

September 24, 2024

Submitted via STEERS

Re: Permit by Rule (PBR) Registration and Certification for §106.262
INV NYLON CHEMICALS AMERICAS LLC
TCEQ Customer Reference No. CN605811850
TCEQ Regulated Entity Reference No. RN104392626
TCEQ Account No. OC-A002-B

Purpose of PBR Registration

INV Nylon Chemicals Americas LLC (INVISTA) submits the enclosed PBR registration for the Orange Site. This PBR registration is being submitted to document the authorization of new piping fugitive components that will be installed under the Management of Change (MOC) number and emission point number (EPN) listed in the following table:

| Process Unit | EPN | MOC No. | PBR Claimed | Affected Permit |
|--------------|-------|----------|-------------|-----------------|
| HMD Unit | PE-51 | 2408-329 | 106.262 | 1303 |

The HMD Unit is currently authorized under NSR Permit No. 1303 and operates under Title V Operating Permit No. O1897. This PBR registration, if accepted, will not trigger the notification or revision requirements of Title 30 Texas Administrative Code (TAC), Chapter 122.

Project and Process Description

The project involves the installation of new fugitive components at the HMD Unit associated with a piping extension required for a replacement density meter. The only project-related changes in emission rates will result from the new fugitive piping components as represented within this PBR registration. There will be no increase to line or unit capacity, production rate, or throughput beyond existing levels as a result of this project because the new fugitive components are associated with repairs only.

Although this project involves chemicals listed in §106.262(a)(4), §106.262(a)(4) does not apply to this project because the new fugitive components on existing piping are not increasing piping capacity.

An emission summary table and corresponding emission calculations are included in Attachments 2 and 3 of this registration. A permit by rule general facilities workbook will be submitted electronically through the State of Texas Environmental Electronic Reporting System (STEERS).

Project Status

- Projected Start of Construction Date: 09/27/2024
- Projected Start of Operation Date: 10/07/2024

Federal Applicability

The proposed project will not affect the applicability of Federal New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), or Maximum Achievable Control Technology (MACT) standard that currently applies to the INVISTA Orange Site. INVISTA will continue to comply with the applicable requirements in any NSPS, NESHAP, or MACT standard that may apply to the new fugitive piping components by including them in the site's Leak Detection and Repair (LDAR) program to meet monitoring requirements. Any deviations will be noted in periodic reports and/or Title V deviation reports, as applicable.

Registration and Certification of Emissions

INVISTA submits this PBR registration to certify and register the maximum emission rates from the project via STEERS.

- INVISTA understands that all actual representations with regard to construction plans, operating procedures, and maximum emission rates are conditions upon which the project permitted by rule will be constructed and operated. However, as may be noted in this registration, certain statements and/or values are included for informational, example, or calculation purposes only and should not be considered to be representations that are conditions upon which the project must be constructed and operated.
- INVISTA will not vary from such actual representations if the change will cause a change in the method of control of emissions, the character of the emissions, or will result in an increase in the discharge of the various emissions, unless a revision to the originally submitted certified registration is submitted to the TCEQ.
- This PBR registration and certification package includes the basis of the emission estimates. INVISTA certifies that the maximum emission rates listed in this registration package reflect the reasonably anticipated maximums for the project.
- A copy of this registration will be kept at the INVISTA Orange Site and will be provided immediately upon request by a representative of the TCEQ or any local air pollution control agency having jurisdiction.

Supporting Documentation

- Attachment 1: Table 1(a)
- Attachment 2: Non-confidential Emissions Calculations
- Attachment 3: Confidential Emissions Calculations

Confidential calculation information is segregated and clearly labeled.

ATTACHMENT 1

TABLE 1(a)

Texas Commission on Environmental Quality
Table 1(a) Emission Point Summary
Air Contaminant Data (Page 1)

| Date: | Permit No.: | Regulated Entity No.: | Area Name | Customer Reference No.: |
|----------------|-------------|-----------------------|-------------|-------------------------|
| September 2024 | TBD | RN104392626 | Orange Site | CN605811850 |

Review of application and issuance of permits will be expedited by supplying all necessary information requested on the Table

| EPN | FIN | Name | Component or Air Contaminant Name | Air Contaminant Emission Rate lb/hr | Air Contaminant Emission Rate TPY |
|-------|-------|---|-----------------------------------|-------------------------------------|-----------------------------------|
| PE-51 | FE-51 | B258 Fugitives (New equipment authorized by PBR) | NH3 | <0.01 | <0.01 |
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EPN = Emission Point Number

FIN = Facility Identification Number

ATTACHMENT 2

NON-CONFIDENTIAL EMISSIONS CALCULATIONS

Table 1.0
Speciated Emissions Summary
New Fugitive Components in the HMD Unit (MOC 2408-329)
INV Nylon Chemicals Americas, LLC - Orange Site

| Chemical | CAS No. | Fugitives Emissions from MOC 2408-329 (EPN PE-51) | | Total Increases in Emission Rates Authorized Under PBR | |
|--|-----------|---|---------------|---|---------------|
| | | lb/hr | tpy | lb/hr | tpy |
| Ammonia (NH ₃) | 7664-41-7 | 0.0002 | 0.0008 | 0.0002 | 0.0008 |
| Total Other Contaminant⁽¹⁾ | - | 0.0002 | 0.0008 | 0.0002 | 0.0008 |
| Other Contaminant Limit in 106.4 | - | - | - | - | 25 |
| Meets 106.4 Limit? | - | - | - | - | Yes |

(1) Other contaminant emissions include those air contaminants that do not have limits under 106.4 and that are not considered a VOC.