

## Permit by Rule (PBR) Registration Technical Review

<b>Company:</b>	Ketjen Limited Liability Company	<b>Registration No.:</b>	179483
<b>Nearest City:</b>	Pasadena	<b>Project No.:</b>	390421
<b>County:</b>	Harris	<b>Project Type:</b>	Initial
<b>Project Reviewer:</b>	Amanda Andrews	<b>Regulated Entity No.:</b>	RN100218247
<b>Unit Name:</b>	Ketjen Pasadena Plant	<b>Customer Reference No.:</b>	CN606211746
<b>PBR No(s).:</b>	106.261	<b>Project Received Date:</b>	March 20, 2025
<b>Physical Location:</b>	2500 N South St		

### Project Overview / Process Description

Ketjen Limited Liability Company (Ketjen) owns and operates a specialty chemicals manufacturing facility at its Pasadena Plant located in Pasadena, Harris County, Texas. This project will be incorporated into NSR No. 69A at then next amendment or renewal.

Ketjen has submitted this Permits By Rule (PBR) application per the annual notification requirement which summarizes the authorization of 1 project during calendar year (CY) 2024 in regards to FOP 2285 and NSR permit 69A. The increases in emissions associated with this project meet the requirements of §106.261 as demonstrated in this PBR registration.

This project will install new piping components and manual valves as part of the installation of a new piping section between SF6190 and D5109. The project will install 3 new valves and 24 new flanges; all in light liquid service

### Permit by Rule Requirements - 30 TAC Chapter 106

#### General Requirements

Registration Fee Reference No.:	<b>Application fee: 758527 / 582EA000660310</b>
Is this registration certified?	<b>Yes</b>
Is planned MSS included in the registration?	<b>No</b>
Are there affected NSR or Title V authorizations for the project?	<b>Yes</b>
<i>NSR and/or Title V authorizations:</i>	<b>NSR No. 69A; Title V O-2285</b>
If there are affected Title V authorizations, is monitoring being submitted as part of this registration?	<b>Yes</b>
Are there any upstream or downstream affects associated with this registration?	<b>No</b>
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	<b>NA</b>
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	<b>Yes</b>
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements? <b>PN for NSR No. 69A</b>	<b>Yes</b>
Are there permit limits on using PBRs at the site?	<b>No</b>
Is the facility subject to the NO <sub>x</sub> Mass Cap and Trade Program? <b>No new NO<sub>x</sub> emissions.</b>	<b>Yes</b>
Is the facility in compliance with all other applicable rules and regulations?	<b>Yes</b>
Does the registration include an appropriate PBR workbook, and has the workbook been verified?	<b>Yes</b>

#### Federal Applicability

Does this project trigger a PSD or Nonattainment review?	<b>No</b>
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	<b>NA</b>
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	<b>No</b>

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## Permit by Rule Requirements - Compliance Demonstrations

### PBR 106.261 Facilities (Emission Limitations)

- (a)(1) The facilities or changes will be located **1385 ft** from any off-site receptor.  
(a)(2) NA, no 106.261(a)(2) chemicals are being authorized with this project.  
(a)(3) Total new or increased emissions authorized by this section are below 1.0 lb/hr  
(a)(4) There will not be any changes or additions of any existing abatement equipment.  
(a)(5) Visible emissions will not exceed the 5.0 % opacity limit.  
(a)(6)-(7) Notification and all required documentation have been submitted.  
(b) This registration is not for authorization for construction or to change a facility authorized under another section of this chapter or under standard permit.

## Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: **March 25, 2025**

Site rating / classification: **0.45 / Satisfactory** Company rating / classification: **1.78 / Satisfactory**

Has any action occurred on the basis of the compliance history or rating? **No**

Did the Regional Office provide site approval and confirm distances? **NA**

### 106.261(a)(3) Emissions

Project Name	Chemical	Emi ssion Threshold (lb/hr)	Emi ssion Threshold (tpy)	Ho urly Emissions (lb/hr)	Annual Emissions (tpy)	Mee ts Threshold?
SF6190 Fugitives	2,6-Methyl Ethyl Aniline	1	4.38	1.31E-03	5.73E-03	Yes

### Total 106.261 Combined Emissions

	Total Hourly Emissions (lb/hr)	Total Annual Emissions (tpy)
<b>Total Emissions:</b>	1.31E-03	5.73E-03

## Emission Summary

EPN / Emission Source	VOC		NOx		CO		PM <sub>10</sub>		PM <sub>2.5</sub>		SO <sub>2</sub>		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
G-GZ-0 / Area G Fugitives	<0.1	0.01												
<b>TOTAL EMISSIONS (TPY):</b>		<b>0.01</b>												
<b>MAXIMUM OPERATING SCHEDULE:</b>	<b>Hours/Day</b>		<b>Days/Week</b>		<b>Weeks/Year</b>		<b>Hours/Year</b>							
	24		7		52		8,760							

*Amanda Andrews*

March 26, 2025

Ms. Amanda Andrews  
Permit Reviewer  
Rule Registration Section

Date

*Michael Partee*

March 27, 2025

Michael Partee, Manager  
Rule Registrations Section  
Air Permits Division  
Section Manager

Date