaped during loading operations and 0.0002 pounds per hour (0.0003 tons per year) are estimated after incineration in the specified (incinerator) control device operating under Permit No. 20900. If aggregating Palatinol TOTM-1, in tons per year estimations (which have been customarily done by the NSR in the past requests), the routine emissions (vapors + incinerator) are estimated at 0.0034 tons per year of Palatinol TOTM-1.

Evans Houston Corporation, Permit No. X, Project No. 75428 Repackaging of (both) Dimethylacetamide and Palatinol TOTM-1 Technical Review Page -2-

PSD or Nonattainment Netti	ng Required: NO Submitted: N/A
<u>NSPS:</u> N/A	NESHAPS: N/A
Emission Reductions Due to	the NSR: NONE
Site Review Required: NO_	Performed by/date: N/A
Public Notice Required: NO	Approved: N/A
Meets all general and specif	ic requirements: YES
Reviewed By: Robert Walts Date: September 27	