

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	O1990	Company:	LaPorte Rail and Terminal, LLC
Project #:	35181	Site:	LaPorte Rail and Terminal
Regulated Entity #:	RN100225085	Application Area:	Leveraged Services
Region:	12	Customer #:	CN605781848
NAICS Code:	325199	County:	Harris
Permit Reviewer:	Erin Walker	NAICS Name:	All Other Basic Organic Chemical Manufacturing

SITE INFORMATION

Physical Location: 12501 Strang Rd
Nearest City: La Porte
Major Pollutants: HAPS, VOC
Additional FOPs: O1907

PROJECT SUMMARY

LaPorte Rail and Terminal, LLC is submitting a timely Title V renewal application for Leveraged Services on 05/25/2023. Previous renewal date is February 6, 2019. LaPorte operates under the Federal Operating Permits (FOP) program, which includes FOP No. O1907. LaPorte is a major source for VOCs and HAPs. Changes to the permit include removal of SE 80 due to the shutdown of Herbicide Business Unit, which housed the associated flare.

PROCESS DESCRIPTION

The La Porte Site Leveraged Services consist of the Paint Shop, the laboratories, fuel dispensing facility, firefighting equipment, utility services, and barge dock. The services are provided to DuPont operations and/or some non-DuPont facilities that are also located within the DuPont property.

Operations at the Paint Shop (MN-01F) consist of Cleaning, blasting, and painting. The operation of the Paint Shop is on a small scale and typically performed on piping or small equipment brought into the shop from the operating areas.

The laboratories (LPT-LAB) provide analytical data to support the operating units on site and contain bench scale equipment.

Fuel dispensing facility consists of an underground 10,000-gallon gasoline storage tank (MN-01T) providing gasoline supply to plant vehicles. The facility also has an underground 6,000-gallon diesel tank (MN-02T) that provides fuel for both vehicles and equipment on site. The site also maintains a 300-gallon diesel tank (MN-FW4-T) to provide fuel for emergency vehicles.

Firefighting equipment consist of three (3) diesel-driven fire pumps each with its own dedicated 600-gallon diesel tank (MN-FW1-T, MN-FW2-T, MN-FW3-T). Outdoor burning conducted for fire training activities is subject to the exception provided in 30 TAC 111.205.

Utility services include process water (SA-22P) and drinking water (SA-23P). Electric pumps are used during normal operation of these services. However, during emergency situations such as power outages or adverse weather condition, back-up pumps driven either by diesel or natural gas are used to prevent sudden shutdown of the process units.

The barge dock (SA-02) is used to load non-fuming sulfuric acid into barges as a service to the Chemours Company. This unit will continue to be operated on an as-needed basis under Permit by Rule 106.472.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... No
3. Was case-by-case PM or CAM included in the permit?..... No
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... No
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No

- (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- Existing permit shields were reviewed and carried forward.
- Periodic monitoring for 30 TAC 111 is carried forward.
- IMS library term A.001.G T&C did not require any change.
- IMS library term B.142 was customized to indicate the OP-PBRSUP submittal date and associated project number.
- Though not initially submitted, the OP-PBRSUP was submitted upon request.
- Remove flare and Standard Exemption No. 80 from NSR permit 2466A since emergency flare was removed due to shutdown of Herbicide Business Unit.
- The Working Draft Permit (WDP) was sent to the applicant for review and on 10/17/2023.
 - o Approval received 10/23/2023.
- An updated OP-1 was requested to reflect the permit area now being a major source of HAPs and VOCs.
- A new OP-CRO1 was requested and received on 10/25/2023. Applicant will mail with a hard signature and email to reviewer.

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.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on July 13, 2023.
 Site rating: 52.03 / Satisfactory Company rating: 52.03 / Satisfactory
 (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on 05/08/2024
2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: February 28, 2024 Newspaper name: Houston Chronicle, Pearland Journal
4. Was bilingual public notice published?..... Yes
 Publication date: February 28, 2024 Newspaper name: Buena Suerte Spanish Newspaper
5. Were comments received during Public Notice period?..... No
- (a) Was a public hearing requested?..... No
- (b) Was a public hearing held?..... No
- (c) Was the public hearing request withdrawn?..... No
- (d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... No

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
If yes, were these changes made within the 60 day Public Petition Period?..... No

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	05/25/2023	
Date Project Received by Engineer	07/12/2023	
Technical Review Period	07/13/2023	10/25/2023
Working Draft Permit Reviewed by Applicant	10/18/2023	10/25/2023
Date PNAP/Draft Permit Mailed	02/15/2024	
Public Notice Comment Period	02/29/2024	03/30/2024
EPA Review Period	02/29/2024	05/03/2024
Date Sign Posting Certification Received	04/05/2024	

EFFECTIVE PERMIT ISSUANCE DATE: May 24, 2024

Erin Walker

05/03/2024

Erin Walker
Permit Reviewer
Operating Permits Section
Air Permits Division

Date

05/22/2024

Rhyan Stone
Team Leader
Rhyan Stone
Operating Permits Section
Air Permit Division

Date

CONTACT INFORMATION

Responsible Official:

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