TCEQ NON-RULE AIR QUALITY STANDARD PERMIT APPLICATION FOR POLLUTION CONTROL PROJECTS

Covestro LLC ▪ Industrial Park Baytown

Prepared By:

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Project No. 244402.0015

Trinity Consultants

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1. EXECUTIVE SUMMARY

Covestro LLC (Covestro) owns and operates a chemical plant located at 8500 West Bay Road in Baytown, Chambers County, Texas (Baytown Facility). Covestro has been assigned a Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 601544042. The Baytown Facility has been assigned TCEQ Regulated Entity Reference Number (RN) 100209931 and TCEQ Air Quality Account Number CI-0016-S. The Aniline Production Unit at the Baytown Facility is authorized under New Source Review (NSR) Permit Number (No.) 32770.

Chambers County is currently classified as a severe non-attainment area for ozone and an attainment or unclassified area for all other criteria pollutants with respect to compliance with the National Ambient Air Quality Standards (NAAQS). [1] The site is a major source with respect to the Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR). In addition, the site is a major source with respect to the federal operating permits (Title V) program. The Aniline Production Unit operates under Federal Operating Permit (FOP) No. O-3674.

Covestro is submitting this Pollution Control Project (PCP) standard permit application to authorize the conversion of a floating roof tank to a fixed roof tank that vents to control. The project will include the removal of emissions associated with the operations of a floating roof tank, fugitive emission updates, central thermal oxidizer (CTO) representation changes, and updates to maintenance/startup/shutdown (MSS) emissions associated with the tank. With this registration, Covestro is requesting the conversion of tank FT612T2102 from a floating roof tank to a fixed roof tank. This will include piping the tank to the existing vent header which routes to the CTO (EPN FV87820115 in NSR 32835) for control. The change in control methodology qualifies for authorization pursuant to TCEQ's non-rule Air Quality Standard Permit for Pollution Control Projects, effective February 9, 2011. This Standard Permit application contains TCEQ Form PI-1S and all required supporting documentation.

1 The United States Environmental Protection Agency (U.S. EPA) Green Book. https://www3.epa.gov/airquality/greenbook/ancl.html (Accessed August 23, 2024)

2. TCEQ FORMS

TCEQ Form PI-1S
TCEQ Pollution Control Project Checklist
Table 1(a)

Form PI-1S
Registrations for Air Standard Permit
(Page 1)
Texas Commission on Environmental Quality

I. Registrant Information
A. Company or Other Legal Customer Name:
Covestro LLC
B. Company Official Contact Information (☐ Mr. ☐ Mrs. ☐ Ms. ☒ Other:) Dr.
Name: Jeffrey Bolton, Ph.D.
Title: VP and Head of Operations West
Mailing Address: 8500 West Bay Road
City: Baytown
State: TX
ZIP Code: 77523
Telephone No.: 281-383-7635
Fax No.:
Email Address: jeffrey.bolton@covestro.com
All permit correspondence will be sent via email.
C. Technical Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:)
Name: Douglas Jones
Title: Principal HES Specialist
Company Name: Covestro LLC
Mailing Address: 8500 West Bay Road
City: Baytown
State: TX
ZIP Code: 77523
Telephone No.: 281-383-6117
Fax No.: 281-383-6020
Email Address: douglas.jones@covestro.com
II. Facility and Site Information
A. Name and Type of Facility
Facility Name: Crude Nitrobenzene Tank 2102
Type of Facility: ☒ Permanent ☐ Temporary

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II. Facility and Site Information *(continued)*
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s):
B. Facility Location Information
Street Address: 8500 West Bay Road
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
City: Baytown
County: Chambers
ZIP Code: 77523
C. Core Data Form (**required** for Standard Permits 6006, 6007, and 6013).
Is the Core Data Form (TCEQ Form 10400) attached? ☐ Yes ☒ No
Customer Reference Number (CN): CN601544042
Regulated Entity Number (RN): RN100209931
D. TCEQ Account Identification Number (if known): CI-0016-S
E. Type of Action
☒ Initial Application ☐ Change to Registration ☐ Renewal ☐ Renewal Certification
For Change to Registration, Renewal, or Renewal Certification actions provide the following:
Registration Number:
Expiration Date:
F. Standard Permit Claimed: 6001 - Pollution Control Projects
G. Previous Standard Exemption or PBR Registration Number:
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? ☐ Yes ☒ No
If "Yes," enter previous standard exemption number(s) and PBR registration number(s) and associated effective date in the spaces provided below.

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II. Facility and Site Information *(continued)*
H. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? ☒ Yes ☐ No
If "Yes," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s) and Effective Date(s)
Multiple
I. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? ☒ Yes ☐ No
If "Yes," enter permit number(s) in the spaces provided below.
2005, 2006A, 2035A, 7870, 32835, 33665, 34017, 35148, 39943, 22197, 32770
J. Affected Air Preconstruction Permits
Does the standard permit directly affect any permitted facility? ☒ Yes ☐ No
If "Yes," enter permit number(s) in the spaces provided below.
32770
32835
K. Federal Operating Permit (FOP) Requirements
Is this facility located at a site that is required to obtain a FOP pursuant to 30 TAC Chapter 122? ☒ Yes ☐ No ☐ To Be Determined
Check the requirements of 30 TAC Chapter 122 that will be triggered if this standard permit is approved (*check all that apply).*
☐ Initial Application for a FOP ☐ Significant Revision for a SOP ☐ Minor Revision for a SOP
☒ Operational Flexibility/Off Permit Notification for a SOP ☐ Revision for a GOP
☐ To be Determined ☐ None
Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. *(check all that apply)*
☒ SOP ☐ GOP ☐ GOP application/revision (submitted or under APD review) ☐ N/A
☒ SOP application/revision (submitted or under APD review)

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III. Fee Information *(go to www.tceq.texas.gov/epay to pay online)*	
A. Fee Amount: 900	
B. Voucher number from ePay:	
IV. Public Notice *(if applicable)*	
A. Responsible Person (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:)_____	
Name:	
Title:	
Company:	
Mailing Address:	
City:	
State:	
ZIP Code:	
Telephone No.:	
Fax No.:	
Email Address:	
B. Technical Contact (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other):_____	
Name:	
Title:	
Company:	
Mailing Address:	
City:	
State:	
ZIP Code:	
Telephone No.:	
Fax No.:	
Email Address:	
C. Bilingual Notice	
Is a bilingual program required by the Texas Education Code in the School District?	☐ Yes ☐ No
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district?	☐ Yes ☐ No

IV.	**Public Notice *(continued)*** *(if applicable) (continued)*	
If "Yes," list which language(s) are required by the bilingual program below?		
D.	Small Business Classification and Alternate Public Notice	
Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than $6 million in annual gross receipts?		☐ Yes ☐ No
Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program?		☐ Yes ☐ No
Are the site emissions of any individual regulated air contaminant equal to or greater than 50 tpy?		☐ Yes ☐ No
Are the site emissions of all regulated air contaminant combined equal to or greater than 75 tpy?		☐ Yes ☐ No
V.	**Renewal Certification Option**	
A.	Does the permitted facility emit an air contaminant on the Air Pollutant Watch List, and is the permitted facility located in an area on the watch list?	☐ Yes ☐ No
B.	For facilities participating in the Houston/Galveston/Brazoria area (HGB) cap and trade program for highly reactive VOCs (HRVOCs), do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)?	☐ Yes ☐ No
C.	Does the company and/or site have an unsatisfactory compliance history?	☐ Yes ☐ No
D.	Are there any applications currently under review for this standard permit registration?	☐ Yes ☐ No
E.	Are scheduled maintenance, startup, or shutdown emissions required to be included in the standard permit registration at this time?	☐ Yes ☐ No
F.	Are any of the following actions being requested at the time of renewal:	☐ Yes ☐ No
1.	Are there any facilities that have been permanently shutdown that are proposed to be removed from the standard permit registration?	☐ Yes ☐ No
2.	Do changes need to be made to the standard permit registration in order to remain in compliance?	☐ Yes ☐ No
3.	Are sources or facilities that have always been present and represented, but never identified in the standard permit registration, proposed to be included with this renewal?	☐ Yes ☐ No
4.	Are there any changes to the current emission rates table being proposed?	☐ Yes ☐ No
*Note: If answers to all of the questions in Section V. Renewal Certification Option are "No," use the certification option and skip to Section VII. of this form. If the answers to any of the questions in Section V. Renewal Certification Option are "Yes," the certification option **cannot** be used.*		
*If notice is applicable and comments are received in response to the public notice, the application does not qualify for the renewal certification option.		

VI. Technical Information Including State and Federal Regulatory Requirements	
Place a check next to the appropriate box to indicate what you have included in your submittal. *Note: Any technical or essential information needed to confirm that facilities are meeting the requirements of the standard permit must be provided. Not providing key information could result in an automatic deficiency and voiding of the project*.	
A. Standard Permit requirements (Checklists are optional; however, your review will go faster if you provide applicable checklists.)	
Did you demonstrate that the general requirements in 30 TAC Sections 116.610 and 116.615 are met?	☒ Yes ☐ No
Did you demonstrate that the individual requirements of the specific standard permit are met?	☒ Yes ☐ No
B. Confidential Information (All pages properly marked "CONFIDENTIAL").	☒ Yes ☐ No
C. Process Flow Diagram.	☒ Yes ☐ No
D. Process Description.	☒ Yes ☐ No
E. Maximum Emissions Data and Calculations.	☒ Yes ☐ No
F. Plot Plan.	☒ Yes ☐ No
G. Projected Start Of Construction Date, Start Of Operation Date, and Length of Time at Site:	☒ Yes ☐ No
Projected Start of Construction (provide date): 03/01/2025	
Projected Start of Operation (provide date): 04/30/2025	
Length of Time at the Site:	
VII. Delinquent Fees and Penalties	
This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: www.tceq.texas.gov/agency/financial/fees/delin/index.html.	

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VIII. Signature Requirements
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.
Name (printed): Jeffrey Bolton
Signature (original signature required):
Date: 10/2/24
IX. Copies of the Registration
The PI-1S application must be submitted through ePermits. No additional copies need to be sent to the Regional Office or local Air Pollution Control Program(s). The link to ePermits can be found here: www3.tceq.texas.gov/steers/.

Air Quality Standard Permits
Pollution Control Project Requirements Checklist
Texas Commission on Environmental Quality

Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page. The Standard Permit forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division website at: www.tceq.texas.gov/permitting/air/nav/standard.html.

Questions/Description		
1.	Please list all existing permits and registrations affected by this project. Also, attach a description of how this standard permit will be administratively incorporated into the existing permit(s).	
32770, 32835		
2.	Will this project reduce or maintain currently authorized emission rates for facilities authorized by a permit or standard permit?	☒ YES ☐ NO
	If "NO," are any increases solely due to the Pollution Control Project Standard Permit?	☐ YES ☐ NO
3.	Will this project include completely replacing or reconstructing an existing production facility?	☐ YES ☒ NO
	If "YES," you may not claim this standard permit.	
4.	Will this project return a facility or group of facilities to compliance with an existing authorization or permit?	☐ YES ☒ NO
	If "YES," approval by the APD Deputy Director will be required as part of the application review.	
5.	Is this pollution control project being submitted voluntarily?	☒ YES ☐ NO
	If "NO," please explain the reason for the submittal.	
6.	Is this pollution control project being submitted to meet any federal or state air quality requirement?	☐ YES ☒ NO
	If "YES," list the federal or state requirement.	
7.	Will the project result in any changes to currently authorized emission rates?	☒ YES ☐ NO
	If "YES," attach documentation listing affected EPNs and rate changes.	
8.	Is there a change in a method of control or control technique?	☒ YES ☐ NO
	If "YES" please attached documentation that demonstrates the new method of control or technique is at least as effective as the current method or control technique.	
9.	Is there a compound being substituted in a manufacturing process?	☐ YES ☒ NO
	If "YES" please attach documentation that demonstrates the new compound is at least as effective as the currently authorized compound.	

Air Quality Standard Permits
Pollution Control Project Requirements Checklist
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Questions/Description		
10.	Will construction or implementation of the pollution control project begin within 18 months of receiving this registration from the executive director?	☒ YES ☐ NO
11.	Are predictable maintenance, startup, and shutdown emissions directly associated with the pollution control project included in this project?	☒ YES ☐ NO
	If "YES," attach documentation showing that MSS was authorized under the existing permit or authorization.	
12.	Are all capacity increases solely due to the project as represented in the registration application?	☒ YES ☐ NO
	If "NO," you may not claim this standard permit.	
13.	Are you replacing emissions control equipment (like-kind replacements or upgrades)?	☒ YES ☐ NO
	If "NO," skip to next question.	
	If "YES" please attach documentation that demonstrates the new control equipment is at least as effective as the current control equipment.	
14.	Will current testing and record keeping requirements be appropriate for the new control equipment or technique?	☒ YES ☐ NO
	If "NO," please attach details of any proposed changes?	

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date:	September-24	**Permit No.:**	TBA	**Regulated Entity No.:**	RN100209931
Area Name:	Aniline Unit			**Customer Reference No.:**	CN601544042

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					
1. Emission Point			**2. Component or Air Contaminant Name**	**3. Air Contaminant Emission Rate**	
(A) EPN	**(B) FIN**	**(C) NAME**		**(A) POUND**	**(B) TPY**
FV87820115	FT612T2102	Central Thermal Oxidizer	VOC	0.01	0.01
			NOx	0.05	0.03
			CO	<0.01	<0.01
			PM/PM10/PM2.5	<0.01	<0.01
FUG	FUG	Aniline Plant Fugitives	VOC	<0.01	0.02
ANI-MSSATM	ANI-UNCONT	Uncontrolled Equipment Clearing	Aliphatics	<0.01	<0.01
			Benzene	<0.01	<0.01
			Dinitrobenzene	<0.01	<0.01
			Dinitrophenol	<0.01	<0.01
			Mononitrophenol	<0.01	<0.01
			Nitrobenzene	<0.01	<0.01
			Picric Acid	<0.01	<0.01
			Total VOC	<0.01	<0.01
ANI-MSSCNT	ANI-CONT	Controlled Equipment Clearing	Aliphatics	<0.01	<0.01
			Benzene	<0.01	<0.01
			Dinitrobenzene	<0.01	<0.01
			Dinitrophenol	<0.01	<0.01
			Mononitrophenol	<0.01	<0.01
			Nitrobenzene	0.01	<0.01
			Picric Acid	<0.01	<0.01
			Total VOC	0.01	<0.01

EPN = Emission Point Number
FIN = Facility Identification Number

*Only emission increases associated with this project are listed in the table.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date:	**September-24**	**Permit No.:**	**TBA**	**Regulated Entity No.:**	**RN100209931**
Area Name:	Aniline Unit			**Customer Reference No.:**	CN601544042

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA			**EMISSION POINT DISCHARGE PARAMETERS**										
1. Emission Point			**4. UTM Coordinates of Emission Point**			**Source**							
						5. Building	**6. Height Above**	**7. Stack Exit Data**			**8. Fugitives**		
EPN (A)	**FIN (B)**	**Name (C)**	**Zone**	**East (Meters)**	**North (Meters)**	**Height (Ft.)**	**Ground (Ft.)**	**Diameter (Ft.) (A)**	**Velocity (FPS) (B)**	**Temperature (°F) (C)**	**Length (Ft.) (A)**	**Width (Ft.) (B)**	**Axis Degrees (C)**
FV87820115	FT612T2102	Central Thermal Oxidizer	15	315341	3293949		100.0	2.0	40.0	160			
FUG	FUG	Aniline Plant Fugitives	15	315160	3293979		15.0				452	387	-10
ANI-MSSATM	ANI-UNCONT	Uncontrolled Equipment Clearing	15	315160	3293979		15.0				452	387	-10
ANI-MSSCNT	ANI-CONT	Controlled Equipment Clearing	15	315160	3293979		15.0				452	387	-10

EPN = Emission Point Number
FIN = Facility Identification Number

3. REGISTRATION FEE

In accordance with Title 30 of the Texas Administrative Code (30 TAC) Section (§) 116.614, a Standard Permit application fee of $900 has been paid electronically through TCEQ's State of Texas Environmental Electronic Reporting System (STEERS).

4. PLOT PLAN

The plot plan is considered CONFIDENTIAL and is included in Appendix A.

5. PROCESS AND PROJECT DESCRIPTION

This section briefly summarizes operations in the Aniline Production Unit at the Baytown Facility, followed by a description of the proposed project.

5.1 Process Description

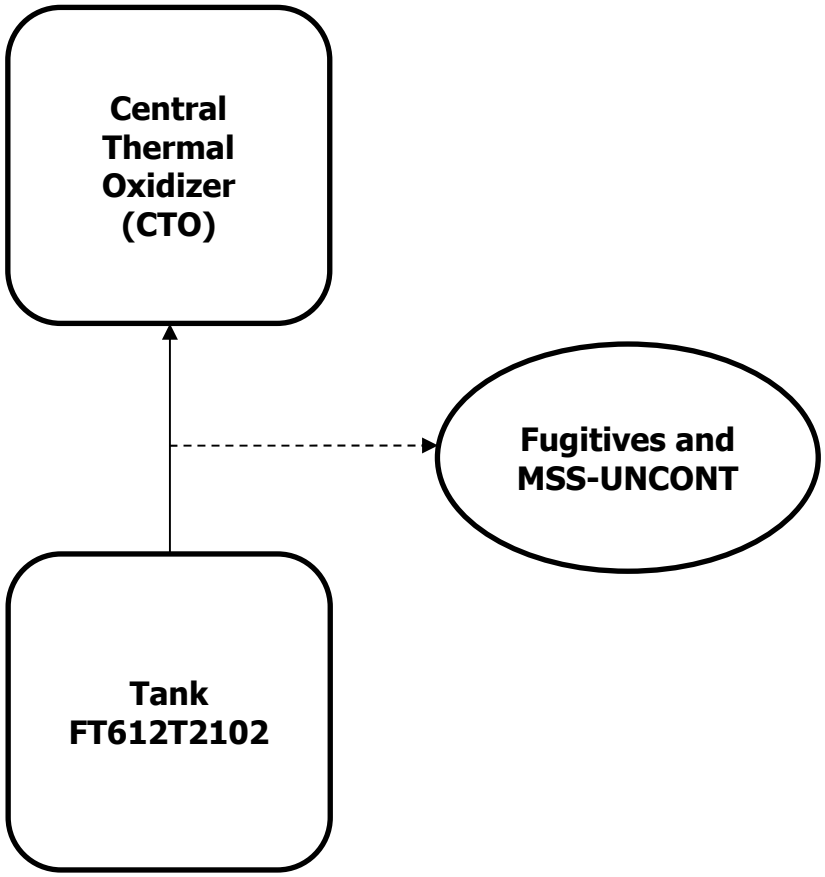
The aniline unit consists of the manufacturing of nitrobenzene and aniline. Nitrobenzene is produced through the reaction of benzene and nitric acid in the presence of sulfuric acid. The refined nitrobenzene is then hydrogenated to produce the aniline product.

5.2 Project Description

With this submittal, Covestro is requesting to authorize a change to tank FT612T2102. The tank is currently a floating roof tank. With this registration, Covestro is requesting the ability to replace the floating roof with a fixed roof tank that vents to the CTO as a control device. This modification aims to enhance emission control measures in compliance with regulatory standards. The specific changes to NSR Permits 32770 and 32835 associated with this application include:

- Removal of EPN FT612T2102 from NSR 32770
- Addition of emissions to EPN FV87820115 in NSR 32835
- Addition of emissions to EPN FUG in NSR 32770
- Removal of source ANI-MSSATM/ANI-FLT from NSR 32770
- Addition of emissions to sources ANI-MSSATM/ANI-UNCONT and ANI-MSSCONT/ANI-CONT

A process flow diagram of the project is included below.


Central
Thermal
Oxidizer
(CTO)
Fugitives and
MSS-UNCONT
Tank
FT612T2102

6. EMISSIONS DATA

The fixed roof tank routed to the CTO will achieve 99.9% efficiency which is higher than the floating roof tank. Table 6-1 summarizes the emission rate prior to and after the project. Detailed calculations are provided in CONFIDENTIAL Appendix B.

Table 6-1. Emissions Summary – Operation of Tank

Pollutant	Units	Emissions from FT612T2102 (pre-project)	Emissions from FV87820115 (post project)	Difference
VOC	lb/hr	0.16	0.01	-0.15
	tpy	0.70	0.007	-0.693
NO_X	lb/hr	0	0.05	0.05
	tpy	0	0.03	0.03
CO	lb/hr	0	0.001	0.001
	tpy	0	0.001	0.001
$PM/PM_{10}/PM_{2.5}$	lb/hr	0	0.001	0.001
	tpy	0	0.001	0.001

In addition to the VOC from the storage tank, the project will require the installation of additional piping to route the emissions from the tank to the existing vent header which routes to the CTO. As these fugitive components are required as part of the pollution control project, they are included with this registration. VOC emissions from the additional fugitive components are summarized in the table below.

Table 6-2. Fugitive Emissions Summary

EPN	VOC (lb/hr)	VOC (tpy)
FUG	0.004	0.02

MSS emissions related to tank FT612T2102 will change due to the change in tank type (floating roof to fixed roof). As there will be no floating roof landings, source ANI-MSSATM/ANI-FLT will be removed from the permit. Additional emissions under sources ANI-MSSATM/ANI-UNCONT and ANI-MSSCNT/ANI-CONT will occur due to the degassing and cleaning of the fixed roof tank. All MSS activities will follow the requirements in NSR Permit 32770. A summary of the MSS emissions is included in the table below.

Table 6-3. Emissions Summary – MSS

Pollutant	Units	Emissions from ANI-MSSATM/ANI-FLT (pre-project)	Emissions from ANI-MSSATM/ANI-UNCONT (post project)[1]	Emissions from ANI-MSSCNT/ANI-CONT (post project)[1]	Difference
Aliphatics	lb/hr	0.11	0.00002	0.00005	-0.1099
	tpy	0.01	0.0000004	0.000001	-0.01
Benzene	lb/hr	1.05	0.0002	0.0005	-1.0493
	tpy	0.01	0.000004	0.00001	-0.01
Dinitrobenzene	lb/hr	0.01	0.000001	0.000002	-0.01
	tpy	0.01	0.00000002	0.00000005	-0.01
Dinitrophenol	lb/hr	0.01	0.000003	0.00001	-0.01
	tpy	0.01	0.0000001	0.0000003	-0.01
Mononitrophenol	lb/hr	0.01	0.000001	0.000003	-0.01
	tpy	0.01	0.00000003	0.0000001	-0.01
Nitrobenzene	lb/hr	0.06	0.002	0.006	-0.052
	tpy	0.01	0.0001	0.0002	-0.0097
Picric Acid	lb/hr	0.01	0.000001	0.000002	-0.01
	tpy	0.01	0.00000001	0.00000004	-0.01
Total VOC	lb/hr	1.27	0.002	0.007	-1.261
	tpy	0.07	0.0001	0.0002	-0.0697

[1] MSS emissions associated with degassing and cleaning of tank FT612T2102.

7. GENERAL STANDARD PERMIT REQUIREMENTS

This section provides a summary demonstration that the pollution control project at the Baytown Facility will meet all applicable requirements of 30 TAC §116.610 and §116.615.

7.1 30 TAC §116.610. Applicability, Effective April 17, 2014

(a) Under the Texas Clean Air Act, §382.051, a project that meets the requirements for a Standard Permit listed in this subchapter or issued by the commission is hereby entitled to the Standard Permit, provided the following conditions listed in this section are met. For the purposes of this subchapter, project means the construction or modification of a facility or a group of facilities submitted under the same registration.

(1) Any project which results in a net increase in emissions of air contaminants from the project other than carbon dioxide, water, nitrogen, ethane, hydrogen, oxygen, or greenhouse gases (GHGs) as defined in §101.1 of this title (relating to Definitions), or those for which a national ambient air quality standard has been established must meet the emission limitations of §106.261 of this title (relating to Facilities (Emission Limitations)), unless otherwise specified by a particular Standard Permit.

The emissions limitations of 30 TAC §106.261 do not apply to the proposed pollution control project pursuant to the Air Quality Standard Permit for Pollution Control Projects, Section (2)(C).

(2) Construction or operation of the project must be commenced prior to the effective date of a revision to this subchapter under which the project would no longer meet the requirements for a Standard Permit.

Construction and operation of the project will commence prior to the effective date of a revision to this subchapter so that the requirements for the Standard Permit are met.

(3) The proposed project must comply with the applicable provisions of the Federal Clean Air Act (FCAA), §111 (concerning New Source Performance Standards) as listed under Title 40 of the Code of Federal Regulations (40 CFR) Part 60, promulgated by the United States Environmental Protection Agency (U.S. EPA).

The proposed project is not subject to any New Source Performance Standard (NSPS) codified in Title 40 of the Code of Federal Regulations (40 CFR) Part 60.

(4) The proposed project must comply with the applicable provisions of FCAA, §112 (concerning Hazardous Air Pollutants) as listed under 40 CFR Part 61, promulgated by the U.S. EPA.

The proposed project is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP) codified in 40 CFR Part 61.

(5) The proposed project must comply with the applicable maximum achievable control technology standards as listed under 40 CFR Part 63, promulgated by the U.S. EPA under

FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR 63)).

The tank will follow the requirements of 40 CFR Part 63 Subpart G.

(6) If subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program) the proposed facility, group of facilities, or account must obtain allocations to operate.

Covestro will comply with 30 TAC Chapter 101, Subpart H, Division 3 as applicable.

(b) Any project that constitutes a new major stationary source or major modification as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions) because of emissions of air contaminants other than greenhouse gases is subject to the requirements of §116.110 of this title (relating to Applicability) rather than this subchapter. Notwithstanding any provision in any specific Standard Permit to the contrary, any project that constitutes a new major stationary source or major modification which is subject to Subchapter B, Division 6 of this chapter (relating to Prevention of Significant Deterioration Review) due solely to emissions of greenhouse gases may use a Standard Permit under this chapter for air contaminants that are not greenhouse gases.

The proposed project does not constitute a new major stationary source or major modification as defined in 30 TAC §116.12. Therefore, this project is not subject to the requirements of 30 TAC §116.110.

(c) Persons may not circumvent by artificial limitations the requirements of §116.110 of this title.

Artificial limitations have not been used to circumvent the requirements of §116.110.

(d) Any project involving a proposed affected source (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) shall comply with all applicable requirements under Subchapter E of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)). Affected sources subject to Subchapter E of this chapter may use a Standard Permit under this subchapter only if the terms and conditions of the specific Standard Permit meet the requirements of Subchapter E of this chapter.

This project is not constructing or reconstructing a major source of HAPs. Therefore, this requirement does not apply.

7.2 30 TAC §116.615. General Conditions, Effective November 22, 2018

The following general conditions are applicable to holders of Standard Permits, but will not necessarily be specifically stated within the Standard Permit document.

(1) Protection of public health and welfare. The emissions from the facility, including dockside vessel emissions, must comply with all applicable rules and regulations of the commission adopted under

Texas Health and Safety Code, Chapter 382, and with the intent of the Texas Clean Air Act (TCAA), including protection of health and property of the public.

This Standard Permit application documents that the proposed project will comply with the rules and regulations of the TCEQ and the intent of the TCAA, including protection of health and property of the public.

(2) Standard permit representations. All representations with regard to construction plans, operating procedures, pollution control methods, and maximum emission rates in any registration for a standard permit become conditions upon which the facility or changes thereto, must be constructed and operated. It is unlawful for any person to vary from such representations if the change will affect that person's right to claim a standard permit under this section. Any change in condition such that a person is no longer eligible to claim a standard permit under this section requires proper authorization under §116.110 of this title (relating to Applicability). Any changes in representations are subject to the following requirements:

(A) For the addition of a new facility, the owner or operator shall submit a new registration incorporating existing facilities with a fee, in accordance with §116.611 and §116.614 of this title, (relating to Registration to use a Standard Permit and Standard Permit Fees) prior to commencing construction. If the applicable standard permit requires public notice, construction of the new facility or facilities may not commence until the new registration has been issued by the executive director.

(B) For any change in the method of control of emissions, a change in the character of the emissions, or an increase in the discharge of the various emissions, the owner or operator shall submit written notification to the executive director describing the change(s), along with the designated fee, no later than 30 days after the change.

(C) For any other change to the representations, the owner or operator shall submit written notification to the executive director describing the change(s) no later than 30 days after the change.

(D) Any facility registered under a standard permit which contains conditions or procedures for addressing changes to the registered facility which differ from subparagraphs (A) - (C) of this paragraph shall comply with the applicable requirements of the standard permit in place of subparagraphs (A) - (C) of this paragraph.

Covestro will comply with all of the above requirements as applicable.

(3) Standard Permit in lieu of permit amendment. All changes authorized by Standard Permit to a facility previously permitted under §116.110 of this title shall be administratively incorporated into that facility's permit at such time as the permit is amended or renewed.

The Standard Permit will be incorporated into NSR Permits 32770 and 32835 at the next amendment or renewal.

(4) Construction progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office not later than 15

working days after occurrence of the event, except where a different time period is specified for a particular Standard Permit.

Covestro will notify the appropriate TCEQ regional office of construction progress, as required.

(5) Start-up notification.

(A) The appropriate air program regional office of the commission and any other air pollution control program having jurisdiction shall be notified prior to the commencement of operations of the facilities authorized by a Standard Permit in such a manner that a representative of the executive director may be present.

(B) For phased construction, which may involve a series of units commencing operations at different times, the owner or operator of the facility shall provide separate notification for the commencement of operations for each unit.

(C) Prior to beginning operations of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).

(D) A particular Standard Permit may modify start-up notification requirements.

Covestro will provide the necessary start-up notifications, as required by this sub-section.

(6) Sampling requirements. If sampling of stacks or process vents is required, the Standard Permit holder shall contact the commission's appropriate regional office and any other air pollution control agency having jurisdiction prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The Standard Permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant.

If stack sampling is required by the Executive Director, Covestro will comply with these stack sampling requirements.

(7) Equivalency of methods. The Standard Permit holder shall demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the Standard Permit. Alternative methods must be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the Standard Permit.

Covestro is not requesting any alternatives to emissions control methods, sampling or other emission testing methods, and monitoring methods indicated in the conditions of the Standard Permit. Covestro understands that if changes are proposed, equivalency of methods will be required.

(8) Recordkeeping. A copy of the Standard Permit along with information and data sufficient to demonstrate applicability of and compliance with the Standard Permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the Standard Permit holder in the Standard Permit registration. This information must include, but is not limited to, production records and operating hours. Additional recordkeeping requirements may be specified in the conditions of the Standard Permit. Information and data sufficient to demonstrate applicability of and compliance with the Standard Permit must be retained for at least two years following the date that the information or data is obtained. The copy of the Standard Permit must be maintained as a permanent record.

Covestro will maintain records as required by the Standard Permit and make them available to representatives of the executive director, the United States Environmental Protection Agency (U.S. EPA), or any local pollution control program with jurisdiction.

(9) Maintenance of emission control. The facilities covered by the Standard Permit may not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. Notification for emissions events and scheduled maintenance shall be made in accordance with §101.201 and §101.211 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; and Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements).

Covestro will maintain the air pollution capture and abatement equipment covered by this Standard Permit in good working order and will operate the air pollution capture and abatement equipment properly during normal facility operations. Notifications under 30 TAC §101.201 and §101.211 will be made, as appropriate.

(10) Compliance with rules. Registration of a Standard Permit by a Standard Permit applicant constitutes an acknowledgment and agreement that the holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the claiming of the Standard Permit. If more than one state or federal rule or regulation or permit condition are applicable, the most stringent limit or condition shall govern. Acceptance includes consent to the entrance of commission employees and designated representatives of any air pollution control agency having jurisdiction into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the Standard Permit.

Covestro will comply will all rules, regulations, and orders of the commission.

(11) Distance limitations, setbacks, and buffer zones. Notwithstanding any requirement in any Standard Permit, if a Standard Permit for a facility requires a distance, setback, or buffer from other property or structures as a condition of the permit, the determination of whether the distance, setback, or buffer is satisfied shall be made on the basis of conditions existing at the earlier of:

(A) the date new construction, expansion, or modification of a facility begins; or

(B) the date any application or notice of intent is first filed with the commission to obtain approval for the construction or operation of the facility.

The non-rule Air Quality Standard Permit for Pollution Control Projects does not require distance limits, setbacks, or buffer zones. Therefore, this condition does not apply.

8. SPECIFIC STANDARD PERMIT REQUIREMENTS

This section demonstrates that the pollution control project at the Baytown Facility meets all requirements of the non-rule Air Quality Standard Permit for Pollution Control Projects, effective February 9, 2011.

8.1 Air Quality Standard Permit for Pollution Control Projects, Effective February 9, 2011

This air quality Standard Permit authorizes pollution control projects that meet all of the conditions listed in sections (1) – (6) of this Standard Permit.

(1) Scope and applicability.

(A) This Standard Permit applies to pollution control projects undertaken voluntarily or as required by any federal or state air quality requirement, which reduce or maintain currently authorized emission rates for existing facilities authorized by a permit, Standard Permit, or permits by rule (PBR). Pollution control projects do not qualify for authorization under this Standard Permit if the project constitutes a

(i) new major stationary source or major modification of an existing major source as defined in 30 Texas Administrative Code (30 TAC) § 116.12, Nonattainment and Prevention of Significant Deterioration Review Definitions; or

(ii) reconstruction of a major source under 30 TAC § 116.400(a)(2), Applicability.

The proposed project does not constitute a new major source nor a major modification of an existing major source with regard to NNSR or PSD permitting.

(B) The project may include:

(i) the installation or replacement of emission control equipment;

(ii) the implementation or change to the control technique; or

(iii) the direct substitution of compounds used in manufacturing or related processes that are a direct substitution for compounds used in a process in the original authorization. The direct substitution of compounds must not result in process reconfiguration, new emission point sources, changes to the process conditions, or increased health impacts.

This pollution control project Standard Permit application addresses the change of the control technique.

(C) This Standard Permit shall not be used to authorize the installation or replacement of emission control equipment, the implementation or change to a control technique, or the direct substitution of compounds used in manufacturing or related processes:

(i) that constitutes the complete replacement of an existing production facility or reconstruction of a production facility as defined in 40 Code of Federal Regulations §60.15(b)(1) and (c);

The proposed pollution control project does not include the complete replacement of an existing production facility or reconstruction of a production facility.

(ii) that causes an exceedance of a National Ambient Air Quality Standards (NAAQS), or is expected to adversely affect human health and the environment due to an increase or change in the nature of any air contaminant until those concerns are addressed by the owner or operator to the satisfaction of the executive director;

The proposed pollution control project will not cause an exceedance of a NAAQS or adversely affect human health. An impacts analysis for NAAQS is included in Appendix C. There is no increase in VOC emissions and therefore, a health effects review is not required.

(iii) that returns a facility or group of facilities to compliance with an existing authorization or permit unless authorized by the executive director; or

The proposed pollution control project is not being used to return a facility or group of facilities to compliance with an existing authorization or permit.

(iv) that makes changes to scrubbers used to control odor or that allows substitution of compounds used in scrubbers.

This pollution control project is not being used to alter scrubbers used to control odor or substitute compounds used in scrubbers.

(D) Only new or modified pollution control projects shall meet the conditions of this Standard Permit.

(i) All Standard Permit registrations under previous versions of the State Pollution Control Project Standard Permit shall remain authorized under the original authorization's version until the ten-year anniversary and renewal of the current authorization, or when the registration is voided.

This application represents a new pollution control project authorization. As such, this requirement is not applicable.

(ii) All Standard Permit registrations that were authorized under previous versions of the State Pollution Control Project Standard Permit shall include the increases and decreases in emissions resulting from those projects in any future netting calculation.

This application represents a new pollution control project authorization. As such, this requirement is not applicable.

(iii) All conditions of this Standard Permit shall be met upon the ten-year anniversary and renewal of the original registration, or when the registration is authorized by the facilities' permit and the registration is voided.

Covestro will meet all conditions of this Standard Permit upon the ten-year anniversary and renewal of the original registration, or when the registration is authorized by the facilities' permit and the registration is voided.

(2) General requirements.

(A) Any claim under this Standard Permit shall comply with:

(i) 30 TAC § 116.604(1) and (2) (Duration and Renewal of Registrations to Use Standard Permits);

Covestro will comply with the renewal requirements in §116.604(1) and (2).

(ii) 30 TAC § 116.605(d)(1) and (2) (Standard Permit Amendment and Revocation);

Covestro will comply with the amendment and revocation requirements in §116.605(d)(1) and (2).

(iii) 30 TAC § 116.610 (Applicability);

Covestro meets the conditions of §116.610 as shown in the previous section of this application.

(iv) 30 TAC § 116.611 (Registration to Use a Standard Permit);

This document includes the registration to use a Standard Permit and contains all of the required elements set forth in §116.611.

(v) 30 TAC § 116.614 (Standard Permit Fees) except as provided otherwise in this Standard Permit; and

The $900 standard permit registration fee was submitted electronically using TCEQ's STEERS as mentioned in Section 3.

(vi) 30 TAC § 116.615 (General Conditions).

Covestro understands the conditions of §116.615 are General Conditions of the Standard Permit and will comply with the applicable requirements as shown in the previous section of this application.

(B) Construction or implementation of the pollution control project shall begin within 18 months of receiving written acceptance of the registration from the executive director, with one 18-

month extension available, and shall comply with 30 TAC § 116.115(b)(2) and 30 TAC § 116.120 (General and Special Conditions and Voiding of Permits). Any changes to allowable emission rates authorized by this section become effective when the project is complete and operation or implementation begins.

Covestro understands that construction and implementation of the project must occur within 18 months of acceptance of this registration or will request an 18-month extension. In addition, Covestro will comply with 30 TAC §116.115(b)(2) and §116.120 (General and Special Conditions and Voiding of Permits).

(C) The emissions limitations of 30 TAC § 116.610(a)(1) do not apply to this Standard Permit.

Covestro understands that the requirements of 30 TAC §116.610(a)(1) are not applicable to this Standard Permit.

(D) Planned maintenance, startup, and shutdown emissions directly associated with the pollution control projects shall be included in the representations of the registration.

MSS emissions associated with the proposed pollution control project are included in this registration.

(E) Initial performance testing, monitoring, recordkeeping, and reporting shall be proposed that demonstrates initial and continuous compliance with the representations made in the registration.

The Baytown Facility will maintain records to demonstrate compliance with representations associated with this Standard Permit registration.

(F) Any increases in actual or allowable emission rates or any increase in production capacity authorized by this section, including increases associated with recovering lost production capacity, shall occur solely as a result of the project as represented in the registration. Any increases of production associated with a pollution control project shall not be utilized until an additional authorization is obtained. This paragraph is not intended to limit the owner or operator's ability to recover lost capacity caused by a derate that may be recovered and used without any additional authorization.

There are no increases in production capacity associated with this application.

(G) Any collateral increases in actual or allowable emission rates shall be demonstrated to be protective of the NAAQS, public health and welfare, and physical property. The owner or operator shall demonstrate protectiveness in accordance with THSC, §382.0518(b)(2) and 30 TAC § 116.610. Projects that result in decreases of emission rates of all air pollutants are deemed to be adequately protective.

There are collateral increases of NO_x, CO, and $PM/PM_{10}/PM_{2.5}$ associated with this application. An impacts analysis for NAAQS is included in Appendix C.

(H) Any direct compound substitution shall be demonstrated not to cause additional health impacts. The commission's Effects Screening Level (ESL) for any substituted compound,

including resulting emissions of new products and byproducts, which result from the direct compound substitution shall not be less than the ESL value for the currently authorized compound and the emission rate for the substituted compound, including resulting emissions of new products and byproducts, which result from the direct compound substitution shall not be greater than the emission rate for the currently authorized compound.

This project does not involve direct compound substitutions.

(I) The facility is required to operate in accordance with all requirements and conditions of the original authorization, except for those conditions identified as being affected in the pollution control Standard Permit approval, including all representations made in the Standard Permit registration.

Covestro will continue to operate in accordance with all requirements and conditions of TCEQ NSR Permit Nos. 32770 and 32835, except as represented in and authorized as a result of this standard permit application.

(3) Replacement projects.

(A) The replacement of emissions control equipment or control technique under this Standard Permit is not limited to the method of control currently in place, provided that the control or control technique is at least as effective as the currently authorized control equipment or control technique and all other requirements of this Standard Permit are met. The replacement control equipment or control technique shall have the demonstrated ability to meet or exceed the performance level of the equipment or control technique that is being replaced.

The CTO will achieve 99.9% efficiency and will be more effective than the floating roof tank (as shown in Table 6-1).

(B) The maintenance, startup, and shutdown emissions may be increased above currently authorized emission limits if the increase is necessary to implement the replacement project and maintenance, startup, and shutdown emissions were authorized by permit, PBR, or Standard Permit for the existing control equipment or technique and the emissions increases meet the NAAQS and are protective of public health, as required by this Standard Permit.

MSS emissions are being revised with this project but will not be increased above currently authorized emission limits.

(C) Equipment installed under this section is subject to the following:

(i) testing, monitoring, recordkeeping, and reporting requirements of the original control authorization shall transmit to all in-kind replacement of emissions control equipment; or

(ii) testing, monitoring, recordkeeping, and reporting shall be proposed by the owner or operator for all replacement of emissions control equipment that is different than those in the original authorization sufficient to demonstrate compliance with this permit. Proposed testing, monitoring, recordkeeping, and reporting for replacement emissions control equipment must meet industry or technology-specific standards.

Covestro will comply with all applicable monitoring and recordkeeping requirements for the CTO (EPN FV87820115) in NSR 32835.

(4) Registration requirements.

(A) A registration shall be submitted in accordance with the following.

(i) Notification is required for the following changes no later than 30 days after construction or implementation begins.

(a) In-kind replacement of emissions control equipment that results in no increase in emissions of any air contaminant. The registration fee shall be accompanied by a $900 fee. No response will be sent from the executive director.

(b) Changes in representations to a previously authorized State Pollution Control Project Standard Permit for which there are no increases in authorized emissions of any air contaminant. No fee applies and no response will be sent from the executive director.

(ii) Notification is required for the following changes no later than 45 days prior to construction or implementation begins. Construction or implementation may begin only after written acceptance of the pollution control project has been issued by the executive director.

(a) Implementation or change to control technique with a demonstrated and established performance level. The registration shall be accompanied by a $900 fee.

(b) Replacement of existing emissions control equipment with a different type of control equipment or in-kind replacement of emissions control equipment that results in an increase in emissions of any contaminant. The registration shall be accompanied by a $900 fee.

(c) Compound substitution. The registration shall be accompanied by a $900 fee.

(d) Changes in representations to a previously authorized State Pollution Control Project Standard Permit that increase authorized emissions of an authorized air contaminant or cause the emission of an air contaminant not previously authorized. The registration shall be accompanied by a $450 fee unless received within 180 days of the original registration approval.

Covestro has submitted this registration and the $900 fee to the TCEQ to authorize the proposed project at the Baytown Facility. The notification is being submitted following the requirements of (4)(A)(ii)(b).

(B) The registration shall include the following:

(i) a description of process units affected by the project;

(ii) a description of the project;

(iii) identification of existing permits or registrations affected by the project, including any conditions that will be changed or removed as a result of this authorization;

(iv) quantification and basis of increases and/or decreases associated with the project, including identification of affected existing or proposed emission points, all air contaminants, and hourly and annual emissions rates;

(v) a description of proposed initial testing, monitoring, recordkeeping, and reporting that will demonstrate that the project operates as represented;

(vi) a description of how the Standard Permit will be administratively incorporated into the existing permit(s); and

(vii) a demonstration that the proposed changes will not cause or contribute to an exceedance of the NAAQS or the commission's ESL and that the resulting emissions are protective of human health and the environment.

This Pollution Control Project Standard Permit registration application contains the requirements listed above.

(5) Operational requirements. Upon installation of the pollution control project, the owner or operator shall comply with the requirements of subsections (A) and (B) of this section.

(A) General duty. The owner or operator shall operate the pollution control project in a manner consistent with good industry and engineering practices and in such a way as to minimize emissions of collateral pollutants, within the physical configuration and operational standards usually associated with the emissions control device, strategy, or control technique.

Covestro will operate the pollution control project in accordance with good industry and engineering practice in order to minimize emissions.

(B) Recordkeeping. The owner or operator shall maintain copies on site of testing, monitoring, or other emission records sufficient to demonstrate that the pollution control project complies with all of the requirements of this Standard Permit and final application representations relied upon to register for this Standard Permit.

Covestro will maintain records to demonstrate that the pollution control project complies with the requirements of this Standard Permit and the final representations relied upon to register for this Standard Permit.

(6) Incorporation of the Standard Permit into the facility authorization.

(A) Any new facilities or changes in method of control or control technique authorized by this Standard Permit at a previously permitted or Standard Permitted facility shall be

administratively incorporated into the permit for that facility when the permit is amended or renewed.

Covestro will incorporate this Standard Permit into NSR Permits 32770 and 32835 at the next amendment or renewal.

(B) All increases in previously authorized emissions, new facilities, or changes in method of control or control technique authorized by this Standard Permit for facilities previously authorized by a PBR shall comply with 30 TAC § 106.4 (Requirements for Permitting by Rule), except 30 TAC § 106.4(a)(1) and 30 TAC § 106.8 (relating to Recordkeeping).

Tank FT612T2102 was not previously authorized by PBR. This condition does not apply.

APPENDIX C. IMPACTS ANALYSIS

There are collateral increases of NOx, CO, and $PM_{10}/PM_{2.5}$ as a result of routing the emissions from FT612T2102 to the CTO. Covestro performed a screening analysis to demonstrate that the increase in emissions will not result in an exceedance of the NAAQS.

The screening tables from the TCEQ's MERA guidance document were used to determine a conservative estimate of ground level concentration. Table 1 (downwash for all hours) was used. Based on a stack height of 100 feet and a distance to the property line of 1,830 feet, the unit impact is 21.7 $\mu g/m^3$ per lb/hr. The NAAQS analysis is documented in the table below.

Table C-1. NAAQS Analysis

Pollutant	Averaging Period	Emission Increase (lb/hr)	Impact ($\mu g/m^3$)	SIL ($\mu g/m^3$)	Impact <SIL?
NOx	1-hr	0.05	1.085	7.5	Yes
	Annual	0.01	0.017	1	Yes
CO	1-hr	0.001	0.022	2000	Yes
	8-hr	0.001	0.015	500	Yes
PM10	24-hr	0.001	0.009	5	Yes
PM2.5	24-hr	0.001	0.009	1.2	Yes
	Annual	0.0002	0.0003	0.13	Yes

As the predicted impacts are below the Significant Impact Levels (SIL) for all pollutants and averaging times, no further analysis is required and the project will not result in an exceedance of the NAAQS.