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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 19, 2025

MR MICHAEL MAYO
SR MANAGER EHS
TOPSOE INC
10010 BAYPORT BLVD
PASADENA TX 77507-1412

Re: Alternative Method of Compliance (AMOC) No. 232
TK3 Catalyst Manufacturing Plant
Hot Water System §117 Alternative Compliance Demonstration
Regulated Entity Number: RN101211498
Customer Reference Number: CN600132435
Associated Permit Numbers: 9203 and O1217

Dear Mr. Mayo:

This correspondence is in response to Topsoe, Inc.'s (Topsoe's) January 30, 2025 follow-up to the February 21, 2024 Alternate Method of Compliance (AMOC) approval and required performance testing for the Hot Water System Heater in the TK3 Catalyst Manufacturing Plant. This AMOC provides an alternative compliance method for NO_x, CO, and NH₃ to comply with 30 TAC 117 Control of NO_x, Subchapter B Combustion control at major industrial, commercial, and institutional sources in ozone nonattainment areas, Division 3 Houston-Galveston-Brazoria Ozone Nonattainment Areas and Subchapter G, General Monitoring and Testing Requirements, Division 1 Compliance Stack Testing and Report Requirements as well as 30 TAC 101, Subchapter H Emissions Banking and Trading Program, Division 3 Mass Emissions Cap and Trade Program.

The performance testing report dated December 27, 2024 demonstrated initial compliance with NO_x, CO, and NH₃ state regulatory requirements applicable to the Hot Water Heater System (FIN HWSB-1).

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a decision to approve the compliance demonstration alternatives for NO_x, CO, and NH₃. Based on the results of the testing, the alternative methods to monitor on-going compliance of air contaminants are included in the attached AMOC Plan Conditions.

The AMOC approval may supersede certain requirements or representations in Permit Nos. 9203. To ensure effective and consistent enforceability, Topsoe is required to incorporate any completed and approved AMOC into the permit through submittal of an Alteration no later than 90 days after this action. This approval may also change applicable requirements for the site, which are identified in the site operating permit (SOP) O1217 and at that time, a submittal of a SOP Revision will be needed. Additionally, if approved, this AMOC is required to be attached to each annual MECT report.

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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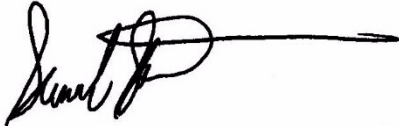
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Mr. Michael Mayo

Re: Permit Number: 9203

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

cc: Stuart Kiel, P.E., Primary , Keil Environmental Inc, Austin
Chief Health Inspector, Health Department, City of Pasadena, Pasadena
Director, Harris County, Pollution Control Services, Pasadena
Air Section Manager, Region 12 - Houston
Jesse E. Chacon, P.E., Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Becky Tsuchiya, Manager, Chemical New Source Review Permits Section, Air Permits Division,
OA: MC-163

Project Number: 388573