

Linde Gas North America LLC



Certified Mail Return Receipt No. 7008 0150 0001 4633 4484 (original)  
PJB 09-011 Linde TV Dev Rpt 04\_30\_09 Rev 1

AIRCO/RN100-217-207/HX2334A  
RP/RC

May 5, 2009

Mr. Mark R. Vickery, Executive Director  
c/o Ms. Linda Vasse  
Air Quality Section Manager  
Texas Commission on Environmental Quality, Region 12  
5425 Polk Street, Suite H  
Houston, TX 77023-1486

**Subject: Linde Gas North America, LLC  
Semi-Annual Deviation Report  
Reporting Period October 1, 2008 to March 31, 2009  
Federal Operating Permit No. O-02290  
Linde Gas La Porte Syngas Plant, La Porte, Harris County, Texas  
TCEQ Account No.: HX-2334-A  
Regulated Entity No.: RN100217207  
Customer No.: CN603335019**

Dear Mr. Vickery,

Attached is the Semi-Annual Deviation Report for the Linde La Porte Syngas Plant located in La Porte, Harris County, Texas. The attached document satisfies the deviation reporting requirements for the reporting period of October 1, 2008 through March 31, 2009. This submittal includes the Deviation Form and the OP-CRO1 Form (Certification by Responsible Official Form) signed by our RO certifying the information in the Deviation Report. This form was signed by me in the original submittal on April 30, 2009. These documents have been prepared in accordance with the Texas Commission on Environmental Quality (TCEQ) instructions.

If you have any questions or require additional information regarding the deviation reporting, please contact me at (713) 767-4175.

Sincerely,

Patrick Boyle  
Process Engineer

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REGION 12

Attachments: Deviation Report Forms  
Form OP-CRO1

AIR CO/ REPORTS  
1st: HX2334A 2nd: Vol: 001 5/5/2009

BBC: 100003446

IBC: 100287263



Linde Gas North America LLC  
11603 Strang Road  
LaPorte, TX 77571

Mailing Address  
P.O. Box 1058  
LaPorte, TX 77572-1058

Phone (713) 767-4175  
FAX (713) 767-4189



**Texas Commission on Environmental Quality  
Federal Operating Permit Deviation Report Form  
Form Dev Rep (Part 1)**

Permit Holder Name		Linde Gas North America, LLC				Customer Number	CN603335019
Area Name		Linde La Porte Syngas Plant				Account Number	HX-2334-A
Report Period Start Date	October 1, 2008	Report Period End Date	March 31, 2009	Operating Permit Number	O-02290	Report Submittal Date	April 30, 2009

**Operating Permit Requirement for Which Deviations are Being Reported**

ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
SGFUG1C3C	N/A		VOC, HAP	116.115(b)	Standard		N/A	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	n/a	3/5/2009	10:00	3/6/2009	06:00	1	Diaphragm failure on 2-14-1 pump. It was estimated that approximately 60 lbs of methanol was emitted during the event, which is well below the reportable quantity of methanol of 5000 lbs/day.	Shut down and isolated pump upon discovery; began clean up of material.
2	n/a	3/1/2009	08:00	3/12/2009	04:00	1	Sight glass leaking on propylene storage receiver. It was estimated that approximately 900 lbs of propylene was emitted during the 260 hour event, which is below the reportable quantity for propylene of 100 lbs/day.	Isolated sight glass from process. Parts for repair are on order.
Total Deviations:						2	Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

TCEQ-10101 [06/08]

Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Page \_\_\_\_ of \_\_\_\_

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**Texas Commission on Environmental Quality  
Federal Operating Permit Deviation Report Form  
Form Dev Rep (Part 1)**

Permit Holder Name		Linde Gas North America, LLC				Customer Number		CN603335019
Area Name		Linde La Porte Syngas Plant				Account Number		HX-2334-A
Report Period Start Date	October 1, 2008	Report Period End Date	March 31, 2009	Operating Permit Number	O-02290	Report Submittal Date	April 30, 2009	
<b>Operating Permit Requirement for Which Deviations are Being Reported</b>								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
N/A	N/A	General	N/A	122.146	Reporting		N/A	

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
3	n/a	10/30/2008	n/a	10/30/2008	n/a	1	Late submittal of the annual permit compliance certification report for the period October 1, 2007 through September 30, 2008. The report was due by October 30, 2008 but was submitted November 6, 2008.	All future reports will be submitted by the 30th day following the end of each reporting period.
4	n/a	10/30/2007	n/a	10/30/2007	n/a	1	Failure to report the late submittal of the annual permit compliance certification report for the period October 1, 2007 through September 30, 2008. The report was due by October 30, 2007 but was submitted July 31, 2008.	All future reports will be submitted by the 30th day following the end of each reporting period.
Total Deviations:						2	Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	



**Texas Commission on Environmental Quality  
Federal Operating Permit Deviation Report Form  
Form Dev Rep (Part 1)**

Permit Holder Name		Linde Gas North America, LLC				Customer Number		CN603335019
Area Name		Linde La Porte Syngas Plant				Account Number		HX-2334-A
Report Period Start Date	October 1, 2008	Report Period End Date	March 31, 2009	Operating Permit Number	O-02290	Report Submittal Date	April 30, 2009	
<b>Operating Permit Requirement for Which Deviations are Being Reported</b>								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
N/A	N/A		N/A	115.725(d)(1)	Reporting		N/A	

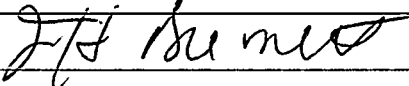
  

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
5	n/a	10/01/2008	n/a	03/31/2009	n/a	1	Flow monitoring system on HRVOC flare was found to not be in working order. The last performance test on the HRVOC flare was in January 2007.	The HRVOC flare flow monitoring system will be repaired.
6	n/a	01/31/2007	n/a	09/30/2008	n/a	1	Failure to report that the HRVOC flare was not in working order. The last performance test on the HRVOC flare was in January 2007.	The HRVOC flare flow monitoring system will be repaired.
Total Deviations:						2	Is there a Part 2 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	



**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**

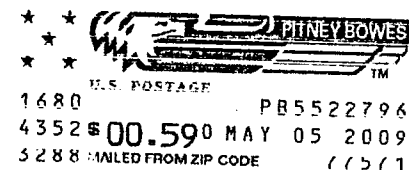
All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. IDENTIFYING INFORMATION</b>			
A. RN:	100217207	B. CN:	603335019
C. Account No.:	HX-2334-A		
D. Permit No.:	O2290	E. Project No.:	
F. Area Name:	Linde Gas La Porte Syngas Plant		
G. Company Name:	Linde Gas North America, LLC		
<b>II. CERTIFICATION TYPE</b> <i>(Please mark the appropriate box)</i>			
A. <input checked="" type="checkbox"/> Responsible Official:		B. <input type="checkbox"/> Duly Authorized Representative:	
<b>III. SUBMITTAL TYPE</b> <i>(Place an "X" in the appropriate box) (Only one response can be accepted per form)</i>			
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other:		Semi-Annual Deviation Report	
<b>IV. CERTIFICATION OF TRUTH</b>			
This certification does not extend to information which is designated by the TCEQ as information for reference only.			
I, <u>Joshua Burnett</u> , certify that I am the <u>RO</u> for this application <i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span>			
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:			
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
A. Time Period: From _____ to _____ <span style="margin-left: 100px;"><i>Start Date*</i></span> <span style="margin-left: 100px;"><i>End Date*</i></span>			
OR			
B. Specific Dates: <u>4/30/2009</u>			
<div style="display: flex; justify-content: space-between;"><span><i>Date 1*</i></span><span><i>Date 2*</i></span><span><i>Date 3*</i></span><span><i>Date 4*</i></span><span><i>Date 5*</i></span><span><i>Date 6*</i></span><span><i>Date 7*</i></span><span><i>Date 8*</i></span></div>			
<i>*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'</i>			
Signature: <u></u>		Signature Date: <u>5/5/09</u>	
Title: <u>Vice President of Operations</u>			



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P.O. Box 1058  
LaPorte, TX 77572-1058

Mr. Mark R. Vickery, Exec.Dir.  
c/o Ms. Linda Vasse  
Air Quality Section Manager  
TCEQ, Region 12  
5425 Polk Street, Suite H  
Houston, TX 77023-1486



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