

Permit by Rule (PBR) Registration Technical Review

Company:	KAG Specialty Products Group, LLC	Registration No.:	179594
Nearest City:	Baytown	Project No.:	390822
County:	Harris	Project Type:	Initial
Project Reviewer:	John Ma	Regulated Entity No.:	RN100885151
Unit Name:	Transport Service Baytown	Customer Reference No.:	CN600313720
PBR No(s).:	106.261	Project Received Date:	March 27, 2025
Physical Location:	5206 Wade Rd		

Project Overview / Process Description

KAG Specialty Products Group, LLC (KAG) operates an existing tank container cleaning facility, Transport Service Baytown Gulf Street Terminal, located in Harris County. Facility operations are authorized under NSR Permit No. 22560. The cleaning process involves the interior cleaning of empty tank containers (including, but not limited to tank semi-trailers, iso-containers, totes) that have been emptied of their cargo except for product residue and vapors. Based on the volatility of the chemicals cleaned, emissions are routed to the flare for destruction or vented straight to atmosphere.

KAG has submitted this certified project to authorize the cleaning of empty containers that last held a new chemical not authorized under the current NSR permit under 106.261. Vapor from cleaning containers that last held certain low volatility chemicals or products are emitted directly to the atmosphere from the wash rack (EPN 92-3). This project will not result in any downstream affects at the site. This project will be incorporated into NSR Permit No. 22560 when it is amended or renewed. Reviewer has confirmed that this project will not affect pending project 366045.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 759591 / 582EA000661289
Is this registration certified?	Yes
Is planned MSS included in the registration?	No
Are there affected NSR or Title V authorizations for the project?	Yes
<i>NSR and/or Title V authorizations:</i>	NSR 22560
If there are affected Title V authorizations, is monitoring being submitted as part of this registration?	No
Are there any upstream or downstream affects associated with this registration?	No
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.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
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?	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility subject to the NO _x Mass Cap and Trade Program?	No NOx emissions from this project.
Is the facility in compliance with all other applicable rules and regulations?	Yes
Does the registration include an appropriate PBR workbook, and has the workbook been verified?	Yes
Notes:	

Federal Applicability

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

Permit by Rule Requirements - Compliance Demonstrations

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PBR 106.261 Facilities (Emission Limitations)

- (a)(1) The facilities or changes will be located >100ft from any off-site receptor.
(a)(2) n/a, there will be no new emissions under 106.261(a)(2).
(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.

Notes:

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: **March 31, 2025**
Site rating / classification: **Unclassified** Company rating / classification: **Unclassified**
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

Chemical	Criteria Pollutant Designation	L Value (mg/m ³)	CAS No. (optional input)	Emission Threshold (lb/hr)	Emission Threshold (tpy)	Hourly Emissions (lb/hr)	Annual Emissions (tpy)	Meets Threshold ?
Colbalt Bis(2-Ethylhexanoate)	VOC		136-52-7	1	4.38	1.82E-01	4.54E-02	Yes

Total 106.261 Combined Emissions

	Total Hourly Emissions (lb/hr)	Total Annual Emissions (tpy)
Total Emissions:	1.82E-01	4.54E-02

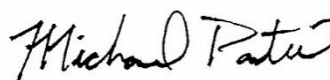
Emission Summary

EPN / Emission Source	VOC		NOx		CO		PM ₁₀		PM _{2.5}		SO ₂		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
92-3 / Wash Rack	0.18	0.05												
TOTAL EMISSIONS (TPY):		0.05												
MAXIMUM OPERATING SCHEDULE:												Hours/Year	8,760	



Mr. John Ma
Permit Reviewer
Rule Registration Section

March 31, 2025
Date



Michael Partee, Manager
Rule Registrations Section
Air Permits Division

April 1, 2025
Date