

Permit Amendment Source Analysis & Technical Review

Company	Mitsubishi Chemical America Inc	Permit Number	19941
City	Pasadena	Project Number	350335
County	Harris	Regulated Entity Number	RN100677731
Project Type	Amendment	Customer Reference Number	CN605866037
Project Reviewer	Brandon Marsh, P.E.	Received Date	November 16, 2022
Site Name	Pasadena Resins Plant		

Project Overview

Mitsubishi Chemical America Inc (MCA) owns and operates the Pasadena Resins Plant in Pasadena, Harris County, Texas. The site is permitted under NSR Permit No. 19941.

Mitsubishi submitted an application to amend NSR Permit No. 19941 following an internal audit of the site and permit. Included in the amendment are items identified in the internal audit. The primary update to the permit is that the storage tank calculations are being updated to reflect throughput increases. Reaction tanks, process tanks, and other EPNs also have a proposed increase of emissions due to the increased throughput and production. MCA is proposing to construct an electric recuperative catalytic oxidizer to control the volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) at the site.

Maintenance, start-up, and shut-down activities are not affected by this amendment and are authorized by PBR 106.263.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	8.27	8.30	0.03
PM ₁₀	7.08	7.14	0.06
PM _{2.5}	7.04	7.07	0.03
VOC	18.04	15.96	-2.08
NO _x	4.51	4.43	-0.08
CO	7.57	7.40	-0.17
SO ₂	0.05	0.05	0.00
HAPs*	4.85	5.50	0.65
Exempt Solvents	0.00	0.02	0.02

* HAPs have been speciated on the MAERT. The table above reflects the current allowable HAPs which are included with VOC limits.

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	December 6, 2022
Site rating & classification:	0.00 / High
Company rating & classification:	4.35 / Satisfactory
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	No

Public Notice Information*

Permit Amendment Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 2

Requirement	Date
Legislator letters mailed	11/18/2022
Date 1 st notice published	12/14/2022
Publication Name: Pasadena Citizen	
Pollutants: carbon monoxide, hazardous air pollutants, nitrogen oxides, organic compounds, particulate matter including Particulate matter with diameters of 10microns or less and 2.5microns or less and sulfur dioxide	
Date 1 st notice Alternate Language published	12/15/2022
Publication Name (Alternate Language): El Perico	
1 st public notice tearsheet(s) received	12/20/2022
1 st public notice affidavit(s) received	12/20/2022
1 st public notice certification of sign posting/application availability received	01/23/2023

* As submitted the project required 2nd public notice; however, no 2nd public notice was required due to the installation of EPN RCO-1, an electric recuperative thermal oxidizer. Due to the proposed installation, the project resulted in a decrease of VOC emissions. Exempt solvents are newly represented on the MAERT; however, exempt solvents are not listed as a pollutant that requires notice per TCEQ APDG 6278v7.

Public Interest

Number of comments received	0
Number of meeting requests received	0
Number of hearing requests received	0
Date meeting held	N/A
Date response to comments filed with OCC	N/A
Date of SOAH hearing	N/A

Federal Rules Applicability

Requirement	
Subject to NSPS?	Yes
Subparts A, Dc, and Kb	
Subject to NESHAP?	No
Subject to NESHAP (MACT) for source categories?	Yes
Subparts A and ZZZZ	
Nonattainment review applicability:	The site is and existing minor source located Harris County which has been designated as a severe nonattainment area for the 2008 8-hour ozone standard. There is a project emission decrease of VOC and NOx. Nonattainment review does not apply.
PSD review applicability:	This site is an existing minor source and will remain a minor source after the project. PSD review does not apply.

Title V Applicability - 30 TAC Chapter 122 Rules

Permit Amendment

Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 3

Requirement

Title V applicability:

The site's potential-to-emit is below the major source thresholds in 30 TAC Chapter 122. The site is not subject to the requirements of 30 TAC Chapter 122.

Periodic Monitoring (PM) applicability:

This site is a minor source and is not subject to 40 CFR 70 periodic monitoring requirements; however, the following monitoring requirements apply:

- Continuous monitoring of storage tank temperatures.
- Sampling of the CAS once every three months to determine VOC breakthrough.
- Monthly monitoring for VOC leakage from heat exchangers in the cooling tower water
- Cooling tower water sampled at least once per week for TDS.
- Fuel gas sampling every 6 months for total sulfur and net heating value.
- Continuous measurement of gas fuel usage with a totalizing fuel flow meter for the boiler.

Compliance Assurance Monitoring (CAM) applicability:

Compliance Assurance Monitoring (CAM) is not applicable to the site because it is not subject to Title V, and none of the facilities have a pre-control emission rate greater than the major source thresholds.

Process Description

The Pasadena Plant produces a variety of thermoplastic acrylic bead resins used primarily in coatings, sealants, adhesives, and food packaging. These resins are polymers or copolymers of various methacrylic, acrylic, and styrene monomers. Methacrylic monomers provide chemical resistance, weather resistance, rigidity, and hardness. Acrylic monomers offer flexibility and solubility. The resins offer a wide range of properties to be used in a wide variety of applications, including but not limited to lacquer coatings, adhesives, paper coatings, waterproof coatings, vinyl film coatings, and automotive finishes.

The production of these resin products includes raw material storage and transfer, raw material preparation, polymerization, washing and dehydration, drying, packaging, and the operation of utilities associated with the operation of the facility.

Project Scope

Mitsubishi Chemical America, Inc. is proposing to amend NSR Permit No. 19941 based on a proposed resin bead production increase over the currently permitted rate of 28,000,000 pounds per year (lb/yr) to approximately 35,000,000 lb/yr. Also included in this amendment are changes to the NSR permit based on an internal audit of the site and permit. Baghouses, process bin vents (EPNs: 430F, 480F, 504F, and 527F) and wastewater fugitives (EPN: WWFUG) do not have proposed emissions increases in this project and are not considered modified or affected sources.

The information below as well as the following changes to special conditions (SCs) and maximum allowable emission rate table (MAERT) sections provide a summary of this amendment.

Storage Tank Updates (FINs 001V, 011V, 021V, 031V, 041V, 051V, 061V, 071V, 081V, 102V, 104V, 110V, 112V, 114V, 116V, and 145V):

MCA updated the storage tank calculations to reflect current EPA methodology including updates to product throughput and parameters reflecting the actual on-site conditions. The primary raw material storage tanks, FINs 001V, 011V, 031V, 051V, 061V, 071V, and 081V are vented to the atmosphere and are temperature controlled between 55°F and 70°F with an assumed average daily temperature of 65°F. Short-term, worst case, emissions have been conservatively assumed to occur at a temperature of 100°F during filling operations.

Permit Amendment

Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 4

During the technical review, it was noted that MCA was claiming 100% control of the working losses from the storage tanks based on them being vapor balanced back to the tank trucks that supplied the raw material. The TCEQ's "Air Permit Technical Guidance for New Source Review Loading Operations, APD-ID 3v1" states that vapor balancing is not considered a control method since the vapors are simply transferred. MCA updated the representations to remove the vapor balance credit from the storage tank calculations. Two tanks, FINs 021V and 041V are controlled by Carbon Adsorption Systems. See below for additional discussion for these FINs.

Storage tanks FINs 102V, 104V, 110V, 112V, 114V, 116V, and 145V are small storage tanks that store monomers used in the reaction process. These tanks are located inside. Rather than all venting through separate vents, FINs 104V, 110V, 112V, 114V, 116V, and 145V are all routed to a common header and exit the building via EPN VENT1.

Storage tanks FINs 021V and 041V are discussed in detail below.

Carbon Adsorption Systems (EPNs CRBNADS and CRBNADS-2):

By updating the short-term emissions to occur at 100°F, the maximum vapor pressure of the material stored in storage tank FIN 021V exceeds 0.5psia. To meet Tier I BACT, vent to control is required. In this amendment, MCA is adding a carbon adsorption system to FIN 021V, which is represented by EPN CRBNADS-2.

Raw material storage tank 041V is also controlled by a carbon adsorption system as EPN CRBNADS. While the operation of EPN CRBNADS has not changed, as part of this amendment, MCA has updated the calculation for FIN 041V as well as the breakthrough concentration for the carbon adsorption system to 15ppm.

Existing Process Vent EPNs VENT2 and PSLOAD and Recuperative Catalytic Oxidizer EPN RCO1

In the current permit, issued May 30, 2019 with NSR Project 269020, EPN VENT2 is represented as the process vent for the reaction tanks and pilot plant. EPN PSLOAD is represented as a separate process vent from process tanks. While these are represented as 2 EPNs, both vent through a common header that is uncontrolled.

With this project, MCA is combining these two EPNs into a single EPN represented by VENT2 since the reactors, pilot plant, and process tank vents all vent to one common header. The calculations and representations for EPN VENT2 (which includes current EPNs VENT2 and PSLOAD) with this amendment were updated based on the increased throughput and production at the site. The calculation methods have not changed since NSR project 269020 was issued, and the emissions are conservatively based on the products with the highest potential VOC emissions.

Due to the increase in production rate, EPN VENT2 had a proposed increase of emissions requiring that BACT be evaluated. This uncontrolled process vent is the main source of VOCs at the site. Tier I BACT for process vents is that they be controlled. A review of the permit history prior to NSR Project 269020 confirmed that emission calculation methods have changed, reactor production rates had increased over time, and no BACT analysis had been performed on process vents VENT2 or PSLOAD.

Tier I BACT for process vents is that they be controlled and meet the BACT requirements on the selected control device. MCA conducted a tiered BACT analysis consistent with the TCEQ's guidance to evaluate the feasibility of controlling EPN VENT2 at the production rates proposed with this amendment. MCA determined that an electric recuperative catalytic oxidizer (RCO) would be added to control the reactor tank, pilot plant, and process tank vents. EPN RCO1 represents the recuperative catalytic oxidizer.

Until the RCO is installed and operational, EPNs VENT2 and PSLOAD have been combined into one EPN represented by VENT2 as noted above. EPN RCO1 has been added to the permit and represents the controlled emissions from the BRG/BRL Process Tanks (Controlled Vapors), Reactor Tanks Vent/Pilot Plant (Controlled Vapors), and products of combustion. The vendor guarantee is 98% DRE of volatile organic compounds. Because the unit is electric, there are no products of combustion expected. MCA has taken the conservative approach of using the heat generated from the combustion of the waste gas (< 1 MMBtu/hr) and the natural gas combustion factors from AP-42 Chapter 1.4 to estimate products of combustion.

Permit Amendment Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 5

Lab Vents (EPN LV):

VOC and HAP emissions from laboratory vents have been added to the permit with this amendment. Based on site-specific material usage in the lab, MCA provided the basis for EPN LV emissions. These have been determined on a short-term and long-term basis. Included in the speciation are VOCs, HAPs, and exempt solvents. Due to the low ESL and conservative emission calculation methods, a Tier III Toxicology review was required for 2-phenoxyethyl acrylate. Additional information may be found below in the impact section.

Other EPNs:

Cooling tower, EPN COOLTWR, PM10 and PM2.5 emission calculations were updated based on a 2013 memo from the Air Quality Bureau of the New Mexico Environmental Department. This method yields results similar to the Reisman-Frisbee method. Plant-wide fugitives, FUGIT, were updated to speciate HAPs as well as PM, PM10, and PM2.5. PM speciation for the plant-wide fugitives has been based on uncaptured particulate matter attributed to product drying and packaging. The emission factor was developed from a survey of fugitive emissions sources from AP-42.

The boiler at the site, EPN BOILSTK, representations were updated to correct the firing rate as well as update the emission factors to the current AP-42 factors. The updated boiler firing rate is represented as 20.412 MMBtu/hr, which results in a minor decrease in the permitted emissions.

Changes to Special Conditions (SC):

Old SC#	New SC#	Change
3	3	Changed formatting and updated 40 CFR Part 60 references to include Subpart Dc.
--	4	Added federal applicability condition for 40 CFR Part 63 references.
4	5	Updated the rolling 12-Month throughput limitations for the storage tanks. Added the inside monomer tanks to this table. FIN 021V was removed from this table since it is controlled via carbon absorption, EPN CRBNADS-2.
5	6	Removed temperature and vapor pressure table since updated representations are based on TCEQ guidance and AP-42 for short- and long-term emission rates. This condition number was maintained and updated to specify that Tank 001V was temperature controlled and shall maintain a temperature less than 65 °F. This is consistent with the representations for short- and long-term emissions for this tank.
6.A – 6.C.	7	Removed the floating roof requirements from this condition. There are no floating roof tanks at the site.
6.D.	7.A	Removed 'unpainted' from aluminum since MCA has insulated storage tanks at the site with aluminum. See BACT discussion as well.
6.E	7.B	Updated the condition to be consistent with storage tank boilerplate and reflect the current application and PI-1 calculation methods.
--	8	Added a condition noting which FINs are controlled by new EPN RCO1, a recuperative catalytic oxidizer. This condition was added due to BACT requirements for EPN VENT2, which was previously uncontrolled.
--	9	Conditions 9.A. – 9.C are new conditions specific to the operational parameters of EPN RCO1.
7	10	Updated the stack testing requirement to require stack testing of EPN RCO1 once operational. The stack testing requirement previously required testing of specific batches of products that were expected to have the highest emission rates. The new condition replaces this requirement with the requirement to stack test RCO1
7.C	10.C	This condition was updated to be consistent with the stack sampling boilerplate and the compounds required to be tested for EPN RCO1 since it will control the previously represented uncontrolled EPNs.
7.D.	10.D	Updated this condition to be consistent with the boilerplate stack sampling requirement that

Permit Amendment Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 6

		sampling occur within 180 days of start-up. This condition also requires re-testing if the batch size is greater than 10% above that of the initial stack test.
7.E	10.E	Previously this condition was very specific to the worst case batches tested. This condition was updated to be consistent with stack testing boilerplate that EPN RCO1 be stack tested once operational.
--	10.G	Added condition requiring that sampling ports be installed into the design of RCO1 according to TCEQ stack sampling guidelines.
--	11	EPN CRBNADS-2 is replacing previous EPN 021V since FIN 021V requires control due to the updated storage tank temperatures required the TCEQ short-term emission calculations. This condition is consistent with boilerplate and is consistent with existing SC 9, which was re-numbered to 12. See notes below for SC 12.
8	12	Added (or larger) to note that the CAS would be 55-gallon (or larger) carbon canisters.
8.A	12.A	Updated the condition to require that sampling occur during loading operations. This is consistent with the boilerplate notes to identify operating conditions reflecting maximum venting to the CAS.
11	15	Updated boiler "fuel" gas to be replaced by "pipeline quality natural" gas.
13	17	Removed "Chapter 2" from the reference to "Guidelines For Stack Sampling Facilities" in the condition.
17	---	Deleted SC #17 as it refers continuous monitoring of H2S from the fuel gas system. The combustion units are fired by pipeline quality natural gas, and continuous monitoring of H2S is not required.
18	21	Updated fugitive condition formatting to be consistent with boilerplate. This is a formatting change in the levels represented. 21.A. reflects an update to the updated SC numbering.
19 – 24	21.F – K	Updated fugitive condition formatting to be consistent with boilerplate. This is a formatting change in the levels represented. 21.J. reflects an update to the SC numbering.
25	22	Updated condition to require/specify that visible emission observation and pressure drop monitoring be required when the bin vent is in operation. If the bin vent is not operating in a 12-hour shift, visible emissions and pressure drop monitoring is not required.
--	25	Added a condition specific to the use of 2-phenoxyethyl acrylate for EPN LV (Laboratory Vent). See the impacts discussion section as this compound required a Tier III toxicology evaluation.
28 – 30	--	Removed these conditions as they do not reflect the operation of the plant. The cyclones vent to baghouses, and the reactor emission rates will be calculated as represented in the application for compliance with the MAERT and condition. Additionally, since EPN RCO1 is being installed a control device for VENT2, these conditions are no longer required.
	35	Updated the PBR references table.

Changes to the MAERT

EPN	Update to MAERT
001V, 031V, VENT1,	Increase in short- and long-term emissions. Addition of HAPs to MAERT.
011V, 061V, 071V, 081V	Increase in short- and long-term emissions.
051V, 102V	Increase in short-term emissions.
CRBNADS-2 (FIN 021V)	Updated EPN for carbon adsorption system for FIN 021V
504F and 527F	Corrected mistake that had VOC instead of PM as a pollutant. Speciation PM10 and PM2.5 for these EPNS conservatively as PM=PM10=PM2.5.
FUGIT	Increase in short- and long-term PM emissions and addition of HAPs to MAERT.
COOLTWR	Updated PM10 speciation due to calc method correction.

Permit Amendment

Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 7

BOILSTK	Updated short- and long-term emissions where applicable to represent corrected firing rate.
LV	Added EPN representing laboratory vents.
VENT2 (includes VENT2 and PSLOAD from current MAERT)	Added footnote (6) indicating that this EPN is authorized until EPN RCO1 is operational.
RCO1	Added to MAERT to represent recuperative catalytic oxidizer for control of VENT2.

Best Available Control Technology

Source Name	EPN	Best Available Control Technology Description
Raw Material Storage Tanks	001V, 011V, 031V, 051V, 061V, 071V, 081V	These tanks are insulated fixed roof storage tanks with submerged fill. With the exception of 001V, which is represented as diffuse aluminum, the exterior of the storage tanks is painted white. The tanks are temperature controlled and contain material with a vapor pressure < 0.5 psia. Because the tanks are insulated and temperature controlled, BACT is satisfied.
Raw Material Storage Tank: FIN 021V	CRBNADS-2	Tank, FIN 021V, is fixed roof storage tanks with submerged fill with a vapor pressure >0.5 psia. The tank will be controlled by a Carbon adsorption system. Carbon adsorption system with 2 canisters in series. Periodic monitoring a minimum of once every 3-months with a breakthrough concentration of 100 ppmv VOC. BACT is satisfied.
Raw Material Storage Tank: FIN 041V	CRBNADS	Tank, FIN 041V, is fixed roof storage tanks with submerged fill with a vapor pressure >0.5 psia. The tank will be controlled by a Carbon adsorption system. Carbon adsorption system with 2 canisters in series. Periodic monitoring a minimum of once every 3-months with a breakthrough concentration of 15 ppmv VOC. BACT is satisfied.
Monomer Tank 102V	102V	This is a small monomer tank located inside. The tank is a fixed roof storage tank with submerged fill. Exterior surfaces have been represented as diffuse aluminum. The vapor pressure of the materials stores is less than 0.05psia. Because the tanks are located inside a building and not subject to direct sunlight or exposure to the atmosphere. For this EPN, BACT is satisfied.
Inside monomer storage tanks 104V, 110V, 112V, 114V, 116V, and 145V	VENT1	Small monomer tanks located inside. The tanks are fixed roof storage tanks with submerged fill. Exterior surfaces have been represented as diffuse aluminum. The vapor pressure of the materials stores is less than 0.05psia. Because the tanks are located inside a building and not subject to

Permit Amendment Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 8

		direct sunlight or heating, BACT is satisfied.
FINs: PSG/PSL, Reactors 201 V-1, 201 V-2, 251V, and pilot plant vents previously represented by EPN VENT2 and PSLOAD	RCO1	Indoor storage tanks PSG/PSL, Reactors 201 V-1, 201 V-2, 251V, and pilot plant vents were all previously uncontrolled and represented by EPN VENT2. These FINs will now be controlled by RCO1. RCO1 is a recuperative catalytic oxidizer. It is operated electronically and is not fired by natural gas. VOC control is 98%. The heat source is electric and products of combustion are assumed to be negligible. Products of combustion have been conservatively represented in the emission calculations and based on EPA AP-42 natural gas factors. For control of process vents and recuperative catalytic oxidizers, BACT is satisfied.
Boiler	BOILSTK	EPN BOILSTK is equipped with a low-NOx burner that operates with a NOx factor of <0.05 lb NOx/MMBtu. Pipeline quality natural gas for minimization of SO2 emissions. CO and VOC emission factors are conservatively based on the AP-42 factors and will be minimized by good combustion practices. For a unit of this size (~20 MMBtu/hr), this is reasonable and BACT is satisfied.
Cooling tower	COOLTWR	Drift eliminators with a vendor guarantee of 0.001 % are installed. The calculation changes were to update the PM10 speciation. No change in circulation rate was proposed. There were no changes to the VOC representations. BACT is satisfied.
Lab Vents	LV	There is no established BACT for laboratory vents. Additional discussion may be found in the impacts section below. Because there is no established BACT for laboratory vents and emission rate is very low at 0.04tpy, BACT is satisfied.
Plant-wide fugitives	FUGIT	Uncontrolled fugitive emissions are between 10tpy and 25tpy. MCA employs the 28M leak detection and repair program. Plant-wide fugitive emissions are controlled by good housekeeping practices to minimize dust during product drying and packaging operations. For both VOC and PM fugitive emissions, BACT is satisfied.

Permits Incorporation

Permit by Rule (PBR) / Standard Permit / Permit Nos.	Description (include affected EPNs)	Action (Reference / Consolidate / Void)
PBR No. 94175	Authorized change of material stored in storage tanks 011V and 021V.	Reference
PBR No. 98045	Authorized the production of Acrysyruv TW-008 within the onsite pilot plant	Reference
PBR No. 107042	Authorized the production of Acrysyruv.	Reference

Impacts Evaluation

Permit Amendment Source Analysis & Technical Review

Permit Number: 19941

Regulated Entity No. RN100677731

Page 9

Was modeling conducted? **Yes**

Type of Modeling: **AERMOD (22112)**

Is the site within 3,000 feet of any school?

Additional site/land use information: The area surrounding the site is industrial.

Summary of Modeling Results

National Ambient Air Quality Standards (NAAQS), State Health Effects Review, and Modeling and Effects Review Applicability (MERA)

The amendment application results in increases in criteria pollutant emissions and health effects pollutants. PM₁₀ (24-hr), PM_{2.5} (24-hr and annual), NO₂ (24-hr and annual), and CO (1-hr and 8-hr) were all evaluated for NSR De Minimis. Based on the modeled parameters and corresponding emission rates, the GLCmax of all criteria pollutants were below the NSR De Minimis levels. No further analysis was required. The results of the NAAQS modeling and impacts analysis may be found in the Air Dispersion Modeling Team's (ADMT) Air Quality Analysis memo as WCC Content ID 6867015.

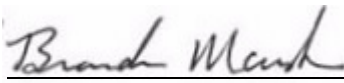
Emissions increases of health effects pollutants were evaluated using the TCEQ's MERA guidance. Using the TCEQ MERA guidance, a total of 62 compounds were evaluated. 27 of the 62 compounds satisfied step 2 of the MERA and no further analysis was required. 9 of the remaining compounds satisfied step 3 of the MERA leaving 26 remaining compounds required site-wide modeling.

The 26 remaining compounds were modeled on a site-wide basis. The modeled 1-hr GLCmax of 17 of the remaining compounds was below the ESL. The 1-hr GLCmax of Styrene, octyl mercaptan, ethyl acrylate, butyl acrylate, hydroxypropyl methacrylate, 2-phenoxyethyl acrylate, dimethyl carbonate, p-methylstyrene, and methyl methacrylate all exceeded the ESL. When these 9 compounds were further evaluated using the non-transient GLCmax and GLCni compared to the ESL, only butyl acrylate, styrene, 2-phenoxyethyl acrylate, and ethyl acrylate required further evaluation.

These four compounds were further evaluated for the hours of, and magnitude of, the exceedances based on the transient, non-transient, and non-industrial GLC values. Four of the compounds: butyl acrylate, styrene, 2-phenoxyethyl acrylate, and ethyl acrylate all required a Tier III toxicology review due to the magnitude of, and hours of, exceedances of the ESL.

A request for comments was submitted to the TCEQ toxicology division. While all 4 compounds were reviewed, the primary chemical of concern was 2-phenoxyethyl acrylate, which is used in the MCA on-site laboratory. Based on the representations in the application, SC #25 was added to the permit to restrict the use of 2-phenoxyethyl acrylate to 30 hours per year and prohibit the use of PBRs to authorize an increase in the use. The resulting review by the toxicology division, in memo 7821, concluded that no anticipated short- or long-term adverse health effects will occur among the general public as a result of exposure to the proposed emissions from this facility.

The health effects review is completed. No adverse health effects are expected to occur among the public health, welfare, or the environment as a result of exposure to the emissions from the facilities authorized by this permit.


Project Reviewer
Brandon Marsh, P.E.

April 29, 2024
Date


Section Manager
Becky Tsuchiya

April 30, 2024
Date