

From: James Wedemeier <james.wedemeier@trinityconsultants.com>
Sent: Friday, March 1, 2024 11:29 AM
To: Sarah Kyser
Cc: Joshua Wheatley; MAHENDRA.MOHITE@LYONDELLBASELL.COM
Subject: RE: TCEQ Air Permit No. 175443 / Project No. 370657 at Equistar Chemicals, LP's Mont Belvieu Facility site
Attachments: Table 1-1_Revised 2.28.2024.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Ms. Kyser,

Please see the attached revised Table 1-1, which provides additional project information. Please acknowledge the receipt of this correspondence. Thanks.

James Wedemeier
Senior Consultant

1800 W. Loop South, Suite 1000
P 713.955.1223 M 832.518.8694 (preferred)
Email: james.wedemeier@trinityconsultants.com



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From: Sarah Kyser Sarah.Kyser@tceq.texas.gov
Sent: Monday, February 26, 2024 4:17 PM
To: James Wedemeier james.wedemeier@trinityconsultants.com
Cc: Joshua Wheatley Joshua.Wheatley@tceq.texas.gov; MAHENDRA.MOHITE@LYONDELLBASELL.COM
Subject: TCEQ Air Permit No. 175443 / Project No. 370657 at Equistar Chemicals, LP's Mont Belvieu Facility site
Importance: High

Good afternoon,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 175443 / Project No. 370657 at Equistar Chemicals, LP and Mont Belvieu Facility in Chambers County, Texas. You have been identified as a Technical Contact.

I have completed my initial review for this project and will need additional information/clarification before I can proceed with my review. Please address the following:

- Provide greater clarification as to the reasoning for the updates to fugitive components in Table 1-1 Project Emissions Summary.
 - More information is needed to determine what specifically is changing/being updated at the site, and the reasoning for the changes/updates.

Failure to submit all of the requested information by **March 4, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Ms. Sarah Kyser
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-5708
Sarah.Kyser@tceq.texas.gov

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**Table 1-1
Project Emissions Summary**

Project No.	EPN	Pollutant	Emissions (lb/hr)	Emissions (tpy)	Project Description
190	90.13	VOC	0.02	0.10	The project scope includes the installation of new piping and the addition of new fugitive components associated with the replacement of valve V-0700 from a slab gate valve to an expanding gate valve to provide double block and bleed capability.
037		VOC	<0.01	<0.01	The project scope includes the installation of new piping and the addition of new fugitive components associated with modification of 190B filter piping to provide flexibility for a variety of filter configurations.
038		VOC	0.01	0.05	The project scope includes the installation of new piping and the addition of new fugitive components associated with the replacement of a leaking slab gate valve with an expanding gate valve.
097		VOC	<0.01	0.01	The project scope includes the installation of new piping and the addition of new fugitive components associated with the repair of a flare header piping.
101		VOC	<0.01	0.01	The project scope includes the installation of new piping and the addition of new fugitive components associated with the installation of a valve downstream of Well 3 to allow for more process control.
117		VOC	0.08	0.36	The project scope includes the installation of new piping and the addition of new fugitive components associated with the replacement of two orbit valves with expanding gate valves with actuators to allow for remote control.
042		VOC	0.01	0.03	The project scope includes the installation of new piping and the addition of new fugitive components associated with the modification of piping to improve meter proving preparation.
148		VOC	<0.01	0.01	The project scope includes the installation of new piping and the addition of new fugitive components associated with replacement of a orbit valve with an expanded gate valve for better pipeline isolation.
173		VOC	<0.01	0.01	The project scope includes the installation of new piping and the addition of new fugitive components associated with the modification of piping to improve meter proving preparation.
159		VOC	0.04	0.16	The project scope includes the installation of new piping and the addition of new fugitive components associated with the D-9021 A/B drain valve removal.
179		VOC	<0.01	0.02	The project scope includes the installation of new piping and the addition of new fugitive components associated with installation of over pressure protection on two meter skids.
181		VOC	0.04	0.17	The project scope includes the installation of new piping and the addition of new fugitive components associated with the relocation of pig traps and filter lines.
Total:			0.21	0.94	

From: James Wedemeier <james.wedemeier@trinityconsultants.com>
Sent: Wednesday, February 28, 2024 2:13 PM
To: Sarah Kyser
Cc: Joshua Wheatley; MAHENDRA.MOHITE@LYONDELLBASELL.COM
Subject: RE: TCEQ Air Permit No. 175443 / Project No. 370657 at Equistar Chemicals, LP's Mont Belvieu Facility site

Hi Ms. Kyser,

We will get you a response back before March 4th. Thanks.

James Wedemeier
Senior Consultant

1800 W. Loop South, Suite 1000
P 713.955.1223 M 832.518.8694 (preferred)
Email: james.wedemeier@trinityconsultants.com



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