



Lyondell Chemical Company
10801 Choate Road
Pasadena, Texas 77507
T: +1 281 291 1200
LYB.com

July 3, 2024

SUBMITTED VIA STEERS

Re: PBR 30 TAC 106.261/106.262 – Alternate WFE Bottoms Processing
Lyondell Chemical Company
Bayport Choate Plant PO/TBA & Derivatives Unit
Pasadena, Harris County, Texas
Regulated Entity Number: RN102523107
Customer Reference Number: CN600344402

Dear APIRT:

Lyondell is requesting to authorize an alternate operating scenario for the Bayport Choate B1780 Catalyst Recovery Unit (CRU) to process a similar WFE bottoms stream to the one produced at the Bayport Choate Plant that is produced at Lyondell's Channelview PO/TBA (CKO) site. Although Channelview typically processes this stream in-house, currently the WFE bottoms include some slightly higher molecular weight compounds that are believed to accelerate fouling in the process unit. Because the Bayport Choate Plant has the capability to process CKO's WFE bottoms, Lyondell is proposing to authorize the processing of CKO's WFE bottoms at its Bayport Choate Plant. Tank F-1780 (EPN E-B1550) will be used to store the CKO WFE bottoms during this alternate operating scenario.

This PBR registration application demonstrates that emissions from EPNs E-B1550 and E-B1780 associated with the changes associated with this project will comply with the requirements of §§106.261 and 106.262 and the PBR general requirements specified in §106.4, the recordkeeping requirements specified in §106.8, and all other rules related to PBRs. The TCEQ 106.261 & 106.262 workbook has been completed and is being submitted along with this application via STEERS. The emissions calculations are being submitted separately as a "**Confidential**" attachment to the registration.

If you should require additional information or if you have any questions regarding this submittal, please contact Mr. Derek Rodricks, Principal Environmental Engineer, at (281) 291-1684 or derek.rodricks@lyondellbasell.com.

Sincerely,

A handwritten signature in blue ink that reads 'Chris V. Patel'.

Christopher V. Patel
HSE & T Manager
Bayport Propylene Oxide Site

Attachments

cc:

Harris County Pollution Control Services
Dr. Latrice Babin, Director
Pasadena, TX
Send via email to
Air_Permits@pcs.hctx.net

Ms. Kathy Perez
Chief Health Inspector
Health Department, City of Pasadena
Pasadena, TX

Send via email to
modaniel@pasadenatx.gov

Air Section Manager
TCEQ Region 12
Houston, TX
Send via email to
R12APDMail@tceq.texas.gov