

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) MINOR REVISION

Permit #:	O2164	Company:	Chevron Phillips Chemical Company, LP
Project #:	35060	Site:	Chevron Phillips Chemical Borger Plant
Regulated Entity #:	RN102320850	Application Area:	Borger Plant
Region:	1	Customer #:	CN600303614
NAICS Code:	325110	County:	Hutchinson
Permit Reviewer:	Ulises Luna	NAICS Name:	Petrochemical Manufacturing

SITE INFORMATION

Physical Location: 2 miles northeast from the intersection of State Highway Spurs 119 and 245
Nearest City: Borger
Major Pollutants: CO, HAPS, SO₂, VOC, H₂S
Additional FOPs: None

PROJECT SUMMARY

Chevron Phillips Chemical Company Borger Plant holds a Federal Operating Permit (FOP) that was issued on October 30, 2019. A minor revision application was received by TCEQ on April 25, 2023 for incorporation of NSR 21918; area wide and unit specific requirements were updated; units were added and deleted; technical contact and public notice contact were updated; and preconstruction authorizations were updated/incorporated.

PROCESS DESCRIPTION

The Borger Plant consists of four plant areas (units) of operation: the Commercial Products Unit (CPU), the Multi-purpose Unit (MPU), Unit 5 and the Blending/Shipping area. All process units are generally standalone units, receiving feedstock and producing finished products independent of other units; exceptions to this are: one, the Commercial Products Unit (CPU) hydrogen sulfide (H₂S) system, which supplies H₂S and recovers H₂S from several different processes, and two, the fractionation systems that purify crude products from other production units. The following is an overview of each operating area within the Borger Plant.

The CPU H₂S system receives hydrogen sulfide from the Phillips 66 refinery. The H₂S is purified, liquefied, and stored in specially designed equipment. The H₂S is used in several processes to make mercaptans and other sulfur chemicals, which are purified in CPU fractionation columns. Mercaptans and sulfides produced at CPU are used as gas odorants, sulfiding agents, polymerization modifiers, and for other industrial purposes.

The Multipurpose Unit (MPU) consists of two production systems. The first is the R-17/R-20 reactor system, which produces several types of mercaptans, sulfides, and other products in batch-wise processes. The second is the Sulfolene/Sulfolane manufacturing process.

TECHNICAL REVIEW

Summary of Revision

- Incorporate March 10, 2023 issuance of NSR permit 21918.
- Remove STND permit 150840 – It has been voided.
- Remove units: F-60VVA, F-63FFFF, F-63H, I-24, LN061, LN093_95_96, LN101, LN13_14, LN1563, LN2608, LN27_307, LN279, LN283, LN91_253, M2C, SP5A-ATM, SP5A-FLARE, SP5A-VC, SP5B10-FLA, SP5B10-VC, TA-08, TA-09, TK-35, TN-02, TP-16
- Add units: F-BLD, F-CPU, F-MPU, F-SHP, SP5A, SP5B1, SP5B3, SP5B4, SP4B5, SP5B6, SP5BU5, SP5B15
- Add new Group ID: GRPS5B; and include these units: SP5B1, SP5B3, SP5B4, SP4B5, SP5B6, SP5BU5, SP5B15
- Rename Tank T-95-4069 to T-95-4106 and update the unit's name/description.
- Update to Pre-Construction Authorizations
- Update several units' attributes.
- Add 40 CFR 60, Subpart Kb applicable requirements to units: TB-31 and TB-34A
- Add 40 CFR 60, Subpart K applicable requirements to units: TD-13 and TF-24
- Update Technical Contact and Public Notice Contact

- Update the MACT DDDD requirements for unit: H-3
- Add MACT FFFF applicable requirements to unit: SP5A.
- Remove NSPS Kb index numbers 60KB_FL, 60KB_FL_P, 60KB_LOW and 60KB_LOW_P from unit - TB-31 and replace with 60KB_VLOW.
- Remove NSPS Kb index number 60KB_FL from unit - TB-34A and replace with 60KB_VLOW.
- Remove NSPS K index numbers 60K_OTHER and 60K_REC1 from unit TF-24 and replace with 60K-LOW.
- Remove index number 60VVA-ALL from F-BLD, F-SHP, F-CPU, and F-MPU.
- Remove index number 63H-ALL from F-BLD.
- Update in several Periodic Monitoring Summary tables for units TB-01, TB-02, TC-01, TC-14, TC-17, TD-09, TD-10, TD-11, TD-12, TD-14, TD-15, TF-22, TP-50, TP-51, TP-56, TP-57, TP-60, TP-61, TP-62, TP-63, TP-66: Index 60KB_FL_P, 60KB_FL, 60KB_HL, 60KB_HL_P, the last few words of the last sentence in the deviation limit are missing. Adding "the leak is found." in the sentence, due to character limit.
- Update the Special Term and Conditions 18 to the latest boilerplate language to reference the OP-PBRSUP form.

Permit Content Summary

1. Was Periodic Monitoring (PM) required and added during this revision?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and added during this revision?..... No
3. Was case-by-case PM or CAM added during this revision?..... No
4. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... Yes
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... Yes
5. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
6. Will the draft permit be sent to public announcement with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- Update in several Periodic Monitoring Summary tables for units TB-01, TB-02, TC-01, TC-14, TC-17, TD-09, TD-10, TD-11, TD-12, TD-14, TD-15, TF-22, TP-50, TP-51, TP-56, TP-57, TP-60, TP-61, TP-62, TP-63, TP-66: Index 60KB_FL_P, 60KB_FL, 60KB_HL, 60KB_HL_P, the last few words of the last sentence in the deviation limit are missing. Adding "the leak is found." in the sentence, due to character limit.
- Add the last few words of the last sentence in the deviation limit. Adding "the leak is found." In the sentence.
- Standard Permit 150840 – Remove term in the permit (Special Condition 21), regarding the Standard Permits

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Delinquent Fee Check

1. The delinquent fee check was performed on September 14, 2023.
2. Were there any delinquent fees owed?..... No

Public Announcement Information

Were comments received during the Public Announcement period?..... No

EPA Review

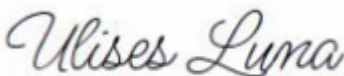
Did the EPA comment on the draft permit?..... No

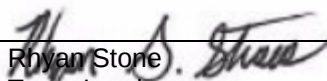
IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	04/25/2023	
Date Project Received by Engineer	07/12/2023	
Technical Review Period	07/13/2023	09/14/2023
Working Draft Permit Reviewed by Applicant	07/15/2023	09/12/2023
Date Rvn-5/Draft Permit Mailed	11/03/2023	

Public Announcement Period	11/07/2023	12/07/2023
EPA Review Period	11/07/2023	12/22/2023

REVISED PERMIT APPROVAL DATE: 01/19/2024


 _____ 01/05/2024
 Ulises Luna
 Permit Reviewer
 Operating Permits Section
 Air Permits Division
 Date


 _____ 01/17/2024
 Bryan Stone
 Team Leader
 Operating Permits Section
 Air Permit Division
 Date

CONTACT INFORMATION

Responsible Official:

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 Senior Vice President of Manufacturing
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Technical Contact:

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 Environmental Engineer
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 Borger, TX 79008-0968
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Duly Authorized Representative:

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