

From: Navy, Carlisa <carlisa.navy@ineos.com>
Sent: Tuesday, April 1, 2025 12:01 PM
To: Sarah Kyser
Cc: McGovern, Kevin; Joshua Wheatley
Subject: RE: TCEQ Air Permit No. 179572 / Project No. 390779 at INEOS Americas LLC's Bayport Eo Plant site
Attachments: 6257E_343829_Approval_6564691.pdf
Follow Up Flag: Follow up
Flag Status: Completed

TA stands for turnaround which is a plant outage that typically covers maintenance work, but also can include implementation of projects that require a unit to be down.

The UAD/PWW project noted in project 4 was authorized by permit amendment under Project Number 343829. This current PBR application submittal is only capturing additional associated fugitive components.

The TCEQ approval of the permit amendment for UAD/PWW project is attached for reference.

Thanks,

INEOS
Oxide

Carlisa Navy

Environmental Engineer

INEOS Oxide
5761 Underwood Road
Pasadena, TX 77507

t: 281-474-0727

e: carlisa.navy@ineos.com

From: Sarah Kyser <Sarah.Kyser@tceq.texas.gov>
Sent: Tuesday, April 1, 2025 10:39 AM
To: Navy, Carlisa <carlisa.navy@ineos.com>
Cc: McGovern, Kevin <kevin.mcgovern@ineos.com>; Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>
Subject: FW: TCEQ Air Permit No. 179572 / Project No. 390779 at INEOS Americas LLC's Bayport Eo Plant site

This Message Is From an External Sender

If in doubt, throw it out.

Report Suspicious

Thank you for the clarification. Can you please also clarify what “TA” refers to in the description of project 4?

Failure to submit all of the requested information by **April 7, 2025** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Ms. Sarah Kyser
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-5708
Sarah.Kyser@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customerurvey

From: Navy, Carlisa <carlisa.navy@ineos.com>
Sent: Monday, March 31, 2025 2:42 PM
To: Sarah Kyser <Sarah.Kyser@tceq.texas.gov>
Cc: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; McGovern, Kevin <kevin.mcgovern@ineos.com>
Subject: RE: TCEQ Air Permit No. 179572 / Project No. 390779 at INEOS Americas LLC's Bayport Eo Plant site

Hello Ms. Kyser,

The reboiler replacement was authorized by PBR in 2023 (PBR Registration Number 171702). The TCEQ approval letter is attached for reference.

Additional fugitive components were captured during the 2024 implementation of the reboiler replacement and that is what has been included as Project 5 in this recent submittal.

Please let me know if you need any additional information.

Thanks,

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Carlisa Navy

Environmental Engineer

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Pasadena, TX 77507

t: 281-474-0727

e: carlisa.navy@ineos.com

From: Sarah Kyser <Sarah.Kyser@tceq.texas.gov>

Sent: Monday, March 31, 2025 1:54 PM

To: Navy, Carlisa <carlisa.navy@ineos.com>

Cc: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; McGovern, Kevin <kevin.mcgovern@ineos.com>

Subject: TCEQ Air Permit No. 179572 / Project No. 390779 at INEOS Americas LLC's Bayport Eo Plant site

Importance: High

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Good afternoon,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 179572 / Project No. 390779 at INEOS Americas LLC and Bayport EO Plant in Harris County, Texas. You have been identified as a Technical Contact.

I have completed my initial review for this project and will need additional information/clarification before I can proceed with my review. Please address the following:

- Project 5 states that it is replacing the AA reboiler. Please clarify why PBR 106.264 or a PCP was not used to authorize the replacement. Is this project only authorizing fugitive tie ins? Provide more details as to why fugitives are the only emissions associated with the replacement of the unit.

Failure to submit all of the requested information by **April 7, 2025** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through

STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

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Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Erin E. Chancellor, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 14, 2023

MR KEVIN KRENGLE
OPERATIONS MANAGER
EQUISTAR CHEMICALS LP
5761 UNDERWOOD RD
PASADENA TX 77507-1031

Re: Permit Amendment
Permit Number: 6257E
Expiration Date: July 28, 2030
Equistar Chemicals, LP
Bayport Underwood Plant
Pasadena, Harris County
Regulated Entity Number: RN102926920
Customer Reference Number: CN600124705

Dear Mr. Krengle:

Equistar Chemicals, LP has requested an amendment to Permit Number 6257E. This letter serves as notice that your application for the above-referenced permit is technically complete as of May 31, 2023.

In accordance with Title 30 Texas Administrative Code (TAC) §116.116(b) and §116.160, Permit Number 6257E is hereby amended. Enclosed are revised general conditions, special conditions, and a maximum allowable emission rates table.

This permit amendment will automatically void upon the occurrence of any of the following, as indicated in 30 TAC § 116.120(a):

1. Failure to begin construction within 18 months of the date of issuance,
2. Discontinuance of construction for more than 18 months prior to completion, or
3. Failure to complete construction within a reasonable time.

Upon request, the executive director may grant extensions as allowed in 30 TAC §116.120(b).

Mr. Kevin Krengle
Page 2
June 14, 2023

Re: Permit Number: 6257E

If you need further information or have any questions, please contact Ms. Fara Samsudeen at (512) 239-1858 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.

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

Enclosure

cc: Chief Health Inspector, Health Department, City of Pasadena, Pasadena
Director, Harris County, Pollution Control Services, Pasadena
Air Section Manager, Region 12 - Houston

Project Number: 343829

From: Navy, Carlisa <carlisa.navy@ineos.com>
Sent: Monday, March 31, 2025 2:42 PM
To: Sarah Kyser
Cc: Joshua Wheatley; McGovern, Kevin
Subject: RE: TCEQ Air Permit No. 179572 / Project No. 390779 at INEOS Americas LLC's Bayport Eo Plant site
Attachments: TCEQ Approval Letter.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Hello Ms. Kyser,

The reboiler replacement was authorized by PBR in 2023 (PBR Registration Number 171702). The TCEQ approval letter is attached for reference.

Additional fugitive components were captured during the 2024 implementation of the reboiler replacement and that is what has been included as Project 5 in this recent submittal.

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Thanks,

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Importance: High

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Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Erin E. Chancellor, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 15, 2023

Mr. Gerald Crawford
Environmental Manager
Equistar Chemicals, LP
10801 Choate Rd
Pasadena, TX 77507

Permit by Rule Registration Number: 171702
Equistar Chemicals, LP
Project Description/Unit: Bayport Eo Plant
City: Pasadena, Harris County
Regulated Entity Number: RN102926920
Customer Reference Number: CN600124705
30 TAC § 106.261
30 TAC § 106.262
Affected Permit(s): 6257E,6257F

This is in response to your Permit by Rule (PBR) registration submitted through the online ePermits process for your facility located near Pasadena, Harris County. Based on the information submitted and review completed by the Rule Registration Section, this is an acknowledgement that Equistar Chemicals, LP has certified emissions associated with Bayport Eo Plant under the Permit By Rule(s) listed above. For rule information see: www.tceq.texas.gov/permitting/air/nav/numerical_index.html. Records must be maintained in accordance with Title 30 Texas Administrative Code § 106.8 to demonstrate compliance with the claimed PBRs.

As referenced in 30 TAC § 116.116(d)(2), all changes authorized under Chapter 106 to a permitted facility shall be incorporated into the NSR Permit No. 6257E,6257F when it is amended or renewed.

As a reminder, regardless of the authorization mechanism, all facilities must be in compliance and operate in accordance with all rules and regulations of the TCEQ and the U.S. Environmental Protection Agency. Facilities not operating in accordance with these rules and regulations, or that misrepresented or failed to fully disclose all relevant facts in obtaining this authorization may be subject to formal enforcement action.

This action is taken under authority delegated by the Executive Director of the TCEQ. If you need further information or have questions, please contact the Rule Registrations Section at (512) 239-1250 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.

Sincerely,

Handwritten signature of Michael Partee in black ink.

Michael Partee, Manager

Rule Registrations Section
Air Permits Division
Texas Commission on Environmental Quality

[Project Number: 353281]