Phone: (713) 864-8701 State District Offices

#### Senate Districts for the 2012 Elections

Senate District 4
Senate District 6
Senate District 15

#### **Texas State Representatives**

House District 23--Representative Craig Eiland

Capitol Office: CAP GW.5 Capitol Phone: (512) 463-0502 Capitol Address: P.O. Box 2910

Austin, TX 78768

District Address: 2211 The Strand

Galveston TX 77550 Phone: (409) 763-3260

House District 128--Representative Wayne Smith

Capitol Office: EXT E2.708 Capitol Phone: (512) 463-0733 Capitol Address: P.O. Box 2910

Austin, TX 78768

District Address: 909 Decker Drive,, Suite 104

Baytown TX 77520 Phone: (832) 556-2002

#### **House Districts for the 2012 Elections**

House District 23 House District 128 House District 144

#### **Texas State Board of Education Members**

SBOE District 4--Mr. Lawrence A. Allen, Jr. State Board of Education Member Websites

SBOE District 7--Mr. David Bradley
State Board of Education Member Websites

#### **SBOE Districts for the 2012 Elections**

SBOE District 7
SBOE District 8



## Who Represents Me? **Districts By Address**

U.S. Senators|U.S. Representatives|State Senators|State Representatives|SBOE The address was matched by ZIP Code. Read cautions about matching addresses.

3439 Park St Baytown, TX 77520 Harris

#### **Texas U.S. Senators**

U.S. Senators represent the entire state. Texas' current U.S. Senators are Senator John Cornyn and Senator Kay Bailey Hutchison. See their websites for current contact information.

#### **Texas U.S. Representatives**

Congressional District 2--Congressman Ted Poe Texas Congressional Member Websites

Congressional District 14--Congressman Ron Paul Texas Congressional Member Websites

Congressional District 29--Congressman Gene Green Texas Congressional Member Websites

#### Congressional District for the 2012 Elections

Congressional District 36

#### **Texas State Senators**

Senate District 4--Senator Tommy Williams

Capitol Office: CAP GE.7

Capitol Phone: (512) 463-0104

Capitol Address: P.O. Box 12068, Capitol Station

Austin, TX 78711

District Address: P. O. Box 8069

The Woodlands TX 77387 Phone: (281) 364-9426 State District Offices

Senate District 6--Senator Mario Gallegos

Capitol Office: EXT E1.804 Capitol Phone: (512) 463-0106

Capitol Address: P.O. Box 12068, Capitol Station

Austin, TX 78711

District Address: P.O. Box 41 Galena Park TX 77547 Phone: (713) 678-8600 State District Offices

Senate District 15--Senator John Whitmire

Capitol Office: CAP 1E.13 Capitol Phone: (512) 463-0115

Capitol Address: P.O. Box 12068, Capitol Station

Austin, TX 78711

District Address: 803 Yale Street

Houston TX 77007

### **Carolyn Thomas**

From:

**ENotice** 

Sent:

Friday, July 27, 2012 11:15 AM

To:

Tommy.williams@senate.state.tx.us; Mario.gallegos@senate.state.tx.us;

lesley.nelson@senate.state.tx.us; John.whitmire@senate.state.tx.us; Craig.estes@senate.state.tx.us; Wayne.smith@house.state.tx.us

Cc:

Toni Oyler; Carolyn Thomas

Subject:

TCEQ Notice Permit - O1610

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at

http://www.tceq.state.tx.us/help/policies/electronic info policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Mrs. Jayme Sadlier with the Office of Air at 512-239-1683.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<a href="http://get.adobe.com/reader">http://get.adobe.com/reader</a>) to download the free Adobe Acrobat Reader software.

Bryan W. Shaw, Ph.D., Chairman Carlos Rubinstein, Commissioner Toby Baker, Commissioner Zak Covar, Executive Director



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 27, 2012

THE HONORABLE TOMMY WILLIAMS THE HONORABLE MARIO GALLEGOS THE HONORABLE JOHN WHITMIRE TEXAS SENATE PO BOX 12068 AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Renewal Application

Project Number: 18273 Permit Number: O1610

Rhodia Inc. Baytown Plant

Baytown, Harris County

Regulated Entity Number: RN100211317 Customer Reference Number: CN600125330

Dear Senator Williams, Gallegos and Whitmire:

As required by the Texas Clean Air Act § 382.0516, as codified in the Texas Health and Safety Code, this letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) renewal application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=29.7475&lng=-95.001944&zoom=13&type=r

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

The Honorable Tommy Williams The Honorable Mario Gallegos The Honorable John Whitmire Page 2 July 27, 2012

Re: Accepted Federal Operating Permit Renewal Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

Michael Wilson, P.E., Director

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

wheel Delson

MPW/ct

Bryan W. Shaw, Ph.D., Chairman Carlos Rubinstein, Commissioner Toby Baker, Commissioner Zak Covar, Executive Director



### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 27, 2012

THE HONORABLE CRAIG EILAND THE HONORABLE WAYNE SMITH TEXAS HOUSE OF REPRESENTATIVES PO BOX 2910 AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Renewal Application

Project Number: 18273 Permit Number: 01610

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Baytown, Harris County

Regulated Entity Number: RN100211317 Customer Reference Number: CN600125330

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The Honorable Craig Eiland The Honorable Wayne Smith Page 2 July 27, 2012

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Sincerely,

Michael Wilson, P.E., Director

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

MPW/ct

Bryan W. Shaw, Ph.D., P.E., Chairman Toby Baker, Commissioner Jon Niermann, Commissioner Richard A. Hyde, P.E., Executive Director



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 3, 2016

MS ELAINE SIMPSON VP OF HEALTH, SAFETY AND ENVIRONMENT ECO SERVICES OPERATIONS CORP 300 LINDENWOOD DR MALVERN PA 19355-1740

Re: Effective Permit Approval

Renewal

Permit Number: 01610

Expiration Date: August 3, 2021 Eco Services Operations Corp.

Baytown Plant

Baytown, Harris County

Regulated Entity Number: RN100211317 Customer Reference Number: CN605004464

Account Number: HG-0696-Q

RECEIVED

AUG 2 2 2016

CENTRAL FILE ROOM

Dear Ms. Simpson:

The effective federal operating permit (FOP) for Eco Services Operations Corp., Baytown Plant is enclosed. This FOP constitutes authority to operate the emission units identified in the FOP application.

All site operating permits are subject to public petition for 60 days following the expiration of the 45-day U.S. Environmental Protection Agency (EPA) review. The public petition period for the FOP extended from May 14, 2016 until July 12, 2016. If the EPA received a valid petition and objects to the above-referenced permit, you will be notified promptly by the Texas Commission on Environmental Quality (TCEQ).

It should be noted that from the date of this letter Eco Services Operations Corp., Baytown Plant must operate in accordance with the requirements of Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122) and the FOP. Some of the terms and conditions contained in the FOP include recordkeeping conditions, reporting conditions (which includes deviation reporting), and compliance certification conditions. All reports, along with any questions regarding the reports, shall be forwarded to the Texas Commission on Environmental Quality, Houston Regional Office, 5425 Polk St Ste H, Houston, Texas 77023-1452.

Consistent with 30 TAC Chapter 122, Subchapter C, the permit holder shall submit an application to the Air Permits Division (APD) for a revision to an FOP for those activities at a site which change, add, or remove one or more FOP terms or conditions. The permit holder shall also submit an application to the APD for a revision to a permit to address the following: the adoption of an applicable requirement previously designated as federally enforceable only; the promulgation of a new applicable requirement; the adoption of a new state-only requirement; or a change in a state-only designation.

Ms. Elaine Simpson Page 2 August 3, 2016

Consistent with 30 TAC §122.133 and 30 TAC §122.134, a complete renewal application must be submitted to the agency no later than six months, but no earlier than 18 months, before the expiration of this permit.

Thank you again for your cooperation in this matter. If you have questions concerning the review or this notice, please contact Ms. Kelley Oswalt at (512) 239-0167.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Michael Wilson, P.E., Director

Michael Klas

Air Permits Division

Office of Air

Texas Commission on Environmental Quality

MPW/ko

cc: Mr. Floyd Dickerson, Environmental Manager, Eco Services Operations Corp., Houston

Mr. William J. McConnell, Plant Manager, Eco Services Operations LLC, Houston

Director, Harris County, Pollution Control Services, Pasadena

Air Section Manager, Region 12 - Houston

**Enclosure: Effective Permit** 

cc: Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 18273

## FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO Eco Services Operations Corp.

AUTHORIZING THE OPERATION OF Eco Services Operations Baytown Plant Baytown Plant Industrial Inorganic Chemicals

LOCATED AT
Harris County, Texas
Latitude 29° 44' 51" Longitude 95° 0' 7"
Regulated Entity Number: RN100211317

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No:	01610	Issuance Date:	<u>August 3, 2016</u>
P	Q A.	the	
For the 0	Commissio	n /	

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#### **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

### Special Terms and Conditions: Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- 1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.

- C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
- D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
- E. The permit holder shall comply with the following 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emission Cap and Trade Program)
  Requirements:
  - (i) Title 30 TAC § 101.352 (relating to General Provisions)
  - (ii) Title 30 TAC § 101.353 (relating to Allocation of Allowances)
  - (iii) Title 30 TAC § 101.354 (relating to Allowance Deductions)
  - (iv) Title 30 TAC § 101.356 (relating to Allowance Banking and Trading)
  - (v) Title 30 TAC § 101.358 (relating to Emission Monitoring and Compliance Demonstration)
  - (vi) Title 30 TAC § 101.359 (relating to Reporting)
  - (vii) Title 30 TAC § 101.360 (relating to Level of Activity Certification)
  - (viii) The terms and conditions by which the emission limits are established to meet or exceed the cap are applicable requirements of this permit
- 2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
  - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ

- E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
- F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
- G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
- H. Title 30 TAC § 101.221 (relating to Operational Requirements)
- I. Title 30 TAC § 101.222 (relating to Demonstrations)
- J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
- 3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
  - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed either before or after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- Visible emissions observations of emission units operated (4)during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in

compliance with the applicable opacity requirement in  $30 \text{ TAC } \S 111.111(a)(1)$  and (a)(1)(B).

- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC  $\S$  111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
  - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)

- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- 4. Permit holder shall comply with the following 30 TAC Chapter 115, Subchapter C requirements:
  - A. When filling stationary gasoline storage vessels (Stage I) for motor vehicle fuel dispensing facilities, constructed prior to November 15, 1992, with transfers to stationary storage tanks located at a facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991, the permit holder shall comply with the following requirements specified in 30 TAC Chapter 115, Subchapter C:
    - (i) Title 30 TAC § 115.222(3) (relating to Control Requirements), as it applies to liquid gasoline leaks, visible vapors, or significant odors
    - (ii) Title 30 TAC § 115.222(6) (relating to Control Requirements)
    - (iii) Title 30 TAC § 115.224(1) (relating to Inspection Requirements), as it applies to liquid gasoline leaks, visible vapors, or significant odors
    - (iv) Title 30 TAC § 115.226(2)(B) (relating to Recordkeeping Requirements)
- 5. The permit holder shall comply with the following requirements of 30 TAC Chapter 115, Subchapter F, Division 3, Degassing of Storage Tanks, Transport Vessels and Marine Vessels:
  - A. For degassing of stationary VOC storage tanks, the permit holder shall comply with the following requirements:
    - (i) Title 30 TAC § 115.541(a) (c) (relating to Emission Specifications)
    - (ii) Title 30 TAC § 115.541(f) (relating to Emission Specifications), for floating roof storage tanks
    - (iii) Title 30 TAC § 115.542(a) and (a)(1), (a)(2), (a)(3) or (a)(4) (relating to Control Requirements). Where the requirements of 30 TAC Chapter 115, Subchapter F contain multiple compliance options, the permit holder shall keep records of when each compliance option was used.
    - (iv) Title 30 TAC § 115.542(b) (d), (relating to Control Requirements)
    - (v) Title 30 TAC § 115.543 (relating to Alternate Control Requirements)

- (vi) Title 30 TAC § 115.544(a)(1) and (a)(2) (relating to Inspection, Monitoring, and Testing Requirements), for inspections
- (vii) Title 30 TAC § 115.544(b) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring
- (viii) Title 30 TAC § 115.544(b)(1) and (b)(2) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring of control devices
- (ix) Title 30 TAC § 115.544(b)(2)(A) (J) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring (as appropriate to the control device)
- (x) Title 30 TAC § 115.544(b)(3), (b)(4) and (b)(6) (relating to Inspection, Monitoring, and Testing Requirements), for VOC concentration or lower explosive limit threshold monitoring
- (xi) Title 30 TAC § 115.544(c), and (c)(1) (c)(3) (relating to Inspection, Monitoring, and Testing Requirements), for testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xii) Title 30 TAC § 115.545(1) (7), (9) (11) and (13) (relating to Approved Test Methods)
- (xiii) Title 30 TAC § 115.546(a), (a)(1) and (a)(3) (relating to Recordkeeping and Notification Requirements), for recordkeeping
- (xiv) Title 30 TAC § 115.546(a)(2) and (a)(2)(A) (J) (relating to Recordkeeping and Notification Requirements), for recordkeeping (as appropriate to the control device)
- (xv) Title 30 TAC § 115.546(a)(4) (relating to Recordkeeping and Notification Requirements), for recordkeeping of testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xvi) Title 30 TAC § 115.546(b) (relating to Recordkeeping and Notification Requirements), for notification
- (xvii) Title 30 TAC § 115.547(4) (relating to Exemptions)
- B. For the degassing of all transport vessels with a nominal capacity of 8,000 gallons or more, the permit holder shall comply with the following requirements:
  - (i) Title 30 TAC § 115.541(a) (c) and (d) (relating to Emission Specifications)

- (ii) Title 30 TAC § 115.542(a) and (a)(1), (a)(2), (a)(3) or (a)(4) (relating to Control Requirements). Where the requirements of 30 TAC Chapter 115, Subchapter F contain multiple compliance options, the permit holder shall keep records of when each compliance option was used.
- (iii) Title 30 TAC § 115.542(b), (c) and (e) (relating to Control Requirements)
- (iv) Title 30 TAC § 115.543 (relating to Alternate Control Requirements)
- (v) Title 30 TAC § 115.544(a)(1) and (a)(2) (relating to Inspection, Monitoring, and Testing Requirements), for inspections
- (vi) Title 30 TAC § 115.544(b) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring
- (vii) Title 30 TAC § 115.544(b)(1) and (b)(2) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring of control devices
- (viii) Title 30 TAC § 115.544(b)(2)(A) (J) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring (as appropriate to the control device)
- (ix) Title 30 TAC § 115.544(b)(3), (b)(4) and (b)(6) (relating to Inspection, Monitoring, and Testing Requirements), for VOC concentration or lower explosive limit threshold monitoring
- (x) Title 30 TAC § 115.544(c), and (c)(1) (c)(3) (relating to Inspection, Monitoring, and Testing Requirements), for testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xi) Title 30 TAC § 115.545(1) (11) and (13) (relating to Approved Test Methods)
- (xii) Title 30 TAC § 115.546(a), (a)(1) and (a)(3) (relating to Recordkeeping and Notification Requirements), for recordkeeping
- (xiii) Title 30 TAC § 115.546(a)(2) and (a)(2)(A) (J) (relating to Recordkeeping and Notification Requirements), for recordkeeping (as appropriate to the control device)
- (xiv) Title 30 TAC § 115.546(a)(4) (relating to Recordkeeping and Notification Requirements), for recordkeeping of testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xv) Title 30 TAC § 115.546(b) (relating to Recordkeeping and Notification Requirements), for notification

- 6. The permit holder shall comply with the requirements of 30 TAC § 115.722(b) (relating to Site-wide Cap and Control Requirements) and the requirements of 30 TAC § 115.726(g) (relating to Recordkeeping and Reporting Requirements).
- 7. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 8. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

## **Additional Monitoring Requirements**

- 9. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
  - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).

- B. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
- C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
- D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.
- E. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.
- F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

## **New Source Review Authorization Requirements**

- 10. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield

- 11. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- The permit holder shall maintain records to demonstrate compliance with any 12. emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).
- 13. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
  - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
  - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
  - C. Boiler Standard Permit

## **Compliance Requirements**

- 14. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
- 15. Permit holder shall comply with the following 30 TAC Chapter 117 requirements:
  - A. The permit holder shall comply with the compliance schedules and submit written notification to the TCEQ Executive Director as required in 30 TAC Chapter 117, Subchapter H, Division 1:

- (i) For sources in the Houston-Galveston-Brazoria Nonattainment area, 30 TAC § 117.9020:
  - (1) Title 30 TAC § 117.9020(2)(A), (C), and (D)
- B. The permit holder shall comply with the Initial Control Plan unit listing requirement in 30 TAC § 117.350(c) and (c)(1).
- C. The permit holder shall comply with the requirements of 30 TAC § 117.354 for Final Control Plan Procedures for Attainment Demonstration Emission Specifications and 30 TAC § 117.356 for Revision of Final Control Plan.
- 16. Use of Emission Credits to comply with applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)(2)
    - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
    - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)(2)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
- 17. Use of Discrete Emission Credits to comply with the applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:

- (i) Title 30 TAC Chapter 115
- (ii) Title 30 TAC Chapter 117
- (iii) If applicable, offsets for Title 30 TAC Chapter 116
- (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
  - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

## Risk Management Plan

18. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

#### Permit Location

19. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

## Permit Shield (30 TAC § 122.148)

20. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit

shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

# Attachments

**Applicable Requirements Summary** 

**Additional Monitoring Requirements** 

**Permit Shield** 

New Source Review Authorization References

Unit Summary .	••••••	17
Applicable Regu	iirements Summary	

Note: A "none" entry may be noted for some emission sources in this permit's "Applicable Requirements Summary" under the heading of "Monitoring and Testing Requirements" and/or "Recordkeeping Requirements" and/or "Reporting Requirements." Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

# **Unit Summary**

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
BARGE-DOCK	LOADING/UNLOADING OPERATIONS	N/A	R5211-0001	30 TAC Chapter 115, Loading and Unloading of VOC	True Vapor Pressure = True vapor pressure less than 0.5 psia.
BARGE-DOCK	-DOCK LOADING/UNLOADING N/A OPERATIONS		R5211-0002	30 TAC Chapter 115, Loading and Unloading of VOC	True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia., Daily Throughput = Loading less than 20,000 gallons per day.
GRPACIDTNK	STORAGE TANKS/VESSELS	T-5, T-6, T-7, T-8	R5112-0001	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
PKGBOILSTK	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	N/A	R7ICI-0001	30 TAC Chapter 117, Subchapter B	No changing attributes.
PKGBOILSTK	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	N/A	60Dc-001	40 CFR Part 60, Subpart Dc	No changing attributes.
PREHTRSTK	PROCESS HEATERS/FURNACES	N/A	R7ICI-0001	30 TAC Chapter 117, Subchapter B	No changing attributes.
PRO-REGEN	SULFURIC ACID PRODUCTION	N/A	REG2-002	30 TAC Chapter 112, Sulfur Compounds	No changing attributes.
PRO-REGEN	SULFURIC ACID PRODUCTION	N/A	60H-001	40 CFR Part 60, Subpart H	No changing attributes.
T-16	STORAGE TANKS/VESSELS	N/A	R5112-0004	30 TAC Chapter 115, Storage of VOCs	No changing attributes.

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)	
BARGE- DOCK	EU	R5211- 0001	voc	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(1) § 115.212(a)(2) § 115.214(a)(1)(B) § 115.214(a)(1)(D) § 115.214(a)(1)(D)(i)	Vapor pressure (at land- based operations). All land- based loading and unloading of VOC with a true vapor pressure less than 0.5 psia is exempt from the requirements of this division, except as specified.	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B)	None	
BARGE- DOCK	EU	R5211- 0002	voc	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(2)(A) § 115.212(a)(2) [G]§ 115.212(a)(7) § 115.214(a)(1)(B) § 115.214(a)(1)(D) § 115.214(a)(1)(D)(i)	Any plant, excluding gasoline bulk plants, which loads less than 20,000 gpd of VOC with a true vapor pressure of 0.5 psia or greater is exempt from the requirements of this division, except for the specified requirements.	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B) § 115.216(3)(D)	None	
GRPACIDT NK	EU	R5112- 0001	voc	30 TAC Chapter 115, Storage of VOCs	§ 115.112(e)(1) § 115.112(e)(3) § 115.112(e)(3)(A) § 115.112(e)(3)(A)(i)	No person shall place, store, or hold VOC in any storage tank unless the storage tank is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere or is in compliance with the control requirements specified in Table 1 of this paragraph for VOC other than crude oil and condensate or Table 2 of subsection (a)(1) of this paragraph for crude oil and condensate.	§ 115.115(a) § 115.115(a)(6) § 115.116(a)(1) [G]§ 115.117	§ 115.118(a)(4) § 115.118(a)(4)(F) § 115.118(a)(5) § 115.118(a)(7)	None	
PKGBOILST K	EU	R7ICI- 0001	NOx	30 TAC Chapter 117, Subchapter B	§ 117.310(d)(3) § 117.310(a) § 117.310(a)(1)(C)	An owner or operator may not use the alternative methods specified in §§	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b)	§ 117.345(a) § 117.345(f) § 117.345(f)(1)	§ 117.335(b) § 117.335(g) § 117.340(p)(2)(D)	

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 117.310(b) [G]§ 117.310(e)(1) § 117.310(e)(2) [G]§ 117.310(e)(3) § 117.310(e)(4) § 117.340(l)(2) § 117.340(p)(1) § 117.340(p)(2)(C) § 117.340(p)(3)	117.315, 117.323 and 117.9800 to comply with the NO <sub>x</sub> emission specifications but shall use the mass emissions cap and trade program in Chapter 101, Subchapter H, Division 3, except that electric generating facilities must also comply with the daily and 30-day system cap emission limitations of § 117.320. An owner or operator may use the alternative methods specified in § 117.9800 to comply with § 117.320.	\$ 117.335(d) \$ 117.335(e) \$ 117.335(g) \$ 117.340(a) \$ 117.340(0)(1) \$ 117.340(p)(1) \$ 117.340(p)(2)(A) \$ 117.340(p)(2)(B) \$ 117.340(p)(2)(C) \$ 117.340(p)(2)(C) \$ 117.8000(b) \$ 117.8000(c) \$ 117.8000(c)(3) \$ 117.8000(c)(5) \$ 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.345(f)(9)	[G]§ 117.345(b) [G]§ 117.345(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8)
PKGBOILST K	EU	R7ICI- 0001	со	30 TAC Chapter 117, Subchapter B	§ 117.310(c)(1) § 117.310(c)(1)(B) § 117.310(c)(3) § 117.8120	CO emissions must not exceed 400 ppmv at 3.0% O 2, dry basis.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(d) § 117.335(e) § 117.335(g) § 117.340(a) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(d) § 117.8120(2) [G]§ 117.8120(2)(A) § 117.8120(2)(B)		§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8)
PKGBOILST K	EU	60Dc-001	SO₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89	None .	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a) § 60.48c(j)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)	
						and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).				
PKGBOILST K	EU	60De-001	<b>PM</b> .	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	\$ 60.48c(g)(1) \$ 60.48c(g)(2) \$ 60.48c(g)(3) \$ 60.48c(i)	[G]§ 60.48c(a) § 60.48c(j)	
PKGBOILST K	EU	60Dc-001	PM (OPACITY)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a) § 60.48c(j)	
PREHTRST K	EU	R7ICI- 0001	NOx	30 TAC Chapter 117, Subchapter B	§ 117.310(d)(3) § 117.310(a) § 117.310(a)(8)(A)(ii) § 117.310(b) [G]§ 117.310(e)(1) § 117.310(e)(2) [G]§ 117.310(e)(4) § 117.340(l)(2) § 117.340(p)(1) § 117.340(p)(2)(C) § 117.340(p)(3)	An owner or operator may not use the alternative methods specified in §§ 117.315, 117.323 and 117.9800 to comply with the NO <sub>x</sub> emission specifications but shall use the mass emissions cap and trade program in Chapter 101, Subchapter H, Division 3, except that electric generating facilities must also comply with the daily and 30-day system cap emission limitations of § 117.320. An owner or operator may use the alternative methods specified in § 117.9800 to comply with § 117.320.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(b) § 117.335(e) § 117.335(g) § 117.340(a) § 117.340(p)(1) § 117.340(p)(1) § 117.340(p)(2)(A) § 117.340(p)(2)(B) § 117.340(p)(2)(C) § 117.340(p)(2)(C)	§ 117.345(a) § 117.345(f) § 117.345(f)(1) § 117.345(f)(9)	\$ 117.335(b) \$ 117.335(g) \$ 117.340(p)(2)(D) [G]\$ 117.345(b) [G]\$ 117.345(c) \$ 117.8010 [G]\$ 117.8010(1) \$ 117.8010(2)(A) \$ 117.8010(2)(B) \$ 117.8010(2)(C) \$ 117.8010(2)(C) \$ 117.8010(3) \$ 117.8010(4) [G]\$ 117.8010(5) \$ 117.8010(6) [G]\$ 117.8010(6) [G]\$ 117.8010(7) [G]\$ 117.8010(8)	

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
PREHTRST K	EU	R7ICI- 0001	со	30 TAC Chapter 117, Subchapter B	§ 117.310(c)(1) § 117.310(c)(1)(B) § 117.310(c)(3)	CO emissions must not exceed 400 ppmv at 3.0% O 2, dry basis.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(b) § 117.335(c) § 117.335(g) § 117.340(a) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8000(d) § 117.8000(d) § 117.8000(d) § 117.8120(d) § 117.8120(d)	§ 117.345(a) § 117.345(f) § 117.345(f)(1) § 117.345(f)(9)	§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8)
PRO- REGEN	EU	REG2-002	SO <sub>2</sub>	30 TAC Chapter 112, Sulfur Compounds	§ 112.6(a)	Except as provided in §112.5 and in §112.14 no person may cause, suffer, allow, or permit emissions of SO2 from any sulfuric acid plant to exceed the emission limits set by the specified equation.	§ 112.2(a) § 112.6(c)	§ 112.2(c)	§ 112.2(b)
PRO- REGEN	EU	REG2-002	H₂SO₄	30 TAC Chapter 112, Sulfur Compounds	§ 112.41(b) § 112.41(b)(1)	Sulfuric acid or oleum facilities may not permit emissions of H2SO4 mist to exceed 0.50 lb/ton (0.25 gram/kg) of 100% H2SO4 produced when burning specified compounds by the contact process.	§ 112.43(b) § 112.43(c) [G]§ 112.43(c)(1) [G]§ 112.43(c)(2) § 112.45(a)	[G]§ 112.45(b)	None
PRO- REGEN	PRO	60H-001	SO <sub>2</sub>	40 CFR Part 60, Subpart H	§ 60.82(a)	On and after the \$60.8 performance test, no owner or operator shall discharge	§ 60.84(a) § 60.84(b) § 60.84(c)	None	§ 60.84(e)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)	
						gases containing SO2 in excess of 2 kg per metric ton (4.0 lb per ton) of acid produced into the atmosphere.	\$ 60.84(e) \$ 60.85(a) \$ 60.85(b)(1) \$ 60.85(b)(2) \$ 60.85(b)(3) ** See CAM Summary			
PRO- REGEN	PRO	60H-001	PM (OPACITY)	40 CFR Part 60, Subpart H	§ 60.83(a)(2)	No owner or operator shall discharge any gases exhibiting 10% opacity, or greater.	§ 60.85(a) § 60.85(b)(4)	None	None	
PRO- REGEN	PRO	60H-001	H <sub>2</sub> SO <sub>4</sub>	40 CFR Part 60, Subpart H	§ 60.83(a)(1)	No owner or operator shall discharge any gases containing acid mist, expressed as H2SO4, in excess of 0.075 kg per metric ton (0.15 lb per ton) of acid produced, the production being expressed as 100% H2SO4.	§ 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3)	None	None	
T-16	EU	R5112- 0004	voc	30 TAC Chapter 115, Storage of VOCs	§ 115.112(e)(1) § 115.112(e)(3) § 115.112(e)(3)(A) § 115.112(e)(3)(A)(i)	No person shall place, store, or hold VOC in any storage tank unless the storage tank is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere or is in compliance with the control requirements specified in Table 1 of this paragraph for VOC other than crude oil and condensate or Table 2 of subsection (a)(1) of this paragraph for crude oil and condensate.	[G]§ 115.117	§ 115.118(a)(4) § 115.118(a)(4)(F) § 115.118(a)(5) § 115.118(a)(7)	None	

Additional Monitoring Requiremen	nts
Compliance Assurance Monitoring Summary	

### **CAM Summary**

Unit/Group/Process Information					
ID No.: PRO-REGEN					
Control Device ID No.: AMMONIA SCRUBB	Control Device Type: SO2 Scrubber				
Applicable Regulatory Requirement					
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001				
Pollutant: SO2	Main Standard: § 60.82(a)				
Monitoring Information					
Indicator: pH					
Minimum Frequency: once per day					
Averaging Period: n/a*					
Deviation Limit: Minimum pH is 4.5					
CAM Text: Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least weekly, whichever is more frequent, and shall be accurate to within $\pm$ 0.5 pH unit.					

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

## **CAM Summary**

Unit/Group/Process Information							
ID No.: PRO-REGEN							
Control Device ID No.: AMMONIA SCRUBB	Control Device Type: SO2 Scrubber						
Applicable Regulatory Requirement							
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001						
Pollutant: SO2	Main Standard: § 60.82(a)						
Monitoring Information							
Indicator: Liquid Flow Rate	Indicator: Liquid Flow Rate						
Minimum Frequency: once per day							
Averaging Period: n/a*							
Deviation Limit: Minimum liquid flow rate is 6	50 gallons per minute						
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:  ± 2% of span; or  ± 5% of design liquid flow rate.							

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

# Permit Shield

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#### **Permit Shield**

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
втст	N/A	40 CFR Part 63, Subpart Q	Cooling tower has not operated with chromium based chemicals on or after 09/18/1994.
DOCKVC	N/A	30 TAC Chapter 117, Subchapter B	Heat Capacity of vapor combustor is < 40 MMBtu/hr
GRPACIDTNK	T-5, T-6, T-7, T-8	40 CFR Part 60, Subpart K	Tanks were constructed prior to June 11, 1973.
PREHTRSTK	N/A	40 CFR Part 63, Subpart DDDDD	Facility is an area source of HAPs.
PRO-REGEN	N/A	30 TAC Chapter 117, Subchapter B	The furnace is exempt on the basis of being a sulfuric acid regeneration unit.
T-16	N/A	40 CFR Part 60, Subpart K	Tanks were constructed prior to June 11, 1973.

New Source Review Authorization References
New Source Review Authorization References 29
New Source Review Authorization References by Emission Unit

#### **New Source Review Authorization References**

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterio	ration (PSD) Permits
PSD Permit No.: PSDTX695M3	Issuance Date: 08/08/2013
Title 30 TAC Chapter 116 Permits (Other Than Permits By Rule, PS Area.	, Special Permits, and Other Authorizations D Permits, or NA Permits) for the Application
Authorization No.: 56534	Issuance Date: 11/24/2014
Authorization No.: 86388	Issuance Date: 10/29/2008
Authorization No.: 9565	Issuance Date: 08/08/2013
Permits By Rule (30 TAC Chapter	106) for the Application Area
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 03/14/1997
Number: 106.412	Version No./Date: 09/04/2000
Number: 106.472	Version No./Date: 03/14/1997
Number: 106.478	Version No./Date: 03/14/1997
Number: 7	Version No./Date: 09/12/1989

#### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
BARGE-DOCK	SPENT ACID LOADING	56534
BTCT	COOLING TOWER	106.371/03/14/1997
DOCKVC	DOCK VAPOR COMBUSTOR	56534
PKGBOILSTK	PACKAGE BOILER	106.183/09/04/2000
PREHTRSTK	PREHEATER	106.183/09/04/2000
PRO-REGEN	REGEN PROCESS UNIT	9565, PSDTX695M3
T-16	SPENT ACID STORAGE TANK	56534
T-5	SPENT ACID STORAGE TANK	56534
T-6	SPENT ACID STORAGE	56534
T-7	SPENT ACID STORAGE TANK	56534
T-8	SPENT ACID STORAGE TANK	56534

# Appendix A Acronym List ......32

# Acronym List

The following abbreviations or acronyms may be used in this permit:

	. 1 1: 6
	actual cubic feet per minute
	alternate means of control
	Acid Rain Program
ASTM	
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	
CD	control device
COMS	continuous opacity monitoring system
CVS	closed-vent system
D/FW	Dallas/Fort Worth (nonattainment area)
DR	Designated Representative
ElP	El Paso (nonattainment area)
	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
	grandfathered
gr/100 scf	grains per 100 standard cubic feet
НАР	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
	hydrogen sulfide
	identification number
	pound(s) per hour
MMRtu/br	Million British thermal units per hour
MDDT	monitoring, recordkeeping, reporting, and testing
	nonattainment
	not applicable
NO.	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
	New Source Review
ORIS	Office of Regulatory Information Systems
	lead
	Permit By Rule
	particulate matter
	parts per million by volume
pcu	prevention of significant deterioration
רטעעפר	
RU	culfur diovida
DU2	sulfur dioxide
TOP	Texas Commission on Environmental Quality
15r	total suspended particulate
IV	true vapor pressureUnited States Code
U.S.C.	United States Code
VUC	volatile organic compound

# Appendix B

Major NSR Summary Table	34
9565 and PSDTX695M3	. 26

### **Major NSR Summary Table**

Permit Number: 9565 and PSDTX695M3 Issuance Date: August 8				e Date: August 8, 2013										
Emission	Source	Air Contaminant	Emiss	ion Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements							
Point No. (1)	Name (2)	Name (3)	lb/hr	TPY (4)	Spec. Cond.	Spec. Cond.	Spec. Cond.							
		Carbon Monoxide	5.50	24.09										
	İ	H <sub>2</sub> SO <sub>4</sub> (6)	6.88	20.08										
		Ammonia	0.40	1.70	]									
		NO <sub>x</sub>	19.75	54.91	]									
		PM <sub>10</sub>	3.19	11.32	]									
		PM <sub>2.5</sub>	3.19	11.32	1									
		Sulfur Dioxide (6)	114.13	441.65	]									
		VOC	0.01	0.01	1									
		Silver	0.03	0.12	1									
		Arsenic	0.13	0.52	2, 3, 4, 5, 7, 9, 11, 13, 14, 15		2, 3, 4, 5, 6, 7, 9, 11, 13, 14, 15							
1	Scrubber Exhaust	Barium	0.03	0.12		2 2 4 5 7 0 11 12 14 15		2, 3, 4, 5, 6, 7, 9, 11, 13,	2, 3, 4, 5, 6, 7, 9, 11, 13,	2, 3, 4, 5, 6, 7, 9, 11, 13,	2, 3, 4, 5, 6, 7, 9, 11, 13,	2 0 11	2 0 11	2, 9, 11
•	Colubbei Exhaust	Beryllium	0.02	0.08		14, 15		<b>- 2, 9, 11</b>						
		Cadmium	0.02	0.08										
		Chlorine	0.01	0.02										
		Chromium	0.67	2.82										
		Hydrogen Chloride	0.06	0.26										
		Mercury	0.0018	0.0041										
	i	Nickel	0.56	2,42										
		Lead	0.06	0.24										
		Antimony	0.03	0.12										
		Selenium	0.05	0.20	1									
	Thallium	0.02	0.08	7										
RACKFUG	Rack Process Fugitives (5)	voc	0.01	0.01	2	2, 6	2							
		Hydrogen Sulfide	0.01	0.01										
FLICEC	Railcar Piping and	VOC	0.01	0.02		0.6								
FUGRC	Components (5)	H <sub>2</sub> SO <sub>4</sub> (6)	0.01	0.01	2	2, 6	2							

#### Footnotes:

- Emission point identification either specific equipment designation or emission point number from plot plan.
   Specific point source name. For fugitive sources, use area name or fugitive source name.
   H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist

NO<sub>x</sub> - total oxides of nitrogen

PM<sub>10</sub> - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no PM greater than 10 microns is emitted.

PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter

VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.

(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

(6) Prevention of Significant Deterioration pollutant

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT



Authorizing the Construction and Operation of The Baytown Sulfuric Acid Plant Located at Baytown, Harris County, Texas

Latitude 29° 44′ 53" Longitude 95° 0′ 7"



1

Permit: 9565 and PSDTX695M3

Amendment Date :	August 8, 2013	7.1
Renewal Date:Au	igust 8, 2023	Lak Cov
		For the Commission

- 1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
- 2. Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
- 3. Construction Progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
- 4. **Start-up Notification**. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify 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). [30 TAC 116.115(b)(2)(B)(iii)]
- 5. Sampling Requirements. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement 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 permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

- 6. **Equivalency of Methods.** The permit holder must 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 permit. Alternative methods shall 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 permit. [30 TAC 116.115(b)(2)(D)]
- 7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
- 8. **Maximum Allowable Emission Rates**. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
- 9. **Maintenance of Emission Control**. The permitted facilities shall 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. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
- 10. Compliance with Rules. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
- 11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
- 12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
- 13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
- 14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

#### **Special Conditions**

#### Permit Numbers 9565 and PSDTX695M3

#### **Emission Standards**

- 1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
- 2. These permitted facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency regulations in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), promulgated for the following: **(PSD)** 
  - A. Subparts A and Cd for Emission Guidelines and Compliance Times for Sulfuric Acid Production Units.
  - B. Subparts A and H for Sulfuric Acid Plants.
  - C. Alternative Monitoring Plan (AMP) for sulfur dioxide (SO<sub>2</sub>) emissions.
- 3. The sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) daily throughput is limited to 1,100 tons. The holder of this permit shall keep records of the daily H<sub>2</sub>SO<sub>4</sub> production and the one-hour SO<sub>2</sub> emissions rates for each day of production. Records shall be made readily available to Texas Commission on Environmental Quality (TCEQ) personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO<sub>2</sub> emission limits specified in the maximum allowable emissions rates table (MAERT). (**PSD**)
- 4. The SO<sub>2</sub> emissions from the H<sub>2</sub>SO<sub>4</sub> plant stack designated as Emission Point Number (EPN) 1 shall not exceed 2.49 pounds per ton of acid produced on an hourly basis. The SO<sub>2</sub> emissions from the H<sub>2</sub>SO<sub>4</sub> plant stack designated as Emission Point No. EPN 1 shall not exceed 2.20 pounds per ton of acid produced on an annual basis. Production is expressed as 100 percent H<sub>2</sub>SO<sub>4</sub>. Records shall be updated once a week to demonstrate compliance with each production parameter. (PSD)
- 5. Sulfuric acid mist, expressed as H<sub>2</sub>SO<sub>4</sub>, shall not be discharged from the H<sub>2</sub>SO<sub>4</sub> acid plant stack designated as EPN 1 in excess of 0.15 pounds per ton of acid produced on an hourly basis. Sulfuric acid mist, expressed as H<sub>2</sub>SO<sub>4</sub>, shall not be discharged from EPN 1 in excess of 0.10 pounds per ton of acid produced on an annual basis. Production is expressed as 100 percent H<sub>2</sub>SO<sub>4</sub>. Records shall be updated once a week to demonstrate compliance with each production parameter. **(PSD)**

- 6. Any construction of new equipment that occurs for the use of adding a new chemical is not allowed through this special condition. New chemical(s) may be added through use of a permit by rule claim and/or registration under 30 TAC Chapter 106.
  - A. Short-term (pounds per hour [lb/hr]) and annual (tons per year) emissions and calculations shall be completed for each chemical at each affected source; emission rates shall be calculated in accordance with the methods documented in the permit amendment application. The calculated emission rates shall not exceed the maximum allowable emission rate at any emission point.
  - B. The Effect Screening Level (ESL) for the chemical shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Division.
  - C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:
    - (1) The total maximum emission rate from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m³;

$$(ER/ESL)_{N} \le (ER/ESL)_{E}$$

 $(ER/ESL)_N$  = plant wide maximum hourly emission rate based on maximum vapor pressure of new compound(s) divided by its ESL.

(ER/ESL)<sub>E</sub> = the highest ratio of any previously authorized compounds plant wide hourly emission rate based on maximum vapor pressure divided by its ESL (i.e., 0.261).

- D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
  - (1) Chemical name(s), composition, and chemical abstract registry number if available.
  - (2) Molecular weight.
  - (3) Storage tanks, loading areas, and loading fugitive areas where the material is to be handled and the emission control device to be utilized.
  - (4) Date new compound handling commenced.
  - (5) Material Safety Data Sheet.

7. The H<sub>2</sub>SO<sub>4</sub> furnace shall be operated with not less than 0.5 percent excess oxygen (O<sub>2</sub>) and not more than 2400°Fahrenheit furnace exit temperature, averaged hourly. Above 1800°F, excess O<sub>2</sub> shall not exceed 3 percent, averaged hourly. The furnace outlet temperature and O<sub>2</sub> content shall be continuously monitored and recorded.

#### **Initial Determination of Compliance**

- 8. Sampling ports and platform(s) shall be incorporated into the design of EPN 1 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" of the TCEQ <u>Sampling Procedures Manual</u>. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.
- 9. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the stack designated as EPN 1. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. (PSD)
  - A. Sampling shall be conducted in accordance with Title 40 Code of Federal Regulations (40 CFR) Part 60, Appendix A, Method 7, "Determination of Nitrogen Oxide (NO<sub>x</sub>) Emissions from Stationary Sources" and Method 8, "Determination of SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> Emissions from Stationary Sources" and Method 10, "Determination of Carbon Monoxide (CO) Emissions from Stationary Sources" and other applicable testing methods.
  - B. The appropriate TCEQ Regional Office in the region where the source is located and applicable local air program(s) shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit provision or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office Director or the Director of the TCEQ in Austin shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Regional Office.

- C. Air contaminants emitted from the H<sub>2</sub>SO<sub>4</sub> acid plant stack designated as EPN 1 to be tested for include (but are not limited to) chlorine, CO, H<sub>2</sub>SO<sub>4</sub>, HCl, NO<sub>x</sub> and SO<sub>2</sub>, H<sub>2</sub>SO<sub>4</sub> mist, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1, 4, and 5.
- D. Stack testing of EPN 1 shall be completed between 90 days and 180 days after permit amendment approval in 2009. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires prior approval and requests shall be submitted to the TCEQ Regional Office.
- E. The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permit holder) for the H<sub>2</sub>SO<sub>4</sub> production unit at the time of testing. The H<sub>2</sub>SO<sub>4</sub> production rate shall be monitored and recorded during the stack test. If the normal production rate of H<sub>2</sub>SO<sub>4</sub> from this facility exceeds by more than 10 percent the tons per day maintained during sampling, the company must notify, in writing, the appropriate TCEQ Regional Office and the source may be subject to additional sampling to demonstrate continued compliance.
- F. Copies of the final sampling report shall be forwarded to the TCEQ and the EPA within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of the TCEQ <u>Sampling Procedures</u> <u>Manual</u>. The reports shall be distributed as follows:

One copy to the appropriate TCEQ Regional Office.

> One copy to each appropriate local air pollution control program. One copy to the Air Enforcement Branch, the EPA, Region 6, Dallas.

#### **Continuous Demonstration of Compliance**

- 10. At no time shall the hourly average ammonia (NH<sub>3</sub>) liquor feed rate into the H₂SO<sub>4</sub> plant exceed 65 gallons per minute (gpm).
- 11. The holder of this permit shall install, calibrate, maintain and operate a continuous monitor to measure and record the feed rate of NH<sub>3</sub> liquor into the H<sub>2</sub>SO<sub>4</sub> plant. The monitoring data shall be reduced to hourly average flow rates at least once everyday.

Semiannual reports of all excessive feed rates and monitor downtime shall be submitted to the appropriate TCEQ Regional Office. These reports shall include the information described in 40 CFR § 60.7(c).

All monitoring data, quality assurance data, excessive feed rate data and monitor downtime data shall be maintained by the source for a period of two years and shall be made readily available to the TCEQ or the EPA upon request.

- 12. At no time shall the hourly rolling average of hydrogen sulfide gas flow to the furnace exceed 150,000 standard cubic feet per hour.
- 13. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO<sub>2</sub> from EPN 1. **(PSD)** 
  - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ±5 percent from the tagged cylinder gas value.
  - B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO<sub>2</sub> per hour at least once every month.
  - C. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ

personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO<sub>2</sub> emission limits specified in MAERT.

- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments.
- E. CEMS shall be used to demonstrate compliance with the SO<sub>2</sub> emission limits as found in Special Condition No. 4. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the AMP shown as Attachment I.
  - (1) The SO<sub>2</sub> CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate in units of pounds per ton of one hundred percent acid produced.
  - (2) The SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
  - (3) Implementation of the monitoring requirements has been defined in the AMP for the SO<sub>2</sub> CEMS system.
  - (4) The AMP supersedes the corresponding SO<sub>2</sub> monitoring requirements of NSPS Subpart H.
  - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
  - (6) In the event of an CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 4 according to the procedures specified in the AMP shown as Attachment I.

#### **Compliance Assurance Monitoring**

- 14. The following requirements apply to ammonia scrubber capture system for EPN 1.
  - A. If used to control pollutants like SO<sub>2</sub>, the permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system.
  - B. The control device shall not have a bypass.
  - C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.
- 15. The minimum liquid flow to the ammonia scrubber shall be 650 gpm. The circulation rate shall be monitored and recorded at least once a day. The liquid flow rate shall be recorded at least once an hour. The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The pH shall be analyzed and recorded at least once a day from the NH<sub>3</sub> scrubber. The minimum allowable pH in the NH<sub>3</sub> scrubber is 4.5. The pH monitoring device shall be cleaned with an automatic cleaning system or cleaned weekly using hydraulic, chemical or mechanical cleaning. The pH monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent and shall be accurate to within 0.5 pH unit.

Quality assured (or valid) data must be generated when the H<sub>2</sub>SO<sub>4</sub> production unit is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the H<sub>2</sub>SO<sub>4</sub> production unit operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

Dated August 8, 2013

#### Emission Sources - Maximum Allowable Emission Rates

#### Permit Number 9565 and PSDTX695M3

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data							
Emission Point No. (1)	Source Name (2)	Air Contaminant	Emission Rates				
		Name (3)	lbs/hour	TPY (4)			
		Carbon Monoxide	5.50	24.09			
		H <sub>2</sub> SO <sub>4</sub> (6)	6.88	20.08			
		Ammonia	0.40	1.70			
		NO <sub>x</sub>	19.75	54.91			
		PM <sub>10</sub>	3.19	11.32			
		PM <sub>2.5</sub>	3.19	11.32			
		Sulfur Dioxide (6)	114.13	441.65			
	·	VOC	0.01	0.01			
	Į	Silver	0.03	0.12			
1	Scrubber Exhaust	Arsenic	0.13	0.52			
	Scrubber Exhaust	Barium	0.03	0.12			
		Beryllium	0.02	0.08			
		Cadmium	0.02	0.08			
		Chlorine	0.01	0.02			
		Chromium	0.67	2.82			
	Hydrogen Chloride	0.06	0.26				
		Mercury	0.0018	0.0041			
		Nickel	0.56	2.42			
		Lead	0.06	0.24			
		Antimony	0.03	0.12			

Project Numbers: 173006, 173012 and 173177

#### Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant	Emission	Emission Rates	
		Name (3)	lbs/hour	TPY(4)	
		Selenium	0.05	0.20	
		Thallium	0.02	0.08	
RACKFUG	Rack Process Fugitives (5)	VOC	0.01	0.01	
		Hydrogen Sulfide	0.01	0.01	
FUGRC	Railcar Piping and Components (5)	VOC	0.01	0.02	
		H <sub>2</sub> SO <sub>4</sub> (6)	0.01	0.01	

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist
  - NO<sub>x</sub> total oxides of nitrogen
  - PM<sub>10</sub> particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no PM greater than 10 microns is emitted.
  - PM<sub>2.5</sub> particulate matter equal to or less than 2.5 microns in diameter
  - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Prevention of Significant Deterioration pollutant

Date:	August 8, 2013	

Project Numbers: 173006, 173012 and 173177

#### FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY SITE OPERATING PERMIT (SOP) RENEWAL

Permit #: O1610 Company:

**Eco Services Operations Corp.** 

Project #:

18273

Site:

**Eco Services Operations Baytown Plant** 

Account #:

HG-0696-Q

Application Area:

**Baytown Plant** 

Regulated Entity #:

RN100211317

Customer #:

CN604683482

Region:

County:

Harris

SIC Code: 2819

SIC Name: Industrial Inorganic Chemicals

Permit Reviewer: Whitney Hill

#### SITE INFORMATION

Physical Location:

Last industrial facility on Park Street; surrounded by ExxonMobil Baytown operations.

3439 Park Street

Nearest City:

**Baytown** NOX, SO2

Major Pollutants: Additional FOPs:

None

#### PROJECT SUMMARY

Eco Services Operations, LLC's Baytown Plant last renewed the site's Site Operating Permit (SOP) on January 25, 2008. On July 24, 2012, Eco Services Operations, LLC submitted a timely renewal application. This application was placed on management delay because a significant revision submitted January 20, 2012 was incorporating a major modification to the site's Prevention of Significant Deterioration (PSD) permit and a revision to the site's case-by-case NSR permit. The major modification to the PSD permit was effective on August 08, 2013 and the case-by-case NSR permit was effective on November 24, 2014. That significant revision is incorporated into this renewal project. Significant emission sources include loading and unloading operations, package boilers, process heaters, sulfuric acid production, storage tanks, and preheaters. Compliance assurance monitoring is included in the permit. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-1, OP-2, OP-REO1, OP-MON, and various Unit Attribute forms).

#### PROCESS DESCRIPTION

This site is a sulfuric acid manufacturing plant. The PRO-REGEN unit is the heart of the plant which is designed to produce fresh sulfuric acid (H2SO4) from reacted sulfuric acids or "sludges" produced by refineries and/or chemical plants. Hydrogen sulfide gas (H2S) and natural gases are burned to maintain proper operating parameters and sulfur dioxide (SO2) strengths.

The sludge and sulfur gas are sprayed into a combustion furnace (2000F) where the hydrocarbons and sulfur are burned and the spent sulfuric acid is decomposed. The combustion gases pass through a boiler for heat recovery and then through a scrubbing tower, a direct contact gas cooler (660F), two electrostatic precipitators, and a drying tower.

The SO2 gas is combined with oxygen in a vanadium substrate catalytic converter to convert the SO2 into sulfur trioxide (SO3). From the converter the gas is finally sent to an absorbing tower where SO3 reacts with water to form sulfuric acid. The gas that exits from the tower is passed through a mist removal element where any entrained acid is removed. The final gas stream enters an ammonia scrubber that reduces the concentration of un-reacted SO2 gas. The tail gas is exhausted to the atmosphere.

#### **TECHNICAL REVIEW**

Permit Content Summary	
1. Was Periodic Monitoring (PM) required and included in the permit?	No
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?	Yes
3. Was case-by-case PM or CAM included in the permit?	No
4. Was a permit shield requested?	Yes
5. If a permit shield was requested, was any permit shield request denied?	No
6. Identify if the following are applicable for this project:	
(a) Manually-built applicable requirements	
(b) Customized Special Terms and Conditions	
(c) Manual changes to the IMS-generated applicable requirements	
(d) Alternate means of compliance for any emission unit/source at the site	
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?	No
8. Did the applicant's review/comments on the working draft permit result in changes	37
to the permit content?	Y es
(i.e., disagreements with applicant)?	No
(i.e., disagreements with applicant)?	190
Permit reviewer notes:	
CAM is included in the permit for emission PRO-REGEN for monitoring SO <sub>2</sub> for 40 CFR Part 60, Subpar	rt H.
· ·	
All of the permit shields submitted or existing in the permit were reviewed and approved.	
Manually built applicability was removed for unit 1 for 20 TAC Chapter 112 and the PSD applicability.	
A major NSR summary table was included in the permit for PSD TX695M3.	
During WDP review, the applicant requested to update the 30 TAC Chapter 112 requirements for PRO-	
REGEN.	
Statement of Basis	
A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included	1 in
the FOP.	- 111
1. The Statement of Basis was prepared on <u>January 28, 2016</u> .	
2. The Statement of Basis GroupWise Document # (OPDP Database) is 77048.	
Compliance History Review	
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 28, 2015.	
Site rating: 0.17 Company rating: 1.19	
(High $< 0.10$ ; Satisfactory $\ge 0.10$ and $\le 55$ ; Unsatisfactory $> 55$ )	
2. Has the permit changed on the basis of the compliance history or site/company rating?	No
Demoit and and an artist	
Permit reviewer notes:	
Site/Permit Area Compliance Status Review	
1. Were there any out-of-compliance units listed on Form OP-ACPS?	No
2. Is a compliance plan and schedule included in the permit?	

#### Permit reviewer notes:

When the renewal application was submitted initially with a compliance plan, however, an updated OP-ACPS was submitted on November 05, 2015 that showed the site was in compliance. A compliance plan and schedule was not included in the permit.

#### **Delinquent Fee Check**

- 1. The delinquent fee check was performed on January 29, 2016.

#### Permit reviewer notes:

#### **Public Notice Information**

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?	NI_
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent	No
for any reason?	No
3. Publication date: March 16, 2016 Newspaper name: The Baytown Sun	
4. Was bilingual public notice published?	NA
Publication date: Newspaper name:	
5. Were comments received during Public Notice period?	No
(a) Was a public hearing requested?	
(b) Was a public hearing held?	
(c) Was the public hearing request withdrawn?	No
(d) Was permit content changed as a result of any public comments?	
6. Was re-publication necessary?	

#### Permit reviewer notes:

#### **EPA Review**

1. Did EPA comment on the draft permit?	No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?	No
If yes, did the EPA comment on the proposed permit?	
3. Were any changes made to the permit after the EPA Review Period?	No
If yes, were these changes made within the 60 day Public Petition Period?	

#### Permit reviewer notes:

#### **IMPORTANT MILESTONES**

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	07/24/2012	
Date Project Received by Engineer	07/30/2012	
Technical Review Period	07/09/2015	01/28/2016
Working Draft Permit Reviewed by Applicant	08/31/2015	09/18/2015

Date PNAP/Draft Permit Mailed	02/18/2016	
Public Notice Comment Period	03/16/2016	04/15/2016
EPA Review Period	03/29/2016	05/13/2016
Date Sign Posting Certification Received	05/31/2016	

Milestone (Optional)	Start Date	End Date
Deficiency Cycle 1		
Deficiency Cycle 2		
Request for Comments on Compliance Plan		
Date Comment on Draft Permit Received from Public		
Date comment on Draft Permit Received from EPA		
Date Public Hearing Requested		
Date Public Hearing Held		

#### **EFFECTIVE PERMIT ISSUANCE DATE: August 3, 2016**

Date

Unavailable to Sign

Whitney Hill
Permit Reviewer
Operating Permits Section
Air Permits Division

Kelley Oswal

07/25/20

Date

Team Leader

Operating Permits Section Air Permit Division

#### **CONTACT INFORMATION**

#### Responsible Official:

Ms. Elaine Simpson VP of Health, Safety and Environment Eco Services Operations Corp 300 Lindenwood Dr. Malvern, PA 19355-1740

#### **Technical Contact:**

Floyd Dickerson Environmental Manager Eco Services Operations Corp. 8615 Manchester St Houston, TX 77012-2142

Phone: (713) 924-1408

Email: floyd.dickerson@eco-services.com

**Duly Authorized Representative:** 

William J. McConnell Plant Manager Eco Services Operations Corp. 8615 Manchester St Houston, TX 77012-2142



# AIR PERMITS DIVISION

**Baytown Plant** 

June 10, 2016

AIR PERMITS DIVISION

HIN 17 2018

2016

RECEIVED

Office of the Chief Clerk, MC-105 Texas Commission on Environmental Quality Attn: Notice Team

P.O. Box 13087

RECEIVED

Austin, Texas 78711-3087

RE:

Eco Services Operations LLC

Baytown, Texas

Title V Renewal Public Notice

Permit No.: O-01610 Account No.: HG-0696-Q

Dear Chief Clerk:

Please find attached the public notice publications for the Title V permit O-01610 renewal on March 16 and 18, 2016 and the associated public notice affidavits. Also included is the public notice verification.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

David Laurie

Environmental Engineer

Attachments

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: <u>Eco Services Operations LLC</u>

Permit No.: <u>Olk10</u>

Notice of Draft Federal Operating Permit

### AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	§
COUNTY OF Harris	§
Before me, the undersigned authority, or	n this day personally appeared
(name of person representing new	, who being by me duly sworn,
deposes and says that (s)he is the(title	YCULATION SUPERVISOR le of person representing newspaper)
of the Baytown Sun (name of newspaper)	; that said newspaper is
generally circulated in	DWN, Texas;
March 16, 2	n said newspaper on the following date(s):  Olb  Mayurtta  wspaper representative's signature)
Subscribed and sworn to before me this	the 2 day of June ,20 16,
to certify which witness my hand and sea	Not of office.  Lelalah Holence Jack  Notary Public in and for the State of Texas
(Seal)  Deborah Florence Robertson My Commission Expires 05/24/2020 ID No. 128999921	Print or Type Name of Notary Public  5-24-20  My Commission Expires

Bryan W. Shaw, Ph.D., P.E., Chairman Toby Baker, Commissioner Jon Niermann, Commissioner Richard A. Hyde, P.E., Executive Director



#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 2, 2016

MR MARK MCFADDEN VICE PRESIDENT AND SECRETARY ECO SERVICES OPERATIONS LLC 245 PARK AVE 16TH FLOOR C/O CCMP CAPITAL ADVISORS NEW YORK NY 10167-0002

Re: Notification of Final Compliance Certification

Federal Operating Permit Permit Number: O1610 Eco Services Operations LLC

**Baytown Plant** 

Baytown, Harris County

Regulated Entity Number: RN100211317 Customer Reference Number: CN604683482

Account Number: HG-0696-Q

Dear Mr. McFadden:

We have received from Eco Services Operations Corp. a letter dated November 13, 2015, concerning an ownership/name change for the above-referenced site. We have been informed that Eco Services Operations LLC is no longer the owner of the above-referenced facility. Our files have been updated to document this change.

You must submit a compliance certification (Form PCC) and deviation report(s) as required by 30 Texas Administrative Code § 122.145 and 146 for the period from the day after the end date of the most recent certification to the effective date of the transfer of ownership agreement (not to exceed 12 months). The compliance certification is due within 30 days after the effective date of the transfer of ownership agreement and should be submitted to the TCEQ Houston Regional Office, 5425 Polk St Ste H, Houston, Texas 77023-1452 and the Environmental Protection Agency Region VI. Please contact the regional office at (713) 767-3500 if you have any questions regarding the compliance certification process.

Please maintain a copy of this letter with your records for future reference. If you have questions concerning the review or this notice, please contact Ms. Alison Ray at (512) 239-4948.

Mr. Mark Mcfadden Page 2 June 2, 2016

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

Johnny D. Bowers, Team Leader Air Permits Initial Review Team

**Air Permits Division** 

Texas Commission on Environmental Quality

JDB/ar

cc: Air Section Manager, Region 12 - Houston

Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6 - Dallas

Project Number: 18273



Baytown Plant

Certified Mail: Return Receipt Requested (7015 1520 0003 4945 7579)

May 26, 2016

Office of the Chief Clerk, MC-105 Texas Commission on Environmental Quality Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

RE: Eco

Eco Services Operations LLC

Baytown, Texas

Title V Renewal Public Notice

Permit No.: O-01610 Account No.: HG-0696-Q

Dear Chief Clerk:

Please find attached the public notice publications for the Title V permit O-01610 renewal on March 16 and 18, 2016 and the associated public notice affidavits. Also included is the public notice verification.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

David Laurie

Environmental Engineer

Attachments



#### Form OP-CRO1

### Certification by Responsible Official

#### **Federal Operating Permit Program**

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFY	ING INFORMA	TION				<del></del>
RN: 100211317 CN: 605004464 Account No.: HG-0696-Q						696-Q
Permit No.: O-161		Project No.:	18273			
Area Name: Bayto	wn Plant		Company Na	ame: Eco	Services Operations	s Corporation
II. CERTIFIC	ATION TYPE (P	lease mark the a	ppropriate bo	ox)		
Responsible O	ficial	119-20-20-20-20-20-20-20-20-20-20-20-20-20-	Duly Au	thorized	Representative	
III. SUBMITT	AL TYPE (Please	mark the appro	priate box) (0	Only one r	esponse can be acc	epted per form)
SOP/TOP Initi	al Permit Applica	tion 🗌 Upda	te to Permit A	pplication	n	
☐ GOP Initial Pe	mit Application	Perm	it Revision, R	enewal, o	r Reopening	
Other: <u>Public</u>	Notice					
IV. CERTIFIC	ATION OF TRU	 ГН				
information for I,	reference only William I	McConnell		Ü	nated by the TCE on the $\frac{DAR}{R}$	
and that, based or		belief formed af			(RO or I the statements and trate, and complete	information
l	IER a Time Perio	d OR Specific Da	te(s) for each	certificat	tion. This section m	
Time Period: Fro	Time Period: From <u>03/16/16</u> to <u>03/18/2016</u> Start Date End Date					
Specific Dates: _	Date 1	Date 2	Date 3	Date 4	Date5	Date 6
Digitature	Signature: Melling In-Forest Signature Date: 5/26/16 Sittle: Plant Manager					



Applicant Name:Eco Services Operations Corporation					
Site or Facility Name: Baytown Plant					
TCEQ Account Number (if applicable):HG-0696-Q	ount Number (if applicable):HG-0696-Q Permit Number:O-1610				
Regulated Entity Number (RN): RN100211317	egulated Entity Number (RN): RN100211317 Customer Number (CN): CN605004464				
All applicants must <b>complete all applicable</b> portions of to the attention of the Office of the Chief Clerk <b>within 10 comment period</b> . For more information regarding publinotice package.	busi	ness days <u>after the end</u> of	the designated		
Alternative Langu	age (	Checklist			
I have contacted the appropriate school district.			⊠ Yes □ No		
School District:Goose Creek ISD		Phone Number:			
Person Contacted:		Date:			
Is a bilingual education program (BEP) required by the Tedistrict?	xas E	ducation Code in the	⊠ Yes □ No		
If answer is "NO," skip to first question in verifica (Note: A BEP is different from "English as a Second Lang schools that only offer ESL will not trigger notice in an al Notice in an alternative language is required if a BEP is re	juage terno	e" (ESL) program; and Elementative language.)			
conditions is met:	don	cu in the District, and one of	t the following		
<ol> <li>students in the elementary or middle school nearest t program at that school;</li> </ol>					
2. students from the elementary or middle school nearest the facility attend a BEP at another location; or ☐ Yes ☒ No					
3. the school district that otherwise would be required to provide a BEP has been granted an exception from the requirements to provide the program, as provided for in 19 Texas Administrative Code 89.1207(a). ☐ Yes ☑ No					
If the answer is "NO" to 1, 2, and 3 above, then alternati	ve la	nguage notice is not require	ed.		
The name of the elementary school nearest to the propose	d or e	existing facility is:			
Pumphrey Elementary					
The name of the middle school nearest to the proposed or	exist	ing facility is:			
Horace Mann Junior High School					
The following language(s) is/are utilized in the bilingual p	rogra	m:			
Spanish					
If notice in an alternative language is required, the language notice(s) and post alternative language so <i>Public Notice</i> and certify compliance with those re	sign(	s), as outlined in the <i>Inst</i> i	ternative ructions for		



Applicant Name:Eco Services Operations Corporation					
Site or Facility Name: Baytown Plant					
TCEQ Account Number (if applicable):HG-0696-Q	Permit Number: O-1610				
Regulated Entity Number (RN): RN100211317	Customer Number (CN)	: CN605004464			
For more information regarding public notice, refer to	the instructions in the public	notice package.			
Alternative Lang	uage Verification	· · · · · ·			
<ol> <li>A BEP is required by the Texas Education Code in permit application and is subject to alternative lan requirements.</li> <li>If "NO," skip 2 through 6 and complete sign name of applicant.</li> </ol>	⊠ Yes □ No				
2. The applicant has conducted a diligent search for a newspaper or publication of general circulation in both the municipality and county in which the facility is located (or proposed to be located).   ✓ Yes ☐ No					
3. A newspaper or publication <b>could not be found</b> language(s) in which notice is required.	in any of the alternative	☐ Yes ⊠ No			
4. The publishers of the <b>newspaper listed below refused to publish the notice</b> as requested, <b>and</b> another newspaper or publication in the same language and of general circulation <b>could not be found</b> in the municipality or county in which the facility is located (or proposed to be located).   □ Yes □ No ⋈ N/A					
Newspaper:La Subasta	Language:Spani	sh			
5. Proof of publication of the newspaper <b>alternative</b> the requested affidavits have been sent to the TCE		⊠ Yes □ No			
6. Alternative language signs were posted as required by the TCEQ.					
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.					
Verified by (signature):					
Applicant: Eco Services Operations Corporation					
Title:Environmental Engineer Date:5/20/2016					



Applicant Name:Eco Services Operations Corporation					
Site or Facility Name: Baytown Plant					
TCEQ Account Number (if applicab	le):HG-0696-Q	Permit Numbe	r:0-1610		
Regulated Entity Number (RN): RN	100211317	Customer Num	nber (CN)	): CN605004464	
For more information regarding pul	olic notice, refer to t	he instructions in	the public	c notice package.	
	ource Review Per Complete this sect				
Proof of publication of the newspape been furnished in accordance with t				☐ Yes ☐ No	
Notice of Receipt of Application	n and Intent to Ol	otain Permit (1 <sup>st</sup>	Notice)	•	
Required signs (for 1st notice) were instructions of the TCEQ.	posted in accordanc	e with the regulati	ons and	Yes No	
A copy of the administratively complete air quality application, and any revisions, were available for review and copying at the public place indicated below throughout the duration of the public comment period.			visions,	☐ Yes ☐ No	
The public place indicated below provides public access to the internet (for PSD, nonattainment, or FCAA 112(g) Permit).					
Notice of Application and Preli	minary Decision (	(2 <sup>nd</sup> Notice, if ap	plicable	e):	
A copy of the complete air quality application (including any subsequent revisions to the application), executive director's preliminary decision (which includes the draft permit), the preliminary determination summary and air quality analysis (if applicable), are available for review and copying at the public place indicated below from the first day after newspaper publication, and will remain available until either:  (1) the TCEQ acts on the application; or (2) the application is referred to the State Office of Administrative Hearings (SOAH) for hearing				☐ Yes ☐ No	
Name of Public Place:Baytown Sterl	ing Municipal Libra	ry			
Address of Public Place:1 Mary Eliza	beth Willbanks Ave.	•			
City:Baytown	City:Baytown State:Tx ZIP Code:77520				
This form must be signed and dated by a designated representative acting on behalf of the applicant after the end of the designated comment period. Send this completed form to the TCEQ to the attention of the Office of the Chief Clerk within 10 business days after the end of the designated comment period. The TCEQ will not accept this form if submitted prior to that date.					
Verified by (signature):	al Prus	U			
Applicant: Eco Services Operations Corporation					
Title:Environmental Engineer		Date:5/20/2016			



Applicant Name:Eco Services Opera	tions Corporation				
Site or Facility Name: Baytown Plant	t				
TCEQ Account Number (if applicable	e):HG-0696-Q	Permit Number:0	0-1610		
Regulated Entity Number (RN): RN:	gulated Entity Number (RN): RN100211317 Customer Number (CN): CN605004464				
For more information regarding p	public notice, refer	to the instructions	s in the	public notice package.	
		Fitle V) Notice Voice Vo		tion	
I verify that the required signs we regulations and instructions of th		dance with the		∑ Yes □ No	
I verify that proof of publication of requested affidavits have been fur and instruction of the TCEQ.	1 =	⊠ Yes □ No			
I verify that a copy of the complete air quality application (including any subsequent revisions to the application) and draft permit were available for review and copying at the public place indicated below throughout the duration of the public comment period.					
Name of Public Place:Baytown Sterli	ing Municipal Libra	ry			
Address of Public Place:1 Mary Eliza	beth Willbanks Ave	•			
City:Baytown	City:Baytown	Ci	ity:Bayto	own	
This form must be signed and the applicant after the end of the TCEQ to the attention of the of the designated comment p that date.	f <b>the designated</b> Office of the Chief	comment perio Clerk within 10 b	<b>d</b> . Send ousines	l this completed form to ss days <u>after the end</u>	
Verified by (signature):	and The	uni			
Applicant:Eco Services Operations C	Corporation				
Title:Environmental Engineer		Date:5/20/2016			

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Applicant Name: <u>Eco Services Operations LLC</u>

Permit No.: <u>O3049</u>

Notice of Draft Federal Operating Permit

# AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	§
COUNTY OF Harris	§
Before me, the undersigned authority,	on this day personally appeared
(name of person representing ne	, who being by me duly sworn, wspaper)
deposes and says that (s)he is the	itle of person representing newspaper)
of the Baytown Sun (name of newspaper)	; that said newspaper is
	which the site or proposed site is located)
that the enclosed notice was published in said newspaper on the following date(s):	
March 16, 201	6
·	Machen Multi- lewspaper representative's signature)
Subscribed and sworn to before me this the 19 day of 1,20 16.	
to certify which witness my hand and seal of office	
	Nøtary Public in and for the State of Texas
(Seal)	Se borah Florence Labertson
DEBORAH FLORENCE ROBERTSON Notary Public, State of Texas	Print or Type Name of Notary Public
My Commission Expires May 24, 2016	My Commission Expires

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087 Applicant Name: <u>Eco Services Operations LLC,</u>

Permit No.: <u>01610</u>

Notice of Draft Federal Operating Permit

ALTERNATIVE L	ANGUAGE AFFIDAVIT C	OF PUBLICATION FOR AIR PERMITTING
STATE OF TEXAS		§
COUNTY OF	Harris	§
,	signed authority, on this day p	•
(name of person re	rilu Gamez epresenting newspaper)	, who being by me duly sworn, depose
	the <u>National Accounts</u>	s Customer Service
		rson representing newspaper)
of the <u>La Su</u> (name of new	basta ; the spaper)	at said newspaper or publication is
generally circulated in	n <u>Harris</u>	, Texas; in which the site or proposed site is located)
	(municipality or county 1	in which the site or proposed site is located)
that the enclosed not	ice was published in said news	spaper or publication on the following date(s):
	March 18, 2016	•
	(newsp	paper or publication representative's signature)
Subscribed and swor		day of <u>March</u> , 20 <u>16</u> ,
to certify which witne	ess my hand and seal of office.	ablic in and for the State of Texas
	Notary Fu	DITC III and for the ordice of Leyes

(Seal)

Melania Martinez
My Commission Expires
06/01/2016

Print or Type Name of Notary Public

Duly 2016

My Commission Expires

#### November 13, 2015

Texas Commission on Environmental Quality Air Permits Division Attn.: Ms. Brooke Grunnet Mail Code 161 P.O. Box 13087 Austin, Texas 78711-3087



Re: Change of Ownership

Eco Services Operations LLC to Eco Services Operations Corp.

Air Account No. HG-0696-Q

RN 100211317 3439 Park Street Baytown, TX 77520

#### Dear Sir or Madam:

Eco Services Operations LLC anticipates that on April 29, 2016 (the "Closing Date"), it will transfer ownership of the above-referenced facility to Eco Services Operations Corp., and Eco Services Operations Corp. will become the owner and operator of the facility. As a result, Eco Services Operations LLC requests that the Commission transfer the following air permits to Eco Services Operations Corp. on the Closing Date:

- Title V Air Permit O-1610;
- Air Permit No. 56534;
- Air Permit No. 9565;
- Air Permit No. 12675;
- Air Permit No. 86388; and
- Air Permit Nos. PSDTX 695, PSDTX 695(M2) and PSDTX 695(M3).

Eco Services Operations LLC will notify the Commission if the Closing Date is delayed beyond November 24, 2015.

Enclosed please find a completed Core Data Form, Change of Name/Ownership Form and Transfer Agreement between Eco Services Operations LLC and Eco Services Operations Corp. reflecting the change in ownership. The site personnel, operations and equipment at the facility will remain the same. There will be no change in the type of pollutants emitted and no increase in the quantity of emissions.

Texas Commission on Environmental Quality Air Permits Division November 13, 2015

Thank you very much for your assistance. Should you have any questions and wish to discuss this matter further, please contact me at (609) 860-4446.

Sincerely,

Rayackel
Roger Yackel

Secretary

Encls.

# AGREEMENT TRANSFERRING RESPONSIBILLTY UNDER BAYTOWN PLANT TITLE V PERMIT NO. O-1610 FROM ECO SERVICES OPERATIONS LLC TO ECO SERVICES OPERATIONS CORP.

#### **November 13, 2015**

#### I. BACKGROUND

WHEREAS, Eco Services Operations Corp. ("<u>Eco Services Corp.</u>") is in the process of acquiring the sulfuric acid manufacturing business of Eco Services Operations LLC ("<u>Eco Services LLC</u>") (the "<u>Transaction</u>").

WHEREAS, as of the closing of the Transaction, which currently is targeted for April 29, 2016, Eco Services Corp. will own and operate Eco Services LLC's Baytown, Texas Plant (the "Closing Date").

WHEREAS, Eco Services Corp. has submitted the Change of Name/Ownership Form (Form 20405) to the Texas Commission on Environmental Quality (the "<u>TCEQ</u>") to request the transfer of all of the air permits currently issued to Eco Services LLC for its Houston Plant, including its Title V Permit No. O-1610.

WHEREAS, in consideration of, and in exchange for, the promises and covenants herein, Eco Services Corp. and Eco Services LLC agree to the terms and provisions of this Agreement Transferring Responsibility Under Houston Plant Title V Permit No. O-1610 from Eco Services LLC to Eco Services Corp. (this "Agreement").

## II. AGREEMENT BETWEEN ECO SERVICES LLC AND ECO SERVICES CORP.

- 1. As of the closing of the Transaction, and in conjunction with the transfer of Title V Permit No. O-1610, Eco Services LLC hereby assigns, and Eco Services Corp. simultaneously assumes, all legal responsibilities under Title V Permit No. O-1610.
- 2. Eco Services LLC will continue to comply with all responsibilities and obligations under Title V Permit No. O-1610 until the Closing Date, and Eco Services Corp. agrees to be bound by and comply with all responsibilities and obligations under Title V Permit No. O-1610 on and after the Closing Date without regard to whether the executive director of the TCEQ has then approved the transfer of Title V Permit No. O-1610 to Eco Services Corp.
- 3. This Agreement shall bind and inure to the benefit of the parties hereto and their respective successors and assigns.

### III. SIGNATORIES

- 4. The signatories for the parties each certify that he or she is authorized to enter into the terms and conditions of this Agreement and to execute and bind legally such party to this Agreement.
- 5. This Agreement may be executed in two or more counterparts (including electronically transmitted counterparts), each of which will be deemed an original but all of which will constitute but one instrument.

[Signature Page Follows]

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed as of the date first above written.

## ECO SERVICES OPERATIONS LLC.

By: Mame: Roger Yackel

Title: Secretary

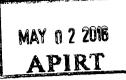
IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed as of the date first above written.

ECO SERVICES OPERATIONS CORP.

y: <u>L</u>

Name: Elaine Simpson

Title: Vice President of Health, Safety, and Environment



I. Application Type								
☑ Change in Ownership ☐ Change in Company Name								
II. Name of the New Owner or Operator of the Facilities or Equipment (Legal Entity Name of the new permittee)								
A. Customer Name: Eco Services	Operations Corp.							
B. Customer Reference Number (	CN) (if issued): No	t yet issued. <u>05</u>	004464 AM					
C. Submittal Date:								
D. Effective Date of Change: 04/29	9/2016							
E. Is the new owner an affiliate of	the previous owne	er?	ĭ YES ☐ NO					
III. Responsible Official (RO)	) Contact Inform	ation						
Name (☐ Mr. ☐Mrs. ☒Ms. ☐Dr.): Elaine Simpson								
Title: VP of Health, Safety and Environ	ıment							
Company Name: Eco Services Operation	tions Corp.							
Mailing Address: c/o PQ Corporation, 300 Lindenwood Drive, Valleybrooke Corporate Center								
City: Malvern	State: PA		Zip Code: 19355					
Territory:		Country: USA						
Foreign Postal Code:		Internal Mail Code:						
Telephone No.: 610-651-4720		Fax No.: 610-651-4249						
E-mail Address: elaine.simpson@pqco	orp.com							
IV. Technical Contact Inform	ıation							
Name (X Mr. Mrs. Mrs. Ms. Dr.)	): Floyd Dickerson							
Title: Environmental Manager								
Company Name: Eco Services Opera	tions Corp.							
Mailing Address: 8615 Manchester St	treet							
City: Houston	State: Texas		Zip Code: 77012					
Territory:		Country: USA						
Foreign Postal Code:		Internal Mail Code:						
Telephone No.: 713-924-1408		Fax No.: 713-835-3261						
E-mail Address: floyd.dickerson@eco-services.com								

YAM	0	2	2016
A	P		RT

										Kirk Comment	
v.	Site 1	Information	(contin	ued)	)						
A.	Site Na	me: Eco Servi	ces Operat	ions	Corp.						
В.	Regulated Entity Number (RN) (if issued): 100211317										
C.	Accoun	t Number ( <i>if i</i>	ssued): H	IG06	96Q						
D.	If action	n is transfer of	f ownersh	ip, is	the change fo	r the enti	re site	?	-	X YES N	O N/A
E.	E. If action is transfer of ownership for a portion of the existing site, will the new site be a major source? ☐ YES ☐ NO ☒ N/A								O 🛭 N/A		
F.	Indicate	e all pollutants	s for whic	h the	e site is a majo	r source b	ased	on t	he site's p	otential to en	nit.
Pollu	tant:	VOC	NOx		SO <sub>2</sub>	PM <sub>10</sub>		СО		PB	HAPs
Site	r at the /NO):	NO	YES		YES	NO		NO		NO	NO
Othe	r:						•				
VI.	Air A	uthorizatio	ns That A	Are.	Affected By	This Act	ion				
A.	List all applica		ations (in	cludi	ng PBR, SE, a	nd standa	rd pe	rmit	registrat	ions, and NSI	R permits), as
Air P	ermit No	. 56534		PSI	DTX695, (M2), (	(M3)			Air Permi	it No. 86388	
Air P	ermit No	. 9565		Air Permit No. 12675							
В.	List all	FOPs (includi	ng SOPs a	ind A	ATOs under GO	OPs), as a	pplica	ble:			
Title	V Air Pe	rmit No. O-161	0								
					-						
VII.	NSR	Conditions	for Chan	ige c	of Ownership	under	30 T <i>A</i>	AC §	116.110	(e)	
	pe	ermit and any	amendme	ents	ound by all the and alteration will be no char	s.				-	s made in the
	The new owner asserts there will be no increase in the quantity emitted.										



VIII.	FOP Conditions for Change of Ownership	
	• For SOP holders: Pursuant to 30 TAC § 122.210 and § 122.211, the permit holder (new owne permit revision application for a change to the permit identification of own control of a site. The change must be facilitated by a written agreement confor transfer of permit responsibility, coverage, and liability between the old This written agreement is maintained with the permit.	nership or operational ntaining a specific date
	<ul> <li>For GOP holders:         Pursuant to 30 TAC § 122.503, the permit holder (new owner) is required change is operated) an application for a new authorization to operate for a identification of ownership or operational control of a site. The change mu written agreement containing a specific date for transfer of permit responsibility between the old and new permit holder. This written agreement is permit.     </li> </ul>	change to the permit ist be facilitated by a sibility, coverage, and
Α.	Are any other changes needed for the FOP? (If YES, submit the information as explained in the instructions.)	☐ YES ☒ NO
В.	Is there an Acid Rain permit or Clean Air Interstate Rule (CAIR) permit included in the SOP? (If YES, submit the information as explained in the instructions.)	☐ YES ☒ NO
IX.	Authorization	
applion inform	aine Simpson	onsible official for this t, the statements and
Title:	VP of Health, Safety and Environment	

VIII. FOP Conditions for Change of Ownership							
• For SOP holders: Pursuant to 30 TAC § 122.210 and § 122.211, the permit holder (new own permit revision application for a change to the permit identification of ow control of a site. The change must be facilitated by a written agreement confor transfer of permit responsibility, coverage, and liability between the of This written agreement is maintained with the permit.	mership or operational ontaining a specific date						
<ul> <li>For GOP holders:         Pursuant to 30 TAC § 122.503, the permit holder (new owner) is required to submit (before the change is operated) an application for a new authorization to operate for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.     </li> </ul>							
A. Are any other changes needed for the FOP? (If YES, submit the information as explained in the instructions.)	☐ YES ⊠ NO						
B. Is there an Acid Rain permit or Clean Air Interstate Rule (CAIR) permit included in the SOP?  (If YES, submit the information as explained in the instructions.)	□ YES ⊠ NO						
IX. Authorization							
I, Elaine Simpson, certify that I am the respanding application and that, based on information and belief formed after reasonable inquirinformation on this form are true, accurate, and complete.  Signature:	y, the statements and						
Title: VP of Health, Safety and Environment							



**TCEQ Core Data Form** 

TCEQ Use Only

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

		neral Infor										
		sion (If other is										
☐ New Per	New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)											
☐ Renewa	(Core L	ata Form should	be submitted	with the	renewal for	n)	_	Oth		Update Cus	_	
2. Customer	Reference	e Number (if iss			ow this link to		ц —	, Reg	gulai	ted Entity Refere	nce Numbe	r (if issued)
CN Not	CN Not yet issued 605004464 ARay											
SECTION	<u> П: С</u>	<u>ustomer Inf</u>									1	
4. General C	4. General Customer Information 5. Effective Date for Customer Information Updates (mm/dd/yyyy) 11/24/2015											
New Cus			_		to Customer						Regulated E	Entity Ownership
Change In	Legal Na	me (Verifiable wit	h the Texas S	ecretary	of State or	Texa	s Con	ptrol	er of	Public Accounts)		- 41 41 -41 -
											rrent and	active with the
Texas Sec	retary c	f State (SOS)	or Texas C	omptr	olier of P	ublic						
6. Customer	Legal Na	me (If an individua	i, print last nam	e first: eg	g: Doe, John)			<u>If nev</u>	v Cu	stomer, enter previ	ous Custome	r below:
Eco Servi	ces One	rations Corp.						Eco	Serv	vices Operations	LLC	
7. TX SOS/C	-		8. TX State	Tax ID	(11 digits)					d Tax ID (9 digits)		S Number (Fapplicable)
	_											
11. Type of (	Customer	: 🗵 Corporati	оп		Individ	ual			Par	tnership: 🔲 Gener	al 🗌 Limited	
Government:	☐ City ☐	County   Federal	☐ State ☐ Othe	r	☐ Sole P	roprie	etorshi	lp		Other:		
12. Number				·············						endently Owned	and Opera	ted?
	21-100	101-250	251-500		501 and high				es	⊠ No		
14. Custome	r Role (P	roposed or Actual) -	- as It relates to					form.	Piea	se check one of the	following:	
Owner		Opera			Owner 8					E lost		
Occupatio			nsibie Party		☐ Voluntar	y Cle	anup.	Applic 	cant	☐Other:		
	Eco Se	rvices Operation on: Elaine Simp	s Corp., c/o	PQ Cor	poration							
15. Mailing		idenwood Drive		<u></u>			•			<del></del>		
Address:	Valley	rooke Corporat	e Center				·	<del></del>				
	City	Malvern		St	ate PA		ZIP	1	935	55	ZIP + 4	
16. Country	Malling ir	formation (If outsi	ide USA)			17.	E-Mal	l Add	ires	(if applicable)		
										r		
18. Telephor	e Numbe	r	:	19. Ex	tension or (	Code				20. Fax Number	• • • •	le)
(610)651	(610)651-4720 (610)651-4249											
SECTION	<u>і Ш: І</u>	Regulated E	ntity Info	rmat	<u>ion</u>							
21. General F	Regulated	Entity Informati	on (If 'New R	egulated							mpanied by	a permit application)
☐ New Regu	· · · · · · · · · · · · · · · · · · ·		to Regulated			<u> </u>				Entity Information		
The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC.)												
	22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)											
		rations Corn										

		3439 P	ark Street										
23. Street Address the Regulated Enti													
(No PO Boxes)		City Baytown			State	T	X ZIP		775	77520		+ 4	
24. County		Harris	Daywiii						1,10				<u> </u>
277 Ovaraj			inter Physical L	ocafio	n Doscrintia	n If no	gtrast	address i	s provid	ied.	<del> </del>		
		<u>F</u>	the Libert	ovatio	II Descriptio	11 11 410	0000	and to the	- pro-				· · · · · · · · · · · · · · · · · · ·
25. Description to Physical Location:	:												
26. Nearest City		· ·		<u>. '</u>	٠, ٠,٠	· 		<del></del>	. State		<del></del>		rest ZIP Code
Baytown									TX		Ĺ	775	20
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29	l			<u> </u>		31.5	riman	NAICS C	ode .			NAI	CS Code
29. Primary SIC Co	de (4 dig	(fis) 30	). Secondary Sid	C Code	e (4 digits)	(5 or 1	3 digits)			(5 or 6 d			
2819						325	180						
33, What is the Prin	nary Bu	ısiness o	f this entity?	Do not n	epeal the SIC or	NAICS	descripti	on.)					
	•		· ···							<del></del>	<del></del>		·
سماائمالا الا		P,O. E	30x 3331										
34. Mailing Address:													
Audiess.		City	Baytown	1	State	1	x :	ZIP		77522	ZIP	+4	3331
35. E-Mail Ad	dress:	fic	oyd.dickerson@	eco-se	ervices.com								
36, To	elephon	ie Numbe	r		37. Extension	on or (	ode	<del></del>	38	Fax Numb	er (if ap	plica	ble)
(7	713 ) 92	4-1408								(713)	835-325	52	
39. TCEQ Programs form. See the Core Data	and ID :	Numbers structions t	Check all Progran for additional guida	ns and v ance.	write in the per	mits/re	gistration	numbers (	nat will b	e affected by	the upda	ies su	bmitted on this
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				<u> </u>				3-0696Q					
☐ Municipal Solid Wa			оцгое Review Alr 565, 11660,	図0	SSF		<u>-   L  </u>	Petroleum	Storage	Tank 🔀	PWS		
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☐ Voluntary Cleanup	<del></del>	☐ Waste \	rvatet .	L) 11	asiewalei Ayi	ICARILIE	+-	AARIGI LUÜLI				24414	agian anon
				<u></u>						1 30	708		
SECTION IV:	Prep	arer I	nformation	<u> </u>			<del>,</del>	<del></del>			·,,		· ·····
40. Name: Floy	d Dic	kerson	/				41. T	itie: I	Inviro	nmental	Manag	361	
42. Telephone Numi	ber	43. Ex	tt./Code	44. Fax	c Number	<u></u>	45.	E-Mall-Ad	dress	<del> </del>			
(713)924-1408		<u></u> _		(713	) 835-3252	2	flo	yd.dicke	rson(	deco-serv	vices.c	om	
SECTION V:	Auth	orized	Signature										
46. By my signature b denature authority to s dentified in field 39.													
Company: E	co Serv	ices Oper	ations Corp.			Job 1	litle:	V.P. of	Health,	Safety, and	Environ	ment	
Name(In Print): E	laine Si	mpson	$\cap$						Pho	ne: (6	10 ) 651	-472	0
Signature:	Ma	igel	Simp	0.50	y .				Date	: 4	19/	15	
CEQ-10400 (04/15)		_		•						./	/		Pons 7 of 3

Bryan W. Shaw, Ph.D., P.E., Chairman Toby Baker, Commissioner Jon Niermann, Commissioner Richard A. Hyde, P.E., Executive Director



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 18, 2016

MR MARK MCFADDEN VICE PRESIDENT AND SECRETARY ECO SERVICES OPERATIONS LLC 245 PARK AVE 16TH FLOOR C/O CCMP CAPITAL ADVISORS NEW YORK NY 10167-0002

Re: Draft Federal Operating Permit Approval and Public Notice Authorization

Renewal

Permit Number: O1610 Eco Services Operations LLC

**Baytown Plant** 

Baytown, Harris County

Regulated Entity Number: RN100211317 Customer Reference Number: CN604683482

Account Number: HG-0696-Q

Dear Mr. McFadden:

The executive director has completed the technical review of your application as required by the Texas Clean Air Act (TCAA) § 382.0517, as codified in the Texas Health and Safety Code, and has determined that the above-referenced application is administratively complete on July 30, 2012. This letter provides notice of the following:

- instructions describing how to publish notice for the draft permit; and
- the executive director's proposed final action is to submit a draft federal operating permit
  (FOP), which serves as a proposed permit, to the U.S. Environmental Protection Agency
  (EPA) for EPA review to run concurrently with the public notice comment period, unless
  public comments are received or the executive director grants a hearing request. If EPA
  review is not concurrent, the EPA review period shall begin no earlier than the close of the
  public comment period or date of the hearing.

The Form OP-ACPS (Application Compliance Plan and Schedule) submitted with the permit application is still valid for all applicable requirements in the attached draft operating permit, including new source review authorizations. If the Form OP-ACPS is no longer correct for any reason, please submit updated Form OP-ACPS, including an updated compliance plan to Ms. Whitney Hill, Air Permits Division. This updated compliance plan must be approved by the Texas Commission Environmental Quality (TCEQ) and added to the FOP before publication.

Mr. Mark McFadden Page 2 February 18, 2016

#### **Public Notice**

The TCEQ has prepared a draft permit for your final review and approval. The draft permit and statement of basis are available at the TCEQ Website:

#### www.tceq.texas.gov/goto/tvnotice

You are now required to publish notice for the draft permit. To help you meet the requirements associated with this notice, we have enclosed the following items:

- Instructions for Public Notice
- Public Notice Checklist
- Notice for Newspaper Publication and Sign Posting
- Affidavit of Publication for Air Permitting (Form TCEQ-20479) and Alternative Language Affidavit of Publication for Air Permitting (Form TCEQ-20480)

Please note that it is **very important** that you follow **all** directions in the enclosed instructions. If you do not, you may be required to republish the notice. A common mistake is the unauthorized changing of notice wording or font. If you have any questions, please contact us before you proceed with publication.

A "Public Notice Checklist" is enclosed which notes the time limitations for each step of the public notice process. This checklist should be used as a tool in conjunction with the enclosed, detailed instructions.

#### **EPA Review**

In accordance with Title 30 Texas Administrative Code § 122.350 (30 TAC § 122.350), the procedural requirements of 30 TAC § 122.320 of this title (relating to Public Notice), 30 TAC § 122.322 of this title (relating to Bilingual Public Notice), and the requirements for EPA review under this section may run concurrently. However, if any person submits comments, or the executive director grants a hearing request, the requirement for EPA review may not run concurrently with the period for public notice. If comments are received, the executive director will submit the comments and revised proposed permit, if applicable, to the EPA and shall restart the 45-day EPA review.

If the EPA does not file an objection to a proposed FOP, or the objection is resolved, the TCEQ will issue the FOP. Any person affected by the decision of the TCEQ, including the applicant, may petition the EPA in accordance with TCAA § 382.0563, as codified in the Texas Health and Safety Code, and 30 TAC § 122.360 within 60 days of the expiration of the EPA's 45-day review period. The petition shall be based only on objections to the permit raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such objections within the public comment period, or the grounds for such objections arose after the public comment period.

Mr. Mark McFadden Page 3 February 18, 2016

The EPA may only object to the issuance of any proposed permit that is not in compliance with the applicable requirements or the requirements of this chapter. The 60-day public petition period will begin on the day after the last day of the EPA review period. Public petitions should be submitted to the TCEQ, the applicant, and the EPA at the following addresses:

Texas Commission Environmental Quality Attn: Mr. Michael Wilson, P.E., Director Air Permits Division, MC-163 P.O. Box 13087 Austin, Texas 78711-3087

U.S. Environmental Protection Agency Administrator Gina McCarthy Ariel Rios Building (AR 1101A) 1200 Pennsylvania Avenue, NW Washington, DC 20460 U.S. Environmental Protection Agency Attn: Air Permit Section Chief (6PD-R) Region 6 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

The TCEQ will make the draft FOP, the statement of basis, FOP application, compliance certification, and if applicable, the compliance plan and monitoring reports available to the public, EPA, and to the affected states and local programs as needed. If you do not comply with all requirements described in the instructions, further processing of your application may be suspended and your application voided, or the agency may take other action.

Thank you for your cooperation in this matter. If you have any questions regarding publication requirements, please contact the Office of the Chief Clerk at (512) 239-3300. If you have any other questions, please contact Ms. Whitney Hill at (512) 239-1301.

Sincerely.

Jesse E. Chacon, P.E., Manager

**Operating Permits Section** 

Air Permits Division

Texas Commission on Environmental Quality

JEC/wh

cc: Mr. Floyd Dickerson, Environmental Manager, Eco Services Operations LLC, Houston Mr. William J. McConnell, Plant Manager, Eco Services Operations LLC, Houston Director, Harris County, Pollution Control Services, Pasadena Air Section Manager, Region 12 - Houston

Project Number: 18273

#### **Public Notice Checklist**

## Notice of Draft Federal Operating Permit (Title V Notice)

The following tasks must be completed for public notice. If publication in an alternative language is required, please complete the tasks for both the English and alternative language publications. Detailed instructions are included in the "Instructions for Public Notice" section of this package.

Within 30 calendar days after date of this letter

Publish Notice of Draft Federal Operating Permit in "public notice" section of newspaper. Review for

accuracy prior to publishing.

Provide copy of complete application, including any subsequent revisions, statement of basis, and the draft permit at a public place for review and copying. Keep them there for duration of the designated comment period.

Prepare signs.

First day of newspaper publication

Review published newspaper notice for accuracy.

Post signs and keep them up for duration of the designated comment period.

Ensure copy of complete application, including any subsequent revisions, statement of basis, and the draft permit are at the public place.

Within 2 business days after date of publication

Fax proof of publication to Ms. Whitney Hill in Air Permits Division at (512) 239 - 1400 or send it by e-mail to Whitney. Hill@tceq.texas.gov.

Within 10 business days after date of publication

Mail proof of publication showing publication date and newspaper name to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of proof of publication showing publication date and newspaper name to TCEQ Regional Office and each local program with jurisdiction over your site.

Within 30 calendar days after date of publication

Mail original affidavit of publication for air permitting and alternative language affidavit of publication for air permitting (if applicable) to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of affidavits to Ms. Whitney Hill in Air Permits Division.

Within 10 business days after end of the designated comment period

Mail Public Notice Verification Form and Form OP-CRO1 to:

Texas Commission on Environmental Quality

Office of the Chief Clerk, MC-105

Attn: Notice Team

P.O. Box 13087

Austin, Texas 78711-3087

Mail photocopies of Public Notice Verification Form and Form OP-CRO1 to Ms. Whitney Hill in Air Permits Division.

## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



## **Instructions for Public Notice** For Federal Operating Permit

## **Notice of Draft Federal Operation Permit**

We have completed the technical review of your application and have prepared a draft federal operating permit (FOP) for public notice. The draft FOP and statement of basis are available at the Texas Commission on Environmental Quality (TCEQ or Commission) Website:

#### www.tceq.texas.gov/goto/tvnotice

You must comply with the following instructions:

#### **Draft Permit Review**

The draft FOP is available for your final review and approval. During technical review of the application, the permit reviewer coordinated with you or your technical contact to address and resolve any outstanding issues. Contact the permit reviewer listed in the cover letter immediately if you have any questions related to the draft FOP.

#### **Notice Review**

Included in the notice is all of the information which the commission believes is necessary to effectuate compliance with applicable public notice requirements. Please read it carefully and notify the permit reviewer listed in the cover letter immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information published. You may not change the text of the notice without prior approval from the TCEQ.

#### **Newspaper Notice**

- You must publish the enclosed Notice of Draft Federal Operating Permit as soon as practical but no later than 30 calendar days after the date on the cover letter with these instructions.
- You must publish the enclosed *Notice of Draft Federal Operating Permit*, at your expense, in the public notice section of one issue of a newspaper of general circulation in the municipality in which the site or proposed site is located, or the municipality nearest to the location of the site or proposed site.
- The bold text of the enclosed notice must be printed in the newspaper in a font style or size that distinguishes it from the rest of the notice (i.e., **bold**, *italics*). **Failure to do so may require re-notice.**

#### **Alternative Language Notice**

In certain circumstances, an applicant for an FOP must complete notice in alternative languages.

- Public notice rules require the applicant to determine whether a bilingual program is
  required at either the elementary or middle school nearest to the facility or proposed
  facility location. Bilingual education programs are determined on a district-wide basis.
  When students who are required to attend either school are eligible to be enrolled in a
  bilingual education program, some alternative language notice is required (newspaper
  notice).
- Since the school district, and not the schools, must provide the bilingual education
  program, these programs do not have to be located at the elementary or middle schools
  nearest to the facility or proposed facility to trigger the alternative language notice
  requirement. Alternative language notice is required when students who would
  normally attend the nearest schools are eligible to be taught in a bilingual education
  program at a different location.
- If triggered, publications of alternative language notices must be made in a newspaper or publication printed primarily in each language taught in the bilingual education program. This notice is required if such a newspaper or publication exists in the municipality or the county where the facility is located or proposed to be located.
- The applicant must demonstrate a good faith effort to identify a newspaper or publication in the required language. If a newspaper or publication of general circulation published at least once a month in such language cannot be found, publishing in that language is not required, but signs must still be posted adjacent to each English language sign.
- The applicant has the burden to demonstrate compliance with these requirements. You must fill out the *Public Notice Verification Form (TCEQ-20244)* indicating your compliance with the requirements regarding publication in an alternative language. This form is available at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html">www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html</a>.
- It is suggested the applicant work with the local school district to do the following:
  - (a) determine if a bilingual program is required in the district;
  - (b) determine which language is required by the bilingual program;
  - (c) locate the nearest elementary and middle schools; and
  - (d) determine if any students attending either school are eligible to be enrolled in a bilingual educational program.
- If you determine that you must meet the alternative language notice requirements, you are responsible for ensuring that the publication in the alternative language is complete and accurate in that language. Since the most common bilingual programs are in Spanish, the TCEQ has provided example Spanish notice templates for your use. All italic notes should be replaced with the corresponding Spanish translations for the specific application and published in the alternative language publication.

## Electronic versions of the Spanish templates are available through the Air Permits Division Web site at www.tceq.texas.gov/goto/air/publicnotice.

• If you are required to publish notice in a language other than Spanish, you must translate the entire public notice at your own expense.

#### **Public Comment Period**

- The public comment period should last at least 30 calendar days.
- The comment period will be longer if the last day of the public comment period ends on a weekend or a holiday. In this case, the comment period will end on the next business day.
- The comment period for the permit may lengthen depending on whether a notice and comment hearing is held. If a hearing is held, the comment period will be extended to the date of the hearing.

#### **Sign Posting**

- You must also post a sign in English and as applicable, in each alternative language, referencing the draft FOP.
- Please read the sign template carefully and notify the permit reviewer listed in the cover letter immediately if it contains any errors or omissions. You are responsible for ensuring the accuracy of all information for the sign posting. You may not change the text of the sign without prior approval from the TCEQ.
- Signs must be in place on the first day of publication in a newspaper and must remain in place and be legible for the entire comment period or the end of a notice and comment hearing, if a hearing is granted.
- The sign placed at the site must be located at or near the site main entrance, provided that the sign is legible from the public street. If the sign would not be legible from the public street, then the sign shall be placed within ten feet of a property line paralleling a public street.
- The executive director may approve variations if you demonstrate that it is not practical to comply with the specific sign posting requirements. The executive director must approve variations before signs are posted.
- All lettering on the sign must be no less than 1-1/2" in height and in block printed capital lettering.
- The sign must be at least 18" wide and 28" tall, and consist of dark lettering on a white background.
- Alternative language signs are required if alternative notice is required, even if no newspaper can be found.
- Inspect each sign posting daily to ensure they are present and visible throughout the comment period.

You must submit certification of sign posting within 10 business days after the end
of the public comment period by completing and submitting *Public Notice*Verification Form (TCEQ-20244).

#### **Proof of Publication and Public Notice Certification**

- Check each publication to ensure that the articles were accurately published.
- You must fax or e-mail a copy of the **proof of publication** of each published notice which shows the complete notice that was published, date of publication, and the name of the newspaper to the permit reviewer, within 2 business days of publication. Acceptable proofs of publication are 1) copies of the published notice or 2) the original newspaper clippings of the published notice. If you choose to submit copies of the published notice to the Office of the Chief Clerk, copies must be on standard-size 8½" x 11" paper and must show the actual size of the published notice (do not reduce the image when making copies). Published notices longer than 11" must be copied onto multiple 8½" x 11" pages. Please note, submitting a copy of your published notice could result in faster processing of your application. It is recommended that you maintain original newspaper clippings or tear sheets of the notice for your records.
- You must submit proof of publication of each published notice which shows the
  complete notice that was published, date of publication, and the name of the
  newspaper to the Office of the Chief Clerk. In addition, send a copy to the TCEQ
  Regional Office and to each local program with jurisdiction over your site, within
  10 business days after the date of publication. You are encouraged to submit the
  affidavit with the proof of publication described above.
- You must submit an original publisher's affidavit to the Office of the Chief Clerk within 30 calendar days after the date of each publication. You must use the enclosed affidavit form. The affidavit must clearly identify the applicant's name and permit number.
- You must submit the *Public Notice Verification Form (TCEQ-20244)* to the Office of the Chief Clerk and return a copy of this form to the Air Permits Division, within **10 business days** of the end of the public comment period. You must use this form to verify that you have met sign posting requirements and bilingual notice requirements, as applicable. It is also used to verify that you placed a copy of the application, the statement of basis, and draft permit in a public place in the county in which the site is located or proposed to be located. **This form is available at www.tceq.texas.gov/permitting/air/nav/air\_publicnotice.html**.
- You must submit a completed Form OP-CRO1 (Certification by Responsible Official), signed by the Responsible Official or Duly Authorized Representative, that verifies the truth and accuracy of all public notice documentation submitted. You must submit this form to the Office of the Chief Clerk and a copy of this form to the Air Permits Division, within 10 business days of the end of the public comment period.

• The original publisher's affidavit, Public Notice Verification Form, Form OP-CRO1, and an acceptable proof of publication of the published notice must be mailed to:

Texas Commission on Environmental Quality Office of the Chief Clerk, MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

 A copy of the publisher's affidavit, Public Notice Verification Form, and Form OP-CRO1 must be mailed to:

> Texas Commission on Environmental Quality Air Permits Division, MC-163 Attn: Ms. Whitney Hill P.O. Box 13087 Austin, Texas 78711-3087

• Please ensure that the affidavit(s) you send to the Chief Clerk is/are originals and that all blanks on the affidavit are filled in correctly. Photocopies of affidavits will not be accepted by the Chief Clerk.

#### Failure to Publish, Submit Proof of Publication and Certification of Public Notice

• You must meet all publication requirements. If you fail to publish the notice, post signs, meet bilingual notice requirements, or submit proof of publication and public notice certification on time, the TCEQ may suspend further processing of your application or take other actions.

#### **Application in a Public Place**

- You must provide a copy of the complete application, including any subsequent revisions, the statement of basis, and the draft permit, at a public place for review and copying by the public. The draft permit and statement of basis may be accessed at the link noted previously in this document. This place must be in the county in which the site is located or proposed to be located as required by 30 TAC § 122.320(b).
- A public place is one that is publicly owned or operated (ex: libraries, county courthouses, or city halls).
- The complete application must be accessible to the public for review and copying beginning on the first day of newspaper publication and remain in place until the end of the comment period.
- If the application is submitted to the TCEQ with information marked as "CONFIDENTIAL," you are required to indicate which specific portions of the application are not being made available to the public. These portions of the applications must be accompanied with the following statement: "Any request for portions of this application that are marked as confidential must be submitted in writing, pursuant to the Public Information Act, to the Texas Commission on Environmental Quality, Public Information Coordinator, MC-197, P.O. Box 13087, Austin, Texas 78711-3087."

## **General Information**

When contacting the Commission regarding this application, please refer to the permit number at the top of the Notice of Draft Federal Operating Permit.

If you have questions or need assistance regarding this notice, please contact the permit reviewer listed in the cover letter or the Office of the Chief Clerk at (512) 239-3300.

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

#### **Notice of Draft Federal Operating Permit**

Draft Permit No.: O1610

Application and Draft Permit. Eco Services Operations LLC, 245 Park Ave 16th Floor C/o Ccmp Capital Advisors, New York, NY 10167-0002, has applied to the Texas Commission on Environmental Quality (TCEQ) for a renewal and revision of Federal Operating Permit (herein referred to as Permit) No. O1610, Application No. 18273, to authorize operation of the Baytown Plant, a Industrial Inorganic Chemicals facility. The area addressed by the application is located at Last industrial facility on Park Street; surrounded by ExxonMobil Baytown operations. 3439 PARK STREET in Baytown, Harris County, Texas 77522. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to the application. You can find an electronic map of the facility at: http://www.tceq.texas.gov/assets/public/hb610/index.html?lat=29.7475&lng=-95.001944&zoom=13&type=r This application was received by the TCEQ on July 24, 2012. The significant revision will result in a change of emissions for the following air pollutant(s): NO<sub>x</sub> and SO<sub>2</sub>.

The purpose of a federal operating permit is to improve overall compliance with the rules governing air pollution control by clearly listing all applicable requirements, as defined in Title 30 Texas Administrative Code § 122.10 (30 TAC § 122.10). The draft permit, if approved, will codify the conditions under which the area must operate. The permit will not authorize new construction. The executive director has completed the technical review of the application and has made a preliminary decision to prepare a draft permit for public comment and review. The executive director recommends issuance of this draft permit. The permit application, statement of basis, and draft permit will be available for viewing and copying at the TCEQ Central Office, 12100 Park 35 Circle, Building E, First Floor, Austin, Texas 78753; the TCEQ Houston Regional Office, 5425 Polk St Ste H, Houston, Texas 77023-1452; and the Baytown Sterling Municipal Library, 1 Mary Elizabeth Wilbanks Avenue, Baytown, Texas 77520-4258, beginning the first day of publication of this notice. The draft permit and statement of basis are available at the TCEQ Website:

#### www.tceq.texas.gov/goto/tvnotice

At the TCEQ central and regional offices, relevant supporting materials for the draft permit, as well as the New Source Review permits which have been incorporated by reference, may be reviewed and copied. Any person with difficulties obtaining these materials due to travel constraints may contact the TCEQ central office file room at (512) 239-1540.

Public Comment/Notice and Comment Hearing. Any person may submit written comments on the draft permit. Comments relating to the accuracy, completeness, and appropriateness of the permit conditions may result in changes to the draft permit.

A person who may be affected by the emission of air pollutants from the permitted area may request a notice and comment hearing. The purpose of the notice and comment hearing is to provide an additional opportunity to submit comments on the draft permit. The permit may be changed based on comments pertaining to whether the permit provides for compliance with 30 TAC Chapter 122 (examples may include that the permit does not contain all applicable requirements or the public notice procedures were not satisfied). The TCEQ may grant a notice and comment hearing on the application if a written hearing request is received within 30 days after publication of the newspaper notice. The hearing request must include the basis for the request, including a description of how the person may be affected by

the emission of air pollutants from the application area. The request should also specify the conditions of the draft permit that are inappropriate or specify how the preliminary decision to issue or deny the permit is inappropriate. All reasonably ascertainable issues must be raised and all reasonably available arguments must be submitted by the end of the public comment period. If a notice and comment hearing is granted, all individuals that submitted written comments or a hearing request will receive written notice of the hearing. This notice will identify the date, time, and location for the hearing.

Written public comments and/or requests for a notice and comment hearing should be submitted to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087, or electronically at www.tceq.texas.gov/about/comments.html and be received within 30 days after the date of newspaper publication of this notice. If you communicate with the TCEQ electronically, please be aware that your email address, like your physical mailing address, will become part of the agency's public record.

A notice of proposed final action that includes a response to comments and identification of any changes to the draft permit will be mailed to everyone who submitted public comments, a hearing request, or requested to be on the mailing list for this application. This mailing will also provide instructions for public petitions to the U.S. Environmental Protection Agency (EPA) to request that the EPA object to the issuance of the proposed permit. After receiving a petition, the EPA may only object to the issuance of a permit which is not in compliance with the applicable requirements or the requirements of 30 TAC Chapter 122.

**Mailing List.** In addition to submitting public comments, a person may ask to be placed on a mailing list for this application by sending a request to the Office of the Chief Clerk at the address above. Those on the mailing list will receive copies of future public notices (if any) mailed by the Chief Clerk for this application.

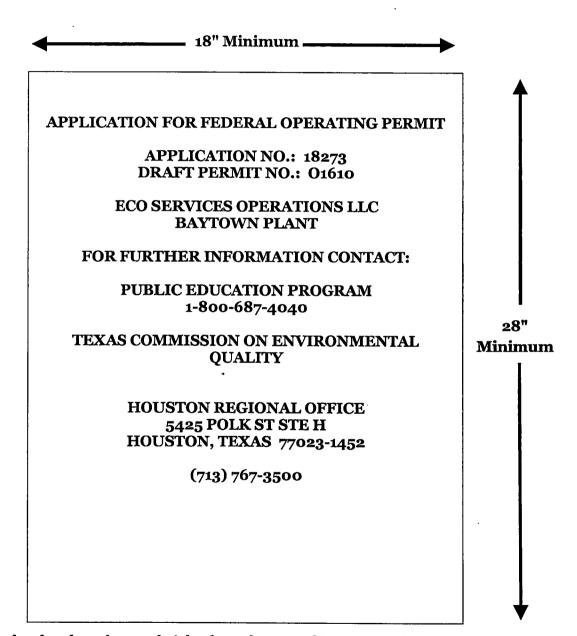
**Information.** For additional information about this permit application or the permitting process, please contact the Texas Commission on Environmental Quality, Public Education Program, MC-108, P.O. Box 13087, Austin, Texas 78711-3087 or toll free at 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained for Eco Services Operations LLC by calling Mr. David Laurie at (713) 924-1484.

Notice Issuance Date: February 18, 2016

**Public Notice Example Sign Posting** 

Sign(s) must be in place on the date of publication of the newspaper notice and must remain in place and be legible throughout the public comment period. Note - The information shown is an **example only**. It is your responsibility to verify that the appropriate information pertaining to **your application** is accurate. Each sign placed at the **area addressed in the FOP application** must be located at or near the site main entrance, provided that the sign is legible from the public street. If the sign would not be legible from the public street, then the sign shall be placed within 10 feet of a property line paralleling a public street.



Sign(s) must be placed at whatever height above the ground is necessary for sign(s) to be 100% visible from the street.

## WHITE BACKGROUND WITH BLACK LETTERS

All lettering must be no less than 1-1/2 inch block printed capitals.

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087 Austin, Texas 78711-3087

Applicant Name: Eco Services Operations LLC	
•	
Permit No.: O1610	
Notice of Draft Federal Operating Permit	

## AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS		§
COUNTY OF		§
Before me, the undersigned author	rity, on this day persona	lly appeared
(name of person representir	, wł ng newspaper)	no being by me duly sworn,
deposes and says that (s)he is the		
of the	; that said	newspaper is
generally circulated in(municipal	<b>ity</b> in which the site or prop	, Texas;
that the enclosed notice was publis	shed in said newspaper	on the following date(s):
	(newspaper represent	ative's signature)
Subscribed and sworn to before m	e this the day of	
to certify which witness my hand a	and seal of office.	
(Seal)	Notary Public in	and for the State of Texas
	Print or Type Na	me of Notary Public
	My Commission	Expires

TCEQ-Office of the Chief Clerk MC-105 Attn: Notice Team P.O. Box 13087

Austin, Texas 78711-3087

Applicant Name: Eco Services Operations LLC

Permit No.: 01610

Notice of Draft Federal Operating Permit

## ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION FOR AIR PERMITTING

STATE OF TEXAS	§	
COUNTY OF	§	
Before me, the undersigned authority, or	this day personally appeared	
(name of person representing newspa	, who being l	by me duly sworn, deposes
and says that (s)he is the	(title of person representing news)	naner)
of the		
generally circulated in(municipality	or county in which the site or propose	, Texas; d site is located)
that the enclosed notice was published in	said newspaper or publication or	
	(newspaper or publication rep	resentative's signature)
Subscribed and sworn to before me this t	he day of	, 20,
to certify which witness my hand and sea	l of office.	
	Notary Public in and for the State	e of Texas
(Seal)		
	Print or Type Name of Notary Pu	blic
	My Commission Expires	

TCEQ - 20480 (Revised 09/13) Alternative Language Affidavit of Publication for Air Permitting APDG 5947v4

## FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO Eco Services Operations LLC

AUTHORIZING THE OPERATION OF Eco Services Operations Baytown Plant Baytown Plant Industrial Inorganic Chemicals

LOCATED AT
Harris County, Texas
Latitude 29° 44' 51" Longitude 95° 0' 7"
Regulated Entity Number: RN100211317

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No:	<u> 01610</u>	_Issuance Date:	 
For the Co	mmission		

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#### **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

### Special Terms and Conditions: Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- 1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.

- C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
- D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
- E. The permit holder shall comply with the following 30 TAC Chapter 101, Subchapter H, Division 3 (Mass Emission Cap and Trade Program) Requirements:
  - (i) Title 30 TAC § 101.352 (relating to General Provisions)
  - (ii) Title 30 TAC § 101.353 (relating to Allocation of Allowances)
  - (iii) Title 30 TAC § 101.354 (relating to Allowance Deductions)
  - (iv) Title 30 TAC § 101.356 (relating to Allowance Banking and Trading)
  - (v) Title 30 TAC § 101.358 (relating to Emission Monitoring and Compliance Demonstration)
  - (vi) Title 30 TAC § 101.359 (relating to Reporting)
  - (vii) Title 30 TAC § 101.360 (relating to Level of Activity Certification)
  - (viii) The terms and conditions by which the emission limits are established to meet or exceed the cap are applicable requirements of this permit
- 2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
  - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ

- E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
- F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
- G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
- H. Title 30 TAC § 101.221 (relating to Operational Requirements)
- I. Title 30 TAC § 101.222 (relating to Demonstrations)
- J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
- 3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
  - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed either before or after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4)Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in

- compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
  - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)

- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- 4. Permit holder shall comply with the following 30 TAC Chapter 115, Subchapter C requirements:
  - A. When filling stationary gasoline storage vessels (Stage I) for motor vehicle fuel dispensing facilities, constructed prior to November 15, 1992, with transfers to stationary storage tanks located at a facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991, the permit holder shall comply with the following requirements specified in 30 TAC Chapter 115, Subchapter C:
    - (i) Title 30 TAC § 115.222(3) (relating to Control Requirements), as it applies to liquid gasoline leaks, visible vapors, or significant odors
    - (ii) Title 30 TAC § 115.222(6) (relating to Control Requirements)
    - (iii) Title 30 TAC § 115.224(1) (relating to Inspection Requirements), as it applies to liquid gasoline leaks, visible vapors, or significant odors
    - (iv) Title 30 TAC § 115.226(2)(B) (relating to Recordkeeping Requirements)
- 5. The permit holder shall comply with the following requirements of 30 TAC Chapter 115, Subchapter F, Division 3, Degassing of Storage Tanks, Transport Vessels and Marine Vessels:
  - A. For degassing of stationary VOC storage tanks, the permit holder shall comply with the following requirements:
    - (i) Title 30 TAC § 115.541(a) (c) (relating to Emission Specifications)
    - (ii) Title 30 TAC § 115.541(f) (relating to Emission Specifications), for floating roof storage tanks
    - (iii) Title 30 TAC § 115.542(a) and (a)(1), (a)(2), (a)(3) or (a)(4) (relating to Control Requirements). Where the requirements of 30 TAC Chapter 115, Subchapter F contain multiple compliance options, the permit holder shall keep records of when each compliance option was used.
    - (iv) Title 30 TAC § 115.542(b) (d), (relating to Control Requirements)
    - (v) Title 30 TAC § 115.543 (relating to Alternate Control Requirements)

- (vi) Title 30 TAC § 115.544(a)(1) and (a)(2) (relating to Inspection, Monitoring, and Testing Requirements), for inspections
- (vii) Title 30 TAC § 115.544(b) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring
- (viii) Title 30 TAC § 115.544(b)(1) and (b)(2) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring of control devices
- (ix) Title 30 TAC § 115.544(b)(2)(A) (J) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring (as appropriate to the control device)
- (x) Title 30 TAC § 115.544(b)(3), (b)(4) and (b)(6) (relating to Inspection, Monitoring, and Testing Requirements), for VOC concentration or lower explosive limit threshold monitoring
- (xi) Title 30 TAC § 115.544(c), and (c)(1) (c)(3) (relating to Inspection, Monitoring, and Testing Requirements), for testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xii) Title 30 TAC § 115.545(1) (7), (9) (11) and (13) (relating to Approved Test Methods)
- (xiii) Title 30 TAC § 115.546(a), (a)(1) and (a)(3) (relating to Recordkeeping and Notification Requirements), for recordkeeping
- (xiv) Title 30 TAC § 115.546(a)(2) and (a)(2)(A) (J) (relating to Recordkeeping and Notification Requirements), for recordkeeping (as appropriate to the control device)
- (xv) Title 30 TAC § 115.546(a)(4) (relating to Recordkeeping and Notification Requirements), for recordkeeping of testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xvi) Title 30 TAC § 115.546(b) (relating to Recordkeeping and Notification Requirements), for notification
- (xvii) Title 30 TAC § 115.547(4) (relating to Exemptions)
- B. For the degassing of all transport vessels with a nominal capacity of 8,000 gallons or more, the permit holder shall comply with the following requirements:
  - (i) Title 30 TAC § 115.541(a) (c) and (d) (relating to Emission Specifications)

- (ii) Title 30 TAC § 115.542(a) and (a)(1), (a)(2), (a)(3) or (a)(4) (relating to Control Requirements). Where the requirements of 30 TAC Chapter 115, Subchapter F contain multiple compliance options, the permit holder shall keep records of when each compliance option was used.
- (iii) Title 30 TAC § 115.542(b), (c) and (e) (relating to Control Requirements)
- (iv) Title 30 TAC § 115.543 (relating to Alternate Control Requirements)
- (v) Title 30 TAC § 115.544(a)(1) and (a)(2) (relating to Inspection, Monitoring, and Testing Requirements), for inspections
- (vi) Title 30 TAC § 115.544(b) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring
- (vii) Title 30 TAC § 115.544(b)(1) and (b)(2) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring of control devices
- (viii) Title 30 TAC § 115.544(b)(2)(A) (J) (relating to Inspection, Monitoring, and Testing Requirements), for monitoring (as appropriate to the control device)
- (ix) Title 30 TAC § 115.544(b)(3), (b)(4) and (b)(6) (relating to Inspection, Monitoring, and Testing Requirements), for VOC concentration or lower explosive limit threshold monitoring
- (x) Title 30 TAC § 115.544(c), and (c)(1) (c)(3) (relating to Inspection, Monitoring, and Testing Requirements), for testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xi) Title 30 TAC § 115.545(1) (11) and (13) (relating to Approved Test Methods)
- (xii) Title 30 TAC § 115.546(a), (a)(1) and (a)(3) (relating to Recordkeeping and Notification Requirements), for recordkeeping
- (xiii) Title 30 TAC § 115.546(a)(2) and (a)(2)(A) (J) (relating to Recordkeeping and Notification Requirements), for recordkeeping (as appropriate to the control device)
- (xiv) Title 30 TAC § 115.546(a)(4) (relating to Recordkeeping and Notification Requirements), for recordkeeping of testing of control devices used to comply with 30 TAC § 115.542(a)(1)
- (xv) Title 30 TAC § 115.546(b) (relating to Recordkeeping and Notification Requirements), for notification

- 6. The permit holder shall comply with the requirements of 30 TAC § 115.722(b) (relating to Site-wide Cap and Control Requirements) and the requirements of 30 TAC § 115.726(g) (relating to Recordkeeping and Reporting Requirements).
- 7. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 8. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

# **Additional Monitoring Requirements**

- 9. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
  - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).

- B. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
- C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
- D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.
- E. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.
- F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

### **New Source Review Authorization Requirements**

- 10. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield

- 11. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- The permit holder shall maintain records to demonstrate compliance with any 12. emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).
- 13. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
  - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
  - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
  - C. Boiler Standard Permit

## **Compliance Requirements**

- 14. The permit holder shall certify compliance in accordance with 30 TAC § 122.146.

  The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
- 15. Permit holder shall comply with the following 30 TAC Chapter 117 requirements:
  - A. The permit holder shall comply with the compliance schedules and submit written notification to the TCEQ Executive Director as required in 30 TAC Chapter 117, Subchapter H, Division 1:

- (i) For sources in the Houston-Galveston-Brazoria Nonattainment area, 30 TAC § 117.9020:
  - (1) Title 30 TAC § 117.9020(2)(A), (C), and (D)
- B. The permit holder shall comply with the Initial Control Plan unit listing requirement in 30 TAC § 117.350(c) and (c)(1).
- C. The permit holder shall comply with the requirements of 30 TAC § 117.354 for Final Control Plan Procedures for Attainment Demonstration Emission Specifications and 30 TAC § 117.356 for Revision of Final Control Plan.
- 16. Use of Emission Credits to comply with applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)(2)
    - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
    - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)(2)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
- 17. Use of Discrete Emission Credits to comply with the applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:

- (i) Title 30 TAC Chapter 115
- (ii) Title 30 TAC Chapter 117
- (iii) If applicable, offsets for Title 30 TAC Chapter 116
- (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
  - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

### **Risk Management Plan**

18. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

### **Permit Location**

19. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

### Permit Shield (30 TAC § 122.148)

20. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit

shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

## Attachments

**Applicable Requirements Summary** 

**Additional Monitoring Requirements** 

**Permit Shield** 

**New Source Review Authorization References** 

Unit Summary	17
Applicable Requirements Summar	v18

Note: A "none" entry may be noted for some emission sources in this permit's "Applicable Requirements Summary" under the heading of "Monitoring and Testing Requirements" and/or "Recordkeeping Requirements" and/or "Reporting Requirements." Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

# **Unit Summary**

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
BARGE-DOCK	LOADING/UNLOADING OPERATIONS	N/A	R5211-0001	30 TAC Chapter 115, Loading and Unloading of VOC	True Vapor Pressure = True vapor pressure less than 0.5 psia.
BARGE-DOCK	LOADING/UNLOADING OPERATIONS	N/A	R5211-0002	30 TAC Chapter 115, Loading and Unloading of VOC	True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia., Daily Throughput = Loading less than 20,000 gallons per day.
GRPACIDTNK	STORAGE TANKS/VESSELS	T-5, T-6, T-7, T-8	R5112-0001	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
PKGBOILSTK	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	N/A	R7ICI-0001	30 TAC Chapter 117, Subchapter B	No changing attributes.
PKGBOILSTK	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	N/A	60Dc-001	40 CFR Part 60, Subpart Dc	No changing attributes.
PREHTRSTK	PROCESS HEATERS/FURNACES	N/A	R7ICI-0001	30 TAC Chapter 117, Subchapter B	No changing attributes.
PRO-REGEN	SULFURIC ACID PRODUCTION	N/A	REG2-002	30 TAC Chapter 112, Sulfur Compounds	No changing attributes.
PRO-REGEN	SULFURIC ACID PRODUCTION	N/A	60H-001	40 CFR Part 60, Subpart H	No changing attributes.
T-16	STORAGE TANKS/VESSELS	N/A	R5112-0004	30 TAC Chapter 115, Storage of VOCs	No changing attributes.

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
BARGE- DOCK	EU	R5211- 0001	voc	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(1) § 115.212(a)(2) § 115.214(a)(1)(B) § 115.214(a)(1)(D) § 115.214(a)(1)(D)(i)	Vapor pressure (at land- based operations). All land- based loading and unloading of VOC with a true vapor pressure less than 0.5 psia is exempt from the requirements of this division, except as specified.	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B)	None
BARGE- DOCK	EU	R5211- 0002	voc	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(2)(A) § 115.212(a)(2) [G]§ 115.212(a)(7) § 115.214(a)(1)(B) § 115.214(a)(1)(D) § 115.214(a)(1)(D)(i)	Any plant, excluding gasoline bulk plants, which loads less than 20,000 gpd of VOC with a true vapor pressure of 0.5 psia or greater is exempt from the requirements of this division, except for the specified requirements.	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B) § 115.216(3)(D)	None
GRPACIDT NK	EU	R5112- 0001	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(e)(1) § 115.112(e)(3) § 115.112(e)(3)(A) § 115.112(e)(3)(A)(i)	No person shall place, store, or hold VOC in any storage tank unless the storage tank is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere or is in compliance with the control requirements specified in Table 1 of this paragraph for VOC other than crude oil and condensate or Table 2 of subsection (a)(1) of this paragraph for crude oil and condensate.	[G]§ 115.117	§ 115.118(a)(4) § 115.118(a)(4)(F) § 115.118(a)(5) § 115.118(a)(7)	None
PKGBOILST K	EU	R7ICI- 0001	NOx	30 TAC Chapter 117, Subchapter B	§ 117.310(d)(3) § 117.310(a) § 117.310(a)(1)(C)	An owner or operator may not use the alternative methods specified in §§	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b)	§ 117.345(a) § 117.345(f) § 117.345(f)(1)	\$ 117.335(b) \$ 117.335(g) \$ 117.340(p)(2)(D)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					\$ 117.310(b) [G]\$ 117.310(e)(1) \$ 117.310(e)(2) [G]\$ 117.310(e)(3) \$ 117.310(e)(4) \$ 117.340(l)(2) \$ 117.340(p)(1) \$ 117.340(p)(2)(C) \$ 117.340(p)(3)	117.315, 117.323 and 117.9800 to comply with the NO <sub>x</sub> emission specifications but shall use the mass emissions cap and trade program in Chapter 101, Subchapter H, Division 3, except that electric generating facilities must also comply with the daily and 30-day system cap emission limitations of § 117.320. An owner or operator may use the alternative methods specified in § 117.9800 to comply with § 117.320.	§ 117.335(d) § 117.335(e) § 117.335(g) § 117.340(a) § 117.340(l)(2) § 117.340(p)(1) § 117.340(p)(2)(A) § 117.340(p)(2)(B) § 117.340(p)(2)(C) § 117.340(p)(2)(C) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.345(f)(9)	[G]§ 117.345(b) [G]§ 117.345(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8)
PKGBOILST K	EU	R7ICI- 0001	СО	30 TAC Chapter 117, Subchapter B	§ 117.310(c)(1) § 117.310(c)(1)(B) § 117.310(c)(3) § 117.8120	CO emissions must not exceed 400 ppmv at 3.0% O 2, dry basis.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(b) § 117.335(e) § 117.335(g) § 117.340(a) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8120(2) [G]§ 117.8120(2)(A) § 117.8120(2)(B)	§ 117.345(a) § 117.345(f) § 117.345(f)(1) § 117.345(f)(9)	§ 117.335(b) § 117.335(g) [G]§ 117.345(c) § 117.345(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(7)
PKGBOILST K	EU	60Dc-001	SO <sub>2</sub>	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a) § 60.48c(j)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).		And a company of a 200 constant of the 450 through a company	
PKGBOILST K	EU	60Dc-001	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a) § 60.48c(j)
PKGBOILST K	EU	60Dc-001	PM (OPACITY)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a) § 60.48c(j)
PREHTRST K	EU	R7ICI- 0001	NOx	30 TAC Chapter 117, Subchapter B	\$ 117.310(d)(3) \$ 117.310(a) \$ 117.310(a)(8)(A)(ii) \$ 117.310(b) [G]\$ 117.310(e)(1) \$ 117.310(e)(2) [G]\$ 117.310(e)(3) \$ 117.310(e)(4) \$ 117.340(l)(2) \$ 117.340(p)(1) \$ 117.340(p)(2)(C) \$ 117.340(p)(3)	An owner or operator may not use the alternative methods specified in §§ 117.315, 117.323 and 117.9800 to comply with the NO <sub>x</sub> emission specifications but shall use the mass emissions cap and trade program in Chapter 101, Subchapter H, Division 3, except that electric generating facilities must also comply with the daily and 30-day system cap emission limitations of § 117.320. An owner or operator may use the alternative methods specified in § 117.9800 to comply with § 117.320.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(d) § 117.335(e) § 117.335(g) § 117.340(a) § 117.340(0)(1) § 117.340(p)(2)(A) § 117.340(p)(2)(B) § 117.340(p)(2)(C) § 117.340(p)(2)(C) § 117.340(p)(2)(C) § 117.340(p)(2)(C) § 117.8000(c) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.345(a) § 117.345(f) § 117.345(f)(1) § 117.345(f)(9)	\$ 117.335(b) \$ 117.335(g) \$ 117.340(p)(2)(D) [G]§ 117.345(b) [G]§ 117.345(c) \$ 117.8010 [G]§ 117.8010(2) \$ 117.8010(2)(A) \$ 117.8010(2)(B) \$ 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) \$ 117.8010(4) [G]§ 117.8010(5) \$ 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
PREHTRST K	EU	R7ICI- 0001	со	30 TAC Chapter 117, Subchapter B	§ 117.310(c)(1) § 117.310(c)(1)(B) § 117.310(c)(3)	CO emissions must not exceed 400 ppmv at 3.0% O 2, dry basis.	[G]§ 117.335(a)(1) § 117.335(a)(4) § 117.335(b) § 117.335(b) § 117.335(e) § 117.335(g) § 117.335(g) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8120(2) [G]§ 117.8120(2) [G]§ 117.8120(2)(B)	§ 117.345(a) § 117.345(f) § 117.345(f)(1) § 117.345(f)(9)	\$ 117.335(b) \$ 117.335(g) [G]§ 117.345(b) [G]§ 117.345(c) \$ 117.8010 [G]§ 117.8010(1) \$ 117.8010(2) \$ 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) \$ 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7) [G]§ 117.8010(8)
PRO- REGEN	EU	REG2-002	SO <sub>2</sub>	30 TAC Chapter 112, Sulfur Compounds	§ 112.6(a)	Except as provided in §112.5 and in §112.14 no person may cause, suffer, allow, or permit emissions of SO2 from any sulfuric acid plant to exceed the emission limits set by the specified equation.	§ 112.2(a) § 112.6(c)	§ 112.2(c)	§ 112.2(b)
PRO- REGEN	EU	REG2-002	H₂SO <sub>4</sub>	30 TAC Chapter 112, Sulfur Compounds	§ 112.41(b) § 112.41(b)(1)	Sulfuric acid or oleum facilities may not permit emissions of H2SO4 mist to exceed 0.50 lb/ton (0.25 gram/kg) of 100% H2SO4 produced when burning specified compounds by the contact process.	§ 112.43(b) § 112.43(c) [G]§ 112.43(c)(1) [G]§ 112.43(c)(2) § 112.45(a)	[G]§ 112.45(b)	None
PRO- REGEN	PRO	60H-001	SO <sub>2</sub>	40 CFR Part 60, Subpart H	§ 60.82(a)	On and after the §60.8 performance test, no owner or operator shall discharge	§ 60.84(a) § 60.84(b) § 60.84(c)	None	§ 60.84(e)

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						gases containing SO2 in excess of 2 kg per metric ton (4.0 lb per ton) of acid produced into the atmosphere.	§ 60.84(e) § 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3) ** See CAM Summary		
PRO- REGEN	PRO	60H-001	PM (OPACITY)	40 CFR Part 60, Subpart H	§ 60.83(a)(2)	No owner or operator shall discharge any gases exhibiting 10% opacity, or greater.	§ 60.85(a) § 60.85(b)(4)	None	None
PRO- REGEN	PRO	60H-001	H₂SO <sub>4</sub>	40 CFR Part 60, Subpart H	§ 60.83(a)(1)	No owner or operator shall discharge any gases containing acid mist, expressed as H2SO4, in excess of 0.075 kg per metric ton (0.15 lb per ton) of acid produced, the production being expressed as 100% H2SO4.	§ 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3)	None	None
T-16	EU	R5112- 0004	voc	30 TAC Chapter 115, Storage of VOCs	§ 115.112(e)(1) § 115.112(e)(3) § 115.112(e)(3)(A) § 115.112(e)(3)(A)(i)	No person shall place, store, or hold VOC in any storage tank unless the storage tank is capable of maintaining working pressure sufficient at all times to prevent any vapor or gas loss to the atmosphere or is in compliance with the control requirements specified in Table 1 of this paragraph for VOC other than crude oil and condensate or Table 2 of subsection (a)(1) of this paragraph for crude oil and condensate.	§ 115.115(a) § 115.115(a)(6) § 115.116(a)(1) [G]§ 115.117	§ 115.118(a)(4) § 115.118(a)(4)(F) § 115.118(a)(5) § 115.118(a)(7)	None

<b>Additional Monitoring Requirements</b>	
Compliance Assurance Monitoring Summary	<b>.</b>

# **CAM Summary**

Unit/Group/Process Information					
ID No.: PRO-REGEN					
Control Device ID No.: AMMONIA SCRUBB	Control Device Type: SO2 Scrubber				
Applicable Regulatory Requirement					
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001				
Pollutant: SO2	Main Standard: § 60.82(a)				
Monitoring Information					
Indicator: pH					
Minimum Frequency: once per day					
Averaging Period: n/a*					
Deviation Limit: Minimum pH is 4.5					
CAM Text: Each monitoring device shall be cleaned with an automatic cleaning system, or cleaned weekly using hydraulic, chemical, or mechanical cleaning. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least weekly, whichever is more frequent, and shall be accurate to within ± 0.5 pH unit.					

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

## **CAM Summary**

Unit/Group/Process Information					
ID No.: PRO-REGEN					
Control Device ID No.: AMMONIA SCRUBB	Control Device Type: SO2 Scrubber				
Applicable Regulatory Requirement					
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001				
Pollutant: SO2	Main Standard: § 60.82(a)				
Monitoring Information					
Indicator: Liquid Flow Rate					
Minimum Frequency: once per day					
Averaging Period: n/a*					
Deviation Limit: Minimum liquid flow rate is 65	o gallons per minute				
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:  ± 2% of span; or  ± 5% of design liquid flow rate.					

<sup>\*</sup>The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

# Permit Shield

Permit Shield	 -
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## **Permit Shield**

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit	/Group/Process	Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
BTCT	N/A	40 CFR Part 63, Subpart Q	Cooling tower has not operated with chromium based chemicals on or after 09/18/1994.
DOCKVC	N/A	30 TAC Chapter 117, Subchapter B	Heat Capacity of vapor combustor is < 40 MMBtu/hr
GRPACIDTNK	T-5, T-6, T-7, T-8	40 CFR Part 60, Subpart K	Tanks were constructed prior to June 11, 1973.
PREHTRSTK	N/A	40 CFR Part 63, Subpart DDDDD	Facility is an area source of HAPs.
PRO-REGEN	N/A	30 TAC Chapter 117, Subchapter B	The furnace is exempt on the basis of being a sulfuric acid regeneration unit.
T-16	N/A	40 CFR Part 60, Subpart K	Tanks were constructed prior to June 11, 1973.

New Source Review Authorization References
New Source Review Authorization References2
New Source Review Authorization References by Emission Unit3

# **New Source Review Authorization References**

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterior	ration (PSD) Permits				
PSD Permit No.: PSDTX695M3 Issuance Date: 08/08/2013					
Title 30 TAC Chapter 116 Permits, (Other Than Permits By Rule, PSI Area.	Special Permits, and Other Authorizations D Permits, or NA Permits) for the Application				
Authorization No.: 56534	Issuance Date: 11/24/2014				
Authorization No.: 86388 Issuance Date: 10/29/2008					
Authorization No.: 9565 Issuance Date: 08/08/2013					
Permits By Rule (30 TAC Chapter	106) for the Application Area				
Number: 106.183	Version No./Date: 09/04/2000				
Number: 106.261	Version No./Date: 11/01/2003				
Number: 106.262	Version No./Date: 09/04/2000				
Number: 106.371	Version No./Date: 03/14/1997				
Number: 106.412	Version No./Date: 09/04/2000				
Number: 106.472	Version No./Date: 03/14/1997				
Number: 106.478	Version No./Date: 03/14/1997				
Number: 7	Version No./Date: 09/12/1989				

## New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization		
BARGE-DOCK	SPENT ACID LOADING	56534		
ВТСТ	COOLING TOWER	106.371/03/14/1997		
DOCKVC	DOCK VAPOR COMBUSTOR	56534		
PKGBOILSTK	PACKAGE BOILER	106.183/09/04/2000		
PREHTRSTK	PREHEATER	106.183/09/04/2000		
PRO-REGEN	REGEN PROCESS UNIT	9565, PSDTX695M3		
T-16	SPENT ACID STORAGE TANK	56534		
T-5	SPENT ACID STORAGE TANK	56534		
T-6	SPENT ACID STORAGE	56534		
T-7	SPENT ACID STORAGE TANK	56534		
T-8	SPENT ACID STORAGE TANK	56534		

	Appendix A
Acronym List	

# **Acronym List**

The following abbreviations or acronyms may be used in this permit:

A CITEM I	actual cubic feet per minute
	alternate means of control
	Acid Rain Program
	American Society of Testing and Materials
	Beaumont/Port Arthur (nonattainment area)
CD	control device
	continuous opacity monitoring system
CVS	closed-vent system
D/FW	Dallas/Fort Worth (nonattainment area)
DR	Designated Representative
ElP	El Paso (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
	grandfathered
	grains per 100 standard cubic feet
	hazardous air pollutant
H/C/R	Houston/Galveston/Brazoria (nonattainment area)
П/O/D	hydrogen sulfide
ID No	identification number
1D/11f	pound(s) per hour
MINIBIU/ Nr	
	monitoring, recordkeeping, reporting, and testing
	nonattainment
N/A	not applicable
	National Allowance Data Base
NO <sub>x</sub>	nitrogen oxides
NSPS	.New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review Office of Regulatory Information Systems
ORIS	Office of Regulatory Information Systems
	lead
PBR	Permit By Rule
	particulate matter
ppmv	parts per million by volume
PSD	prevention of significant deterioration
	Responsible Official
	sulfur dioxide
TCEO	Texas Commission on Environmental Quality
	total suspended particulate
	true vapor pressure
	volatile organic compound
<b>YOU</b>	voiathe organic compound

# Appendix B

Major NSR Summary Table	34
9565 and PSDTX695M3	36

# **Major NSR Summary Table**

Permit Number: 9565 and PSDTX695M3 Issuance Date: August 8, 2013							
Emission Source Point No. (1) Name (2)	Source			ion Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	Name (2)	Name (3)	lb/hr	TPY (4)	Spec. Cond.	Spec. Cond.	Spec. Cond.
		Carbon Monoxide	5.50	24.09	-		2, 9, 11
		H <sub>2</sub> SO <sub>4</sub> (6)	6.88	20.08			
		Ammonia	0.40	1.70			
		NOx	19.75	54.91			
		PM <sub>10</sub>	3.19	11.32			
		PM <sub>2.5</sub>	3.19	11.32	1		
		Sulfur Dioxide (6)	114.13	441.65			
		VOC	0.01	0.01			
		Silver	0.03	0.12			
		Arsenic	0.13	0.52	2, 3, 4, 5, 7, 9, 11, 13, 14, 15		
1	Scrubber Exhaust	Barium	0.03	0.12		2, 3, 4, 5, 6, 7, 9, 11, 13, 14, 15	
•	Sciubbet Eallaust	Beryllium	0.02	0.08			
		Cadmium	0.02	0.08			
		Chlorine	0.01	0.02			
		Chromium	0.67	2.82			
		Hydrogen Chloride	0.06	0.26			
		Mercury	0.0018	0.0041			
		Nickel	0.56	2.42			
		Lead	0.06	0.24			
		Antimony	0.03	0.12			
		Selenium	0.05	0.20			
		Thallium	0.02	0.08			
RACKFUG	Rack Process Fugitives (5)	voc	0.01	0.01	2	2, 6	2
		Hydrogen Sulfide	0.01	0.01			
FUGRC	Railcar Piping and	VOC	0.01	0.02	2	2, 6	2
FUGRE	Components (5)	H <sub>2</sub> SO <sub>4</sub> (6)	0.01	0.01		2,0	

#### Footnotes:

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
   (3) H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist

 $NO_x$  - total oxides of nitrogen

PM<sub>10</sub> - particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no PM greater than 10 microns is emitted.

 $PM_{2.5}$  - particulate matter equal to or less than 2.5 microns in diameter

VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

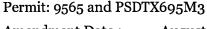
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Prevention of Significant Deterioration pollutant

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT

A Permit Is Hereby Issued To Rhodia Inc.

Authorizing the Construction and Operation of The Baytown Sulfuric Acid Plant Located at Baytown, Harris County, Texas

Latitude 29° 44′ 53" Longitude 95° 0′ 7"



Amendment Date: August 8, 2013

Renewal Date: August 8, 2023



1

- 1. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
- 2. Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
- 3. Construction Progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
- 4. Start-up Notification. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify 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). [30 TAC 116.115(b)(2)(B)(iii)]
- 5. Sampling Requirements. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement 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 permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

Revised (10/12)

- 6. **Equivalency of Methods.** The permit holder must 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 permit. Alternative methods shall 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 permit. [30 TAC 116.115(b)(2)(D)]
- 7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
- 8. **Maximum Allowable Emission Rates**. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
- 9. **Maintenance of Emission Control**. The permitted facilities shall 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. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
- 10. **Compliance with Rules**. Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
- 11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
- 12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
- 13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
- 14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

### **Special Conditions**

### Permit Numbers 9565 and PSDTX695M3

### **Emission Standards**

- 1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit.
- 2. These permitted facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency regulations in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), promulgated for the following: **(PSD)** 
  - A. Subparts A and Cd for Emission Guidelines and Compliance Times for Sulfuric Acid Production Units.
  - B. Subparts A and H for Sulfuric Acid Plants.
  - C. Alternative Monitoring Plan (AMP) for sulfur dioxide (SO<sub>2</sub>) emissions.
- 3. The sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) daily throughput is limited to 1,100 tons. The holder of this permit shall keep records of the daily H<sub>2</sub>SO<sub>4</sub> production and the one-hour SO<sub>2</sub> emissions rates for each day of production. Records shall be made readily available to Texas Commission on Environmental Quality (TCEQ) personnel upon request, EPA personnel or any applicable local program with jurisdiction and may be used to determine compliance with the SO<sub>2</sub> emission limits specified in the maximum allowable emissions rates table (MAERT). **(PSD)**
- 4. The SO<sub>2</sub> emissions from the H<sub>2</sub>SO<sub>4</sub> plant stack designated as Emission Point Number (EPN) 1 shall not exceed 2.49 pounds per ton of acid produced on an hourly basis. The SO<sub>2</sub> emissions from the H<sub>2</sub>SO<sub>4</sub> plant stack designated as Emission Point No. EPN 1 shall not exceed 2.20 pounds per ton of acid produced on an annual basis. Production is expressed as 100 percent H<sub>2</sub>SO<sub>4</sub>. Records shall be updated once a week to demonstrate compliance with each production parameter. **(PSD)**
- 5. Sulfuric acid mist, expressed as H<sub>2</sub>SO<sub>4</sub>, shall not be discharged from the H<sub>2</sub>SO<sub>4</sub> acid plant stack designated as EPN 1 in excess of 0.15 pounds per ton of acid produced on an hourly basis. Sulfuric acid mist, expressed as H<sub>2</sub>SO<sub>4</sub>, shall not be discharged from EPN 1 in excess of 0.10 pounds per ton of acid produced on an annual basis. Production is expressed as 100 percent H<sub>2</sub>SO<sub>4</sub>. Records shall be updated once a week to demonstrate compliance with each production parameter. **(PSD)**

- 6. Any construction of new equipment that occurs for the use of adding a new chemical is not allowed through this special condition. New chemical(s) may be added through use of a permit by rule claim and/or registration under 30 TAC Chapter 106.
  - A. Short-term (pounds per hour [lb/hr]) and annual (tons per year) emissions and calculations shall be completed for each chemical at each affected source; emission rates shall be calculated in accordance with the methods documented in the permit amendment application. The calculated emission rates shall not exceed the maximum allowable emission rate at any emission point.
  - B. The Effect Screening Level (ESL) for the chemical shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Division.
  - C. The total emissions of any compound from all emission points in this permit must satisfy one of the following conditions:
    - (1) The total maximum emission rate from all sources is less than 0.04 lb/hr and the ESL greater than 2 ug/m³;

$$(ER/ESL)_{N} \le (ER/ESL)_{E}$$

 $(ER/ESL)_N$  = plant wide maximum hourly emission rate based on maximum vapor pressure of new compound(s) divided by its ESL.

(ER/ESL)<sub>E</sub> = the highest ratio of any previously authorized compounds plant wide hourly emission rate based on maximum vapor pressure divided by its ESL (i.e., 0.261).

- D. The permit holder shall maintain records of the information below and the demonstrations in steps A through C above. The following documentation is required for each compound:
  - (1) Chemical name(s), composition, and chemical abstract registry number if available.
  - (2) Molecular weight.
  - (3) Storage tanks, loading areas, and loading fugitive areas where the material is to be handled and the emission control device to be utilized.
  - (4) Date new compound handling commenced.
  - (5) Material Safety Data Sheet.

7. The H<sub>2</sub>SO<sub>4</sub> furnace shall be operated with not less than 0.5 percent excess oxygen (O<sub>2</sub>) and not more than 2400°Fahrenheit furnace exit temperature, averaged hourly. Above 1800°F, excess O<sub>2</sub> shall not exceed 3 percent, averaged hourly. The furnace outlet temperature and O<sub>2</sub> content shall be continuously monitored and recorded.

### **Initial Determination of Compliance**

- 8. Sampling ports and platform(s) shall be incorporated into the design of EPN 1 according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" of the TCEQ <u>Sampling Procedures Manual</u>. Alternate sampling facility designs must be submitted for approval to the TCEQ Regional Director.
- 9. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the stack designated as EPN 1. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. **(PSD)** 
  - A. Sampling shall be conducted in accordance with Title 40 Code of Federal Regulations (40 CFR) Part 60, Appendix A, Method 7, "Determination of Nitrogen Oxide (NO<sub>x</sub>) Emissions from Stationary Sources" and Method 8, "Determination of SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> Emissions from Stationary Sources" and Method 10, "Determination of Carbon Monoxide (CO) Emissions from Stationary Sources" and other applicable testing methods.
  - B. The appropriate TCEQ Regional Office in the region where the source is located and applicable local air program(s) shall be contacted as soon as testing is scheduled, but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit provision or the TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office Director or the Director of the TCEQ in Austin shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for New Source Performance Standard testing which must have EPA approval shall be submitted to the TCEQ Regional Office.

- C. Air contaminants emitted from the H<sub>2</sub>SO<sub>4</sub> acid plant stack designated as EPN 1 to be tested for include (but are not limited to) chlorine, CO, H<sub>2</sub>SO<sub>4</sub>, HCl, NO<sub>x</sub> and SO<sub>2</sub>, H<sub>2</sub>SO<sub>4</sub> mist, antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver and thallium. These stack testing results shall be used to demonstrate compliance with Special Condition Nos. 1, 4, and 5.
- D. Stack testing of EPN 1 shall be completed between 90 days and 180 days after permit amendment approval in 2009. Sampling shall occur at such other times as may be required by the Executive Director of the TCEQ. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office. Additional time to comply with the applicable requirements of 40 CFR Part 60 and 40 CFR Part 61 requires prior approval and requests shall be submitted to the TCEQ Regional Office.
- E. The sulfuric acid plant shall be sampled while operating at the maximum possible safe production rate (as determined by the permit holder) for the H<sub>2</sub>SO<sub>4</sub> production unit at the time of testing. The H<sub>2</sub>SO<sub>4</sub> production rate shall be monitored and recorded during the stack test. If the normal production rate of H<sub>2</sub>SO<sub>4</sub> from this facility exceeds by more than 10 percent the tons per day maintained during sampling, the company must notify, in writing, the appropriate TCEQ Regional Office and the source may be subject to additional sampling to demonstrate continued compliance.
- F. Copies of the final sampling report shall be forwarded to the TCEQ and the EPA within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of the TCEQ <u>Sampling Procedures</u> <u>Manual</u>. The reports shall be distributed as follows:

One copy to the appropriate TCEQ Regional Office.

> One copy to each appropriate local air pollution control program. One copy to the Air Enforcement Branch, the EPA, Region 6, Dallas.

## Continuous Demonstration of Compliance

- 10. At no time shall the hourly average ammonia (NH<sub>3</sub>) liquor feed rate into the H<sub>2</sub>SO<sub>4</sub> plant exceed 65 gallons per minute (gpm).
- 11. The holder of this permit shall install, calibrate, maintain and operate a continuous monitor to measure and record the feed rate of NH<sub>3</sub> liquor into the H<sub>2</sub>SO<sub>4</sub> plant. The monitoring data shall be reduced to hourly average flow rates at least once everyday.

Semiannual reports of all excessive feed rates and monitor downtime shall be submitted to the appropriate TCEQ Regional Office. These reports shall include the information described in 40 CFR § 60.7(c).

All monitoring data, quality assurance data, excessive feed rate data and monitor downtime data shall be maintained by the source for a period of two years and shall be made readily available to the TCEQ or the EPA upon request.

- 12. At no time shall the hourly rolling average of hydrogen sulfide gas flow to the furnace exceed 150,000 standard cubic feet per hour.
- 13. The holder of this permit shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) to measure and record the in-stack concentration of SO<sub>2</sub> from EPN 1. **(PSD)** 
  - A. The CEMS calibration shall be checked daily and the CEMS shall be zeroed and spanned using cylinder gas at least once a week and corrective action taken when the results differ by greater than ±5 percent from the tagged cylinder gas value.
  - B. The monitoring data shall be reduced to one-hour average concentrations at least once every month using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emissions rates in pounds of SO<sub>2</sub> per hour at least once every month.
  - C. All monitoring data and quality-assurance data shall be maintained by the source for a period of two years and shall be made readily available to TCEQ

Special Conditions Permit Numbers 9565 and PSDTX695M3 Page 6

personnel, EPA personnel or any local program with jurisdiction upon request. The data from the CEMS may, at the discretion of the TCEQ, EPA personnel or any local program with jurisdiction, be used to determine compliance with the SO<sub>2</sub> emission limits specified in MAERT.

- D. The CEMS must operate at all times when sulfur bearing compounds (except natural gas) are being fed to the furnace, but need not operate during CEMS breakdown, repairs for calibration checks and zero span adjustments.
- E. CEMS shall be used to demonstrate compliance with the SO<sub>2</sub> emission limits as found in Special Condition No. 4. The permit holder must meet the quality assurance procedures required by 40 CFR Part 60 Appendix F or any alternate procedures specified in the AMP shown as Attachment I.
  - (1) The SO<sub>2</sub> CEMS shall monitor and record the three hour arithmetic average (not weighted by production volume) SO<sub>2</sub> emission rate in units of pounds per ton of one hundred percent acid produced.
  - (2) The SO<sub>2</sub> CEMS shall monitor and record the SO<sub>2</sub> emission rate averaged (arithmetic average, not weighted by production) over all operation hours in each 365 day period in units of pounds per ton of one hundred percent acid produced.
  - (3) Implementation of the monitoring requirements has been defined in the AMP for the SO<sub>2</sub> CEMS system.
  - (4) The AMP supersedes the corresponding SO<sub>2</sub> monitoring requirements of NSPS Subpart H.
  - (5) All steps necessary to avoid CEMS breakdowns and minimize CEMS down time must be taken. This shall include, but is not limited to, operating and maintaining the CEMS in accordance with best practices and maintaining an on-site inventory of spare parts or other supplies necessary to make rapid repairs of the equipment.
  - (6) In the event of an CEMS downtime lasting longer than twenty-four hours, the permittee shall demonstrate compliance with the emission limits established in Special Condition No. 4 according to the procedures specified in the AMP shown as Attachment I.

Special Conditions Permit Numbers 9565 and PSDTX695M3 Page 7

#### **Compliance Assurance Monitoring**

- 14. The following requirements apply to ammonia scrubber capture system for EPN 1.
  - A. If used to control pollutants like SO<sub>2</sub>, the permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system.
  - B. The control device shall not have a bypass.
  - C. If any of the above inspections are not satisfactory, the permit holder shall promptly take necessary corrective action.
- 15. The minimum liquid flow to the ammonia scrubber shall be 650 gpm. The circulation rate shall be monitored and recorded at least once a day. The liquid flow rate shall be recorded at least once an hour. The flow monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least annually, whichever is more frequent, and shall be accurate to within 2 percent of span or 5 percent of the design value.

The pH shall be analyzed and recorded at least once a day from the NH<sub>3</sub> scrubber. The minimum allowable pH in the NH<sub>3</sub> scrubber is 4.5. The pH monitoring device shall be cleaned with an automatic cleaning system or cleaned weekly using hydraulic, chemical or mechanical cleaning. The pH monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or at least weekly, whichever is more frequent and shall be accurate to within 0.5 pH unit.

Quality assured (or valid) data must be generated when the  $\rm H_2SO_4$  production unit is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in hours) that the  $\rm H_2SO_4$  production unit operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgement and the methods used recorded.

Dated August 8, 2013

#### Emission Sources - Maximum Allowable Emission Rates

#### Permit Number 9565 and PSDTX695M3

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

	Air Co	ontaminants Data		
Emission Point No. (1)	Source Name (2)	Air Contaminant	Emissio	ı Rates
	500100 (1 <b>2mc</b> (2)	Name (3)	lbs/hour	TPY (4)
		Carbon Monoxide	5.50	24.09
		H <sub>2</sub> SO <sub>4</sub> (6)	6.88	20.08
		Ammonia	0.40	1.70
		NO <sub>x</sub>	19.75	54.91
		PM <sub>10</sub>	3.19	11.32
		PM <sub>2.5</sub>	3.19	11.32
		Sulfur Dioxide (6)	114.13	441.65
	Scrubber Exhaust	VOC	0.01	0.01
		Silver	0.03	0.12
1		Arsenic	0.13	0.52
1		Barium	0.03	0.12
		Beryllium	0.02	0.08
		Cadmium	0.02	0.08
		Chlorine	0.01	0.02
		Chromium	0.67	2.82
		Hydrogen Chloride	0.06	0.26
		Mercury	0.0018	0.0041
		Nickel	0.56	2.42
		Lead	0.06	0.24
		Antimony	0.03	0.12
		1		

Project Numbers: 173006, 173012 and 173177

#### Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant	Emission Rates		
		Name (3)	lbs/hour	TPY (4)	
and the second of the second o		Selenium	0.05	0.20	
		Thallium	0.02	0.08	
D A CIVILIC		VOC	0.01	0.01	
RACKFUG	Rack Process Fugitives (5)	Hydrogen Sulfide 0.01	0.01	0.01	
TIVODO	Railcar Piping and	VOC	0.01	0.02	
FUGRC	Components (5)	H <sub>2</sub> SO <sub>4</sub> (6)	0.01	0.01	

- (1) Emission point identification either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist
  - NO<sub>x</sub> total oxides of nitrogen
  - PM<sub>10</sub> particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall
    - be assumed that no PM greater than 10 microns is emitted.
  - $PM_{2.5}$  particulate matter equal to or less than 2.5 microns in diameter
  - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Prevention of Significant Deterioration pollutant

Date:	August 8, 2013

Project Numbers: 173006, 173012 and 173177

#### FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:

O1610

Company:

**Eco Services Operations LLC** 

Project #:

18273

Site:

**Eco Services Operations Baytown Plant** 

Account #: HG-0696-Q

Application Area:

**Baytown Plant** 

Regulated Entity #: RN100211317

Customer #:

CN604683482

Region: 12

County:

Harris

SIC Code: 2819

SIC Name:

**Industrial Inorganic Chemicals** 

Permit Reviewer: Whitney Hill

#### SITE INFORMATION

Physical Location:

Last industrial facility on Park Street; surrounded by ExxonMobil Baytown operations.

3439 Park Street

Nearest City:

**Baytown** 

Major Pollutants:

NOX, SO2

Additional FOPs:

None

#### **PROJECT SUMMARY**

Eco Services Operations, LLC's Baytown Plant last renewed the site's Site Operating Permit (SOP) on January 25, 2008. On July 24, 2012, Eco Services Operations, LLC submitted a timely renewal application. This application was placed on management delay because a significant revision submitted January 20, 2012 was incorporating a major modification to the site's Prevention of Significant Deterioration (PSD) permit and a revision to the site's case-by-case NSR permit. The major modification to the PSD permit was effective on August 08, 2013 and the case-by-case NSR permit was effective on November 24, 2014. That significant revision is incorporated into this renewal project. Significant emission sources include loading and unloading operations, package boilers, process heaters, sulfuric acid production, storage tanks, and preheaters. Compliance assurance monitoring is included in the permit. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-1, OP-2, OP-REQ1, OP-MON, and various Unit Attribute forms).

#### PROCESS DESCRIPTION

This site is a sulfuric acid manufacturing plant. The PRO-REGEN unit is the heart of the plant which is designed to produce fresh sulfuric acid (H2SO4) from reacted sulfuric acids or "sludges" produced by refineries and/or chemical plants. Hydrogen sulfide gas (H2S) and natural gases are burned to maintain proper operating parameters and sulfur dioxide (SO2) strengths.

The sludge and sulfur gas are sprayed into a combustion furnace (2000F) where the hydrocarbons and sulfur are burned and the spent sulfuric acid is decomposed. The combustion gases pass through a boiler for heat recovery and then through a scrubbing tower, a direct contact gas cooler (660F), two electrostatic precipitators, and a drying tower.

The SO2 gas is combined with oxygen in a vanadium substrate catalytic converter to convert the SO2 into sulfur trioxide (SO3). From the converter the gas is finally sent to an absorbing tower where SO3 reacts with water to form sulfuric acid. The gas that exits from the tower is passed through a mist removal element where any entrained acid is removed. The final gas stream enters an ammonia scrubber that reduces the concentration of un-reacted SO2 gas. The tail gas is exhausted to the atmosphere.

### TECHNICAL REVIEW

Provide Constant Constant
Permit Content Summary  1. Was Periodic Monitoring (PM) required and included in the permit?
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?
3. Was case-by-case PM or CAM included in the permit?
4. Was a permit shield requested?
5. If a permit shield was requested, was any permit shield request denied?
6. Identify if the following are applicable for this project:
(a) Manually-built applicable requirementsNo
(b) Customized Special Terms and Conditions
(c) Manual changes to the IMS-generated applicable requirements
(d) Alternate means of compliance for any emission unit/source at the site
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?
8. Did the applicant's review/comments on the working draft permit result in changes
to the permit content?Yes
9. Will the draft permit be sent to public notice with unresolved issues
(i.e., disagreements with applicant)?No
Permit reviewer notes:
CAM is included in the permit for emission PRO-REGEN for monitoring SO <sub>2</sub> for 40 CFR Part 60, Subpart H.
All of the permit shields submitted or existing in the permit were reviewed and approved.
Manually built applicability was removed for unit 1 for 20 TAC Chapter 112 and the PSD applicability.
A major NSR summary table was included in the permit for PSD TX695M3.
It major note summary table was included in the permit for 1 5D 12075115.
During WDP review, the applicant requested to update the 30 TAC Chapter 112 requirements for PRO-
REGEN.
Statement of Basis
A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in
the FOP.
1. The Statement of Basis was prepared on January 28, 2016.
2. The Statement of Basis GroupWise Document # (OPDP Database) is 77048.
Compliance History Review
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 28, 2015.
Site rating: 0.17 Company rating: 1.19
(High $< 0.10$ ; Satisfactory $\ge 0.10$ and $\le 55$ ; Unsatisfactory $> 55$ )
2. Has the permit changed on the basis of the compliance history or site/company rating?
Demoit mailtean materi
Permit reviewer notes:
Sita/Parmit Area Compliance Status Deview
Site/Permit Area Compliance Status Review  1. Were there any out-of-compliance units listed on Form OP-ACPS?
2. Is a compliance plan and schedule included in the permit?
2. 15 a comphance plan and sonedule mended in the permit!

### Permit reviewer notes:

When the renewal application was submitted initially with a compliance plan, however, an updated OP-ACPS was submitted on November 05, 2015 that showed the site was in compliance. A compliance plan and schedule was not included in the permit.

#### **Delinquent Fee Check**

- 1. The delinquent fee check was performed on January 29, 2016.

#### Permit reviewer notes:

#### **Public Notice Information**

1. Were comments received from the appl	icant after the draft permit was mailed and	
before Public Notice was published	d?	Yes/No
	tice authorization package (PN-Errata) sent	
for any reason?		Yes/No
3. Publication date:		
4. Was bilingual public notice published?		Yes/No/NA
	Newspaper name:	
5. Were comments received during Public	Notice period?	Yes/No
(a) Was a public hearing requested	?	Yes/No
(b) Was a public hearing held?	••••••	Yes/No
(c) Was the public hearing request	withdrawn?	Yes/No
(d) Was permit content changed as	a result of any public comments?	Yes/No
6. Was re-publication necessary?		Ves/No

#### Permit reviewer notes:

#### **EPA Review**

1. Did EPA comment on the draft permit?	Yes/No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?	Yes/No
If yes, did the EPA comment on the proposed permit?	
3. Were any changes made to the permit after the EPA Review Period?	Yes/No
If yes, were these changes made within the 60 day Public Petition Period?	

#### Permit reviewer notes:

#### **IMPORTANT MILESTONES**

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	07/24/2012	
Date Project Received by Engineer	07/30/2012	
Technical Review Period	07/09/2015	01/28/2016
Working Draft Permit Reviewed by Applicant	08/31/2015	09/18/2015

Date PNAP/Draft Permit Mailed	
Public Notice Comment Period	
EPA Review Period	
Date Sign Posting Certification Received	

Milestone (Optional)	Start Date	End Date
Deficiency Cycle 1		1.00
Deficiency Cycle 2		
Request for Comments on Compliance Plan		
Date Comment on Draft Permit Received from Public		
Date comment on Draft Permit Received from EPA		
Date Public Hearing Requested		
Date Public Hearing Held		***

#### **EFFECTIVE PERMIT ISSUANCE DATE:**

Whitney Hill

Permit Reviewer

Operating Permits Section

Air Permits Division

Javier Maldonado, P.E.

Team Leader

**Operating Permits Section** 

Date

Air Permit Division

#### **CONTACT INFORMATION**

#### Responsible Official:

Mark Mcfadden Vice President And Secretary Eco Services Operations LLC 245 Park Ave 16th Floor C/o Ccmp Capital Advisors New York, NY 10167-0002

#### **Technical Contact:**

Floyd Dickerson Environmental Manager Eco Services Operations LLC 8615 Manchester St Houston, TX 77012-2142

Phone: (713) 924-1408

Email: floyd.dickerson@eco-services.com

#### **Duly Authorized Representative:**

William J. Mcconnell Plant Manager Eco Services Operations LLC 8615 Manchester St Houston, TX 77012-2142

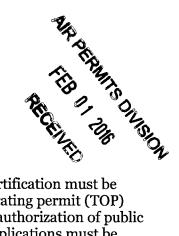
#### Permit Consultant:

<Name>
<Title>
<Company>
<Address>

Phone: <Phone>
Email: <Email>



# Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program



All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. ID	ENTIFYING INFORMA	TION	·			-	
RN: 100	211317	CN: 60468348	2		Account l	No.: HG-06	96-Q
Permit 1	No.: O-1610		Project No.:	18273			
Area Na	me: Baytown Plant		Company Na	ame: Eco	Services	Operations	LLC
II. CI	ERTIFICATION TYPE (P	lease mark the a	ppropriate b	ox)			
☐ Resp	onsible Official		☐ Duly At	uthorized	Represen	ıtative	
III. SU	JBMITTAL TYPE (Please	mark the appro	priate box) ((	Only one	response	can be acce	epted per form)
SOP/	TOP Initial Permit Application	tion 🛭 Upda	te to Permit A	Application	n		
☐ GOP	Initial Permit Application	Permi	it Revision, R	enewal, c	r Reopen	ing	
☐ Othe	r:						
DV CI	ERTIFICATION OF TRU	TI					
17. 01	MIII CALITON OF THE						
This ce inform	rtification does not exte ation for reference only	nd to informa <sup>.</sup>	tion which i	is desigr	nated by	the TCEQ	as
I,	William I	McConnell	certif	y that I a	m the DA	AR	
	William N (Certifier Name printed	d or typed)	·	-		(RO or D	AR)
and that dated du	, based on information and Iring the time period or on t	belief formed aft the specific date(	ter reasonable s) below, are	e inquiry, true, accı	the state urate, and	ments and i	information
Note: E	nter EITHER a Time Period ed. The certification is not t	d OR Specific Da valid without doc	te(s) for each cumentation (	n certifica date(s).	tion. This	section mu	ıst be
Time Pe	riod: From <u>08/11/15</u>		to <u>1/26/2</u>	2016			
		Start Date			End D	ate	
Specific	Dates:						
-	Date 1	Date 2	Date 3	Date 4		Date5	Date 6
Signatur	e: Willing b	2 rocce	(	Signatu	ıre Date:	1/26	/1-6
Title: Pl	ant Manager						

# Statement of Basis of the Federal Operating Permit

**Eco Services Operations LLC** 

Site Name: Eco Services Operations Baytown Plant

Area Name: Baytown Plant

Physical Location: Last Industrial Facility On Park Street; Surrounded By Exxonmobil Baytown Operations.

3439 Park Street Nearest City: Baytown County: Harris

Permit Number: O1610 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2819 SIC Name: Industrial Inorganic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected;

A compliance status; and

 $C_i$ 

A list of available unit attribute forms.

Prepared on: January 28, 2016

#### Operating Permit Basis of Determination

**Permit Area Process Description** 

This site is a sulfuric acid manufacturing plant. The PRO-REGEN unit is the heart of the plant which is designed to produce fresh sulfuric acid (H2SO4) from reacted sulfuric acids or "sludges" produced by refineries and/or chemical plants. Hydrogen sulfide gas (H2S) and natural gases are burned to maintain proper operating parameters and sulfur dioxide (SO2) strengths.

The sludge and sulfur gas are sprayed into a combustion furnace (2000F) where the hydrocarbons and sulfur are burned and the spent sulfuric acid is decomposed. The combustion gases pass through a boiler for heat recovery and then through a scrubbing tower, a direct contact gas cooler (660F), two electrostatic precipitators, and a drying tower.

The SO2 gas is combined with oxygen in a vanadium substrate catalytic converter to convert the SO2 into sulfur trioxide (SO3). From the converter the gas is finally sent to an absorbing tower where SO3 reacts with water to form sulfuric acid. The gas that exits from the tower is passed through a mist removal element where any entrained acid is removed. The final gas stream enters an ammonia scrubber that reduces the concentration of un-reacted SO2 gas. The tail gas is exhausted to the atmosphere.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

#### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Maior Dollartonto	LCO- NOW	
Il Major Pollutants	ISO2, NOX	
Major Pollutants	1002, 11021	

#### **Reading State of Texas's Federal Operating Permit**

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

- Additional Monitoring Requirements
- New Source Review Authorization Requirements
- Compliance Requirements
- o Protection of Stratosphere Ozone
- o Permit Location
- o Permit Shield (30 TAC § 122.148)
- Attachments
  - o Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - o Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - o Compliance Plan
  - o Alternative Requirements
- Appendix A
  - o Acronym list
- Appendix B
  - Copies of major NSR authorizations

#### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### **Special Terms and Conditions**

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

#### Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

# Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

#### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No

40 CFR Part 63 - NESHAPs for Source Categories	No
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

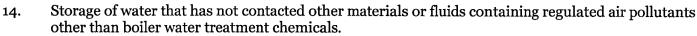
#### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

#### **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.



15. Well cellars.

- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.

18. Equipment used exclusively for the melting or application of wax.

19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.

20. Shell core and shell mold manufacturing machines.

21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;

22. Equipment used for inspection of metal products.

- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.

25. Battery recharging areas.

26. Brazing, soldering, or welding equipment.

#### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at

www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

# **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*	
GRPACIDTNK	30 TAC Chapter 115,	R5112-0001	Today's Date = Today's date is March 1, 2013 or later.	
	Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Other vapor destruction unit	,
GRPACIDTNK	40 CFR Part 60, Subpart K	60K-0003	Construction/Modification Date = On or before June 11, 1973	
T-16	30 TAC Chapter 115,	R5112-0004	Today's Date = Today's date is March 1, 2013 or later.	
	Storage of VOCs		Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.	
			Tank Description = Tank using a vapor recovery system (VRS)	
			True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia	
			Product Stored = VOC other than crude oil or condensate	
			Storage Capacity = Capacity is greater than 40,000 gallons	
			Control Device Type = Other vapor destruction unit	
T-16	40 CFR Part 60, Subpart K	60K-0003	Construction/Modification Date = On or before June 11, 1973	
BARGE-DOCK	30 TAC Chapter 115, Loading and	R5211-0001	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure less than 0.5 psia.	
BARGE-DOCK	30 TAC Chapter 115, Loading and	R5211-0002	Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.	
	Unloading of VOC		Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.	
			Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.	
			Transfer Type = Loading and unloading.	
			True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.	
			Daily Throughput = Loading less than 20,000 gallons per day.	
PREHTRSTK	30 TAC Chapter 117,	R7ICI-0001	Diluent CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent.	
	Subchapter B	,	Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			Unit Type = Process heater	

Unit ID	Regulation	Index Number	Basis of Determination*	
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option	
			Maximum Rated Capacity = Maximum rated capacity is at least 2 MMBtu/hr, but less than 40 MMBtu/hr.	
			CO Monitoring System = Emissions are monitored using methods other than CEMS or PEMS.	
			NOx Emission Limit Basis = Emission limit in lb/MMBtu on a rolling 30-day average	
			NOx Reduction = No NO <sub>x</sub> control method	
			Fuel Type #1 = Natural gas	
			Ox Monitoring System = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	
			NOx Emission Limitation = Title 30 TAC §§ 117.310(d)(3) and 117.310(a)(8)	
PKGBOILSTK	30 TAC Chapter 117, Subchapter B	R7ICI-0001	NOx Emission Limitation = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration].	
			Unit Type = Other industrial, commercial, or institutional boiler.	
4			Maximum Rated Capacity = MRC is greater than 2 MMBtu/hr but less than 40 MMBtu/hr.	
			NOx Monitoring System = Maximum emission rate testing.	
			Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option.	
			CO Monitoring System = Monitored by method other than CEMS or PEMS.	
			EGF System Cap Unit = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.	
			Fuel Type #1 = Gaseous fuel other than natural gas landfill gas or renewable non-fossil fuel gases.	
			NOx Emission Limit Average = Emission limit in pounds/hour on a block one-hour average.	
			NOx Reductions = No NO <sub>x</sub> reduction.	
PKGBOILSTK	40 CFR Part 60,	60Dc-001	Construction/Modification Date = After February 28, 2005.	
	Subpart Dc		PM Monitoring Type = No particulate monitoring.	
			Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).	
			SO2 Inlet Monitoring Type = No SO <sub>2</sub> monitoring.	
)				
			Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.	
			SO <sub>2</sub> Outlet Monitoring Type = No SO <sub>2</sub> monitoring.	
			Heat Input Capacity = Heat input capacity is greater than or equal to 30 MMBtu/hr (8.7 MW) but less than or equal to 75 MMBtu/hr (22 MW).	
			Technology Type = None.	
			D-Series Fuel Type = Other fuel.	
			47C-Option = COMS exemption § 60.47c(f) for a facility that burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur and operates according to a written site-specific monitoring plan approved by the permitting authority.	
			ACF Option - SO2 = Other ACF or no ACF.	
			ACF Option - PM = Other ACF or no ACF.	
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	

Unit ID	Regulation	Index Number	Basis of Determination*	
втст	40 CFR Part 63, Subpart Q	63Q-0001	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
DOCKVC	30 TAC Chapter 117, Subchapter B	R7ICI-0002	Maximum Rated Capacity = MRC is less than 40 MMBtu/hr	
PRO-REGEN	30 TAC Chapter 112, Sulfur Compounds	REG2-002	Facility Type = Sulfuric acid plant that burns alkylation acid, hydrogen sulfide, organic sulfides, mercaptans, or acid sludge by contact process.  Effective Stack Height = The effective stack height is not less than the standard effective stack height.  Production Capacity = Production capacity is greater than 300 tons per day (expressed as 100 percent acid).  Facility Use = The plant is not used exclusively as a sulfur dioxide control system, chamber process plant, acid concentrator, or oleum transfer and storage facility.	
PRO-REGEN	40 CFR Part 60, Subpart H	60H-001	Construction/Modification Date = After August 17, 1971.  Process Design = The source does not process elemental sulfur or an ore that contains elemental sulfur, or processes elemental sulfur or an ore that contains elemental sulfur and does not use air to supply oxygen.	

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply

#### **NSR Versus Title V FOP**

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

7702 2	
NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification	For initial permit with application shield, can be issued
of an existing facility	after operation commences; significant revisions require
	approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not
	authorize new emissions
Ensures issued permits are protective of the	Applicable requirements listed in permit are used by the
environment and human health by conducting a	inspectors to ensure proper operation of the site as
health effects review and that requirement for	authorized. Ensures that adequate monitoring is in
best available control technology (BACT) is	place to allow compliance determination with the FOP.
implemented.	_
Up to two Public notices may be required.	One public notice required. Opportunity for public
Opportunity for public comment and contested	comments. No contested case hearings.
case hearings for some authorizations.	Ŭ
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources
	identified by the EPA.
Applies to facilities: a portion of site or individual	One or multiple FOPs cover the entire site (consists of
emission sources	multiple facilities)
Permits include terms and conditions under	Permits include terms and conditions that specify the
which the applicant must construct and operate	general operational requirements of the site; and also
its various equipment and processes on a facility	include codification of all applicable requirements for
basis.	emission units at the site.
Opportunity for EPA review for Federal	Opportunity for EPA review, Affected states review, and
Prevention of Significant Deterioration (PSD)	a Public petition period for every FOP.
and Nonattainment (NA) permits for major	position overly 2 of the
sources.	
Permits have a table listing maximum emission	Permit has an applicable requirements table and
limits for pollutants	Periodic Monitoring (PM) / Compliance Assurance
	Monitoring (CAM) tables which document applicable
	monitoring requirements.
Permits can be altered or amended upon	Permits can be revised through several revision
application by company. Permits must be issued	processes, which provide for different levels of public
before construction or modification of facilities	notice and opportunity to comment. Changes that would
can begin.	be significant revisions require that a revised permit be
J	issued before those changes can be operated.
NSR permits are issued independent of FOP	FOP are independent of NSR permits, but contain a list
requirements.	of all NSR permits incorporated by reference
	or an inote pormiss most porated by reference

#### **New Source Review Requirements**

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

 $www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/oldselist/se\_index.html$ 

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

Prevention of Significant Deterioration (PSD) Permits					
PSD Permit No.: PSDTX695M3	Issuance Date: 08/08/2013				
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.					
Authorization No.: 56534	Issuance Date: 11/24/2014				
Authorization No.: 86388	Issuance Date: 10/29/2008				
Authorization No.: 9565	Issuance Date: 08/08/2013				
Permits By Rule (30 TAC Chapter	106) for the Application Area				
Number: 106.183	Version No./Date: 09/04/2000				
Number: 106.261	Version No./Date: 11/01/2003				
Number: 106.262	Version No./Date: 09/04/2000				
Number: 106.371	Version No./Date: 03/14/1997				
Number: 106.412	Version No./Date: 09/04/2000				
Number: 106.472	Version No./Date: 03/14/1997				
Number: 106.478	Version No./Date: 03/14/1997				
Number: 7	Version No./Date: 09/12/1989				

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

#### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

# Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

control device is operating properly.

Unit/Group/Process Information				
ID No.: PRO-REGEN				
Control Device ID No.: AMMONIA SCRUBB	Control Device Type: SO2 Scrubber			
Applicable Regulatory Requirement				
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001			
Pollutant: SO2	Main Standard: § 60.82(a)			
Monitoring Information				
Indicator: pH				
Minimum Frequency: once per day				
Averaging Period: n/a*				
Deviation Limit: Minimum pH is 4.5				
parameters established either by the manufacture	ssions from sources is by the use of a wet scrubber. Many r's recommendations or a recent performance test may be rs may include gas residence time, gas velocities, gas and			

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

liquid temperatures, gas and liquid pressure drop, pH and the liquid/gas flow rate ratio ensure that the

Unit/Group/Process Information	
ID No.: PRO-REGEN	
Control Device ID No.: AMMONIA SCRUBB	Control Device Type: SO2 Scrubber
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart H	SOP Index No.: 60H-001
Pollutant: SO2	Main Standard: § 60.82(a)
Monitoring Information	
Indicator: Liquid Flow Rate	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum liquid flow rate is 650	gallons per minute
parameters established either by the manufacture monitored to ensure compliance. These parameters	issions from sources is by the use of a wet scrubber. Many or's recommendations or a recent performance test may be ers may include gas residence time, gas velocities, gas and , pH and the liquid/gas flow rate ratio ensure that the

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Compliance Review  1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 28, 2015.  Site rating:
(High < 0.10; Satisfactory $\geq$ 0.10 and $\leq$ 55; Unsatisfactory $>$ 55)  2. Has the permit changed on the basis of the compliance history or site/company rating?
Site/Permit Area Compliance Status Review  1. Were there any out-of-compliance units listed on Form OP-ACPS?No
2. Is a compliance plan and schedule included in the permit?No
Available Unit Attribute Forms
OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes OP UA18 - Surface Coating Operations Attributes
OP-UA18 - Surface Coating Operations Attributes OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes

OP-UA41 - Dry Cleaning Facility Attributes

OP-UA42 - Phosphate Fertilizer Manufacturing Attributes

OP-UA43 - Sulfuric Acid Production Attributes

OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes

OP-UA45 - Surface Impoundment Attributes

OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes

OP-UA47 - Ship Building and Ship Repair Unit Attributes

OP-UA48 - Air Oxidation Unit Process Attributes

OP-UA49 - Vacuum-Producing System Attributes

OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur

**Recovery Plant Attributes** 

OP-UA51 - Dryer/Kiln/Oven Attributes

OP-UA52 - Closed Vent Systems and Control Devices

OP-UA53 - Beryllium Processing Attributes

OP-UA54 - Mercury Chlor-Alkali Cell Attributes

OP-UA55 - Transfer System Attributes

OP-UA56 - Vinyl Chloride Process Attributes

OP-UA57 - Cleaning/Depainting Operation Attributes

OP-UA58 - Treatment Process Attributes

OP-UA59 - Coke By-Product Recovery Plant Attributes

OP-UA60 - Chemical Manufacturing Process Unit Attributes

OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes

OP-UA62 - Glycol Dehydration Unit Attributes

OP-UA63 - Vegetable Oil Production Attributes

#### **Whitney Hill**

From:

David Laurie < David.Laurie@eco-services.com>

Sent:

Tuesday, January 26, 2016 4:29 PM

To:

Whitney Hill

Subject:

Title V O-1610

**Attachments:** 

OP-CRO1 1-2016.pdf

Follow Up Flag: Flag Status:

Follow up Flagged

Categories:

**Project Update** 

Whitney,

Attached is the updated OP-CRO1 for the revised forms that have been submitted.

What mailing address should I send the form so that it is received for your files?

David Laurie Environmental Engineer

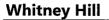
Eco Services Operations LLC 8615 Manchester St. Houston Tx, 77012 713 924 1484



# Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMAT	ΓΙΟΝ			
RN: 100211317	CN: 60468348	2	Account No.:	HG-0696-Q
Permit No.: 0-1610		Project No.: 1827	73	
Area Name: Baytown Plant		Company Name:	Eco Services Oper	rations LLC
II. CERTIFICATION TYPE (Pl	ease mark the a	ppropriate box)		
Responsible Official		Duly Author	rized Representativ	ve
III. SUBMITTAL TYPE (Please	mark the appro	priate box) (Only	one response can	be accepted per form)
SOP/TOP Initial Permit Applicat	ion 🛛 Updat	te to Permit Appli	cation	
GOP Initial Permit Application	☐ Permi	it Revision, Renew	val, or Reopening	
Other:				
IV. CERTIFICATION OF TRUT	CH CH			
This certification does not exterinformation for reference only.  I,	• IcConnell		at I am the DAR	
(Certifier Name printed	l or typed)		(R	O or DAR)
and that, based on information and l dated during the time period or on t	belief formed aft he specific date(	er reasonable inq s) below, are true	uiry, the statement , accurate, and con	ts and information aplete:
Note: Enter EITHER a Time Period completed. The certification is not v				tion must be
Time Period: From 08/11/15		to <u>1/26/2016</u>		
Si	tart Date		End Date	
Specific Dates:	Date 2	Date 3 Date	te 4 Date	e5 Date 6
		يبريد و پينيد	to 4 Duce	20 Dute O
Signature: Willing V	2 com	(Sig	gnature Date:	126/16
Title: Plant Manager U				



From:

David Laurie < David.Laurie@eco-services.com>

Sent:

Friday, January 22, 2016 4:40 PM

To:

Whitney Hill

**Subject:** 

OP-UA43 2016-0118 1847.docx

**Attachments:** 

OP-UA43 2016-0118 1847.docx

**Categories:** 

**Project Update** 

Ms. Hill,

Attached is the UA43 form. The facility use has been answered "NO" to indicate that the exemption in 112.41(b)(2) is not applicable.

Assuming this is the final form correction we have to make, I will have a new OP-CRO1 signed by our plant manager first thing next week to cover the changes we've made from 8/11/15 to present.

**David Laurie Environmental Engineer** 

**Eco Services Operations LLC** 713 924 1484

### Texas Commission on Environmental Quality Sulfuric Acid Production Attributes Form OP-UA43 (Page 2) Federal Operating Permit Program

# Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112) Control of Air Pollution from Sulfur Compounds (Sulfuric Acid Production)

Date: 1/18/2015 Permit No.: O-1610 Regulated Entity No.: RN100211317

Area Name: Baytown Plant Customer Reference No.: CN604683482

Process ID No.	SOP Index No.	Facility Type≅	Effective Stack Height	Production Capacity	Facility Use
PRO-REGEN	REG2-002	SULFCON	NO	300+	NO
<u> </u>		-			
J					

#### Whitney Hill

From:

Whitney Hill

Sent:

Thursday, January 14, 2016 1:48 PM

To:

'David Laurie'

Subject:

RE: Baytown Title V O1610 updated forms

David,

CAM for 30 TAC Ch 112 is not required. The applicable requirements include a requirement for the CEMS to be continuously monitored. At this point I think that was the only outstanding issue left and you can send the OP-CRO1. Please send this by January 21, 2016.

Thanks,

# Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-1400

From: David Laurie [mailto:David.Laurie@eco-services.com]

Sent: Tuesday, December 29, 2015 2:13 PM

To: Whitney Hill

Subject: FW: Baytown Title V O1610 updated forms

Ms. Hill,

When we spoke about the comments I had on the draft permit you indicated that the OP-MON table would need to be modified to represent the CAM for 40 CFR Subpart H and 30 TAC 112 and OP-SUMR table would need to be modified to represent the PREHTRSTK authorization, but I cannot determine what needs to be changed from our previous representation.

I am still reviewing the change in regulation representation with our consultant pertaining to my second question/comment regarding the change in 30 TAC 112.41 change.

Thank you,

David Laurie Environmental Engineer

Eco Services Operations LLC 713 924 1484

From: David Laurie

Sent: Monday, October 19, 2015 11:36 AM

To: 'Whitney Hill'

Subject: Baytown Title V O1610 updated forms

Ms. Hill,

Attached are the updated forms you requested.

David Laurie Environmental Engineer

Eco Services Operations LLC 8615 Manchester St. Houston Tx, 77012 713 924 1484

#### Whitney Hill

From:

David Laurie < David.Laurie@eco-services.com>

Sent:

Tuesday, December 29, 2015 2:13 PM

To:

Whitney Hill

Subject:

FW: Baytown Title V O1610 updated forms

Attachments:

OP-CRO1 10-15.pdf; Eco Services - FOP Renewal Application Review - Oct 8.

Update.pdf; Major NSR Summary Table - Permit Number 9565 2015-1007 1147.doc

**Categories:** 

Project Update

Ms. Hill,

When we spoke about the comments I had on the draft permit you indicated that the OP-MON table would need to be modified to represent the CAM for 40 CFR Subpart H and 30 TAC 112 and OP-SUMR table would need to be modified to represent the PREHTRSTK authorization, but I cannot determine what needs to be changed from our previous representation.

I am still reviewing the change in regulation representation with our consultant pertaining to my second question/comment regarding the change in 30 TAC 112.41 change.

Thank you,

David Laurie Environmental Engineer

Eco Services Operations LLC 713 924 1484

From: David Laurie

Sent: Monday, October 19, 2015 11:36 AM

To: 'Whitney Hill'

Subject: Baytown Title V O1610 updated forms

Ms. Hill,

Attached are the updated forms you requested.

David Laurie Environmental Engineer

Eco Services Operations LLC 8615 Manchester St. Houston Tx, 77012 713 924 1484

#### Whitney Hill

From:

Whitney Hill

Sent:

Friday, December 18, 2015 11:39 AM

To:

'David Laurie'; Floyd Dickerson

Subject:

RE: FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

David,

Based on our conversation this morning, I have the following response. Please submit any new information by January 4, 2016.

Thank you,

# Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov
Phone: (512) 239-1301

Fax: (512) 239-1400

Any OP-CRO1 submitted is required to be the original version.

1. I did not see the inclusion of the following language requested by EPA Region 6
The EPA Region 6 has requested that the following language be included in our Title V permit before they will agree to terminate our current consent decree. Please include the following language from the EPA:

"Future Emission Limits and Standards: As soon as practicable, but no later than ninety (90) days after the relevant Effective Date listed in Paragraph 11.i, Defendant shall submit administratively complete applications to the applicable federal, state or local agency to incorporate that emission limit or standard into federally-enforceable minor or major new source review permits or other permits that will ensure that the underlying emission limit or standard survives the termination of this Consent Decree."

This will be added to the permit.

2. Can you explain the change in applicability for Unit ID PRO-REGEN from 30TAC 112.41(b) and 30TAC 112.41(b)(1) to just 30TAC 112.41(b)(2) as well as the removal of the monitoring, testing, and recordkeeping requirements?

The requirements in the permit seem appropriate based on the flowchart and the unit attributes submitted. I'm not sure what "change" you are seeing. If there is an issue with the requirements, it needs to be more specific.

- 3. In the CAM summaries the previous Title V cited 30 TAC 112 and this draft cites 40 CFR Part 60, Subpart H. The monitoring requirements remain the same, but the regulatory citation changed. Can you explain that change? CAM is based on emission units. If CAM is required for other units in the permit, then it needs to be submitted on the OPMON. Is there a unit that requires CAM and is not in the permit?
- 4. New Source Review Authorization References Under Permits by Rule SE7 is still listed. This exemption is no longer applicable to any equipment at the Baytown site due to modifications of the equipment requiring reauthorization under the 106.183 permit by rule

This will be removed

5. New Source Review Authorization References by Emission Unit – The Unit ID PREHTRSTK is listed as authorized by SE7 and should be listed as authorized by 106.183. Submit the OP-SUMR. The version date of the PBR is also need.

From: David Laurie [mailto:David.Laurie@eco-services.com]

Sent: Thursday, December 10, 2015 12:07 PM

To: Whitney Hill; Floyd Dickerson

Subject: RE: FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

Whitney,

We have the follow comments on the draft permit you provided.

1. I did not see the inclusion of the following language requested by EPA Region 6
The EPA Region 6 has requested that the following language be included in our Title V permit before they will agree to terminate our current consent decree. Please include the following language from the EPA:

"Future Emission Limits and Standards: As soon as practicable, but no later than ninety (90) days after the relevant Effective Date listed in Paragraph 11.i, Defendant shall submit administratively complete applications to the applicable federal, state or local agency to incorporate that emission limit or standard into federally-enforceable minor or major new source review permits or other permits that will ensure that the underlying emission limit or standard survives the termination of this Consent Decree."

- 2. Can you explain the change in applicability for Unit ID PRO-REGEN from 30TAC 112.41(b) and 30TAC 112.41(b)(1) to just 30TAC 112.41(b)(2) as well as the removal of the monitoring, testing, and recordkeeping requirements?
- 3. In the CAM summaries the previous Title V cited 30 TAC 112 and this draft cites 40 CFR Part 60, Subpart H. The monitoring requirements remain the same, but the regulatory citation changed. Can you explain that change?
- 4. New Source Review Authorization References Under Permits by Rule SE7 is still listed. This exemption is no longer applicable to any equipment at the Baytown site due to modifications of the equipment requiring reauthorization under the 106.183 permit by rule
- 5. New Source Review Authorization References by Emission Unit The Unit ID PREHTRSTK is listed as authorized by SE7 and should be listed as authorized by 106.183.

David Laurie Environmental Engineer

Eco Services Operations LLC 713 924 1484

**From:** Whitney Hill [mailto:whitney.hill@tceq.texas.gov]

Sent: Thursday, December 03, 2015 2:11 PM

To: David Laurie; Floyd Dickerson

Subject: FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

I have updated the draft permit with the working draft permit comments. Please submit the OP-CRO1 to certify the new information submitted during the technical review by **December 10, 2015**. You can use the time period section of the form and the dates between August 11, 2015 and October 19, 2015. The original form must be submitted, however, if you email a copy before it goes in the mail, I am able to move the project along a little guicker.

Please let me know if you have any questions.



Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

Phone: (512) 239-1301 Fax: (512) 239-1400



From: Whitney Hill

Sent: Thursday, December 03, 2015 2:11 PM

To: 'David Laurie'; 'Floyd Dickerson'

**Subject:** FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

Attachments: SOP.v.2.pdf

I have updated the draft permit with the working draft permit comments. Please submit the OP-CRO1 to certify the new information submitted during the technical review by **December 10, 2015**. You can use the time period section of the form and the dates between August 11, 2015 and October 19, 2015. The original form must be submitted, however, if you email a copy before it goes in the mail, I am able to move the project along a little quicker.

Please let me know if you have any questions.

#### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-1400

#### **Whitney Hill**

From:

David Laurie < David.Laurie@eco-services.com>

Monday, October 19, 2015 11:36 AM Sent:

To: Whitney Hill

Baytown Title V O1610 updated forms Subject: OP-CRO1 10-15.pdf; Eco Services - FOP Renewal Application Review - Oct 8. **Attachments:** 

Update.pdf; Major NSR Summary Table - Permit Number 9565 2015-1007 1147.doc

**Follow Up Flag:** Follow up Flag Status:

Flagged

**Project Update Categories:** 

Ms. Hill,

Attached are the updated forms you requested.

**David Laurie Environmental Engineer** 

**Eco Services Operations LLC** 8615 Manchester St. Houston Tx, 77012 713 924 1484



1001 West Loop South | Suite 640 | Houston, TX 77027 | P (713) 552-1371 | F (713) 552-1374

trinityconsultants.com

#### Trinity A Consultants

VIA E-MAIL: whitney.hill@tceq.texas.gov

October 8, 2015

Whitney Hill
Air Permits Division
Texas Commission on Environmental Quality
12100 Park 35 Circle, MC 163
Austin, TX 78753

RE: Federal Operating Permit (FOP) Renewal Application Review

Permit No. 01610 – TCEQ Project No. 18273 Eco Services Operations LLC – Baytown Plant Customer Reference Number (CN) 604683482 Regulated Entity Reference Number (RN) 100211317

Dear Ms. Hill:

Eco Services Operations LLC (Eco Services), formerly Solvay USA Inc., owns and operates a sulfuric acid manufacturing plant in Baytown, Harris County, Texas (Baytown Plant). The facility produces sulfuric acid by regenerating spent sulfuric acid (sulfuric acid received from petroleum refining and chemical processes that has been in contact with volatile organic compounds). The Baytown Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) account number HG-0696-Q and is authorized by FOP O1610.

On behalf of Eco Services, Trinity Consultants (Trinity) is submitting this response to your requests for supplementary information requested via email on July 9 and August 31, 2015. The requests specified the submittal of the following materials:

#### 1. Any forms that correspond to changes that have been made at the site since 2012

An OP-2 form is being included in Attachment 1 to account for changes that have taken place at the Baytown Plant since 2012. Revisions include the following:

- > NSR Permit No. 56534 has underwent a minor revision to update spent sulfuric acid composition and add PM<sub>2.5</sub> emissions to EPN FILTERSTK.
- > The revision for Unit ID No. PREHTRSTK is being submitted to reflect its current NSR authorization.
- > It has also been determined that since Unit ID Nos. 1 and PRO-REGEN both encompass the entire acid making process, the permit could benefit by being streamlined via the removal of Unit ID No. 1. Title 30 TAC Chapter 112 and 40 CFR Subpart H applicability overlaps for both unit IDs; therefore, Eco Services is requesting that Unit ID No. 1 be deleted from the FOP. Included in Attachment 2 is the OP-SUMR form to document this change. To finalize the deletion of Unit ID. No. 1, form OP-UA43 (Attachment 3) is being submitted.
- > As part of the 2012 renewal application package, OP-MON forms were submitted with the purpose of deleting the two Periodic Monitoring requirements the Baytown Plant is subject to. Since that time, business conditions have changed such that the justifications for their removal are no longer be valid. Therefore, Eco Services is requesting that the previously submitted deletion request be considered void and not taken into consideration during the permit renewal process. This request is documented in the OP-2 by copying the 2012 revision language in strikethrough font.
- > Revisions are being submitted to request the removal of compliance schedules for PREHTRSTK stack testing requirements, as these corrective actions have already been completed.

Attachment 4 encloses form OP-CRO1, submitted to certify the aforementioned permit updates.

#### 2. The most recent OP-REQ1

The most recent OP-REQ 1 is being included in Attachment 5. Updates to questions I.A.3 and I.C.2 should eliminate the need for the submission of the OP-UA15 form.

#### 3. The OP-MON for CAM (if applicable) for units PRO-REGEN and 1 for 40 CFR Part 60, Subpart H for SO2

In consideration of the Unit ID No. 1 deletion request, an OP-MON form (Attachment 6) is being submitted only for unit PRO-REGEN for 40 CFR Part 60, Subpart H. An OP-MON form for PRO-REGEN for 30 TAC Chapter 112 is included as well as this CAM requirement was previously associated with Unit ID No. 1. Please note that although PRO-REGEN fits the "Large" definition, the selected CAM options (CAM-SS-009 and CAM-SS-010) are for "Small" sized units, as defined in the CAM guidance. The minimum monitoring period of once per week is determined to be allowable as documented via NSR Permit No. 9565, SCs 14 &15, as well as the current operating permit.

#### 4. The OP-UA05 for emission units 1 and PREHTRSTK

Attachment 7 includes the OP-UA5 form, completed for units PREHTRSTK and PRO-REGEN (with the assumption that PRO-REGEN takes the place of the requested Unit ID No. 1). PRO-REGEN has been determined to be exempt from 30 TAC Chapter 117 requirements on the basis of the furnace being a sulfuric acid regeneration unit (30 TAC §117.303(a)(4)). This negative applicability is documented with the submission of an OP-REQ2 form (Attachment 8). Additionally, the OP-REQ2 includes unit PREHTRSTK's negative applicability for 40 CFR Part 63, Subpart DDDDD (better known as Boiler MACT).

#### 5. Major NSR Summary Table

The major NSR summary table for NSR Permit No. 9565 is being submitted as Attachment 9.

If you have any questions regarding this submittal or require additional information about this submittal, please feel free to contact David Laurie at (713) 924-1484.

Sincerely,

TRINITY CONSULTANTS

Adam Mielnicki Senior Consultant

Attachment

cc: David Laurie, Eco Services Operations LLC Floyd Dickerson, Eco Services Operations LLC

Attachment 1

OP-2

#### Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2 (Page 1)

#### Table 1

Date: 10/08/2015	Permit	Permit No.: O-1610			Account N	No.: HG-0	696-Q		Regulated Entity No.: RN100211317	
Area Name: Baytown Plant			Com	Company Name: Eco Services Operations LLC Cus				stomer Reference No.: C	N604683482	
For Submissions to EPA (SO)	<sup>p</sup> renewa	l, minor re	vision, an	id signific	ant revisio	n applicat	ions <u>only</u> )		A STATE OF THE STA	
Has a copy of this application t	een subn	nitted (or i	s being su	ıbmitted)	to EPA? (I	Refer to the	e form instru	ctions for	additional information.)	⊠ YES □ NO
I. Application Type				¥\$						ここのでは LAME COC
Indicate the type of application	•									
Renewal Streamlined Re	evision M	Iust includ	e provisio	onal terms	and condi	itions as ex	plained in t	he instruc	tions.)	
Significant Revision  Rev	ision Red	questing P	ior Appro	oval 🔲 A	dministrat	ive Revisi	on 🔲 Respo	nse to Re	opening	
II. Qualification Statemen	(				Tar scorp code and					
For SOP Revisions Only	The ref	erenced cl	anges qua	alify for th	ne marked	revision ty	pe.			⊠ YES □ NO
For GOP Revisions Only	The per	rmitted are	a continue	es to qual	ify for a G	OP.				☐ YES ☐ NO
III. Major Source Pollutant	ts (Comp	lete this se	ction if th	e permit i	evision is	due to a cl	nange at the	site or ch	ange in regulations.)	
Indicate all pollutants for which	n the site	is a major	source ba	sed on th	e site's pot	tential to e	mit after the	change is	operated:	
Pollutant	voc	NOx	SO <sub>2</sub>	PM <sub>10</sub>	СО	Pb	HAPs	Other [		
Major at the Site (YES/NO):	No	Yes	Yes	No	No	No	No	No		
IV. Fee Information										
Has the applicant paid emission	ns fees fo	r the most	recent ag	ency fisca	l year (Se	otember 1	- August 31)	?	⊠ YES [	NO N/A
V. Delinquent Fees and Pe	nalties							i 170 ka libri i ili ili ili Maria 1800 ili ili		Property and the second
Notice: This form will not be pare paid in accordance with the					or penaltie	s owed the	TCEQ or the	ne Office	of the Attorney General on	behalf of the TCEQ

#### Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2 (Page 2)

#### Table 2

Date: 10/08/2015 Permit No.: O-1610			Account No.: HG-0696-Q			Regulated Entity No.: RN100211317		
Area Name: Baytown Plant				Company Name: Eco Services Operations LLC			Customer Reference No.: CN604683482	
I. De	scription of F	Revision				60		Anne de la Companya d
			Unit/Group	Process	G	Action,		
Revision Revision No. Code		New Unit	ID No	).	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions	
1	MS-A	NO				56534	Updated spent sulfuric acid composition. Added PM2. emissions for FILTERSTK.	
2	SIG-E	NO	PREHTRSTK	C	OP-UA5	106.183 (09/04/2000)		ting NSR authorization and adding to permit shield for 3, Subpart DDDDD.
3	SIG-E	NO	O PRO-REGEN		OP-UA5	9565		ng CAM for Ch. 112 and Part 60, Subpart H. Adding mit shield for Ch. 117.
4	MS-C	NO	1			9565	applic	esting to remove Unit ID from permit to streamline cability. All Unit 1 applicability has determined to ap with PRO-REGEN.
1	SIG-A	NO	GRPACIDTNI	€ €	OP-UA3	<del>56534</del>	Rule applicability change and remove periodic monitor	
2	SIG-A	NO	T-16	E	OP-REQ2	<del>56534</del>	Rule	applicability change.
5	MS-C	NO	PREHTRSTK	C	OP-2	106.183 (09/04/2000)	Remove the Compliance Schedule for PREHTRSTK, 117.310(a)(8)(A)(ii) for NOx because the corrective act have been completed.	
6	MS-C	NO PREHTRSTK		C	OP-2	106.183 (09/04/2000)	117.3	ove the Compliance Schedule for PREHTRSTK, 10(c)(1) for CO because the corrective actions have completed.

### Attachment 2 OP-SUMR



# Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 1

Date: 10/08/2015	Regulated Entity No.: RN10	0211317	Permit No.: O-1610
Company Name: Eco Services Operations LLC		Area Name: Baytown Plant	

100 T			Preconstruction	Authorizations			
AI	Revision No.	D No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/30 TAC Chapter 106	Title I
	2	PREHTRSTK	OP-UA5	PREHEATER		106.183 (09/04/2000)	
	3	PRO-REGEN	OP-UA5	REGEN PROCESS UNIT	Y	9565	PSD-TX-695M3
D	4	1		FURNACE		9565	PSD-TX-695M3
· · ·							

Attachment 3

OP-UA43



### Texas Commission on Environmental Quality Sulfuric Acid Production Attributes Form OP-UA43 (Page 1) Federal Operating Permit Program

Table 1: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60) Subpart H: Standards of Performance for Sulfuric Acid Plants

Account No.: HG-0696-Q	Date: 10/08/2015	Project No.: 18273
Area Name: Baytown Plant		

Process ID No.	SOP Index No.	Construction/Modification Date	Process Design	Emission Rate	Optional Procedures
PRO-REGEN	60H-001	71+	NO		



## Texas Commission on Environmental Quality Sulfuric Acid Production Attributes Form OP-UA43 (Page 2) Federal Operating Permit Program

Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)
Control of Air Pollution from Sulfur Compounds (Sulfuric Acid Production)

Account No.: HG-0696-Q	Date: 10/08/2015	Project No.: 18273
Area Name: Baytown Plant		

Process ID No.	SOP Index No.	Facility Type	Effective Stack Height	Production Capacity	Facility Use
PRO-REGEN	REG2-002	SULFCON	NO	300+	YES
	10 7 1 200 1 200 1				
<del></del>					
and the second s					
		***************************************			

#### Attachment 4 OP-CRO1



### Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFOR	MATION				
RN: 100211317	CN: 6046834	82	Acc	count No.: HG-o	696-Q
Permit No.: O-1610		Project N	0.: 18273		
Area Name: Baytown Plant		Company	Name: Eco Ser	vices Operation	s LLC
II. CERTIFICATION TYPE	E (Please mark the	appropriate	e box)		
Responsible Official		⊠ Duly	Authorized Re	presentative	
III. SUBMITTAL TYPE (Ple	ase mark the appr	opriate box,	) (Only one resp	ponse can be acc	epted per form)
SOP/TOP Initial Permit App	lication 🛮 🖾 Upd	ate to Permi	it Application		
GOP Initial Permit Application	on Perr	nit Revision	, Renewal, or R	eopening	
☐ Other:					
IV. CERTIFICATION OF T	RUM				
This certification does not e information for reference o		ation whic	h is designat	ed by the TCE	Q as
I, Willia	m McConnell	cei	tify that I am t		D 4 B)
(Certifier Name pro	ntea or typea)			(RO or I	DAK)
and that, based on information dated during the time period or					
Note: Enter EITHER a Time Pe completed. The certification is t				n. This section m	nust be
Time Period: From		to			
	Start Date			End Date	
Specific Dates: 10/08/2015					
Date 1	Date 2	Date 3	Date 4	Date5	Date 6
Signature:		***	Signature	Date:	
Title: <u>Plant Manager</u>					

Attachment 5
OP-REQ1

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 1) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317	Permit No.: O-1610				
Area Name: Baytown Plant	Customer R	Customer Reference No.: CN604683482				
For SOP applications, answer ALL questions unless otherwise directed						

For SOP applications, answer ALL questions unless otherwise directed.

<b>♦</b> 1	For GOP app	plications, answer ONLY these questions unless otherwise directed.								
I.	Title 30 T	AC Chapter 111 - Control of Air Pollution from Visible Emissions and I	articulate Matter							
	A. Visible Emissions									
<b>*</b>	1.	The application area includes stationary vents constructed on or before January 31, 1972.	⊠ YES □ NO							
•	2.	The application area includes stationary vents constructed after January 31, 1972.  If the response to both Question I.A.1. and I.A.2. is "NO," go to Question I.A.6.  If the response to Question I.A.1. is "NO" and the response to Question I.A.2. is "YES," go to Question I.A.4.	⊠ YES □ NO							
<b>♦</b>	3.	The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	⊠ YES □ NO							
<b>♦</b>	4.	All stationary vents are addressed on a unit specific basis.  If the response to Question I.A.4. is "YES," go to Question I.A.6.	☐ YES ⊠ NO							
<b>*</b>	5.	Stationary vents are subject to compliance assurance monitoring requirements.	☐ YES ⊠ NO							
<b>*</b>	6.	Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	⊠ YES □ NO							
<b>♦</b>	7.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	☐ YES ⊠ NO							
•	8.	The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC	☐ YES ⊠ NO							

Emissions from units in the application area include contributions from

The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30

§ 111.111(a)(8)(A).

uncombined water.

TAC § 111.111(c).

9.

10.

YES □ NO

☐ YES ☒ NO ☐ N/A

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 2) **Federal Operating Permit Program**

Date: 10/08/2015 RN No.: RN10021		317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

♦ For	GOP applications.	answer ONLY	these auestions	unless oth	herwise directed.

l. Titl	e 30 T <i>A</i>	C Chapter 111 - Control of Air Pollution from Visible Emissions and	Particulate Matter
В.	Mate	rials Handling, Construction, Roads, Streets, Alleys, and Parking Lots	
	1.	Items a - d determines applicability of any of these requirements based on	geographical location.
•		a. The application area is located within the City of El Paso.	☐ YES ⊠ NO
<b>&gt;</b>		b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	☐ YES ⊠ NO
<b>•</b>		c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	☐ YES ☒ NO
•		d. The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	☐ YES ⊠ NO
		re is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2 responses to Questions I.B.1.a-d are "NO", go to Section I.C.	?.a - d.
	2.	Items a - d determine the specific applicability of these requirements.	
<b>•</b>		a. The application area is subject to 30 TAC § 111.143.	☐ YES ☐ NO
<b>)</b>		b. The application area is subject to 30 TAC § 111.145.	☐ YES ☐ NO
<b>)</b>		c. The application area is subject to 30 TAC § 111.147.	☐ YES ☐ NO
<b>)</b>		d. The application area is subject to 30 TAC § 111.149.	☐ YES ☐ NO
c.	Emis	sions Limits on Nonagricultural Processes	
<b>&gt;</b>	1.	The application area includes nonagricultural processes subject to 30 TAC § 111.151.	⊠ YES □ NO
	2.	The application area includes vents from a nonagricultural process that are subject additional monitoring requirements.  If the response to Question I.C.2. is "NO," go to Question I.C.4.	☐ YES ⊠ NO
			☐ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 3) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317	Permit No.: O-1610			
Area Name: Baytown Plant	Custom	ner Reference No.: CN604683482			
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					

		applications, answer ALL questions unless otherwise directed.  Applications, answer ONLY these questions unless otherwise directed.	
I.		TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Part	iculate Matter
	C. I	missions Limits on Nonagricultural Processes (continued)	
	4	The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	☐ YES ⊠ NO
	5	The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements.  If the response to Question I.C.5. is "NO," go to Question I.C.7.	☐ YES ⊠ NO
	6	. All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	☐ YES ☐ NO
	7	The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	☐ YES ⊠ NO
	8	The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements.  If the response to Question I.C.8. is "NO," go to Section I.D.	☐ YES ⊠ NO
	9	All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	☐ YES ☐ NO
	D. F	missions Limits on Agricultural Processes	
	1	. The application area includes agricultural processes subject to 30 TAC § 111.171.	☐ YES ⊠ NO
	E. (	Outdoor Burning	
•	1	Outdoor burning is conducted in the application area.  If the response to Question I.E. 1 is "NO," go to Section II.	☐ YES ☒ NO
•	2	. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	☐ YES ☐ NO
•	3	Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	☐ YES ☐ NO
<b>•</b>	4	Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	☐ YES ☐ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 4) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN10			RN No.: RN100211	317		Permit No.: O-1610		
Area	Name:	Bayto	wn Plant		Custome	r Referenc	e No.: CN604	683482
<b>♦</b>			lications, answer ALI lications, answer ON				cted.	
I.		30 T.	AC Chapter 111 - Co	ontrol of Air Pollut	ion from	Visible En	nissions and I	Particulate Matter
	E.	Out	door Burning <i>(contin</i>	rued)				
•		5.		is used in the application 30 TAC § 111.21		and subjec	t to the	☐ YES ☐ NO
•		6.		ng is used in the appling 30 TAC § 111.21		ea and sub	ject to the	☐ YES ☐ NO
•		7.	7. The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.			☐ YES ☐ NO		
п.	Title	30 T	AC Chapter 112 - Co	ontrol of Air Pollut	ion from	Sulfur Co	mpounds	
	A.	Tem	porary Fuel Shorta	ge Plan Requireme	ats			
		1.		a includes units that a tage plan requirement			ct to the	☐ YES ⊠ NO
III.	Title	30 T.	AC Chapter 115 - C	ontrol of Air Pollut	ion from	Volatile O	rganic Comp	ounds
	A.	App	licability				A markety is a second	
•	1. The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10.  See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.		⊠ YES □ NO					
	В.	Stor	age of Volatile Orga	nic Compounds				
<b>•</b>		1.	containers capable	a includes storage tar of maintaining worki C vapor or gas loss to	ing pressu	re sufficie		□ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 5) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211	317	Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482	

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.						
III. Title 30 TA	III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
C. Indu	istrial Wastewater					
1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140.  If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.	☐ YES ⊠ NO ☐ N/A				
2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.	☐ YES ☐ NO				
3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater).  If the response to Question III.C.3 is "YES," go to Section III.D.	☐ YES ☐ NO				
4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons).  If the response to Question III.C.4 is "YES," go to Section III.D.	☐ YES ☐ NO				
5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	☐ YES ☐ NO				
6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	☐ YES ☐ NO				
7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	☐ YES ☐ NO				
D. Loae	ding and Unloading of VOCs					
<b>♦</b> 1.	The application area includes VOC loading operations.	⊠ YES □ NO				
<b>•</b> 2.	The application area includes VOC transport vessel unloading operations.  For GOP applications, if the responses to Questions III.D.1 - D.2, are "NO," go to Section III.E.	⊠ YES □ NO				

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 6) **Federal Operating Permit Program**

Date: 10/08/2015	RN No.: RN100211317	Permit No.: O-1610	
Area Name: Baytown Plant	Customer Reference	ce No.: CN604683482	

For SOP applications, answer ALL questions unless otherwise directed.

<u> </u>	For GOP app	lications, answer ONLY these questions unless otherwise directed.	
III.	Title 30 T	AC Chapter 115 - Control of Air Pollution from Volatile Organic Comp	ounds (continued)
	D. Load	ding and Unloading of VOCs (continued)	
<b>*</b>	3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	☐ YES ⊠ NO
	E. Filli	ng of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispens	ing Facilities
<b>*</b>	1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container.  If the response to Question III.E.1 is "NO," go to Section III.F.	⊠ YES □ NO
<b>•</b>	2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	☐ YES ⊠ NO
<b>*</b>	3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent.  If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.	☐ YES ⊠ NO
•	4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10.  If the response to Question III.E.4 is "NO," go to Question III.E.9.	☐ YES ⊠ NO
<b>♦</b>	5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	☐ YES ☐ NO
<b>♦</b>	6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	☐ YES ☐ NO
•	7.	At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 125,000 gallons of gasoline in a calendar month after January 1, 1999. If the response to Question III.E.7 is "YES," go to Section III.F.	☐ YES ☐ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 7) Federal Operating Permit Program

Date: 10/08/2015			RN No.: RN100211317 Permit No.:		o.: O-1610		
Area N	Name: Baytor	wn Plant		Customer I	Reference No.: CN604683482		
		lications, answer ALI lications, answer ON	_				
m.	Title 30 T	AC Chapter 115 - C	ontrol of Air Pollut	ion from V	olatile Organic Com	pounds <i>(continued)</i>	
	E. Filli	ng of Gasoline Stora	ge Vessels (Stage I)	) for Motor	Vehicle Fuel Dispen	sing Facilities (continued)	
<b>*</b>	8.	Hays, Travis, Willia stationary storage to which has dispense	in Bastrop, Bexar, Camson, or Wilson Coanks greater than 100 d no more than 25,00 er December 31, 200 in III.E.8. Is "YES,"	ounty, transf 00 gallons lo 00 gallons o 4.	ers are made to ecated at a facility f gasoline in a	☐ YES ☐ NO	
•	9.	fuel dispensing faci gallons of gasoline	to stationary storage ility which has dispe in any calendar mon began prior to Nove	nsed no mor th after Janu	ary 1, 1991 and for	⊠ YES □ NO	
•	10.	fuel dispensing faci gasoline in any cale		nsed more th nuary 1, 199	ed at a motor vehicle nan 10,000 gallons of 1 and for which	☐ YES ⊠ NO	
•	11.		lity which commend		ed at a motor vehicle tion on or after	☐ YES ⊠ NO	
•	12.	County, transfers ar facility which has d	in Ellis, Johnson, K re made to stationary lispensed at least 10, as of gasoline in a ca	storage tand 000 gallons	ks located at a of gasoline but less	□ YES ⊠ NO	
		trol of VOC Leaks f Ps 511, 512, 513 and		ssels (Comp	lete this section for (	GOP applications for	
•	1.		re filled with, or emp C § 115.214(a)(1)(C		oline at a facility that (2) within the	YES □ NO □ N/A	

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 8) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317 Permi		Permit No.:	mit No.: O-1610	
Area	Name: Bayto	wn Plant		Customer Reference	e No.: CN604	683482
<b>♦</b>		lications, answer ALI plications, answer ON			ected.	
III.	Title 30 T.	AC Chapter 115 - Co	ontrol of Air Pollut	ion from Volatile (	Organic Comp	oounds <i>(continued)</i>
	F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)					
<b>♦</b>	2.	greater than or equa	ıl to 0.5 psia under a	soline VOCs having ctual storage condit (1)(C) within the ap	ions at a	☐ YES ⊠ NO ☐ N/A
<b>♦</b>	3.			otied of, gasoline at a c) or 115.224(2) with		☐ YES ☐ NO ⊠ N/A
	G. Con	trol of Vehicle Refu	eling Emissions (Sta	age II) at Motor Ve	hicle Fuel Di	spensing Facilities
•	1.	facilities and gasoli into motor vehicle f	ne is transferred from fuel tanks.	ore motor vehicle fum a stationary storage	ge container	☐ YES ⊠ NO ☐ N/A
•	2.	The application areafter November 15,		that began construct lay 16, 2012.	ion on or	☐ YES ☐ NO
<b>♦</b>	3.	November 15, 1992	2. Juestion III.G.2. and	that began construct	-	☐ YES ☐ NO
•	4.	The application are throughput of less t		ities that have a mor of gasoline.	nthly	☐ YES ☐ NO
<b>*</b>	5.		cation area has been	por recovery contro completed and the	l equipment	☐ YES ☐ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 9) Federal Operating Permit Program

Date: 10/08/2015			RN No.: RN100211317 P		Permit No.: O-1610	
Area	Name: Bayte	own Plant		Customer Reference	No.: CN604	683482
<b>♦</b>		plications, answer AL oplications, answer ON			cted.	
III.	Title 30 T	TAC Chapter 115 - C	ontrol of Air Pollut	tion from Volatile O	rganic Comp	ounds (continued)
	H. Co	ntrol Of Reid Vapor	Pressure (RVP) of	Gasoline		
<b>*</b>	♦ 1. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.					□ YES □ NO ⊠ N/A
•	2.		ion area includes stationary tanks, reservoirs, or other olding gasoline that will be used exclusively for the fueling al implements.			☐ YES ☐ NO
<b>♦</b>	3.	The application are	a includes a motor v	ehicle fuel dispensing	g facility.	☐ YES ☐ NO
•	4.		tion area includes stationary tanks, reservoirs, or other olding gasoline and having a nominal capacity of 500 ess.			☐ YES ☐ NO
	I. Pr	ocess Unit Turnaı	round and Vacu	um-Producing Sy	stems in P	etroleum Refineries
	1.	1. The application area is located at a petroleum refinery.				☐ YES ⊠ NO
	J. Sui	rface Coating Process	ses (Complete this s	ection for GOP app	lications only	)
<b>•</b>	1.	located on-site and	in-place) that meet t	hose performed on equipment on equipment of the exemption specific (b)(1) are performed in the exemption of	ed in	☐ YES ☐ NO ☐ N/A

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 10) Federal Operating Permit Program

Date	: 10/08/2	2015		RN No.: RN100211	317	Permit No.:	O-1610
Area	Name: l	Baytov	vn Plant		Customer Reference	e No.: CN604	683482
<b>♦</b>	For SOP applications, answer ALL questions unless of For GOP applications, answer ONLY these questions unless of the solution					ected.	
III.	Title	30 T	AC Chapter 115 - C	ontrol of Air Pollut	ion from Volatile (	organic Com	oounds <i>(continued)</i>
	K.	Cutl	oack Asphalt			a delikubikan sa	
		1.	roadways, driveway application area by	ck asphalt containings, or parking lots, is a state, municipal, output list in the control of th	used or specified for county agency.	r use in the	☐ YES ⊠ NO ☐ N/A
		2.	asphalt containing	ication, sale, or offering for sale of conventional cutback ining VOC solvents for the paving of roadways, driveways, is occurs in the application area.			☐ YES ⊠ NO ☐ N/A
		3.	Asphalt emulsion is	s used or produced w	vithin the application	area.	☐ YES ⊠ NO
		4.	in 30 TAC § 115.5	a is using an alternat 13. Question III.K.4 is "N			☐ YES ⊠ NO
		5.		a uses, applies, sells, h cutback asphalt, tha 17(1).			☐ YES ☐ NO
		6.		a uses, applies, sells, as a penetrating prime		tback asphalt	☐ YES ☐ NO
		7.	The applicant using agency.	g cutback asphalt is a	state, municipal, or	county	☐ YES ☐ NO
L.	Dega	ssing	of Storage Tanks, T	Fransport Vessels a	nd Marine Vessels		
•		1.	and/or transport ve		_		⊠ YES □ NO □ N/A

Degassing of only ocean-going, self-propelled VOC marine vessels is

If the response to Question III.L.2 is "YES," go to Section III.M.

performed in the application area.

2.

☐ YES ⊠ NO ☐ N/A

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 11) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	1317	Permit No.: O-1610	
Area	a Name: Baytown Plant		Customer Reference No.: CN604683482		
<b>♦</b>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.				
III.	III. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)				
	L. Degassing of Storage Ta	anks, Transport Ves	ssels and Marine Ve	essels(continued)	

III.	I. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)					
	L.	Deg	assing of Storage Tanks, Transport Vessels and Marine Vessels <i>(continu</i>	ued)		
<b>*</b>		3.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	⊠ YES □ NO □ N/A		
•		4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	⊠ YES □ NO □ N/A		
•		5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	⊠ YES □ NO		
<b>*</b>		6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐ YES ☒ NO ☐ N/A		
<b>*</b>		7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure $\geq 0.5$ psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	☐ YES ⊠ NO ☐ N/A		
	М.	Petr	oleum Dry Cleaning Systems			
		1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	☐ YES ☑ NO ☐ N/A		

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 12) **Federal Operating Permit Program**

Date: 10/08/2015	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant	•	Customer Reference	e No.: CN604683482	

For SOP applications answer AII questions unless otherwise directed

	11	lications, answer ALL questions unless otherwise directed.  lications, answer ONLY these questions unless otherwise directed	
m.	Title 30 T	AC Chapter 115 - Control of Air Pollution from Volatile Organic Comp	oounds <i>(continued)</i>
	N. Vent	Gas Control (Highly-reactive volatile organic compounds (HRVOC)	
	1.	The application area includes one or more vent gas streams containing HRVOC.	✓ YES   NO   N/A
	2.	The application area includes one or more flares that emit or have the potential to emit HRVOC.  If the response to Question III.N.1. and III.N.2. are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.	☐ YES ⊠ NO ☐ N/A
	3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	☐ YES ⊠ NO
	4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times.  If the response to Questions III.N.3. and III.N.4. are both "NO," go to Section III.O.	☐ YES ⊠ NO
	5.	The application area contains pressure relief valves that are not controlled by a flare.	☐ YES ☐ NO
	6.	The application area has at least one vent stream which has no potential to emit HRVOC.	☐ YES ☐ NO
	7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	☐ YES ☐ NO
	O. Cool	ling Tower Heat Exchange Systems (HRVOC)	
	1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	☐ YES ☒ NO ☐ N/A

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 13) **Federal Operating Permit Program**

Date: 10/08/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.							
IV.	Title 30 TA	AC Chapter 117 - Control of Air Pollution from NITROGEN COMPOU	J <b>NDS</b>				
	A. Applicability						
•	1.	The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, Dallas/Fort Worth, or Dallas/Fort Worth Eight-Hour area.  For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.  For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F.  For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C. and IV.F.  For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.	⊠ YES □ NO				
	2.	The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln.  If the response to Question IV.A.2 is "YES," go to Question IV.H.1.	☐ YES ⊠ NO				
	3.	The application area includes a utility electric generator in an east or central Texas county.  See instructions for a list of counties included.  If the response to Question IV.A.3 is "YES," go to Question IV.G.1.  If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.	☐ YES ⊠ NO				
В.	Utility Elec	ctric Generation in Ozone Nonattainment Areas					
	1.	The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300.  If the response to Question IV.B.1. is "NO," go to Question IV.C.1.	☐ YES ⊠ NO				
	2.	The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	☐ YES ☐ NO				

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 14) Federal Operating Permit Program

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Are	a Name: Baytov	wn Plant		Customer Reference No.: CN604683482		
<u> </u>		lications, answer ALI blications, answer ON			cted.	
IV.	Title 30 T	AC Chapter 117 - C	ontrol of Air Pollut	tion from Nitrogen (	Compounds(c	ontinued)
	C. Com	amercial, Institution	al, and Industrial S	ources in Ozone No	nattainment	Areas
<b>•</b>	1.	Subchapter B and in 117.300, or 117.400 For SOP application Question IV.D.1.	ncludes units specific 0. ons, if the response to ons for GOP 517, if i	subject to 30 TAC Cled in 30 TAC §§ 117 o Question IV.C.1. is the response to Quest	".100, "NO," go to	⊠ YES □ NO
•	2.	The application are before November 1		that was a major sour	ce of NO <sub>x</sub>	ĭ YES ☐ NO ☐ N/A
<b>*</b>	3.		a includes an electric estem Cap in 30 TAC	c generating facility r	equired to	☐ YES ⊠ NO
	D. Adip	pic Acid Manufactu	ring			
	1.	The application are unit.	a is located at, or par	rt of, an adipic acid p	oroduction	☐ YES ⊠ NO ☐ N/A
	E. Niti	ric Acid Manufac	turing - Ozone N	Nonattainment A	reas	
	1.	The application are	a is located at, or par	rt of, a nitric acid pro	duction unit.	☐ YES ☐ NO ☐ N/A
		nbustion Control at ionary Engines and		)zone Nonattainmer	ıt Areas - Boi	lers, Process Heaters,
<b>•</b>	1.	the Houston/Galves For SOP application Question IV.H.1.	ston/Brazoria or Dall ons, if the response to	that is a minor source las/Fort Worth Eight- o Question IV.F.1 is to Question IV.F.1 is	Hour areas. "NO," go to	□ YES ⊠ NO
•	2.	* *		ouston/Galveston/Bra		☐ YES ☐ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 15) Federal Operating Permit Program

Date: 10/08/2015			RN No.: RN100211	317	Permit No.:	O-1610
Area Name:	Bayto	wn Plant		Customer Reference No.: CN604683482		
		lications, answer ALl plications, answer ON	-			
IV. Title	30 T	AC Chapter 117 - C	ontrol of Air Pollut	ion from Nitro	ogen Compounds(	continued)
F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Bo Stationary Engines and Gas Turbines (continued)					ilers, Process Heaters,	
•	3.		rea is located in the Houston/Galveston/Brazoria area qualify for an exemption under 30 TAC			☐ YES ☐ NO
<b>•</b>	4.	The application area is located in the Dallas/Fort Worth Eight-Hour area and has units that qualify for an exemption under 30 TAC § 117.2103.			☐ YES ☐ NO	
♦ 5. The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.				specifications	☐ YES ☐ NO	
G.	Utili	ity Electric Generati	on in East and Cen	tral Texas		
	1.	stationary gas turbin ducts) that were pla	a includes utility elemes (including duct because into service before the street of th	urners used in ore December 3	turbine exhaust 31, 1995.	☐ YES ☐ NO
	2.	The application ares	a is complying with	the System Cap	p in 30 TAC	☐ YES ☐ NO
II.	Mul	ti-Region Combusti	on Control - Water	Heaters, Sma	ll Boilers, and Pro	cess Heaters
	1.	installer of natural g	a includes a manufac gas fired water heater apacity of 2.0 MMB suestion IV.H.1. is "N	rs, boilers or pr tu/hr or less.	rocess heaters with	☐ YES ⊠ NO
	2.		oilers or process hea qualify for an exem		-	☐ YES ☐ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 16) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	317	Permit No.:	O-1610
Area Name: Bayto	wn Plant		Customer Reference No.: CN604683482		
	lications, answer ALI plications, answer ON		otherwise directed. ss unless otherwise directed.		
	ode of Federal Regu Standards for Consu			ational Volatil	e Organic Compound
Residual Marky S. J. Common Common Conference Common Commo	part B – National Vo tings	olatile Organic Com	pound Emission	Standards for	Automobile Refinish
1.		a manufactures autor s and sells or distribu Jnited States.			☐ YES ⊠ NO
2.	components, manuf	a imports automobile actured on or after Jatings or coating con Questions V.A.1 and	anuary 11, 1999, a ponents in the Un	nd sells or lited States.	☐ YES ⊠ NO
3.	or imported by the	nish coatings or coat application area mee & § 59.100(c)(1) - (6)	t one or more of th		☐ YES ☐ NO
B. Sub	part C – National Vo	olatile Organic Con	apound Emission	Standards for	Consumer Products
1.	The application are distribution in the U	a manufactures const Inited States.	umer products for	sale or	☐ YES ⊠ NO
2.		a imports consumer p 1998 and sells or disted States.			☐ YES ⊠ NO
3.	appears on the label	a is a distributor of c l of one or more of th Questions V.B.1 - V.1	ne products.		☐ YES ⊠ NO
4.		acts manufactured, in et one or more of the o(1) - (7).			☐ YES ☐ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 17) Federal Operating Permit Program

RN No.: RN100211	RN No.: RN100211317		Permit No.: O-1610	
	Customer Reference No.: CN604683482			
		ected.		
		tional Volatile C	organic Compound	
Volatile Organic Con	pound Emission S	Standards for A	chitectural Coatings	
	ports architectural	coatings for sale	☐ YES ⊠ NO	
the Federal Insecticide,	Fungicide, and Ro	denticide Act.	☐ YES ⊠ NO	
			☐ YES ☐ NO	
Volatile Organic Con	pound Emission S	Standards for Ae	rosol Coatings	
		coating	☐ YES ⊠ NO	
	of aerosol coating	s for resale or	☐ YES ⊠ NO	
of Evaporative Emission	ons From New and	l In-Use Portabl	e Fuel Containers	
on in the United States.			☐ YES ⊠ NO	
			☐ YES ☐ NO	
gulations Part 60 - Ne	w Source Perform	ance Standards		
subparts.	•		⊠ YES □ NO	
s of Performance for	Coal Preparation :	and Processing F	Plants	
	- <del>-</del>		☐ YES ⊠ NO	
	ALL questions unless of ONLY these questions unless of ONLY these questions unless of only the gulations Part 59 (40 consumer and Commerce Volatile Organic Commerce and area manufactures or in the Federal Insecticide, to Questions V.C.1 and coatings manufactured to of the exemptions specified or distribution in the area is a distributor the United States.  The Evaporative Emission of Evaporative Emission in the United States.  The Question V.E.1 is "Not containers manufactures or important of the exemption of t	Customer Referent ALL questions unless otherwise directed. ONLY these questions unless otherwise directed. ONLY these questions unless otherwise directed. ONLY these questions unless otherwise directural gulations Part 59 (40 CFR Part 59) - Nansumer and Commercial Products  Volatile Organic Compound Emission States area manufactures or imports architectural the United States.  Area manufactures or imports architectural the Federal Insecticide, Fungicide, and Roto Questions V.C.1 and V.C.2 are both "Note to Questions V.C.1 and V.C.2 are both "Note of the exemptions specified in 40 CFR §  Volatile Organic Compound Emission States area is a distributor of aerosol coating the United States.  A area is a distributor of aerosol coating the United States.  A presentative Emissions From New and the United States.  A Question V.E.1 is "NO," go to Section V.C.1 is "NO," go to Section	Customer Reference No.: CN60468  ALL questions unless otherwise directed.  ONLY these questions unless otherwise directed.  gulations Part 59 (40 CFR Part 59) - National Volatile Consumer and Commercial Products  Volatile Organic Compound Emission Standards for Anarea manufactures or imports architectural coatings for sale the United States.  Area manufactures or imports architectural coatings that are the Federal Insecticide, Fungicide, and Rodenticide Act. to Questions V.C.1 and V.C.2 are both "NO," go to Section coatings manufactured or imported by the application area to of the exemptions specified in 40 CFR § 59.400(c)(1) -  Volatile Organic Compound Emission Standards for Act area manufactures or imports aerosol coating the or distribution in the United States.  A area is a distributor of aerosol coatings for resale or the United States.  Of Evaporative Emissions From New and In-Use Portable area manufactures or imports portable fuel containers for on in the United States.  Of Question V.E.1 is "NO," go to Section VI.  Containers manufactured or imported by the application more of the exemptions specified in 40 CFR § 59.605(a) -  Guestions Part 60 - New Source Performance Standards  area includes a unit(s) that is subject to one or more	

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 18) **Federal Operating Permit Program**

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	11	ications, answer ALL questions unless otherwise airectea. lications, answer ONLY these questions unless otherwise directed.						
VI.	Title 40 Co	ode of Federal Regulations Part 60 - New Source Performance Standar	ds (continued)					
	B. Subpart Y - Standards of Performance for Coal Preparation and Processing Plants (continued)							
	2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd).  If the response to Question VI.B.2 is "NO," go to Section VI.C.	☐ YES ☐ NO					
	3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option.  If the response to Question VI.B.3. is "YES," go to Section VI.C.	☐ YES ☐ NO					
	4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility.  If the response to Question VI.B.4. is "NO," go to Section VI.C.	☐ YES ☐ NO					
	5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	☐ YES ☐ NO					
	C. Subp	oart GG - Standards of Performance for Stationary Gas Turbines (GO	P applicants only)					
•	1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.	☐ YES ☐ NO ☐ N/A					
<b>*</b>	2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. If the response to Question VI.C.2 Is "NO," go to Section VI.D.	☐ YES ☐ NO					
•	3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	☐ YES ☐ NO					
•	4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	☐ YES ☐ NO					

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Area Name: Baytown Plant				Customer Reference No.: CN604683482				
		lications, answer ALI plications, answer ON	_					
VI.	Title 40 C	ode of Federal Regu	lations Part 60 - No	w Source Pe	rformance Standaı	ds (continued)		
	C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)							
<b>*</b>	<ol> <li>One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam the control of nitrogen oxides.</li> </ol>				☐ YES ☐ NO			
)	D. Sub	part XX - Standards	of Performance fo	r Bulk Gasol	ine Terminals			
			a includes bulk gasoline terminal loading racks.  Question VI.D.1 is "NO," go to Section VI.E.			☐ YES ☒ NO ☐ N/A		
	2.	One or more of the December 17, 1980		constructed or	modified after	☐ YES ☐ NO		
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dio. (SO <sub>2</sub> ) Emissions								
•	1.	§ 60.640(a) that pro	-	shore). O Question VI.	E.1 is "NO," go to	□ YES ⊠ NO		
•	2.	January 20, 1984 ar For SOP applicatio Section VI.F.	es commenced considered on or before Augusts, if the response to ons, if the response to	ust 23, 2011. O Question VI.	E.2. is "NO," go to	□ YES □ NO		
•	3.	capacity greater tha	-	tons per day ( an 2 LTPD. O Question VI.	LTPD) of  E.3. is "NO," go to	☐ YES ☐ NO		

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 20) Federal Operating Permit Program

Date: 10/08/2015			RN No.: RN100211317   Perm		Permit No.:	rmit No.: O-1610			
Area	Name: Bay	town Plant		Customer Refe	ustomer Reference No.: CN604683482				
<b>♦</b>		pplications, answer ALl applications, answer ON	-						
VI.	Title 40	Code of Federal Regu	lations Part 60 - Ne	w Source Perf	ormance Standar	ds (continued)			
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO <sub>2</sub> ) Emissions <i>(continued)</i>									
<b>•</b>	4.	Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LPTD.  For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F.  For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.				☐ YES ☐ NO			
•	5.	<u> </u>	Unit ID(s) for the gasing limits in the space			blished federally			
	F. Sı	ubpart 000 - Standar	ds of Performance	for Nonmetall	ic Mineral Proces	sing Plants			
	1.	§ 60.670(a)(1) that processing plant.	a includes affected fa are located at a fixed duestion VI.F.1 is "N	or portable no	nmetallic mineral	☐ YES ⊠ NO			
	2.		dentified in 40 CFR subject to 40 CFR P			☐ YES ☐ NO			
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems									
	1.	or more of the affect § 60.690(a)(2) - (4) reconstruction was	a is located at a petro eted facilities identification which construction commenced after Management of the Management o	ed in 40 CFR on, modification y 4, 1987.	on, or	☐ YES ⊠ NO			
	2.	The application are	a includes storm wat	er sewer systen	ns.	☐ YES ☐ NO			

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 21) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317 Perm		Permit No.:	Permit No.: O-1610	
Area Name: Baytow	n Plant		Customer Reference	e No.: CN604	683482	
		L questions unless oth LY these questions u		cted.		
VI. Title 40 Co	de of Federal Regu	lations Part 60 - Ne	w Source Performa	ince Standar	ds (continued)	
	art QQQ - Standar ewater Systems <i>(co</i>	ds of Performance ( ntinued)	for VOC Emissions	s from Petrole	eum Refinery	
3.		a includes ancillary e astewater system and vater.			☐ YES ☐ NO	
4.	The application area	a includes non-conta	ct cooling water sys	tems.	☐ YES ☐ NO	
5.		a includes individual Luestion VI.G.5 is "N		<i>І.Н</i> .	☐ YES ☐ NO	
6.	6. The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).					
7.	The application area	a includes completely	y closed drain system	ns.	☐ YES ☐ NO	
Whic	h Construction Co	rds of Performance mmenced After Aug nced on or After Jun	gust 30, 1999 or for		Caracter State Countries and the contract of t	
<b>•</b> 1.	incineration unit, ot If the response to Q	a includes at least on her than an air curtai nuestion VI.H.1. is "Non VI.H.1. is "Non" g	n incinerator. I/A," go to Section I	VI.I. If the	☐ YES ⊠ NO ☐ N/A	
<b>♦</b> 2.	incineration unit, ot	a includes at least on her than an air curtai modified or reconstr	n incinerator, constr	ructed after	☐ YES ☐ NO	
<b>♦</b> 3.	incineration unit, ot	a includes at least on her than an air curtai d not modified or rec	n incinerator, constr	ucted before	☐ YES ☐ NO	
<b>4</b> .		a includes at least on se to Question VI.H.4			☐ YES ⊠ NO	

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Date:	10/08/2	015		RN No.: RN100211	1317 Permit No.: O-1610		O-1610
Area ]	Name: I	Baytov	vn Plant		Customer Reference	e No.: CN604	683482
				L questions unless ot ILY these questions u		cted.	
VI.	Title	40 Co	de of Federal Regu	lations Part 60 - Ne	w Source Performa	ince Standar	ds (continued)
	н.	Whic	ch Construction Co	ords of Performance mmenced After Au nced on or After Ju	gust 30, 1999 or for		
•		5.	constructed after A after June 6, 2006.	a includes at least on ugust 30, 1999 or mo	odified or reconstruct	ted on or	☐ YES ☐ NO
<b>•</b>		6.		nerators constructed a tructed on or after Ju			☐ YES ☐ NO
<b>*</b>		7.		a includes at least on August 30, 1999 and 2006.			☐ YES ☐ NO
<b>*</b>		8.		nerators constructed b tructed on or after Ju			☐ YES ☐ NO
	L	Incir	neration Units for V	ards of Performance Which Construction truction Commence	Commenced After	November 3	Solid Waste 0, 1999 or for Which
•		1.	waste incineration if the response to Q	a includes at least on unit, other than an air Question VI.I.1. is "No on VI.I.1. is "NO," g	r curtain incinerator. VA," go to Section V		☐ YES ⊠ NO ☐ N/A
<b>*</b>		2.	waste incineration	ea includes at least on unit, other than an air , 1999 or modified or	r curtain incinerator,	constructed	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 23) Federal Operating Permit Program

Date: 10/08/2015			RN No.: RN100211317		Permit No.: O-1610	
Area	Name: Baytov	vn Plant		Customer Reference	e No.: CN604	683482
<b>♦</b>			L questions unless oth ILY these questions u	herwise directed. Inless otherwise dire	cted.	
VI.	Title 40 Co	de of Federal Regu	lations Part 60 - Ne	w Source Performa	nce Standar	ds (continued)
	Incin	eration Units for W	hich Construction	e for Commercial a Commenced After d on or After June	November 3	0, 1999 or for Which
•	3.	waste incineration u	ınit, other than an air	e commercial or indecurtain incinerator, ified or reconstructed	constructed	☐ YES ☐ NO
•	4.			e air curtain incinera O, " go to Section VI.		☐ YES ⊠ NO
<b>•</b>	5.	constructed after No after June 1, 2001.		e air curtain incinera modified or reconstr		☐ YES ☐ NO
•	6.	modified or reconst	ructed on or after Jur	fter November 30, 1 ne 1, 2001 combust on ixture of these mate	only wood	☐ YES ☐ NO
•	7.		November 30, 1999 a	e air curtain incinera and not modified or	tor,	☐ YES ☐ NO
<b>•</b>	8.	not modified or reco	onstructed on or after	efore November 30, r June 1, 2001 combi e or a mixture of thes	ust only	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 24) Federal Operating Permit Program

			•			
Date	e: 10/08/2015		RN No.: RN100211	1317	Permit No.: C	)-1610
Area	a Name: Bayto	wn Plant		Customer Reference	e No.: CN6046	583482
<b>♦</b>		lications, answer ALI plications, answer ON			cted.	
VI.	Title 40 C	ode of Federal Regu	lations Part 60 - Ne	w Source Performa	ince Standard	s (continued)
	Con	part EEEE - Standa struction Commenc umenced on or After	ed After December	ainelet itt tifkennräkkillentigbenmmaskikteriöbe		ion Units for Which on or Reconstruction
•	1.	incineration unit or incinerator.  If the response to Q	institutional incineration VI.J.1. is "N	ne very small municipation unit, other than U/A," go to Section V/10 to Question VI.J.4	an air curtain	☐ YES ⊠ NO ☐ N/A
•	2.	incineration unit, ot	ea includes at least one very small municipal waste other than an air curtain incinerator, constructed after or modified or reconstructed on or after June 16, 2006.			☐ YES ☐ NO
•	3.	incineration unit, ot	her than an air curta	ne very small municiping in incinerator, constructed on or a	ucted before	☐ YES ☐ NO
•	4.			ne air curtain incinera IO," go to Section V		☐ YES ⊠ NO
<b>*</b>	5.	constructed after De after June 16, 2006.	ecember 9, 2004 or r	ne air curtain incinera modified or reconstru IO," go to Question	icted on or	☐ YES ☐ NO
<b>•</b>	6.	modified or reconst	ructed on or after Ju	after December 9, 20 ne 16, 2006 combust mixture of these mat	t only wood	☐ YES ☐ NO
<b>♦</b>	7.	The application area	a includes at least or	e air curtain incinera	ator	☐ YES ☐ NO

constructed before December 9, 2004 and not modified or reconstructed

on or after June 16, 2006.

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 25) Federal Operating Permit Program

Date:	Pate: 10/08/2015 RN No.: RN100211317 Permit No.: O-1610		D-1610				
Area	Name: B	ayto	wn Plant		Customer Reference	e No.: CN604	683482
			lications, answer ALI lications, answer ON	-		ected.	
VI.	Title 4	10 C	ode of Federal Regu	lations Part 60 - Ne	w Source Perform	ance Standard	ls (NSPS) (continued)
		Con		ed After December	9, 2004 or for Whi		tion Units for Which on or Reconstruction
<b>*</b>		8.	modified or reconst	erators constructed l cructed on or after Ju r, or yard waste or a	ne 16, 2006 combus	t only wood	☐ YES ☐ NO
•		9.		ain incinerator is located at an institutional facility and is a rating unit of the institutional facility that generated the waste.			☐ YES ☐ NO
<b>♦</b>		10.		nerator burns less that rd waste or a mixture		f wood waste,	☐ YES ☐ NO
VII.	Title 4	40 C	ode of Federal Regu	lations Part 61 - Na	itional Emission St	andards for H	azardous Air Pollutants
	Α.	App	licability				
<b>•</b>		1.	CFR Part 61 subpar	a includes a unit(s) the cts. Question VII.A.1 is "I	-		☐ YES ⊠ NO ☐ N/A
	В.	Subj	part F - National En	aission Standard fo	r Vinyl Chloride		
		1.	dichloride by reacti vinyl chloride by ar	a is located at a plan on of oxygen and hy ny process, and/or or merized vinyl chlori	drogen chloride with ne or more polymers	h ethylene,	☐ YES ☐ NO
			part J - National En ssion Sources) of Be				
<b>♦</b>		1.	The application are	a includes equipmen	t in benzene service.	•	☐ YES ☐ NO ☐ N/A

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 26) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317 Perm		Permit No.: C	Permit No.: O-1610		
Area N	ame: ]	Baytov	vn Plant		Customer Reference	No.: CN6046	583482
<b>♦</b>				LL questions unless ( ONLY these questions	otherwise directed. s unless otherwise di	rected.	
VII.	·	40 Co inued	Control of the Contro	lations Part 61 - Na	tional Emission Sta	ndards for H	azardous Air Pollutants
	D.	### ### ### ##########################	oart L – National Er ts <i>(continued)</i>	nission Standard fo	r Benzene Emission	s from Coke	By-Product Recovery
		1.	includes one or mor § 61.130(a) - (b).	re of the affected sou	by-product recovery rces identified in 40 VO," go to Section V	ČFR	☐ YES ☐ NO
		2.	The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).			☐ YES ☐ NO	
		3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.			☐ YES ☐ NO		
	E.	Subp	oart M - National E	mission Standard fo	or Asbestos		
	1923 1923 1923 1933	Appl	icability			e de la companya de	
		1.	in 40 CFR §§ 61.14	3, .144, .146, 147, .1	perations, or activitien. 48, or .155.  NO," go to Section V.	-	☐ YES ☐ NO
		Road	lway Construction				
		2.		a includes roadways asbestos-containing	constructed or maint waste material.	ained with	☐ YES ☐ NO
	7	Man	ufacturing Comme	rcial Asbestos			
		3.	commercial asbesto	os.	cturing operation using NO," go to Question		☐ YES ☐ NO
			a. Visible emiss manufacturin		to outside air from th	e	☐ YES ☐ NO
				at has received prior	nd waste treatment m U.S. Environmental		☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 27) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN10021	RN No.: RN100211317 Permit N		it No.: O-1610	
Area Name: Baytown Plant		Customer Reference No.: CN604683482			
For SOP applications, answ  For GOP applications, answ			cted.		
VII. Title 40 Code of Federal (continued)	Regulations Part 61 - Na	ational Emission Sta	ndards for H	azardous Air Pollutants	
E. Subpart M - Natio	nal Emission Standard f	or Asbestos <i>(continu</i>	ed)		
Manufacturing Co	ommercial Asbestos <i>(cont</i>	inued)			
c. Asbest forms.	os-containing waste materi	ial is processed into n	on-friable	☐ YES ☐ NO	
d. Asbest	os-containing waste materi	ial is adequately wette	ed.	☐ YES ☐ NO	
II.	e. Alternative filtering equipment is being used that has received EPA approval.			☐ YES ☐ NO	
	efficiency particulate air ( d to be at least 99.97% eff			☐ YES ☐ NO	
	A has authorized the use of with a unit contacting ene	•	•	☐ YES ☐ NO	
Asbestos Spray A	plication				
materials are	on area includes operations spray applied. See to Question VII.E.4 is "I		_	☐ YES ☐ NO	
binder <i>If the r</i>	os fibers are encapsulated of during spraying and are no esponse to Question VII.E. on VII.E.5.	t friable after drying.		☐ YES ☐ NO	
	on applications on building use material containing mo		nd conduits	☐ YES ☐ NO	
1	rnative emission control as sed that has received prior		ethod is	☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 28) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN100211317 Permit No.: O-1610			-1610				
Area Name: Baytown P	lant		Customer Reference No.: CN604683482				
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
VII. Title 40 Code of (continued)	of Federal Regu	lations Part 61 - Na	tional Emission Sta	ndards for H	azardous Air Pollutants		
E. Subpart	M - National E	mission Standard fo	or Asbestos <i>(continu</i>	ed)			
Asbestos	Spray Applicat	tion <i>(continued)</i>			The second secon		
d.	Asbestos-conforms.	taining waste materi	al is processed into n	on-friable	☐ YES ☐ NO		
e.	Asbestos-con	taining waste materi	al is adequately wette	ed.	☐ YES ☐ NO		
f.	Alternative fi approval.	ltering equipment is	being used that has r	eceived EPA	☐ YES ☐ NO		
g,		er is being used that i 0.3 micron particles.	s certified to be at lea	ast 99.97%	☐ YES ☐ NO		
h.			of wet collectors designer of at least 9.95 k		☐ YES ☐ NO		
Fabricat	ing Commercia	l Asbestos					
asb	estos.		ing operation using co		☐ YES ☐ NO		
a.	Visible emiss manufacturin		to outside air from th	e	☐ YES ☐ NO		
b.		e emission control ar at has received prior	nd waste treatment m EPA approval.	ethod is	☐ YES ☐ NO		
c.	Asbestos-conforms.	taining waste materi	al is processed into n	on-friable	☐ YES ☐ NO		
d.	Asbestos-con	itaining waste materi	al is adequately wett	ed.	☐ YES ☐ NO		
e.	Alternative fi	iltering equipment is	being used that has r	eceived EPA	☐ YES ☐ NO		

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 29) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317 Pe		Permit No: O-1610			
Area	Area Name: Baytown Plant				Customer Reference No.: CN604683482		
				L questions unless ot ILY these questions i		cted.	
VII.	Title 4 (conti			lations Part 61 - Na	itional Emission Sta	ndards for H	lazardous Air Pollutants
		Fabri	icating Commercia	l Asbestos <i>(continue</i>	ed)		
				er is being used that i 0.3 micron particles.	s certified to be at lea	ast 99.97%	YES NO
				authorized the use o a unit contacting ene			☐ YES ☐ NO
		Non-	sprayed Asbestos I	nsulation			
	(	6.		a includes insulating naterials) that are eitl after drying.			☐ YES ☐ NO
	La Pri	Asbe	stos Conversion		Kung Sungan dan Sungan Sung Penggan Sungan Sung		
	,	7.		a includes operations and asbestos-contain cos-free) material.			☐ YES ☐ NO
			art P - National En Metallic Arsenic Pr		r Inorganic Arsenic	Emissions fr	om Arsenic Trioxide
		1.	an arsenic trioxide	a is located at a meta plant that processes l ing condensation pro	ow-grade arsenic bea		☐ YES ☐ NO
			art BB - National E ations	Emission Standard f	or Benzene Emissio	ns from Ben	zene Transfer
	,		bulk terminal.	a is located at a benz	•	•	☐ YES ☐ NO
		2.	The application are loading racks.	a includes benzene tr	ansfer operations at	marine vessel	☐ YES ☐ NO

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 30) **Federal Operating Permit Program**

Date: 10/08/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

		ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.	
	**************************************	ode of Federal Regulations Part 61 - National Emission Standards for (continued)	Hazardous Air
G.		part BB - National Emission Standard for Benzene Emissions from Be rations <i>(continued)</i>	nzene Transfer
	3.	The application area includes benzene transfer operations at railcar loading racks.	☐ YES ☐ NO
	4.	The application area includes benzene transfer operations at tank-truck loading racks.	☐ YES ☐ NO
181	. Subj	part FF - National Emission Standard for Benzene Waste Operations	
	Appl	licability	
	1.	The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	☐ YES ☐ NO
	2.	The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.	☐ YES ☐ NO
	3.	The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates.  If the response to Question VII.H.3 is "YES," go to Section VIII.	☐ YES ☐ NO
	4.	The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). If the response to Question VII.H.4 is "YES", go to Section VIII	☐ YES ☐ NO
	5.	The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr.  If the response to Question VII.H.5 is "YES," go to Section VIII.	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 31) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317		Permit No.: O-1610		
Area Name: B	Baytov	wn Plant		Customer Reference	e No.: CN6046	583482
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					
VII. Title			lations Part 61 - Na	ntional Emission Sta	ndards for H	azardous Air Pollutants
н.	Subp	oart FF - National E	mission Standard f	for Benzene Waste (	Operations <i>(co</i>	ontinued)
	Appl	licability (continued)	)			
	6.		annual average benz based on documenta	zene concentration of ation.	each waste	☐ YES ☐ NO
	7.		a has waste streams ont of 10% or greater	with flow-weighted a	ınnual	☐ YES ☐ NO
A PROPERTY OF THE PROPERTY OF	Wast	te Stream Exemptio	ns		ANALON (S. C.) VIII PRANT	
	8.		(c)(2) (the flow-wei	that meet the exempt ghted annual average		☐ YES ☐ NO
	9.	in 40 CFR § 61.342	(c)(3) because proce	that meet the exempt ess wastewater has a wastewater quantity	flow rate less	☐ YES ☐ NO
	10.		(c)(3) because the to	that meet the exempt otal annual benzene q		☐ YES ☐ NO
	11.	The application are facility.	a transfers waste off-	-site for treatment by	another	☐ YES ☐ NO
	12.	The application area	a is complying with	40 CFR § 61.342(d).		☐ YES ☐ NO
	13.			40 CFR § 61.342(e). "NO," go to Questio		☐ YES ☐ NO
	14.		a has facility waste vent of less than 10%.	with a flow weighted	annual	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 32) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN		RN No.: RN10021	1317	Permit No.: C	)-1610
Area Name: Baytov	wn Plant		Customer Reference	e No.: CN6046	583482
	lications, answer AL. lications, answer ON	-	herwise directed. unless otherwise dire	cted.	
VII. Title 40 Co		lations Part 61 - Na	ational Emission Sta	ndards for H	azardous Air Pollutants
H. Subj	oart FF - National E	Emission Standard (	for Benzene Waste (	Op <mark>erations</mark> (co	ontinued)
Cont	tainer Requirement	s			
15.	receive non-exemp	t benzene waste.	defined in 40 CFR § "NO," go to Question		☐ YES ☐ NO
16.	40 CFR § 61.345 re	equirements for cont	ns of compliance to nainers. "YES," go to Question		☐ YES ☐ NO
17.			or containers operate ss than atmospheric p		☐ YES ☐ NO
Indiv	vidual Drain Systen	1 <b>S</b>		40 - 40 - 20 - 20 - 20 - 20 - 20 - 20 -	a satiliandos. Carego
18.	§ 61.341, that recei	ve or manage non-ex	n systems, as defined kempt benzene waste "NO," go to Question	•	☐ YES ☐ NO
19.	the 40 CFR § 61.34	6 requirements for i	te means of complian ndividual drain syste "YES," go to Question	ms.	☐ YES ☐ NO
20.	CFR § 61.346(a).		n systems complying		☐ YES ☐ NO
21.		dual drain system is	or individual drain sys maintained at a press		☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 33) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317		Permit No.: O-1610			
Area Name: Baytown Plant					Customer Reference No.: CN604683482		
			lications, answer ALI plications, answer ON			cted.	
VII.		40 C		lations Part 61 - Na	tional Emission Sta	ındards for H	azardous Air Pollutants
	H.	Sub	part FF - National E	Emission Standard f	or Benzene Waste (	Operations <i>(c</i>	ontinued)
		Indi	vidual Drain System	is .			
		22.	40 CFR § 61.346(b)	a has individual drain ). <i>Question VII.H.22 is</i> '			☐ YES ☐ NO
:		23.	to prevent the flow	ne individual drain sy of organic vapors fro ing normal operation	om the junction box		☐ YES ☐ NO
		24.	Junction box vent p closed-vent system	ipes in the individua and control device.	l drain systems are c	onnected to a	☐ YES ☐ NO
		Rem	ediation Activities				
		25.	Remediation activit CFR Part 61, Subpa	ies take place at the art FF.	application area subj	ect to 40	☐ YES ☐ NO
VIII.			ode of Federal Regu Categories	lations Part 63 - Na	tional Emission Sta	indards for H	azardous Air Pollutants
	A.	App	licability				
•		1.	40 CFR Part 63 sub reference under sub	a includes a unit(s) the parts other than subpoparts in 40 CFR Part 40 CFR Part 63 sub	parts made applicable t 60, 61 or 63.	e by	☐ YES ⊠ NO
	В,		part F - National En anic Chemical Mani			ous Air Pollut	ants from the Synthetic
		1.	defined in the Feder	a is located at a plant ral Clean Air Act § 1 duestion VIII.B.1. is	12(a).		☐ YES ⊠ NO

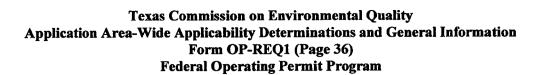
## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 34) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant			Customer Reference No.: CN604683482		
		L questions unless ot ILY these questions i	herwise directed. Inless otherwise dire	cted.	
	le of Federal Regu Categories <i>(continu</i>	CONTRACTOR AND STATES IN THE SECOND CONTRACTOR OF THE SECOND CONTRACTOR	itional Emission Sta	ndards for H	azardous Air Pollutants
tata ang ang mga katalang ang ang ang ang ang ang ang ang ang		nission Standards fo ufacturing Industry		ous Air Pollut	ants from the Synthetic
1 1 2	manufacturing proc manufactures as a p 40 CFR § 63.100(b	ess unit, as defined in the contract one (a) (1)(i) or (b)(1)(ii).	that includes at least in 40 CFR § 63.101, for more of the chemi "NO," go to Section	that cals listed in	☐ YES ☐ NO
1	manufacturing proc manufactures as a p 40 CFR § 63.100(b manufactures as a p	tess unit, as defined in the orimary product one of the official or (b)(1)(ii). a product, or co-product.	that includes at least in 40 CFR § 63.101, or more of the chemi and uses as a reactant of, one or more of the of 40 CFR Part 63,	that cals listed in or organic	☐ YES ☐ NO
	defined in 40 CFR or more of the chen and uses as a reacta	§ 63.101, that manuf nicals listed in 40 CF nt or manufactures a	Il manufacturing productures as a primary FR § 63.100(b)(1)(i) on a product, or co-presents listed in table 2	product one or (b)(1)(ii) oduct, one or	☐ YES ☐ NO
	defined in 40 CFR or more of the chen and does <u>not</u> use as one or more of the CCFR Part 63, Subpa	§ 63.101, that manuf nicals listed in 40 CF a reactant or manufa organic hazardous ai art F.	Il manufacturing productures as a primary R § 63.100(b)(1)(i) of acture as a product, or pollutants listed in R 4 and R 5 are all "	product one or (b)(1)(ii) or co-product, table 2 of 40	☐ YES ☐ NO

Section VIII.D.

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 35) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317 Per		Permit No.: C	Permit No.: O-1610		
Area Name: Baytown Plant Customer Reference No.: CN604683482					583482		
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
	Code of Federal Regu rce Categories <i>(continu</i>		tional Emission Sta	ndards for H	azardous Air Pollutants		
0	ubpart G - National Er organic Chemical Man operations, and Wastew	ufacturing Industry			tants from the Synthetic els, Transfer		
g e	pplicability						
1.	Subpart F and the a transfer racks, or we process subject to 4	pplication area incluaste streams associat O CFR 63, Subpart F	that is subject to 40 C des process vents, sto ed with a chemical not. NO," go to Section 1	orage vessels, nanufacturing	☐ YES ☐ NO		
2.	• •	a includes fixed roof ply with 40 CFR § 6	s, covers, and/or enc. 3.148.	losures that	☐ YES ☐ NO		
3.	systems that are req	uired to comply with	ection systems or clon 40 CFR § 63.148. NO," go to Question		☐ YES ☐ NO		
4.		a includes vapor coll nstructed of hard-pip	ection systems or clo	sed-vent	☐ YES ☐ NO		
5.	systems that contain from a control device	n bypass lines that co	ection systems or clo ould divert a vent stre here. NO," go to Question	am away	☐ YES ☐ NO		
V	apor Collection and C	losed Vent Systems					
6.		installed, calibrated, lines in the application	maintained, and ope	erated at the	☐ YES ☐ NO		
7.	~ ~	application area are s lock-and-key type co	secured in the closed onfiguration.	position	☐ YES ☐ NO		



Date: 1	te: 10/08/2015 RN No.: RN100211317 Permit No.: O		-1610				
Area N	lame: E	3aytov	vn Plant		Customer Reference No.: CN604683482		
<b>*</b>			plications, answer A. oplications, answer C				
VIII.	to the argument and a read	addition of the contract of th	ode of Federal Regu Categories <i>(continu</i>		ational Emission S	tandards for H	azardous Air Pollutants
	C.	Orga	part G - National En anic Chemical Manu rations, and Wastew	ufacturing Industry			ants from the Synthetic els, Transfer
		Tran	isfer Racks				
		8.	The application are HAPs.	a includes Group 1 t	transfer racks that lo	oad organic	☐ YES ☐ NO
	Process Wastewater Streams						
		9.		a includes process was a includes process was a large strain viii. C.9 is		on VIII.C.31.	☐ YES ☐ NO
		10.	subject to the provi	a includes process visions of 40 CFR Par Question VIII.C.10 is	rt 61, Subpart FF.		☐ YES ☐ NO
		11.		a includes process v CFR §§ 63.110(e)(1		that are	☐ YES ☐ NO
		12.	subject to the provi	a includes process visions of 40 CFR Par Question VIII.C.12 is	rt 61, Subpart F.		☐ YES ☐ NO
		13.		ea includes process v specified in 40 CFR		utilizing the	☐ YES ☐ NO
		14.	subject to the provi	ea includes process visions of 40 CFR Par Question VIII.C.14 is	rts 260 through 272.	•	☐ YES ☐ NO
		15.	The application are 40 CFR § 63.110(e	ea includes process v e)(2)(i).	vastewater streams (	complying with	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 37) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317   Permit No.:		O-1610			
Area Name: Bayte	own Plant	Customer Reference No.: CN604683482					
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
	Code of Federal Regu ce Categories <i>(contin</i>		ational Emission S	Standards for I	Hazardous Air Pollutants		
Or <sub>l</sub>	opart G - National Enganic Chemical Man erations, and Wastey	ufacturing Industr			itants from the Synthetic sels, Transfer		
Pro	ocess Wastewater Str	eams	73.L				
16.	The application are 40 CFR § 63.110(e	includes process wa )(2)(ii).	astewater streams c	omplying with	YES NO		
17.	existing sources, th	a includes process wat are designated as under 40 CFR § 63.20 compounds.	Group 1; are requir	red to be	☐ YES ☐ NO		
18.	The application are existing sources that	a includes process wat are Group 2.	vastewater streams,	located at	☐ YES ☐ NO		
19.	new sources, that a	a includes process we re designated as Gro CFR § 63.110; or are compounds.	up 1; required to be	e treated as	☐ YES ☐ NO		
20.	* *	a includes process we Group 2 for both 1			☐ YES ☐ NO		
21.	total source mass fl	vater streams at the sow rate of less than buestion VIII.C.21. is	1 MG/yr.	ed to have a	☐ YES ☐ NO		
22.	streams demonstrat MG/yr.	ed and/or partially to ed to have a total so duestion VIII.C.22. is	urce mass flow rate		☐ YES ☐ NO		
23.	A A	a includes waste ma treated Group 1 was	_		☐ YES ☐ NO		

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 38) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN10021131	7	Permit No.: O-1610
Area Name: Baytown Plant	Cu	ustomer Referenc	e No.: CN604683482

Area Name: Baytown Plant			Customer Reference No.: CN604683482					
		lications, answer ALL questions unless oth lications, answer ONLY these questions un						
		ode of Federal Regulations Part 63 - Nat Categories <i>(continued)</i>	tional Emission Standards for l	Hazardous Air Pollutants				
	Org	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)						
	Proc	Process Wastewater Streams (continued)						
	24.	Group 1 wastewater streams or residual a wastewater streams are transferred to an is not owned or operated by the owner or generating the waste stream or residual.	on-site treatment operation that	☐ YES ☐ NO				
	25.	Group 1 wastewater streams or residual wastewater streams are transferred to an If the response to Question VIII.C.24 - V. Question VIII.C.27.	off-site treatment operation.	☐ YES ☐ NO				
	26.	The application area includes waste man manage a Group 1 wastewater stream or Group 1 wastewater stream prior to ship If the response to Question VIII.C.24 - V Question VIII.C.27.	a residual removed from a ment or transport.	☐ YES ☐ NO				
	27.	The application area includes containers Group 1 wastewater stream or a residual wastewater stream.		☐ YES ☐ NO				
	Dra	Drains						
	28.	The application area includes individual manage a Group 1 wastewater stream or Group 1 wastewater stream.  If the response to Question VIII.C.28 is	a residual removed from a	☐ YES ☐ NO				

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 39) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317		Permit No.: O-1610		
Area Name: Baytown Plant				Customer Reference No.: CN604683482		
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
		ode of Federal Regu Categories <i>(continu</i>		tional Emission Sta	indards for I	Hazardous Air Pollutants
C.	Org	part G - National En anic Chemical Many rations, and Wastew	<mark>ifacturing Industry</mark>			itants from the Synthetic sels, Transfer
	Drai	ins <i>(continued)</i>				
	29.	complying with 40		drain systems that a gh the use of cover as devices.		☐ YES ☐ NO
	30.		CFR § 63.136 throug	drain systems that a gh the use of water se		☐ YES ☐ NO
	31.	trenches, or pipes the that meets the criter	nat are part of a chemia of 40 CFR § 63.10	nin hubs, manholes, l nical manufacturing p 00(b). "NO," go to Questio	process unit	☐ YES ☐ NO
	32.	trenches or pipes (the that meet the criteria	nat are part of a chema listed in 40 CFR §	nin hubs, manholes, l nical manufacturing p 63.149(d). "NO," go to Questio	process unit)	☐ YES ☐ NO
	33.	trenches, or pipes the	at convey water with or than or equal to 10	nin hubs, manholes, lin hubs, manholes, lin a total annual avera 1,000 parts per millio Subpart G, Table 9, a	nge n by weight	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 40) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference No.: CN604683482		
For SOP applications, answer AI  For GOP applications, answer O  name of the source o			cted.	
VIII. Title 40 Code of Federal Reg for Source Categories (contin		itional Emission Sta	ndards for Haz	ardous Air Pollutants
C. Subpart G-National En Organic Chemical Mar and Wastewater <i>(conti</i> n	ufacturing Industry			
Drains (continued)			E COTTO CONTRACTO DE PORTO DE LA CONTRACTOR DE LA CONTRAC	
trenches or pipes t concentration grea of compounds liste	ea includes drains, dra hat convey water with ter than or equal to 1, ed in 40 CFR Part 63 greater than or equal t	n a total annual avera 000 parts per million Subpart G, Table 9, a	ge by weight at an annual	YES 🗌 NO
trenches or pipes t that is subject to th or (l)(2); and the e concentration grea compounds listed	ea includes drains, dra hat are part of a chem ne new source requires quipment conveys wa ter than or equal to 10 in 40 CFR Part 63 Sul reater than or equal to	ical manufacturing p ments of 40 CFR § 6 iter with a total annual parts per million by bpart G, Table 8, at a	rocess unit 3.100(l)(1) al average weight of un average	YES □ NO
Gas Streams				
40 CFR § 63.107(	ea includes gas stream b) - (h) or the criteria ntrol device not owne	of 40 CFR § 63.113(	i) and are	YES 🗌 NO
	nable to comply with ans described in 40 CF			YES NO
D. Subpart N - National E Chromium Electroplat			sions From Har	rd and Decorative
anodizing tanks lo	ea includes chromium cated at hard chromiu plating, and/or chromi	ım electroplating, dec	corative	YES 🖾 NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 41) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317	Permit No.: O-1610			
Area Name: Baytown Plant	Custome	r Reference No.: CN604683482			
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					

			olications, answer ALL questions unless otherwise atrected.						
VIII.		Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>							
33	E.	Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities							
		1.	The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials.  If the response to Question VIII.E.1 is "NO," go to Section VIII.F.	☐ YES ⊠ NO					
		2.	Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O.  If the response to Question VIII.E.2 is "NO," go to Section VIII.F.	☐ YES ☐ NO					
		3.	The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	☐ YES ☐ NO					
		4.	The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	☐ YES ☐ NO					
	F.	Subj	part Q - National Emission Standards for Industrial Process Cooling To	owers					
		1.	The application area includes industrial process cooling towers.  If the response to Question VIII.F.1 is "NO," go to Section VIII.G.	⊠ YES □ NO					
		2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	☐ YES ⊠ NO					
	G.		part R - National Emission Standards for Gasoline Distribution Faciliti k Gasoline Terminals and Pipeline Breakout Stations)						
		1.	The application area includes a bulk gasoline terminal.	☐ YES ⊠ NO					
		2.	The application area includes a pipeline breakout station.  If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.	☐ YES ⊠ NO					
		3.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station.  If the response to Question VIII.G.3 is "YES," go to Question VIII.G.9.	☐ YES ☐ NO					

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 42) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN1002113	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

	lications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.	
	ode of Federal Regulations Part 63 - National Emission Standards for I Categories <i>(continued)</i>	Hazardous Air Pollutants
🕶	oart R - National Emission Standards for Gasoline Distribution Faciliti k Gasoline Terminals and Pipeline Breakout Stations) <i>(continued)</i>	es
4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs.  If the response to Question VIII.G.4 is "YES," go to Question VIII.G.9.	☐ YES ☐ NO
5.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep).  If the response to Question VIII.G.5 is "NO," go to Question VIII.G.9.	☐ YES ☐ NO ☐N/A
6.	Emissions screening factor less than 0.5 (ET or EP < 0.5).  If the response to Question VIII.G.6 is "YES," go to Section VIII.H.	☐ YES ☐ NO ☐N/A
7.	Emissions screening factor greater than or equal to 0.5, but less than $1.0 (0.5 \le \text{ET or EP} < 1.0)$ .  If the response to Question VIII.G.7 is "YES", go to Section VIII.H	☐ YES ☐ NO ☐N/A
8.	Emissions screening factor greater than or equal to 1.0 (ET or EP $\geq$ 1.0). If the response to Question VIII.G.8 is "YES," go to Question VIII.G.10.	☐ YES ☐ NO ☐N/A
9.	The site at which the application area is located is a major source of HAP.  If the response to Question VIII.G.9 is "NO", go to Section VIII.H	☐ YES ☐ NO
10.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 43) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	11317 Permit No.: O-1610		
Area Name: Bayto	wn Plant		Customer Reference No.: CN604683482		
	olications, answer ALI plications, answer ON	•		cted.	
	ode of Federal Regu e Categories <i>(continu</i>		ational Emission Sta	indards for H	azardous Air Pollutants
PRESENTED TO THE PROPERTY OF T	part S - National En ustry	iission Standards fo	or Hazardous Air P	ollutants fron	n the Pulp and Paper
1.	paperboard and are as defined in 40 CF	located at a plant sit R § 63.2.	that produce pulp, page that is a major sour	ce of HAPs	☐ YES ⊠ NO
2.	§ 63.440(a)(1) - (3)	•	materials specified i		☐ YES ☐ NO
3.	63, Subpart S that a	ation area includes one or more sources subject to 40 CFR Part t S that are existing sources.  onse to Question VIII.H.3 is "NO," go to Section VIII.I.			☐ YES ☐ NO
4.	The application are existing sources.	a includes one or mo	ore kraft pulping syste	ems that are	☐ YES ☐ NO
5.			ore dissolving-grade l aft or sulfite pulping	_	☐ YES ☐ NO
6.	and are complying Program for Effluer	with the Voluntary Ant Limitation Guidel	systems that are exist Advanced Technologines in 40 CFR § 430 "NO," go to Section	y Incentives 0.24.	☐ YES ☐ NO
7.	The application area 40 CFR § 63.440(d		systems that are con	nplying with	☐ YES ☐ NO
8.	The application are	•	systems that are con	nplying with	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 44) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN1002113	1317 Permit No.: O-1610		
Area Name: Baytown Plant		Customer Reference No.: (	CN604683482	
	wer ALL questions unless othe swer ONLY these questions un			
VIII. Title 40 Code of Feder for Source Categories		onal Emission Standard	s for Hazardous Air Pollutants	
I. Subpart T - Nati	onal Emission Standards for	· Halogenated Solvent Cl	eaning	
line cold, ar hazardous a HAP solver	tion area includes an individund/or batch cold solvent cleaning pollutant (HAP) solvent, or ats, in a total concentration great/or drying agent.	ing machine that uses a any combination of halog	enated	
cleaning ma	ntion area is located at a major achines, qualifying as affected hylene, trichloroethylene or m	facilities, that use	nt ☐ YES ☒ NO	
cleaning ma	The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.			
J. Subpart U - Nati Polymers and Re	onal Emission Standards for esins	r Hazardous Air Pollutar	nt Emissions: Group 1	
wastewater elastomer p	ation area includes elastomer p streams and wastewater opera product process units. Inse to Question VIII.J.1 is "N	ations that are associated w		
wastewater 40 CFR Par	oroduct process units and/or wooperations located in the applet 63, Subpart U.  The subpart of t	ication area are subject to	☐ YES ☐ NO	
designated	ation area includes process was as Group 1 or are determined in 40 CFR § 63.482.		HAPs YES NO	
	ation area includes process was r organic HAPs as defined in 4		☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 45) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	1317	Permit No.: O-1610	
Area Name: Baytown	rtown Plant Customer Reference No.: CN604683482			1683482	
		questions unless of LY these questions i	herwise directed. Inless otherwise dire	cted.	•
	e of Federal Regu Categories <i>(continu</i>		itional Emission Sta	ndards for I	Hazardous Air Pollutants
	rt U - National En ers and Resins <i>(co</i>	CONTRACTOR	or Hazardous Air P	ollutant Em	issions: Group 1
t	otal source mass flo	ow rate of less than 1	ite are demonstrated I MG/yr. YES, " go to Question		☐ YES ☐ NO
s 1	treams demonstrate MG/yr.	ed to have a total sou	reated Group 1 waste arce mass flow rate of NO," go to Question	f less than	☐ YES ☐ NO
n			nagement units that re ewater stream prior t		☐ YES ☐ NO
i i	vastewater streams s not owned or ope	are transferred to an	removed from Group on-site treatment op or operator of the sou	eration that	☐ YES ☐ NO
v L	vastewater streams	are transferred to an	removed from Group off-site treatment of II.J.9 are both "NO,"	eration.	☐ YES ☐ NO
n	nanage a Group 1 v		nagement units that re a residual removed oment or transport.		☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 46) Federal Operating Permit Program

Date: 10/0	Date: 10/08/2015 RN No.: RN100211317 Permit No.: O-1610		O-1610			
Area Nam	ne: Bayto	wn Plant		Customer Referen	nce No.: CN604	4683482
		lications, answer AL. blications, answer ON			irected.	
	38/00/88/00/21/00 - 10/2	ode of Federal Regu Categories <i>(continu</i>		ational Emission S	Standards for ]	Hazardous Air Pollutants
J.	0100890001000 A	part U - National En mers and Resins <i>(ca</i>		for Hazardous Air	· Pollutant Em	issions: Group 1
	Con	tainers				
	11.		a includes container r stream or a residua			☐ YES ☐ NO
	Drai	ins				
	12.	manage a Group 1 Group 1 wastewate	a includes individua wastewater stream or stream. Question VIII.J.12. is	r a residual remove	ed from a	☐ YES ☐ NO
	13.	complying with 40	a includes individua CFR § 63.136 throu systems and contro	igh the use of cover		☐ YES ☐ NO
	14.		a includes individua CFR § 63.136 throu or plugs.			☐ YES ☐ NO
	15.	trenches, or pipes the	a includes drains, de hat are part of an ela Question VIII.J.15 is	stomer product pro	cess unit.	☐ YES ☐ NO
	16.	trenches or pipes the § 63.501(a)(12).	a includes drains, drain at meet the criteria	listed in 40 CFR §	63.149(d) and	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 47) Federal Operating Permit Program

Date: 10/08/2015	.317	Permit No.: O-	·1610	
Area Name: Baytown Plant		Customer Reference	e No.: CN60468	33482
	, answer ALL questions unless ot s, answer ONLY these questions u		cted.	
VIII. Title 40 Code of Fo for Source Catego	ederal Regulations Part 63 - Na ries <i>(continued)</i>	itional Emission Sta	ndards for Ha	zardous Air Pollutants
Especial Control of the Control of t	National Emission Standards fo d Resins <i>(continued)</i>	or Hazardous Air P	ollutant Emiss	ions: Group 1
Drains (cont	inued)			
trenche concen of com	plication area includes drains, dra es, or pipes that convey water with stration greater than or equal to 10 pounds meeting the definition of 32, at any flow rate.	h a total annual avera 0,000 parts per millio	age on by weight	] YES □ NO
trenche concen of com	plication area includes drains, dra es or pipes that convey water with stration greater than or equal to 1, pounds meeting the definition of , at an annual average flow rate g nute.	n a total annual avera 000 parts per million organic HAP in 40 (	ge by weight CFR §	] YES 🗌 NO
trenche a new a convey equal to definiti	plication area includes drains, drains or pipes that are part of an elast affected source or part of a new a swater with a total annual average of 10 parts per million by weight of the off organic HAP in 40 CFR § the greater than or equal to 0.02 limits.	tomer product procest ffected source and the ge concentration great of compounds meeting 63.482, at an average	ss unit that is ne equipment ater than or ng the	] YES [] NO
	National Emission Standards ( and Non-nylon Polyamides Pro		Pollutants for I	Epoxy Resins
of wet	anufacture of basic liquid epoxy r strength resins (WSR) is conduct esponse to Question VIII.K.1 is "	ed in the application	area.	] YES ⊠ NO □ N/A
	plication area includes a BLR and pment facility.	d/or WSR research a	nd	] YES [] NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 48) Federal Operating Permit Program

Date: 10/08/2	015		RN No.: RN100211	317	7 Permit No.: O-1610	
Area Name: B	Baytov	vn Plant		Customer Referen	ice No.: CN60	4683482
		ications, answer ALL lications, answer ON			rected.	
		ode of Federal Regul Categories <i>(continu</i>		tional Emission S	tandards for	Hazardous Air Pollutants
L.	Subp Smel	A CONTRACTOR OF A CONTRACTOR O	nission Standards f	or Hazardous Air	Pollutants fr	om Secondary Lead
	1.	CFR § 63.541(a) tha	a includes one or mo at are located at a sec uestion VIII.L.1 is ".	condary lead smelt	er.	☐ YES ⊠ NO ☐ N/A
	2.		a is using and approv b) for control of fugit		-	☐ YES ☐ NO
М.	Subp	oart Y - National En	nission Standards fo	or Marine Tank V	<sup>7</sup> essel Loadin	g Operations
	1.		a includes marine tar CFR § 63.560 and lo § 63.561.	•	-	☐ YES ⊠ NO
N.	N. Subpart CC - National Emission Standards for Hazardous Air Pollutants Refineries (continued)				ir Pollutants	from Petroleum
	Appl	licability				
	1.	related emission poi 40 CFR § 63.640(c)	a includes petroleum ints that are specified o(1) - (c)(7). Suestion VIII.N.1 is "	d in		☐ YES ⊠ NO
	2.	within the application 40 CFR § 63.640(g)	ing process units/and on area are specified o(1) - (g)(7). uestion VIII.N.2 is "	in	•	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 49) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	317	Permit No.: O-1610		
Area Name: Baytow	n Plant		Customer Reference	e No.: CN60	4683482	
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					
	de of Federal Regu Categories <i>(continu</i>	<ul> <li>M * ** &lt; * &lt; ** A SECTION OF THE ART AND A SECTION ASSECTION AS A SECTION AND A SECTION ASSECTION ASSECTION ASSECTION ASSECTION ASSECTION A</li></ul>	tional Emission Sta	ındards for	Hazardous Air Pollutants	
	art CC - National I eries <i>(continued)</i>	Emission Standards	for Hazardous Air	Pollutants	from Petroleum	
Appli	icability (continued)	)				
3.	defined in the Feder	ral Clean Air Act § 1	t site that is a major s 12(a). NO," go to Section		☐ YES ☐ NO	
4.	equipment containing table 1 of 40 CFR P	ng/contacting one or Part 63, Subpart CC.	t site which emits or more of the HAPs li NO," go to Section	isted in	☐ YES ☐ NO	
5.	conveyed, stored, or that also receives st	r treated in a wastew reams subject to the	vastewater streams the vater stream manager provisions of 40 CFI water provisions sections	nent unit R	☐ YES ☐ NO	
6.	conveyed, stored, or that also receives st	r treated in a wastew reams subject to the	vastewater streams the vater stream manager provisions of 40 CFI water provisions sections	nent unit R	☐ YES ☐ NO	
7.	that are conveyed, s management unit th 40 CFR §§ 63.133 - section.	stored, or treated in a lat also receives strea 63.147 of Subpart C	or Group 2 wastewater wastewater stream arms subject to the programmer of wastewater provision of the programmer of the wastewater provision of the programmer of the wastewater provision of the wast	ovisions of ons	☐ YES ☐ NO	
8.		a includes Group 1 owith 40 CFR § 63.64	or Group 2 wastewate 40(o)(2)(i).	er streams	☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 50) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN10021131	17	Permit No.: O-1610
Area Name: Baytown Plant	C	ustomer Referenc	e No.: CN604683482

Area Nam	e: Bayto	wn Plant Cust	tomer Reference No.: CN60	4683482
		ications, answer ALL questions unless otherw. lications, answer ONLY these questions unless		
		ode of Federal Regulations Part 63 - Nationa Categories <i>(continued)</i>	al Emission Standards for	Hazardous Air Pollutants
N.		oart CC - National Emission Standards for l neries <i>(continued)</i>	Hazardous Air Pollutants i	from Petroleum
	App	licability (continued)		
	9.	The application area includes Group 1 or Grothat are complying with 40 CFR § 63.640(o). If the response to Question VIII.N.9 is "NO,"	(2)(ii).	☐ YES ☐ NO
	10.	The application area includes Group 2 wasterstreams whose benzene emissions are subject use of one or more treatment processes or was under the provisions of 40 CFR Part 61, Subj. December 31, 1992.	et to control through the aste management units	☐ YES ☐ NO
	Con	tainers, Drains, and other Appurtenances		
	11.	The application area includes containers that requirements of 40 CFR § 63.135 as a result § 63.640(o)(2)(ii).		☐ YES ☐ NO
	12.	The application area includes individual drain to the requirements of 40 CFR § 63.136 as a 40 CFR § 63.640(o)(2)(ii).	•	☐ YES ☐ NO
O	. Sub	oart DD - National Emission Standards for	Off-site Waste and Recove	ry Operations
	1.	The application area is located at a plant site meets the criteria for off-site material as spec § 63.680(b)(1).  If the response to Question VIII.O.1 is "NO" VIII.P	cified in 40 CFR	☐ YES ⊠ NO ☐ N/A
	2.	Materials specified in 40 CFR § 63.680(b)(2) application area.	) are received at the	☐ YES ☐ NO

The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.

3.

☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 51) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	Permit No.: O-1610		O-1610
Area Name: Bayto	wn Plant		Customer Reference No.: CN604683482		
	lications, answer ALI plications, answer ON			cted.	
	ode of Federal Regu e Categories <i>(continu</i>		itional Emission Sta	ndards for	Hazardous Air Pollutants
O. Subj	part DD - National I	Emission Standards	for Off-site Waste	and Recove	ry Operations (continued)
4.	wastewater which is		ement operation treat and is exempted unc		☐ YES ☐ NO
5.		The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a "state" or "municipality."			☐ YES ☐ NO
6.		The predominant activity in the application area is the treatment of wastewater received from off-site.			☐ YES ☐ NO
7.	reprocesses hazardo	e application area has a recovery operation that recycles or rocesses hazardous waste which is an off-site material and is mpted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).			☐ YES ☐ NO
8.	8. The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.			☐ YES ☐ NO	
9.	reprocesses used oil	area has a recovery operation that re-refines or doil which is an off-site material and is regulated under 9, Subpart F (Standards for Used Oil Processors and		☐ YES ☐ NO	
10.	of HAPs in the off-s	site material is less tl	where the total annua han 1 megagram per "YES," go to Section	year.	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 52) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	317	Permit No.:	O-1610
Area Name: Baytown Plant			Customer Reference No.: CN604683482		
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)					
O. Subp	oart DD - National F	Emission Standards	for Off-site Waste	and Recove	ry Operations (continued)
11.	concentration less the combined with mate or greater.	han 500 ppmw at the crials having a VOH uestion VIII.O.11 is	terials with average to point of delivery the AP concentration of "NO," go to	at are not	☐ YES ☐ NO
12.	VOHAP concentrat	ncentration is determined by direct measurement.		☐ YES ☐ NO	
13.	VOHAP concentrat	PHAP concentration is based on knowledge of the off-site material.		☐ YES ☐ NO	
14.	compressor, and ag system, open-ended system.	itator, pressure relief valve or line, valve ruestion VIII.O.14 is	nent component that f device, sampling co, connector or instrur	onnection	☐ YES ☐ NO
15.			tion area contains or ion greater than or ec		☐ YES ☐ NO
16.		ponent in the applica during a 12-month p	ation area is intended eriod.	to operate	☐ YES ☐ NO
17.	The application are site material.	a includes containers	s that manage non-ex	cempt off-	☐ YES ☐ NO
18.	The application are non-exempt off-site		I drain systems that n	nanage	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 53) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN10021	RN No.: RN100211317 Permit No.		o.: O-1610	
Area	ea Name: Baytown Plant Customer Reference No.: CN604683482			04683482		
			ications, answer ALL questions unless o lications, answer ONLY these questions			
VIII.	******************		de of Federal Regulations Part 63 - N Categories <i>(continued)</i>	ational Em	ission Standards fo	r Hazardous Air Pollutants
	P	Subp	pace Manufacturin	ing and Rework Facilities		
		1.	The application area includes facilities commercial, civil, or military aerospace If the response to Question VIII.P.1 is VIII.Q.	e vehicles o	r components.	☐ YES ⊠ NO ☐ N/A
		2.	The application area includes one or m specified in 40 CFR § 63.741(c)(1) - (7		fected sources	☐ YES ☐ NO
			oart HH - National Emission Standard Production Facilities.	s for Hazai	dous Air Pollutant	s From Oil and Natural
<b>*</b>		1.	The application area contains facilities hydrocarbon liquids that are located at facilities prior to the point of custody to	oil and natu		☐ YES ⊠ NO
<b>*</b>	2	2.	The application area contains facilities natural gas prior to the point at which retransmission and storage source categoruser.  For SOP applications, if the response to VIII.Q.2. is "NO," go to Section VIII.R. For GOP applications, if the response VIII.Q.2. is "NO," go to Section VIII.Z.	natural gas e ry or is deliv o both Ques c to both Que	nters the natural gas wered to a final end etion VIII.Q.1. and	☐ YES ⊠ NO
•	3	3.	The application area contains only facistore or transfer black oil as defined in For SOP applications, if the response to go to Section VIII.R.  For GOP applications, if the response go to Section VIII.Z.	§ 63.761. o Question	VIII.Q.3. is "YES,"	☐ YES ☐ NO
•		4.	The application area is located at a site If the response to Question VIII.Q.4. is Question VIII.Q.6.			☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 54) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317		Permit No.: O-1610		
Area Name: Baytown Plant				Customer Reference No.: CN604683482		
		applications, answer AL applications, answer ON			cted.	
VIII.		O Code of Federal Regu arce Categories <i>(contina</i>		ational Emission St	andards fo	r Hazardous Air Pollutants
		Subpart – HH – Nationa Gas Production Facilitie		rds for Hazardous A	Air Polluta	nts From Oil and Natural
•	5	custody transfer, w throughput less that ft <sup>3</sup> ) per day and a fa liquid throughput le For SOP application go to Section VIII. I For GOP application go to Section VIII. 2	ons, if the response t	tal annual average national annual average hydrocological (10,487.6 gallons) per Question VIII.Q.5.	tural gas 49,789.9 arbon or day. is "YES,"	☐ YES ☐ NO
•	6	unit.  For SOP application  to Section VIII.R. F	a includes a triethyle ons, f the answer to Q For GOP application go to Section VIII.Z.	Question VIII.Q.6. is s, if the response to Q	"NO," go	☐ YES ☐ NO
<b>*</b>	7		a is located at a site to UC, as defined in 4		indaries of	☐ YES ☐ NO
<b>♦</b>	8		emissions of 5 tons per year or more of a			☐ YES ☐ NO
•	9	-	or source determination attural gas or hydroca	_		☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 55) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	317	Permit No	o.: O-1610
Area Name: Baytown Plant			Customer Reference No.: CN604683482		
	applications, answer ALI applications, answer ON			cted.	
	Code of Federal Regu rce Categories <i>(continu</i>		tional Emission Sta	ındards fo	r Hazardous Air Pollutants
R. S	ubpart II - National Er	nission Standards f	or Shipbuilding and	l Ship Rep	oair (Surface Coating)
1.	4.4		ng or ship repair ope NO," go to Section 1		☐ YES ⊠ NO
2.	, U	p repair operations lo R Part 63, Subpart I	ocated in the applicat	ion area	☐ YES ☐ NO
	ubpart JJ - National E continued)	mission Standards 1	for Wood Furniture	Manufac	turing Operations
1.	operations and/or wooperations.	ood furniture compo	niture manufacturing onent manufacturing NO" or "N/A," go to	)	☐ YES ⊠ NO ☐ N/A
2.	A 1	a meets the definition efined in 40 CFR § 6	n of an "incidental w 3.801.	ood	☐ YES ☐ NO
T. S	ubpart KK - National 1	Emission Standards	for the Printing an	d Publishi	ing Industry
1.	* *		n rotogravure, produ xographic printing pr		☐ YES ⊠ NO ☐N/A
U. S	ubpart PP - National E	mission Standards	for Containers		
1.	Part 60, 61, or 63 su Subpart PP for the 6	abpart references the control of air emission	for which another 4 use of 40 CFR Part ons. NO," go to Section	63,	☐ YES ⊠ NO
2.	The application are controls.	a includes containers	using Container Lev	vel 1	☐ YES ☐ NO
3.	The application are Level 2 controls.	a includes containers	using Container		☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 56) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown plant		Customer Reference No.: CN604683482	

		ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.	
SHKHXXXXXIIIIXXX - SHHARIXIXIXXIXIXIII - TO	SN . SN. SNASASS	ode of Federal Regulations Part 63 - National Emission Standards for Categories <i>(continued)</i>	r Hazardous Air Pollutants
<b>U.</b>	Subp	part PP - National Emission Standards for Containers (continued)	
	4.	The application area includes containers using Container Level 3 controls.	☐ YES ☐ NO
v.	Subp	oart RR - National Emission Standards for Individual Drain Systems	Za II da wa sa
	1.	The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	☐ YES ⊠ NO
w.		oart YY - National Emission Standards for Hazardous Air Pollutants eric Maximum Achievable Control Technology Standards	for Source Categories -
	1.	The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	☐ YES ⊠ NO
	2.	The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. If the response to Questions VIII.W.1. and VIII.W.2. are both "NO," go to Question VIII.W.20	□ YES ⊠ NO
	3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	☐ YES ☐ NO
	4.	The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	☐ YES ☐ NO
	5.	All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	☐ YES ☐ NO
	6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr.  If the response to Question VIII.W.6. is "NO," go to Question VIII.W.8.	☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 57) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN100211		Permit No.: O-1610
Area Name: Baytown Plant	Cus	tomer Reference No.: CN604683482
T COD 1: 4:	7	. 7. 7

	lications, answer ALL questions unless otherwise directed.						
VIII. Title 40 Co	olications, answer ONLY these questions unless otherwise directed.  ode of Federal Regulations Part 63 - National Emission Standards for  e Categories (continued)	r Hazardous Air Pollutants					
	W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards						
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐ YES ☐ NO					
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐ YES ☐ NO					
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. If the response to Question VIII.W.8. and W.9. are both "NO," go to Question VIII.W.11.	☐ YES ☐ NO					
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐ YES ☐ NO					
11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐ YES ☐ NO					
12.	The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.  If the response to Question VIII.W.12. is "NO," go to Question VIII.W.15.	☐ YES ☐ NO					
13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	☐ YES ☐ NO					
14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐ YES ☐ NO					

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 58) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN100211317 Permit			Permit No.	.: O-1610	
Area Name: Baytov	vn Plant		Customer Reference	> No.: CN6	04683482
		L questions unless oti LY these questions u	herwise directed. Inless otherwise direc	cted.	
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>				
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards					
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit.  If the response to Question VIII.W.15. is "NO," go to Question VIII.W.20.				☐ YES ☐ NO	
16.	stations, trenches of § 63.1106(c)(1) - (3	pipes that meet the i).	nin hubs, manholes, l criteria listed in 40 C s "NO," go to Questi	CFR	☐ YES ☐ NO
17.	17. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.			ual er million	☐ YES ☐ NO
18.	stations, trenches of average concentrati by weight of compo Table 9 to 40 CFR	r pipes that convey wo on greater than or equipounds meeting the de	ain hubs, manholes, leater with a total annual to 1,000 parts perfinition of organic Hat an annual average faute.	ual r million IAP in	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 59) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN1002			Permit No.: O-1610			
Area Name: Baytown Plant Customer Reference No.: CN					04683482	
♦ For GOP applicate	ions, answer ON If Federal Regu	lations Part 63 - Na	ınless otherwise dire	25, 007, 008, 007, 000, 307,	· Hazardous Air Pollutants	
W. Subpart						
stat and affe wat to 1 Tab	ions, trenches of I modacrylic filected source or it fer with a total at 0 ppmw of com tole 9 to 40 CFR	r pipes that are part of ber production pro- s a new affected sour nnual average concer pounds meeting the	ain hubs, manholes, laf an acrylic resins of cess unit that is part of the equipment of the	or acrylic of a new at conveys or equal HAP in	☐ YES ☐ NO	
20. The	application are	a includes an ethyler	ne production process	s unit.	☐ YES ☒ NO ☐N/A	
ethy <i>If th</i>	ylene production he response to Q	n process unit.	ams generated from a		☐ YES ⊠ NO ☐N/A	
22. The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1).  If the response to Question VIII.W.22. is "NO," go to Question VIII.W.54.					☐ YES ☐ NO	
23. Waste stream(s) are transferred off-site for treatment.  If the response to Question VIII.W.23. is "NO," go to  Question VIII.W.25.					☐ YES ☐ NO	
was If th	ste stream(s) prie	or to transfer off-site uestion VIII. W.24. is		or manage	☐ YES ☐ NO	

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 60) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317	Permit No.: O-1610
Area Name: Baytown Plant	Custor	ner Reference No.: CN604683482
w con 1	TT	7+ . 7

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.

control of the waste stream(s).

a continuous butadiene waste stream.

Question VIII.W.33

Question VIII.W.43.

29.

30.

31.

VIII.		Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>					
	w.	V. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards					
		25.	The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	☐ YES ☐ NO			
		26.	The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). If the response to Question VIII.W.26. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO			
		27.	The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control.  If the response to Question VIII.W.27. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO			
		28.	The control requirements of 40 CFR Part 63, Subpart G for process	☐ YES ☐ NO			

wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for

The application area includes containers that receive, manage, or treat

The application area includes individual drain systems that receive,

The application area includes individual drain systems that are

complying with 40 CFR § 63.136 through the use of cover and, if

If the response to Question VIII.W.28. is "NO," go to

manage, or treat a continuous butadiene waste stream. If the response to Question VIII.W.30. is "NO," go to

vented, closed vent systems and control devices.

☐ YES ☐ NO

☐ YES ☐ NO

☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 61) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN100211317 Permit No.: O-1610			.: O-1610		
Area Name: Baytow	n Plant		Customer Reference	e No.: CN6	04683482
		L questions unless ot ILY these questions u		cted.	
	de of Federal Regu Categories <i>(continu</i>		tional Emission Sta	ındards fo	r Hazardous Air Pollutants
		Emission Standards evable Control Tec		200022-0012-002-00-00-00-00-00-00-00-00-00-00-00-0	for Source Categories -
32.	complying with 40 tightly fitting caps of	uestion VIII.W.32. is	gh the use of water so		☐ YES ☐ NO
33.	that receive a contin	a has containers, as de nuous butadiene wast buestion VIII.W.33. is	te stream.	61.341,	☐ YES ☐ NO
34.	40 CFR § 61.345 re	a is an alternate mean equirements for contact duestion VIII.W.34. is	iners.	meet the	☐ YES ☐ NO
35.		vent systems used for intained at a pressure			☐ YES ☐ NO
36.	CFR § 61.341, that stream.	a has individual drain receive or manage a duestion VIII.W.36. is	continuous butadien		☐ YES ☐ NO
37.	the 40 CFR § 61.34	a is using an alternate 6 requirements for in Auestion VIII.W.37. is	dividual drain syste		☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 62) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317	Permit No.: O-1610
Area Name: Baytown Plant	Customer	Reference No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

		ode of Federal Regulations Part 63 - National Emission Standards fo Categories <i>(continued)</i>	r Hazardous Air Pollutants
W.	AMERICAN THE PARTY OF THE PARTY	part YY - National Emission Standards for Hazardous Air Pollutant eric Maximum Achievable Control Technology Standards	s for Source Categories -
	38.	The application area has individual drain systems complying with 40 CFR § 61.346(a).  If the response to Question VIII.W.38. is "NO," go to Question VIII.W.40.	☐ YES ☐ NO
	39.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐ YES ☐ NO
	40.	The application area has individual drain systems complying with 40 CFR § 61.346(b).  If the response to Question VIII.W.40. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO
,	41.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	☐ YES ☐ NO
	42.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☐ YES ☐ NO
	43.	The application area has at least one waste stream that contains benzene.  If the response to Question VIII.W.43. is "NO," go to Question VIII.W.54.	☐ YES ☐ NO
	44.	The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene.  If the response to Question VIII.W.44. is "NO," go to Question VIII.W.47.	☐ YES ☐ NO
	45.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers.  If the response to Question VIII.W.45. is "YES," go to Question VIII.W.47.	☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 63) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN10021			Permit No.: O-1610		
Area Name: Bayto	own Plant		Customer Reference No.: CN604683482		
	olications, answer ALI plications, answer ON			cted	
	code of Federal Regu e Categories <i>(continu</i>		tional Emission Sta	ndards fo	r Hazardous Air Pollutants
	part YY - National I Peric Maximum Achi			Pollutants	for Source Categories -
46.			r containers operate seless than atmospher		☐ YES ☐ NO
47.	47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene.  If the response to Question VIII.W.47. is "NO," go to Question VIII.W.54.				☐ YES ☐ NO
48.	48. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems.  If the response to Question VIII.W.48. is "YES," go to Question VIII.W.54.				☐ YES ☐ NO
49.	49. The application area has individual drain systems complying with 40 CFR § 61.346(a).  If the response to Question VIII.W.49. is "NO," go to Question VIII.W.51.				☐ YES ☐ NO
50.	50. Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.				☐ YES ☐ NO
51.	CFR § 61.346(b).	uestion VIII.W.51. is	n systems complying	with 40	☐ YES ☐ NO
52.	system to prevent th		estems are equipped values from the junctional operation.		☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 64) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211	317	Permit No	.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN6	04683482
For SOP applications, answer AL For GOP applications, answer ON	NLY these questions i	ınless otherwise dire	FRANK / (MCCC) - (EMCCC) (888)	
VIII. Title 40 Code of Federal Regu for Source Categories (continu		tional Emission Sta	indards foi	r Hazardous Air Pollutants
W. Subpart YY - National l Generic Maximum Achi			Pollutants	for Source Categories -
II -	pipes in the individua stem and control devi	_	onnected	☐ YES ☐ NO
process.				
	cals manufacturing p ing hydrogen cyanid	_	intenance	☐ YES ☐ NO
X. Subpart JJJ - National l Polymers and Resins (co		for Hazardous Air	Pollutant	Emissions: Group IV
and/or their associa § 63.1310(a)(1) - (5	a includes thermopla ted affected sources b), that are subject to cuestion VIII.X.1. is	specified in 40 CFR 40 CFR Part 63, Sub	opart JJJ.	☐ YES ⊠ NO
and/or wastewater s associated with the	a includes thermopla streams and wastewa rmoplastic product population VIII.X.2 is "	ter operations that ar rocess units.	e	☐ YES ☐ NO
application area are	rater streams generate from sources production VIII.X.3. is	cing polystyrene.		☐ YES ☐ NO
application area are	rater streams generate from sources production VIII.X.4. is	cing ASA/AMSAN.		☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 65) Federal Operating Permit Program

Date: 10/0	Date: 10/08/2015 RN No.: RN1002			1317	Permit No.	: O-1610
Area Nam	e: Bayto	wn Plant		Customer Reference No.: CN604683482		
	~ ~	lications, answer AL plications, answer Ol	-			
		ode of Federal Regu Categories <i>(contin</i>		ational Emissio	on Standards for	Hazardous Air Pollutants
X		part JJJ - National mers and Resins <i>(co</i>		i for Hazardou	s Air Pollutant l	Emissions: Group IV
	5.	designated as Grou	a includes process w p 1 or are determined 40 CFR § 63.1312.			☐ YES ☐ NO
	6.		a includes process wat are Group 2 for or		•	☐ YES ☐ NO
	7.		a includes process were Group 2 for organ			☐ YES ☐ NO
	8.	total source mass fl	water streams at the sow rate of less than Question VIII.X.8. is	1 MG/yr.	rated to have a	☐ YES ☐ NO
	9.	streams demonstrat  1 MG/yr.	ted and/or partially to ted to have a total so Question VIII.X.9. is	urce mass flow	rate of less than	☐ YES ☐ NO
	10.		a includes waste ma treated Group 1 was			☐ YES ☐ NO
	11.	wastewater streams	r streams or residual are transferred to are erated by the owner of the stream or residual.	on-site treatme or operator of th	ent operation that	☐ YES ☐ NO

Group 1 wastewater streams or residual removed from Group 1

wastewater streams are transferred to an off-site treatment operation. If the response to Question VIII.X.11. - VIII.X.12. are both "NO," go to

Question VIII.X.14.

12.

☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 66) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317		Permit No.: O-1610		
Area Name: Bayto	wn Plant		Customer Reference No.: CN604683482			
	lications, answer ALI plications, answer ON			cted.		
	ode of Federal Regu Categories <i>(continu</i>		tional Emission Sta	ndards for	Hazardous Air Pollutants	
	part JJJ - National I mers and Resins <i>(co</i>		for Hazardous Air	Pollutant F	Emissions: Group IV	
13.	manage a Group 1 v	a includes waste management units that receive or wastewater stream or a residual removed from a stream prior to shipment or transport.			☐ YES ☐ NO	
Con	tainers					
14.		a includes containers r stream or a residual	- · · · · · · · · · · · · · · · · · · ·		☐ YES ☐ NO	
Dra	ins					
15.	manage a Group 1 v Group 1 wastewater	uestion VIII.X.15. is	a residual removed		☐ YES ☐ NO	
16.		a includes individual CFR § 63.136 throug	_		☐ YES ☐ NO	

vented, closed vent systems and control devices.

tightly fitting caps or plugs.

The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or

The application area includes drains, drain hubs, manholes, lift stations,

trenches, or pipes that are part of an thermoplastic product process unit. If the response to Question VIII.X.18. is "NO," go to Section VIII.Y.

17.

18.

☐ YES ☐ NO

☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 67) Federal Operating Permit Program

Date: 10/08/201	15	RN No.: RN100211317		Permit No.: O-1610		
Area Name: Bay	ytown Plant		Customer Reference	Customer Reference No.: CN604683482		
	applications, answer ALl applications, answer ON	<u> </u>		cted.		
	Code of Federal Regu rce Categories <i>(continu</i>		ntional Emission Sta	ndards for	Hazardous Air Pollutants	
Expenditure of the control of the co	ubpart JJJ - National I olymers and Resins <i>(co</i>	THE PARTY OF THE CONTRACT OF THE PARTY OF TH	s for Hazardous Air	Pollutant E	Emissions: Group IV	
D	rains (continued)					
19	trenches or pipes th § 63.1330(b)(12).	at meet the criteria I	ain hubs, manholes, listed in 40 CFR § 63. "NO," go to Section	149(d) and	☐ YES ☐ NO	
2	trenches, or pipes the concentration greater	nat convey water wit er than or equal to 10 ds meeting the defin	ain hubs, manholes, l h a total annual avera 0,000 parts per millio ition of organic HAP	ige n by	☐ YES ☐ NO	
21. The application area includes of trenches or pipes that convey we concentration greater than or experience of compounds meeting the def 63.1312, at an annual average per minute.		at convey water with er than or equal to 1, ing the definition of	n a total annual avera ,000 parts per million organic HAP in 40 C	ge by weight CFR §	☐ YES ☐ NO	
2.	trenches or pipes the that is a new affected equipment conveys greater than or equal meeting the definition.	at are part of an ther ed source or part of a water with a total ar al to 10 parts per mil on of organic HAP i	ain hubs, manholes, I moplastic product pro i new affected source nnual average concen lion by weight of con in 40 CFR § 63.1312, equal to 0.02 liter pe	and the tration apounds at an	□ YES □ NO	

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 68) Federal Operating Permit Program

Date: 10/08/2015			RN No.: RN100211317		Permit No.: O-1610		
Area Nam	e: Bayto	own Plant		Customer Reference No.: CN604683482			
		olications, answer AL plications, answer ON			cted.		
CONTRACTOR	MM AND COLUMN SACTOR COLUMN SACTOR SA	Code of Federal Regu e Categories <i>(continu</i>	C. C	itional Emission Sta	ındards for	Hazardous Air Pollutants	
Y.			ts for Petroleum ur Recovery Units.				
	1. The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.				☐ YES ⊠ NO		
Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.						nts for Municipal Solid	
<b>•</b>	♦ 1. The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.		s Air	☐ YES ⊠ NO			
A.		part FFFF - Nations ganic Chemical Prod			ir Pollutan	ts for Miscellaneous	
	1.		rimary product one o	that includes process or more of the chemic		☐ YES ⊠ NO	
	2. The application area is located at a plant site that is a major source as defined in FCAA § 112(a).				source as	☐ YES ⊠ NO	
	3.	chemical manufact generate one or mo § 112(b) of the Cle	uring process units (I ore of the organic haz an Air Act or hydrog	that includes miscella MCPU) that process, ardous air pollutants gen halide and haloge A.2 or AA.3 is "NO,	use or listed in on HAP.	□ YES ⊠ NO	

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 69) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN1002	RN No.: RN100211317 Permi		rmit No.: O-1610			
Area Name: Baytown Plant		Customer Reference	Customer Reference No.: CN604683482				
	answer ALL questions unless of answer ONLY these questions		cted.				
** ** ** ** ** ** ** ** ** ** ** ** **	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)						
	AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)						
4. The application area includes process vents, storage vesses racks, or waste streams associated with a miscellaneous of manufacturing process subject to 40 CFR 63, Subpart FF If the response to Question VIII.AA.4 is "NO," go to Sect			nical	☐ YES ☐ NO			
If the res	5. The application area includes process wastewater streams.  If the response to Question VIII.AA.5 is "NO," go to  Question VIII.AA.18.			☐ YES ☐ NO			
designate listed in	lication area includes process and as Group 1 or are determined. Table 8 of 40 CFR Part 63, Supriate, of 40 CFR Part 63, Subpriate, of 40 CFR Part 63, Subpriate,	ed to be Group 1 for conspart G or Table 8 and	ompounds	☐ YES ☐ NO			
are Gro	7. The application area includes proces are Group 2 for compounds listed in T as appropriate, of 40 CFR Part 63, Subp			☐ YES ☐ NO			
total sou	up 1 wastewater streams at the ree mass flow rate of less than sponse to Question VIII.AA.8.	ı 1 MG/yr.		☐ YES ☐ NO			
streams of MG/yr If the res	has untreated and/or partially demonstrated to have a total so : sponse to Question VIII.AA.9. n VIII.AA.11.	ource mass flow rate of		□ YES □ NO			
	lication area includes waste m a partially treated Group 1 wa t.			□ YES □ NO			

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 70) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211	1317	Permit No.: O-1610		
Area Name: Baytown	Plant		Customer Reference No.: CN604683482			
		L questions unless of ILY these questions t	herwise directed. unless otherwise dire	ected.		
	of Federal Regu tegories <i>(continu</i>		ntional Emission St	andards for	Hazardous Air Pollutants	
BOOK AND STANDARD INVANTABLE OF THE STANDARD O	**************************************	l Emission Standar uction and Process		Air Pollutan	ts for Miscellaneous	
w is	astewater streams not owned or ope	are transferred to ar	removed from Ground on-site treatment of or operator of the sou	peration that	☐ YES ☐ NO	
w <i>If</i>	astewater streams	are transferred to ar uestion VIII.AA.11.	removed from Groun off-site treatment of and VIII.AA.12. are	peration.	☐ YES ☐ NO	
fa <i>If</i>	cility meeting the	requirements of 40 puestion VIII.AA. 13.		ntment	☐ YES ☐ NO	
th	at the wastewater	ment in the notificati will be treated in a t CFR § 63.138(h) is		atus report	☐ YES ☐ NO	
ec Si <i>If</i>	oncentration of cou abpart FFFF less t	mpounds in Table 8 than 50 ppmw are tra Question VIII.AA.15.	ansferred offsite.	average	☐ YES ☐ NO	
T:	able 9 of 40 CFR		s than 5 percent of the FF is emitted from wudge unit.		☐ YES ☐ NO	
			nagement units that a		☐ YES ☐ NO	

Group 1 wastewater stream prior to shipment or transport.

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 71) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN10021131	7 Permit No.: O-1610		
Area Name: Baytown Plant	C	Customer Reference No.: CN604683482		
For SOP applications, answer  For GOP applications, answer				

VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued) AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued) The application area includes containers that receive, manage, or treat a ☐ YES ☐ NO Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. 19. The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. ☐ YES ☐ NO If the response to Question VIII.AA.19. is "NO," go to Question VIII.AA.22. 20. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if ☐ YES ☐ NO vented, closed vent systems and control devices. 21. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or ☐ YES ☐ NO tightly fitting caps or plugs. 22. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit ☐ YES ☐ NO that meets the criteria of 40 CFR § 63.100(b). If the response to Question VIII.AA.22. is "NO," go to Section VIII.BB. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical ☐ YES ☐ NO manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). If the response to Question VIII.AA.23. is "NO," go to Section VIII.BB. 24. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart ☐ YES ☐ NO FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 72) Federal Operating Permit Program

Date: 10/08/2015		RN No.: RN100211317 Permit No.		Permit No.:	.: O-1610	
Area Name: Ba	nytown Plant		Customer Reference No.: CN604683482			
	applications, answer ALI applications, answer ON	_		ected.		
	0 Code of Federal Regu urce Categories <i>(continu</i>		tional Emission Sta	indards for	Hazardous Air Pollutants	
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)						
2	<ul> <li>25. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.</li> <li>26. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.</li> </ul>			☐ YES ☐ NO		
2				□ YES □ NO		
	Subpart GGGG - Nation Extractions for Vegetab		ards for Hazardous	Air Polluta	nts for: Solvent	
1	by itself a major so	a includes a vegetabl urce of HAP emissio r sources that are ind ssions.	ns or, is collocated v	within a	□ YES ⊠ NO	
CC. 8	Subpart GGGGG - Nati	onal Emission Stan	dards for Hazardo	us Air Pollu	tants: Site Remediation	
1	conducted.	a includes a facility a			☐ YES ⊠ NO	
2	2. The application area is located at a site that is a major source of HAP. If the answer to Question VIII.CC.2. is "NO," go to Section VIII.DD.				☐ YES ☐ NO	
3	CFR § 63.7881(b)(	n's qualify for one of 1) through (6). sestion VIII.CC.3. is	•		☐ YES ☐ NO	

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 73) **Federal Operating Permit Program**

Date: 10/08/2015 RN No.: RN100211		317	Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference No.: CN604683482		

	lications, answer ALL questions unless otherwise directed.  olications, answer ONLY these questions unless otherwise directed.						
	ode of Federal Regulations Part 63 - National Emission Standards for e Categories <i>(continued)</i>	Hazardous Air Pollutants					
CC. Subj	CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation						
4.	Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. If the answer to Question VIII.CC.4. is "YES," go to Section VIII.DD.	☐ YES ☐ NO					
5.	The site remediation will be completed within 30 consecutive calendar days.	☐ YES ☐ NO					
6.	No site remediation will exceed 30 consecutive calendar days. If the answer to Question VIII.CC.6. is "YES," go to Section VIII.DD.	☐ YES ☐ NO					
7.	Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	☐ YES ☐ NO					
8.	All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.  If the answer to Question VIII.CC.8. is "YES," go to Section VIII.DD.	☐ YES ☐ NO					
9.	The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG.  If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.	☐ YES ☐ NO					
10.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	☐ YES ☐ NO					
11.	The application area includes containers with a capacity greater than 0.46 m³ that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	☐ YES ☐ NO					
12.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	☐ YES ☐ NO					
13.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	☐ YES ☐ NO					
14.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	☐ YES ☐ NO					

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 74) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482	

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.							
VIII.	I. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)						
	tants for Source e Facilities						
	1.	The application area is located at a site that is an area source of hazardous air pollutants.  If the answer to Question DD. 1. is "NO," go to Section VIII.FF.	☐ YES ☒ NO				
	2.	The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	☐ YES ☐ NO				
	3.	The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	☐ YES ☐ NO				
	4.	The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB.  If the answer to Question VIII.DD.4. is "NO," go to Question VIII.DD.6.	☐ YES ☐ NO				
	5.	The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	☐ YES ☐ NO				
	6.	The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC.  If the answer to Question VIII.DD.6. is "NO," go to Section VIII.EE.	☐ YES ☐ NO				
	7.	The bulk gasoline terminal has a throughput of less than 250,000 gallons per day.  If the answer to Question VIII.DD.7. is "YES," go to Section VIII.EE.	☐ YES ☐ NO				
	8.	The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	☐ YES ☐ NO				
	9.	The bulk gasoline terminal loads gasoline into railcar cargo tanks.  If the answer to Question VIII.DD.9. is "NO," go to Section VIII.EE.	☐ YES ☐ NO				
	10.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	☐ YES ☐ NO				
	11.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	☐ YES ☐ NO				

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 75) Federal Operating Permit Program

Date: 10/08/2015				RN No.: RN100211317 Permit N		Permit No.	t No.: O-1610	
Area 1	Name: B	ayto	own Plant		Customer Reference No.: CN604683482			
			olications, answer ALI plications, answer ON			cted.		
VIII.			ode of Federal Regu e Categories <i>(continu</i>		tional Emission Sta	ndards for	Hazardous Air Pollutants	
	220000000000000000000000000000000000000		part CCCCCC - Nat egory: Gasoline Dis	N 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Contract to the contract of th	us Air Poll	utants for Source	
			♦ 1.The application hazardous air po		site that is an area	source of	☐ YES ☐ NO	
				n area includes at led in 40 CFR § 63.1 per to Question VII	1132.		☐ YES ☐ NO	
			♦3. The applicatio facility with a m	n area includes at l onthly throughput			☐ YES ☐ NO	
		4.		rea includes at leas athly throughput g 000 gallons.			☐ YES ☐ NO	
		5.		rea includes at leas athly throughput o			☐ YES ☐ NO	
	FF.	Rec	ently Promulgated 4	0 CFR Part 63 Sub	parts			
<b>*</b>		1.	63 subparts not add If the response to Q of promulgated 40 (	a is subject to one or ressed on this form. Puestion VIII.EE.1. is CFR Part 63 subparted in the instructions	"NO," go to Section s not otherwise addr	ı IX. A list	☐ YES ⊠ NO	
<b>*</b>		2.	Provide the Subpart	t designation (i.e. Sul	bpart EEE) in the spa	ce provided	l below.	
881111 1117 141101		an carer	Zarosungan, ayung digu san solya ding hin					
IX.			ode of Federal Regu TION PROVISIONS		CFR Part 68) - CHI	EMICAL A	CCDENT	
	Α.	App	licability		<b>生成的现在分词</b>			
<b>*</b>		1.		a contains processes Prevention Provision			⊠ yes □ no	

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 76) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN1002			RN No.: RN100211	1317 Permit No.: O-1610			
Are	a Name: I	Baytov	vn Plant		Customer Reference	No.: CN60	4683482
<b>♦</b>			ications, answer ALI lications, answer ON			cted.	
X.	Title OZO		ode of Federal Regu	lations Part 82 (40	CFR Part 82) - PRC	TECTION	OF STRATOSPHERIC
	A.	Subp	oart A - Production	and Consumption (	Controls		
•		1.			hat produces, transfo d substance or produ		☐ YES ⊠ NO ☐ N/A
	В.	Subp	oart B - Servicing of	Motor Vehicle Air	Conditioners		
<b>♦</b>		1.			f fleet vehicle air con nts is conducted in th		☐ YES ⊠ NO
	C,		oart C - Ban on Non lucts Containing or				and Ban on Nonessential
<b>♦</b>		1.		ease a Class I or Cla	one or more nonesserss II substance) that a		☐ YES ⊠ NO ☐ N/A
	D.	Subj	oart D - Federal Pro	curement			
•		1.	The application area instrumentality of the		by a department, age	ncy, or	☐ YES ☒ NO ☐ N/A
	E.	Subp	oart E - The Labelin	g of Products Using	g Ozone Depleting S	ubstances	
•		1.	substance is stored		s in which a Class I on to the sale of the Class mer.		☐ YES ⊠ NO ☐ N/A
•		2.			importer, wholesaler, ning a Class I or Cla		☐ YES ⊠ NO ☐ N/A
•		3.		er of products manuf	importer, wholesaler, factured with a proce		☐ YES ⊠ NO ☐ N/A

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 77) Federal Operating Permit Program

Date: 10/08/2015 RN I			RN No.: RN100211	N No.: RN100211317 Permit No.:		O-1610
Area	a Name: Bayto	wn Plant		Customer Reference No.: CN604683482		
<b>♦</b>		olications, answer ALI plications, answer ON			cted.	
X.		ode of Federal Regu (continued)	lations Part 82 (40 (	CFR Part 82) - PRO	TECTION	OF STRATOSPHERIC
	F. Sub	part F - Recycling ai	nd Emissions Reduc	tion		
•	1.	vehicle air condition	nnce, and/or repair on n appliances using oz utes is conducted in t	zone-depleting refrig		□ YES ⊠ NO
•	2.		ces (including motor xempt substitute recl			☐ YES ⊠ NO ☐ N/A
•	3.	The application area and recovery equip	a manufactures appli ment.	ances or refrigerant i	ecycling	☐ YES ⊠ NO ☐ N/A
	G. Sub	part G - Significant l	New Alternatives Po	olicy Program		
<b>*</b>	1.	product substitutes, intended for use as	a manufactures, form or alternative manufa replacement for a Cuestion X.G.1 is "NO	facturing processes the Class I or Class II con	nat are mpound.	☐ YES ☒ NO ☐ N/A
•	2.		uced by the applicati 0 CFR § 82.176(b)(1		more of	☐ YES ☐ NO ☐ N/A
	H. Sub	part H -Halon Emiss	sions Reduction			
<b>♦</b>	1.		maintaining, repairing conducted in the ap		uipment	☐ YES ⊠ NO ☐ N/A
<b>♦</b>	2.	Disposal of halons of application area.	or manufacturing of l	halon blends is cond	ucted in the	☐ YES ☒ NO ☐ N/A
XI.	Miscellan	eous				
	A. Req	uirements Reference	Tables (RRT) and	Flowcharts		
	1.		a contains units that and the TCEQ has not o			☐ YES ⊠ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 78) Federal Operating Permit Program

Date: 10/08/2015 RN No.: RN10021			RN No.: RN100211			
Are	a Name: Baytov	wn Plant		Customer Reference	No.: CN60	4683482
<b>♦</b>		ications, answer ALI lications, answer ON			cted.	
XI.	Miscellane	ous (continued)				
	B. Forn	ns			ingets:	
•	1.	regulation for which		are potentially subject developed a unit attrice or "N/A," go to		☐ YES ⊠ NO ☐ N/A
•	2.			n for the federal rule ation(s) in the space		apter, Subchapter, and ow.
	C. ZEmi	ssion Limitation	Certifications			
•	1.		a includes units for v s have been establish	which federally enfor ned by certification.	ceable	⊠ yes □ no
	::::::::::::::::::::::::::::::::::::::	rnative Means of Co uirements	ontrol, Alternative l	Emission Limitation	or Standaı	rd, or Equivalent
	1.		a is located at a site t state implementation	that is subject to a sit plan (SIP).	e specific	☐ YES ⊠ NO
	2.	The application are a site specific requi		ted at the site that are	subject to	☐ YES ⊠ NO
	3.	using an alternative standard or equivale Administrator.  If the response to Q	means of control, al ent requirements app	ES," please include	mitation or	☐ YES ⊠ NO
	4.	using an alternative standard or equivale Director.  If the response to Q	means of control, alent requirements app	ch demonstrate completernative emission libroved by the TCEQ (ES, " please include tion.	mitation or Executive	☐ YES ⊠ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 79) Federal Operating Permit Program

Date: 10/08/2015 RN N		RN No.: RN100211	317	Permit No.	: O-1610
Area Name: Baytov	wn Plant		Customer Reference No.: CN604683482		
	lications, answer ALI lications, answer ON	-	herwise directed. Inless otherwise direc	cted.	
XI. Miscellane	ous <i>(continued)</i>				
E. Title	IV - Acid Rain Pro	gram	r ea a		
1.		a includes emission u cluding the Opt-In Pr	units subject to the A ogram.	cid Rain	☐ YES ⊠ NO
2.	The application area exemption under 40		units qualifying for th	ne new unit	☐ YES ⊠ NO
3.	The application are unit exemption und		units qualifying for th	ne retired	☐ YES ⊠ NO
F. Clea	n Air Interstate Rul	e (CAIR NO <sub>x</sub> and C	CAIR SO <sub>2</sub> Permit)		
1.	requirements of the	a includes emission u Clean Air Interstate uestion XI.F.1. is "N		. <i>G</i> .	☐ YES ⊠ NO
2.		a includes emission u der 40 CFR §§ 96.10	units qualifying for the 5 and 96.205.	e retired	☐ YES ☐ NO
G. Pern	iit Shield (SOP App	licants Only)			
1.	-	le Requirement Dete	y entries on Form Ol erminations) is being	-	⊠ YES □ NO
H. GOP	Type (Complete th	is section for GOP	applications only)		
<b>♦</b> 1.	renewal of an oil an 511 - Oil and Gas C Collin, Dallas, Dent Harris, Jefferson, Jo	d gas general operati deneral Operating Petton, El Paso, Ellis, Fo	rmit for Brazoria, Ch ort Bend, Galveston, berty, Montgomery,	ambers, Hardin,	□ YES □ NO
<b>♦</b> 2.	renewal of an oil an	d gas general operati	al issuance, revision, ing permit under rmit for Gregg, Nuec		∏ YES ∏ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 80) Federal Operating Permit Program

Dat	e: 10/08/2015		RN No.: RN100211	1317	Permit No.: O-1610		
Are	a Name: Baytov	vn Plant		Customer Reference	No.: CN60	4683482	
<b>\</b>			L questions unless ot VLY these questions i	herwise directed. unless otherwise direc	cted.		
XI.	Miscellane	ous <i>(continued)</i>					
	H. GOP	Type (Complete th	is section for GOP	applications only) (	continued)		
•	3.	renewal of an oil ar 513 - Oil and Gas (	nd gas general operat	ermit for Aransas, Be		☐ YES ☐ NO	
•	4.	renewal of an oil ar 514 - Oil and Gas O Except Aransas, Be Denton, El Paso, El Jefferson, Johnson,	nd gas general operat General Operating Pe exar, Brazoria, Calho Ilis, Fort Bend, Galvo Kaufman, Liberty, I arker, Rockwall, San	ial issuance, revision ting permit under ermit for All Texas Coun, Chambers, Collin eston, Gregg, Hardin Matagorda, Montgom Patricio, Tarrant, Tra	ounties  1, Dallas,  1, Harris,  1ery,	□ YES □ NO	
•	5.	renewal of a solid v	waste landfill general	ial issuance, revision I operating permit underal operating permi	der	☐ YES ☐ NO	
	I. Title	30 TAC Chapter 1	01, Subchapter H				
•	1.		ea is located in a none Question XI.I.1. is "N	attainment area. TO," go to question X	<i>T.I.3</i> .	⊠ yes □ no	
•	2.		or will generate emiss ns Banking and Trad	sion reductions to be ling Program.	credited in	☐ YES ☒ NO ☐ N/A	
•	3.			ete emission reductiong and Trading Progr		☐ YES ☒ NO ☐ N/A	
•	4.	Houston/Galveston		in the nent area where the fa apacity to emit 10 tpy		⊠ yes □ no	
•	5.		ea includes an electric epter 116, Subchapter	c generating facility p	permitted	☐ YES ⊠ NO	

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 81) Federal Operating Permit Program

Date: 1	0/08/2015		RN No.: RN100211	317	Permit No.:	: O-1610
Area N	ame: Bayto	own Plant		Customer Reference	e No.: CN60	04683482
		olications, answer AL. plications, answer Ol			ected.	
XI.	Miscellan	eous (continued)				
	I. Titl	e 30 TAC Chapter 1	01, Subchapter H (d	continued)		
•	6.	Houston/Galveston potential to emit mocompounds (HRVC	a is located at a site in the information in the information or a site in the information	ent area and the site	e organic	☐ YES ⊠ NO
<b>•</b>	7.	Houston/Galveston to emit 10 tpy or le applicant is opting	a is located at a site in	ent area, the site has covered facilities and equirements of 30 T.	d the AC Chapter	☐ YES ⊠ NO
	J. Per	iodic Monitoring				
<b>*</b>	1.		rmit holder is submit al described on Form			☐ YES ⊠ NO
<b>•</b>	2.	requirement.	ntly contains at leas	-		⊠ YES □ NO
<b>*</b>	3.	All periodic monitor permit with this app	oring requirements ar	e being removed fro	om the	☐ YES ⊠ NO
	K. Cor	npliance Assurance	Monitoring		200	
<b>*</b>	1.	potential to emit gr required in a site cl	a includes at least on eater than or equal to assified as a major so question XI.K.1. is "N	the amount in tons ource.	per year	⊠ YES □ NO
<b>♦</b>	2.	The unit or units de	fined by XI.K.1 are	using a control device	ce to	⊠ YES □ NO

comply with an applicable requirement.

If the response to Question XI.K.2. is "NO," go to Section XII.

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 82) Federal Operating Permit Program

Date	Date: 10/08/2015 RN No.: RN100211317 Permit N					O-1610
Area	a Name: Baytov	vn Plant		Customer Reference	No.: CN60	4683482
<b>♦</b>		ications, answer ALl lications, answer ON		herwise directed. Inless otherwise dire	cted.	
XI.	Miscellane	ous <i>(continued)</i>				
	K. Com	pliance Assurance l	Monitoring <i>(continu</i>	ted)		
<b>♦</b>	3.	The permit holder has previous application		f proposal on Form C	P-MON in	⊠ YES □ NO
•	4.	Form OP-MON acc § 64.5 in this applic	ator or permit holder is submitting a CAM proposal on according to the deadlines for submittals in 40 CFR plication.  o Questions XI.K.3. and XI.K.4. are both "NO," go to			⊠ yes □ no
	5.	5. The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.				☐ YES ⊠ NO
	6.		entification numbers n and schedule in the		h the applic	ant is submitting a CAM
		1-1				
<b>*</b>	7.			XI.K.2. is using a Cents of 40 CFR § 64.3		☐ YES ⊠ NO
•	♦ 8. All units defined by XI.K.1. and XI.K.2. are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).  If the response to Question XI.K.8. is "YES," go to Section XII.				☐ YES ⊠ NO	
<b>♦</b>	9.		as described by que te matter or opacity.	stion XI.K.3.or XI.K	.4.	☐ YES ⊠ NO
<b>*</b>	10.	The CAM proposal addresses VOC.	as described by que	stion XI.K.3.or XI.K	.4.	☐ YES ⊠ NO
<b>*</b>	11.		in the CAM proposa XI.K.4. has a bypass			☐ YES ☒ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 83) Federal Operating Permit Program

Date	e: 10/08/2015		RN No.: RN100211	1317 Permit No.: O-1610		
Are	a Name: Baytov	wn Plant		Customer Reference	• No.: CN60	)4683482
<b>♦</b>		lications, answer ALI plications, answer ON			cted.	
XII.	. New Sourc	ce Review (NSR) Au	thorizations <i>(contin</i>	nued)		
	A. Was	te Permits with Air	Addendum			
•	1.	Industrial Hazardou	is Waste with an Air II.A.1. is "YES," inc	pal Solid Waste Perm Addendum. Flude the waste permi		☐ YES ⊠ NO
	B. Air (	Quality Standard Pe	ermits			
<b>*</b>	1.	NSR authorization. If the response to XI to XII.B.1 is "YES,"	II.B.1 is "NO," go to " be sure to include t	ne Air Quality Standa o Section XII.C. If the the standard permit's and answer XII.B.2 -	e response	⊠ YES □ NO
•	2.		a includes at least on d Permit NSR autho	ne "Pollution Control orization.	Project"	☐ YES ⊠ NO
<b>♦</b>	3.		a includes at least on lity Standard Permit	ne "Modification of ONSR authorization.	oil and Gas	☐ YES ☒ NO
•	4.			ne "Municipal Solid V NSR authorization und		☐ YES ⊠ NO
•	5.	Landfill Facilities a		e "Municipal Solid V " Standard Permit au ' U.		☐ YES ⊠ NO
	6.		a includes at least on ermit NSR authorizat	e "Concrete Batch Pl	lant" Air	☐ YES ⊠ NO
	7.			ne "Concrete Batch Pl rd Permit NSR author		☐ YES ⊠ NO
	8.		a includes at least on ermit NSR authorizat	e "Hot Mix Asphalt lition.	Plant" Air	☐ YES ☒ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 84) Federal Operating Permit Program

Date	: 10/08/20	)15		RN No.: RN100211	317	Permit No.:	O-1610
Area	Name: B	aytov	vn Plant		Customer Reference	e No.: CN60	4683482
<b>♦</b>			ications, answer ALI lications, answer ON			cted.	
XII.	New S	Soure	e Review (NSR) Au	thorizations <i>(contin</i>	rued)		
	В.	Air (	Quality Standard Pe	ermits (continued)			
•		9.	The application area		e "Rock Crusher" A	ir Quality	☐ YES ⊠ NO
•		10.	Air Quality Standar	d Permit NSR autho	e "Electric Generatin rization. to Question XII.B.13	_	☐ YES ⊠ NO
•		11.			nit" Air Quality Stan the East Texas Reg		☐ YES ☐ NO
•		12.		_	nit" Air Quality Stan the West Texas Reg		☐ YES ☐ NO
•		13.	The application area		e "Boiler" Air Quali	ty Standard	⊠ YES □ NO
•		14.		a includes at least on Control Projects N	e non-rule Air Quali SR authorization.	ty Standard	☐ YES 🖾 NO
•		15.			e non-rule Air Quali oduction Facilities N		☐ YES ⊠ NO
	C.	Flexi	ble Permits				
•		1.	The application are authorization.	a includes at least on	e Flexible Permit NS	SR	☐ YES ⊠ NO
	D.	Mult	iple Plant Permits				
		1.	The application are	a includes at least on	e Multi-Plant Permit	NSR	☐ YES ☒ NO

authorization.

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 85) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN10021	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant	•	Customer Reference No.: CN604683482			
	answer ALL questions unless of answer ONLY these questions				
XII. NSR Authorizations (Attach additional s	s sheets if necessary for sections	s E-J)			
♦ E. PSD Permits	and PSD Major Pollutants				
PSD Permit No.: PSD-TX-695M3	Issuance Date:08/08/2013	Pollutant(s)	SO <sub>2</sub>		
PSD Permit No.:	Issuance Date:	Pollutant(s)			
PSD Permit No.:	Issuance Date:	Pollutant(s)	:		
PSD Permit No.:	Issuance Date:	Pollutant(s)			
, ·	the application area, please con www.tceq.texas.gov/permittin	•		•	d under the
F. Nonattainmer	nt (NA) Permits and NA Majo	or Pollutants			
NA Permit No.:	Issuance Date:	Pollutant(s)			
NA Permit No.:	Issuance Date:	Pollutant(s)			
NA Permit No.:	Issuance Date:	Pollutant(s)			
NA Permit No.:	Issuance Date:	Pollutant(s)			
	or the application area, please of g at: www.tceq.texas.gov/perm				ated under the
♦ G. NSR Authoriz	zations with FCAA § 112(g) R	Requirements			
NSR Permit No.:	Issuance Date:	NSR Permit No	•	Issuance D	Date:
NSR Permit No.:	Issuance Date:	NSR Permit No	•	Issuance D	Date:
NSR Permit No.:	Issuance Date:	NSR Permit No	•	Issuance D	Date:
	Chapter 116 Permits, Special Permits By Rule, PSD Permit				rizations
Authorization No.: 9565	Issuance Date: 08/08/2013	Authorization N	lo.:	Issuance D	Pate:
Authorization No.: 56534	Issuance Date: 11/24/14	Authorization N	lo.:	Issuance D	Pate:
Authorization No.:	Issuance Date:	Authorization N	o.:	Issuance D	Date:
Authorization No.:	Issuance Date:	Authorization N	o.:	Issuance D	Date:

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 86) Federal Operating Permit Program

Date: 10/08/2015	RN No.: RN10021131	.7	Permit No.: O-1610
Area Name: Baytown Plant	C	ustomer Referenc	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

	L questions unless otherwise directed. ILY these questions unless otherwise directed.
XII. NSR Authorizations (Attach additional sheets if nece	ssary for sections E-J)
♦ I. Permits by Rule (30 TAC	Chapter 106) for the Application Area
A list of selected Permits by Rule (previou FOP application is available in the instru	sly referred to as standard exemptions) that are required to be listed in the ctions.
PBR No.: 106.183	Version No./Date: 09/04/2000
PBR No.: 106.371	Version No./Date: 03/14/1997
PBR No.: 106.472	Version No./Date: 03/14/1997
PBR No.: 106.478	Version No./Date: 03/14/1997
PBR No.: 106.261	Version No./Date: 11/01/2003
PBR No.: 106.262	Version No./Date: 09/04/2000
PBR No.: 106.262	Version No./Date: 11/01/2003
PBR No.: 106.412	Version No./Date: 09/04/2000
PBR No.:	Version No./Date:
♦ J. Municipal Solid Waste an	d Industrial Hazardous Waste Permits With an Air Addendum
Permit No.:	Permit No.:

# Attachment 6 OP-MON

#### Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 1) Federal Operating Permit Program

Table 1a: CAM/PM Additions

I. Identifying Information			
Account No.: HG-0696-Q	RN No.: RN100	211317	CN: CN604683482
Permit No.: O-1610	Pr	oject No.: 1827	73
Area Name: Baytown Plant			
Company Name: Eco Services Ope	erations LLC		
II. Unit/Emission Point/Gro	oup/Process Informa	ition	
Revision No.: 3			
Unit/EPN/Group/Process ID No.:	PRO-REGEN		
Applicable Form: OP-UA43			
III. Applicable Regulatory Re	equirement		
Name: Title 30 TAC Chapter 112			
SOP/GOP Index No.: REG2-002			
Pollutant: SO2			
Main Standard: 112.6			
IV. Title V Monitoring Inform	mation		
Monitoring Type: CAM			
Unit Size: Large			
CAM/PM Option No.: CAM-SS-oo	9		
Deviation Limit: Minimum pH is 4	l.5		
CAM/PM Option No.: CAM-SS-01	0		
Deviation Limit: Minimum liquid f	flow rate is 650 gallons j	per minute	
V. Control Device Informati	ion		
Control Device ID No.: Ammonia S	Scrubber		
Control Device Type: SO2SCR			

# Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 1) Federal Operating Permit Program

Table 1a: CAM/PM Additions

I. Identifying Information		
Account No.: HG-0696-Q	RN No.: RN100211317	CN: CN604683482
Permit No.: O-1610	Project No.: 1	8273
Area Name: Baytown Plant		
Company Name: Eco Services Ope	rations LLC	
II. Unit/Emission Point/Gro	oup/Process Information	
Revision No.: 3		
Unit/EPN/Group/Process ID No.:	PRO-REGEN	
Applicable Form: OP-UA43		
III. Applicable Regulatory Re	equirement	
Name: 40 CFR Part 60, Subpart H		
SOP/GOP Index No.: 60H-001		
Pollutant: SO2		
Main Standard: 60.82(a)		
IV. Title V Monitoring Inform	nation	
Monitoring Type: CAM		
Unit Size: Large		
CAM/PM Option No.: CAM-SS-oo	9	
Deviation Limit: Minimum pH is 4	-5	
CAM/PM Option No.: CAM-SS-01	0	
Deviation Limit: Minimum liquid t	flow rate is 650 gallons per minute	
V. Control Device Informat	ion	
Control Device ID No.: Ammonia S	Scrubber	
Control Device Type: SO2SCR		

#### Attachment 7 OP-UA5

# Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 1) Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters

Date: 10/08/2015	Permit: O-1610	Regulated Entity No.:	RN100211317
Area Name: Baytown Plant		Customer Reference No	.: CN604683482

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement	F	uel Type(s)	Annual Heat Input	NO <sub>x</sub> Emission Limitation	Opt-In Unit	23C- Option
PREHTRSTK	R7ICI-0001	PRHTR	2-40			NG			310D		
											<del></del>
									:		
											·
											<del></del>

#### Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 2) Federal Operating Permit Program

Table 1b: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters

Date: 10/08/2015	Permit: O-1610	Regulated Entity No.: RN100211317	1
Area Name: Baytown Plant		Customer Reference No.: CN604683482	1

Unit ID No.	SOP/GOP Index No.	Diluent CEMS	30 TAC Chapter 116 Limit	NO <sub>x</sub> Emission Limit Basis	NO <sub>x</sub> Reduction	Common Stack Combined	Fuel Type Heat Input	NO <sub>x</sub> Monitoring System
PREHTRSTK	R7ICI-0001	NO		30DAY	NONE			MERT
			. ,					

## Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 3) Federal Operating Permit Program

Table 1c: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters

Date: 10/08/2015	Permit: O-1610	Regulated Entity No.: RN100211317	gulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN604683482	stomer Reference No.: CN604683482

Unit ID No.	SOP/GOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring
PREHTRSTK	R7ICI-0001	X40A	310C	OTHER		
<del>-</del>						
•						
						· · · · · · · · · · · · · · · · · · ·

## Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 5) Federal Operating Permit Program

Table 3a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Furnaces

Date: 10/08/2015	Permit: O-1610	Regulated Entity No.: RN100211317	<u></u>
Area Name: Baytown Plant		Customer Reference No.: CN604683482	

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	NO <sub>x</sub> Emission Limitation	23C-Option	NO <sub>x</sub> Emission Limit Basis	NO <sub>x</sub> Reduction	NO <sub>x</sub> Monitoring System
PRO-REGEN	R7ICI-0002	OTHER			-			
			·		-			
			•		<del></del>			

Attachment 8

OP-REQ2

## Texas Commission on Environmental Quality Form OP-REQ2 Negative Applicable Requirement Determinations Federal Operating Permit Program

Date: 10/08/2015	Permit No.: O-1610	Regulated Entity No.: RN100211317	
Area Name: Baytown Plant		Customer Reference No.	: CN604683482

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/ Process 'Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability Citation	Negative Applicability Reason
	2	PREHTRSTK	OP-UA5	MACT DDDDD	§ 63.7485	Not subject as the facility is not a major source of HAPs.
	3	PRO-REGEN	OP-UA5	Ch. 117	30 TAC §117.303(a)(4)	The furnace is exempt on the basis of being a sulfuric acid regeneration unit.
					•	
			:			

## Attachment 9 Major NSR Summary Table



### **Texas Commission on Environmental Quality**

### **Major NSR Summary Table**

ermit Number:	9565 and PSDTX695M3			Issuanc	e Date: August 8, 2013																											
Emission	Source	Air Contaminant	Emiss	ion Rates	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements																									
Point No. (1)	Name (2)	Name (3)	lb/hr	TPY (4)	Spec. Cond.	Spec. Cond.	Spec. Cond.																									
		Carbon Monoxide	5.50	24.09																						_						
		H <sub>2</sub> SO <sub>4</sub> (6)	6.88	20.08																												
		Ammonia	0.40	1.70																												
		NOx	19.75	54.91																												
		PM <sub>10</sub>	3.19	11.32	]																											
		PM <sub>2.5</sub>	3.19	11.32																												
		Sulfur Dioxide (6)	114.13	441.65																												
		VOC	0.01	0.01																												
		Silver	0.03	0.12																												
	Arsenic	0.13	0.52	]		I																										
1	Scrubber Exhaust	Barium	0.03	0.12	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13,	2, 3, 4, 5, 6, 7, 9, 11, 13,	2, 9, 11																									
•	Detapper Limitati	Beryllium	0.02	0.08	14, 15	14, 15																										
		Cadmium	0.02	0.08																												
		Chlorine	0.01	0.02																												
		Chromium	0.67	2.82																												
		Hydrogen Chloride	0.06	0.26	]																											
	1	Mercury	0.0018	0.0041	]																											
		Nickel	0.56	2.42																												
		Lead	0.06	0.24	_																											
		Antimony	0.03	0.12																												
		Selenium	0.05	0.20	]																											
		Thallium	0.02	0.08																												
RACKFUG	Rack Process Fugitives (5)	voc	0.01	0.01	2, 6	2, 6	2																									
		Hydrogen Sulfide	0.01	0.01																												
FIICPC	Railcar Piping and	VOC	0.01	0.02	2, 6	2, 6	2																									
FUGRC	Components (5)	H <sub>2</sub> SO <sub>4</sub> (6)	0.01	0.01	2,0	2,0	4																									

#### Footnotes:

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) H<sub>2</sub>SO<sub>4</sub> sulfuric acid mist
  - NO<sub>x</sub> total oxides of nitrogen
  - PM<sub>10</sub> particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no PM greater than 10 microns is emitted.
  - $PM_{2.5}$  particulate matter equal to or less than 2.5 microns in diameter
  - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Prevention of Significant Deterioration pollutant

#### **Whitney Hill**

From:

Whitney Hill

Sent:

Thursday, October 01, 2015 10:34 AM

To:

'David Laurie'; 'Floyd Dickerson'

Subject:

RE: Working Draft Permit -- FOP O1610/Project 18273, Eco Services Operations

LLC/Baytown Plant

David,

As we discussed on the phone you will submit the information requested originally on August 31<sup>st</sup> by <u>October 8, 2015</u>. Please let me know if you have any questions.

In addition to your review of the WDP, please submit the following:

- Resubmit page 1 of form OP-REQ1. Question I.A.3. was not answered.
- Submit forms OP-UA15, Table 15 and OP-MON for vents subject to the requirements in 30 TAC §111.151 with addition monitoring, as stated on page 3 of the OP-REQ1 [question I.C.2.]
- Submit the <u>Major NSR Summary Table</u> in Word format, per the instructions on TCEO's website.
- Resubmit form OP-ACPS because the form submitted with the original renewal application has dates in the compliance plan and schedule that have passed.
- As requested in the previous email, submit OP-UA05 for emission unit 1

Thank you,

### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-1400

From: David Laurie [mailto:David.Laurie@eco-services.com]

Sent: Friday, September 18, 2015 12:14 PM

To: Whitney Hill

Subject: RE: Working Draft Permit -- FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

Ms. Hill,

I have reviewed the draft permit and have the following comments and questions.

Unit ID 1 vs PRO-REGEN – were you able to identify in the technical review history how these two process IDs came to be redundant IDs? Upon review of our deviation reporting and recordkeeping, it appears that, for consistency, we should seek to keep PRO-REGEN and either eliminate Unit ID 1 or return it to its simple PSD representation. Do you know if there is any benefit to keeping Unit ID 1 as a PSD representation versus reassigning this applicability to PRO-REGEN. 1 is the name of the NSR EPN.

The representations submitted updating the authorization of PREHTRSTK were no included in this draft.

The EPA Region 6 has requested that the following language be included in our Title V permit before they will agree to terminate our current consent decree. Please include the following language from the EPA:

"Future Emission Limits and Standards: As soon as practicable, but no later than ninety (90) days after the relevant Effective Date listed in Paragraph 11.i, Defendant shall submit administratively complete applications to the applicable federal, state or local agency to incorporate that emission limit or standard into federally-enforceable minor or major new source review permits or other permits that will ensure that the underlying emission limit or standard survives the termination of this Consent Decree."

Thank you,

David Laurie Environmental Engineer

Eco Services Operations LLC 713 924 1484

From: Whitney Hill [mailto:whitney.hill@tceq.texas.gov]

Sent: Monday, August 31, 2015 11:15 AM

To: David Laurie; Floyd Dickerson

Subject: Working Draft Permit -- FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

I have conducted a technical review of renewal application for Eco Services Operations LLC, Baytown Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by <u>September 14, 2015</u>. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

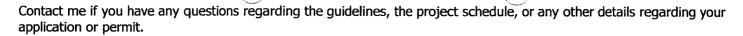
In addition to your review of the WDP, please submit the following:

- Resubmit page 1 of form OP-REQ1. Question I.A.3. was not answered.
- Submit forms OP-UA15, Table 15 and OP-MON for vents subject to the requirements in 30 TAC §111.151 with addition monitoring, as stated on page 3 of the OP-REQ1 [question I.C.2.]
- Submit the Major NSR Summary Table in Word format, per the instructions on <u>TCEO's website</u>.
- Resubmit form OP-ACPS because the form submitted with the original renewal application has dates in the compliance plan and schedule that have passed.
- As requested in the previous email, submit OP-UA05 for emission unit 1

In accordance with the policy memorandum dated January 6, 2006 available at <a href="http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf">http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf</a>, please be advised that failure to submit all of the information necessary to process your application by the deadline specified will result in the voidance of this application.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at <a href="http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp factsheet.pdf">http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp factsheet.pdf</a>. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any as yet uncertified submittals, including the WDP response, is required to be submitted with the WDP response. After final review of the WDP, additional changes may require certification. I will advise you of these changes at a later date. Upon final approval of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form must be submitted which includes the specific dates or time period of all submitted application documentation that was not previously certified.



Thank you for your cooperation.

Sincerely,

### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-1400

#### Whitney Hill

From:

David Laurie < David.Laurie@eco-services.com>

Sent:

Friday, September 18, 2015 12:14 PM

To:

Whitney Hill

Subject:

RE: Working Draft Permit -- FOP O1610/Project 18273, Eco Services Operations

LLC/Baytown Plant

Follow Up Flag: Flag Status:

Follow up Flagged

**Categories:** 

Project Update

Ms. Hill,

I have reviewed the draft permit and have the following comments and questions.

Unit ID 1 vs PRO-REGEN — were you able to identify in the technical review history how these two process IDs came to be redundant IDs? Upon review of our deviation reporting and recordkeeping, it appears that, for consistency, we should seek to keep PRO-REGEN and either eliminate Unit ID 1 or return it to its simple PSD representation. Do you know if there is any benefit to keeping Unit ID 1 as a PSD representation versus reassigning this applicability to PRO-REGEN. 1 is the name of the NSR EPN.

The representations submitted updating the authorization of PREHTRSTK were no included in this draft.

The EPA Region 6 has requested that the following language be included in our Title V permit before they will agree to terminate our current consent decree. Please include the following language from the EPA:

"Future Emission Limits and Standards: As soon as practicable, but no later than ninety (90) days after the relevant Effective Date listed in Paragraph 11.i, Defendant shall submit administratively complete applications to the applicable federal, state or local agency to incorporate that emission limit or standard into federally-enforceable minor or major new source review permits or other permits that will ensure that the underlying emission limit or standard survives the termination of this Consent Decree."

Thank you,

David Laurie Environmental Engineer

Eco Services Operations LLC 713 924 1484

From: Whitney Hill [mailto:whitney.hill@tceq.texas.gov]

Sent: Monday, August 31, 2015 11:15 AM

To: David Laurie; Floyd Dickerson

Subject: Working Draft Permit -- FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

I have conducted a technical review of renewal application for Eco Services Operations LLC, Baytown Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by <u>September 14, 2015</u>. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

In addition to your review of the WDP, please submit the following:

- Resubmit page 1 of form OP-REQ1. Question I.A.3. was not answered.
- Submit forms OP-UA15, Table 15 and OP-MON for vents subject to the requirements in 30 TAC §111.151 with addition monitoring, as stated on page 3 of the OP-REQ1 [question I.C.2.]
- Submit the Major NSR Summary Table in Word format, per the instructions on TCEQ's website.
- Resubmit form OP-ACPS because the form submitted with the original renewal application has dates in the compliance plan and schedule that have passed.
- As requested in the previous email, submit OP-UA05 for emission unit 1

In accordance with the policy memorandum dated January 6, 2006 available at <a href="http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf">http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf</a>, please be advised that failure to submit all of the information necessary to process your application by the deadline specified will result in the voidance of this application.

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Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov
Phone: (512) 239-1301

Fax: (512) 239-1400

#### **Whitney Hill**

From:

Whitney Hill

Sent:

Monday, August 31, 2015 11:14 AM

To:

'David Laurie'; 'Floyd Dickerson'

**Subject:** 

Working Draft Permit -- FOP O1610/Project 18273, Eco Services Operations

LLC/Baytown Plant

I have conducted a technical review of renewal application for Eco Services Operations LLC, Baytown Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by <u>September 14, 2015</u>. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

In addition to your review of the WDP, please submit the following:

- Resubmit page 1 of form OP-REQ1. Question I.A.3. was not answered.
- Submit forms OP-UA15, Table 15 and OP-MON for vents subject to the requirements in 30 TAC §111.151 with addition monitoring, as stated on page 3 of the OP-REQ1 [question I.C.2.]
- Submit the Major NSR Summary Table in Word format, per the instructions on TCEQ's website.
- Resubmit form OP-ACPS because the form submitted with the original renewal application has dates in the compliance plan and schedule that have passed.
- As requested in the previous email, submit OP-UA05 for emission unit 1

In accordance with the policy memorandum dated January 6, 2006 available at <a href="http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf">http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf</a>, please be advised that failure to submit all of the information necessary to process your application by the deadline specified will result in the voidance of this application.

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Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov
Phone: (512) 239-1301

Fax: (512) 239-1400

#### **Whitney Hill**

From:

David Laurie < David.Laurie@eco-services.com>

Sent:

Tuesday, August 11, 2015 5:00 PM

To:

Whitney Hill

**Subject:** 

RE: Renewal Application Review -- FOP O1610/Project 18273, Eco Services Operations

LLC/Bavtown Plant

**Attachments:** 

Eco Services - FOP Renewal Application Review.pdf; OP-CRO1.pdf

Follow Up Flag:

Follow up

Flag Status:

Flagged

**Categories:** 

**Project Update** 

#### Whitney,

I have attached the updated forms you requested. I just learned that the plant manager had to leave early to address a family issue today and did so before signing the OP-CRO1 form. I can have the signed and sent tomorrow morning. Is that acceptable?

Do you need hard copies of these forms mailed to you in addition to the electronic copies attached?

Some of the forms included in this update pertain to the removal of PRO-REGEN to combine with Unit 1. I reviewed the permit history, after the forms were drafted, and observed that, in the original Title V issued in 2002, Unit 1 was assigned solely to the PSD permit. The regulatory applicability was assigned to PRO-REGEN. In 2007, when the Title V was renewed and after Rhodia signed its consent decree with the EPA, the new regulatory applicability was assigned to Unit 1. This has made Unit 1 and PRO-REGEN redundant SOP IDs. In your review, I would like to examine the technical review history to confirm if my deductions are correct and discuss which of the two SOP IDs we remove to streamline the permit. At this time, we cannot determine an advantage to having an SOP ID dedicated to the PSD permit unless that was a requirement of Title V during the original permitting process.

Thank you,

David Laurie
Environmental Engineer

Eco Services Operations LLC 713 924 1484

From: Whitney Hill [mailto:whitney.hill@tceq.texas.gov]

**Sent:** Thursday, July 23, 2015 4:08 PM **To:** David Laurie; Floyd Dickerson

Cc: Adam Mielnicki (amielnicki@trinityconsultants.com)

Subject: RE: Renewal Application Review -- FOP 01610/Project 18273, Eco Services Operations LLC/Baytown Plant

David,

That should be fine. I will move the due date to August 11. Please let me know if you need anything else or have any questions.

Thanks,



Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-7130

From: David Laurie [mailto:David.Laurie@eco-services.com]

**Sent:** Thursday, July 23, 2015 2:27 PM **To:** Whitney Hill: Floyd Dickerson

Cc: Adam Mielnicki (amielnicki@trinityconsultants.com)

Subject: RE: Renewal Application Review -- FOP O1610/Project 18273, Eco Services Operations LLC/Baytown Plant

Whitney,

Our permitting consultant has been working on getting together the information you requested, but we would like to request an additional 2 weeks to complete the necessary forms and updates. Vacation schedules and TCEQ inspections have caused our transfer and review of information to progress more slowly than usual.

Thank you.

David Laurie Environmental Engineer

Eco Services Operations LLC 713 924 1484

From: Whitney Hill [mailto:whitney.hill@tceq.texas.gov]

**Sent:** Thursday, July 09, 2015 10:57 AM **To:** Floyd Dickerson; David Laurie

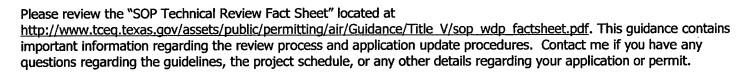
Subject: Renewal Application Review -- FOP 01610/Project 18273, Eco Services Operations LLC/Baytown Plant

I have been assigned to the Federal Operating Permit (FOP) renewal application for Eco Services Operations LLC, Baytown Plant and have begun technical review. This application for renewal of Permit No. O1610 has been assigned Project No. 18273. Please address all correspondence pertaining to this permit application, including updates, to me at the address below, and use the Permit and Project reference numbers above to facilitate tracking.

This renewal project and a significant revision project to incorporate PSD permit PSDTX695 into the permit were on hold until the PSD permit was issued. Since this permit was issued in November, the renewal project can be issued. Any changes from the significant revision will be incorporated into the renewal project. **Please submit the following** form/information by July 28, 2015:

- Any forms that correspond to changes that have been made at the site since 2012
- The most recent OP-RE01
- The OP-MON for CAM (if applicable) for PRO-REGEN and 1 for 40 CFR Part 60, Subpart H for SO2
- The OP-UA05 for emission units 1 and PREHTRSTK

In accordance with the policy memorandum dated January 6, 2006 available at <a href="http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf">http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf</a>, please be advised that failure to submit all of the information necessary to process your application by the deadline specified will result in the voidance of this application.



Thank you for your cooperation.

Sincerely,

### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-7130



## Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFO	<b>PRMATION</b>	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1						
RN: 100211317	CN: 604683	482	Account No.: HG-0696					
Permit No.: O-1610		Project N	Project No.: 18273					
Area Name: Baytown Plant		Company	Name: Eco Ser	vices Operation	s LLC			
II. CERTIFICATION TY	(PE (Please mark the	appropriate	e box)					
Responsible Official	5	⊠ Duly	Authorized Re	presentative				
III. SUBMITTAL TYPE (	Please mark the app	ropriate box	) (Only one res	oonse can be acc	cepted per fori			
SOP/TOP Initial Permit A	Application 🛛 Upo	date to Perm	it Application					
GOP Initial Permit Applic	eation Per	mit Revision	, Renewal, or R	eopening				
Other:								
IV. CERTIFICATION O	FTRUTH							
This certification does no information for reference	e only.		C		_			
	illiam McConnell printed or typed)	ce	rtily that I am t	he <u>DAR</u> (RO or .				
and that, based on informati dated during the time period Note: Enter EITHER a Time completed. The certification	l or on the specific dat e <i>Period OR Specific</i> i	te(s) below, a Date(s) for e	re true, accurat ach certification	te, and complete	<b>:</b>			
Time Period: From		to						
	Start Date			End Date				
Specific Dates: <u>08/11/2015</u> Date 1		Date 3	Date 4	Date5	Date 6			
Signature:			Signature	Date:				
Title: <u>Plant Manager</u>								



1001 West Loop South | Suite 640 | Houston, TX 77027 | P (713) 552-1371 | F (713) 552-1374

trinityconsultants.com

VIA E-MAIL: whitney.hill@tceq.texas.gov

August 11, 2015

Whitney Hill Air Permits Division Texas Commission on Environmental Quality 12100 Park 35 Circle, MC 163 Austin, TX 78753

RE: Federal Operating Permit (FOP) Renewal Application Review

Permit No. 01610 – TCEQ Project No. 18273 Eco Services Operations LLC – Baytown Plant Customer Reference Number (CN) 604683482 Regulated Entity Reference Number (RN) 100211317

Dear Ms. Hill:

Eco Services Operations LLC (Eco Services), formerly Solvay USA Inc., owns and operates a sulfuric acid manufacturing plant in Baytown, Harris County, Texas (Baytown Plant). The facility produces sulfuric acid by regenerating spent sulfuric acid (sulfuric acid received from petroleum refining and chemical processes that has been in contact with volatile organic compounds). The Baytown Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) account number HG-0696-Q and is authorized by FOP 01610.

On behalf of Eco Services, Trinity Consultants (Trinity) is submitting this response to your request for supplementary information requested via email on July 9, 2015. The request specified the submittal of the following materials:

#### 1. Any forms that correspond to changes that have been made at the site since 2012

An OP-2 form is being included in Attachment 1 to account for changes that have taken place at the Baytown Plant since 2012. Revisions include the following:

- > NSR Permit No. 56534 has underwent a minor revision to update spent sulfuric acid composition and add PM<sub>2.5</sub> emissions to EPN FILTERSTK.
- > The revision for Unit ID No. PREHTRSTK is being submitted to reflect its current NSR authorization.
- > It has also been determined that since Unit ID Nos. 1 and PRO-REGEN both encompass the entire acid making process, the permit could benefit by being streamlined via the removal of PRO-REGEN. Title 30 TAC Chapter 112 and 40 CFR Subpart H applicability overlaps for both unit IDs; therefore, Eco Services is requesting that the PRO-REGEN Unit ID be deleted from the FOP. Included in Attachment 2 is the OP-SUMR form to document this change. Additionally, in the current permit, PRO-REGEN is subject to Chapter 112 requirements that Unit ID No. 1 is exempt from. To finalize the deletion of PRO-REGEN, forms OP-UA43 and OP-REQ3 (Attachments 3 and 4, respectively) are being submitted to make Unit ID No. 1 subject to these requirements.
- > As part of the 2012 renewal application package, OP-MON forms were submitted with the purpose of deleting the two Periodic Monitoring requirements the Baytown Plant is subject to. Since that time, business conditions have changed such that the justifications for their removal are no longer be valid. Therefore, Eco Services is requesting that the previously submitted deletion request be considered void and not taken into consideration during the permit renewal process. This request is documented in the OP-2 by copying the 2012 revision language in strikethrough font.



Attachment 5 encloses form OP-CRO1, submitted to certify the aforementioned permit updates.

#### 2. The most recent OP-REO1

The most recent OP-REQ 1 is being included in Attachment 6.

#### 3. The OP-MON for CAM (if applicable) for PRO-REGEN and 1 for 40 CFR Part 60, Subpart H for SO2

In consideration of the PRO-REGEN deletion request, an OP-MON form (Attachment 7) is being submitted only for unit 1 for 40 CFR Part 60, Subpart H. Please note that although unit 1 fits the "Large" definition, the selected CAM options (CAM-SS-009 and CAM-SS-010) are for "Small" sized units, as defined in the CAM guidance. The minimum monitoring period of once per week is determined to be allowable as documented via NSR Permit No. 9565, SCs 14 &15, as well as the current operating permit.

#### 4. The OP-UA05 for emission units 1 and PREHTRSTK

Attachment 8 includes the OP-UA5 form, completed only for unit PREHTRSTK. Unit 1 has been determined to be exempt from 30 TAC Chapter 117 requirements on the basis of the furnace being a sulfuric acid regeneration unit (30 TAC §117.303(a)(4)). Additionally, Attachment 9 includes an OP-REQ2 form that documents PREHTRSTK's negative applicability for 40 CFR Part 63, Subpart DDDDD (better known as Boiler MACT).

If you have any questions regarding this submittal or require additional information about this submittal, please feel free to contact David Laurie at (713) 924-1484.

Sincerely,

TRINITY CONSULTANTS

Adam Mielnicki Senior Consultant

Attachment

cc: David Laurie, Eco Services Operations LLC Floyd Dickerson, Eco Services Operations LLC

Attachment 1

OP-2

### Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2 (Page 1)

#### Table 1

Date: 08/11/2015	Permit	No.: O-10	10	A	Account N	No.: HG-0	696-Q		Regulated Entity No.: F	RN100211317
Area Name: Baytown Plant			Con	npany Nam	e: Eco Se	rvices Op	erations Ll	C Cus	stomer Reference No.: C	N604683482
For Submissions to EPA (SOI	<sup>P</sup> renewa	ıl, minor re	vision, a	ınd significa	ınt revisio	n applicat	ions <u>only</u> )			
Has a copy of this application b	een subn	nitted (or i	s being s	submitted) to	o EPA? <i>(1</i>	Refer to the	e form instri	ictions for	additional information.)	⊠ YES □ NO
I. Application Type		NAMES OF STREET		200		(B)				ting the second
Indicate the type of application	•									
☐ Renewal 🛛 Streamlined Re	evision M	Iust includ	e provisi	ional terms	and cond	itions as ex	plained in t	he instruct	tions.)	
Significant Revision Rev	ision Re	questing P	ior App	roval 🔲 Ad	lministrat	ive Revisio	on 🔲 Respo	nse to Rec	ppening	
II. Qualification Statemen	t	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX								
For SOP Revisions Only	The ref	ferenced ch	anges qu	ualify for th	e marked	revision ty	pe.			⊠ YES □ NO
For GOP Revisions Only	The per	rmitted are	a contin	ues to qualit	fy for a G	OP.		_		☐ YES ☐ NO
III. Major Source Pollutant	s (Comp	lete this se	ction if t	he permit re	evision is	due to a cl	ange at the	site or cha	ange in regulations.)	
Indicate all pollutants for which	n the site	is a major	source b	ased on the	site's pot	tential to en	mit after the	change is	operated:	
Pollutant	voc	NOx	SO <sub>2</sub>	PM <sub>10</sub>	СО	Pb	HAPs	Other [		
Major at the Site (YES/NO):	No	Yes	Yes	No	No	No	No	No		
IV. Fee Information								14 h		
Has the applicant paid emission	ns fees fo	or the most	recent a	gency fiscal	year (Se	ptember 1	- August 31	)?	⊠ YES [	] NO □ N/A
V. Delinquent Fees and Pe	nalties			100000000000000000000000000000000000000			on access the Till			1.000
Notice: This form will not be pare paid in accordance with the			•		r penaltie	s owed the	TCEQ or t	he Office o	of the Attorney General on	behalf of the TCEQ

### Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2 (Page 2)

#### Table 2

Date: 08/1	1/2015	Perm	nit No.: O-1610		Accoun	t No.: HG-0696-Q		Regulated Entity No.: RN100211317	
Area Nam	e: Baytown P	lant		Company	Name: Eco	Services Operations L	LC	Customer Reference No.: CN604683482	
I. De	scription of R	tevision							
			Unit/Group	Process	and the				
Revision No.	Revision Code	New Unit	ID No	) <b>.</b>	Applicable Form	NSR Authorization	Description of Changes and Provisional Terms and Conditions		
1	MS-A	NO				56534		ted spent sulfuric acid composition. Added PM2.5 cions for FILTERSTK.	
2	MS-C	NO	PREHTRSTK		OP-UA5	106.183 (09/04/2000)	Updat	ting NSR authorization.	
3	MS-C	NO	PRO-REGEN			9565	applic	esting to remove Unit ID from permit to streamline cability. All PRO-REGEN applicability has mined to overlap with Unit ID 1.	
4	MS-C	NO	1		OP-UA43	9565	Updat	ting 30 TAC Chapter 112 applicability.	
1	SIG-A	NO	GRPACIDTNI	4	OP-UA3	<del>56534</del>	Rule	applicability change and remove periodic monitoring.	
2	SIG-A	NO	<del>T-16</del>	:	OP-REQ2	<del>56534</del>	Rule	applicability change.	
							<u> </u>		

### Attachment 2 OP-SUMR



# Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 1

Date: 08/11/2015	Regulated Entity No.: RN10	0211317	Permit No.: O-1610
Company Name: Eco Services Operations LLC	;	Area Name: Baytown Plant	

			Unit/Proce	SS (2.14) 175 (1.15)	Preconstruction	Authorizations		
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/30 TAC Chapter 106	Title I	
D	3	PRO-REGEN	OP-UA43	REGEN PROCESS UNIT		9565	PSD-TX-695M3	
	2	PREHTRKSTK	OP-UA5			106.183 (09/04/2000)		]
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Attachment 3

OP-UA43



## Texas Commission on Environmental Quality Sulfuric Acid Production Attributes Form OP-UA43 (Page 2) Federal Operating Permit Program

Table 2: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 112)
Control of Air Pollution from Sulfur Compounds (Sulfuric Acid Production)

Account No.: HG-0696-Q	Date: 08/11/2015	Project No.: 18273
Area Name: Baytown Plant		

Process ID No.	SOP Index No.	Facility Type	Effective Stack Height	Production Capacity	Facility Use
1	REG2-002	SULFCON	NO	300+	YES
_					

## Attachment 4 OP-REQ3

### Applicable Requirements Summary Form OP-REQ3 (Page 1) Federal Operating Permit Program

Table 1a: Additions

Date: 08/11/2015	Regulated Entity No.: RN100211317	Permit No.: O-1610
Company Name: : Eco Services Operations LLC	Area Name: Baytown Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	1	OP-UA43	REG2-002	H2SO4	Chapter 112	§112.41(b) §112.41(b)(1)
	7337/80/2				_	
<del></del>				<del></del>		

### Applicable Requirements Summary Form OP-REQ3 (Page 2) Federal Operating Permit Program

Table 1b: Additions

Date: 08/11/2015	Regulated Entity No.: RN100211317	Permit No.: O-1610
Company Name: Eco Services Operations LLC	Area Name: Baytown Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	1	REG2-002	H2SO4	§112.43(b) §112.43(c) [G] §112.43(c)(1) [G] §112.43(c)(2) §112.45(a)	[G] §112.45(b)	
···						

### Applicable Requirements Summary Form OP-REQ3 (Page 3) Federal Operating Permit Program

Table 2a: Deletions

Date: 08/11/2015	Regulated Entity No.: RN100211317	Permit No.: O-1610
Company Name: Eco Services Operations LLC	Area Name: Baytown Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	1	OP-UA43	REG2-002	H2SO4	Chapter 112	§112.41(b)(2)
·						
· · · · · · · · · · · · · · · · · · ·						

## Attachment 5 OP-CRO1

## Attachment 6 OP-REQ1

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 1) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

1.	Title 30 TA	AC Chapter 111 - Control of Air Pollution from Visible Emissions and F	articulate Matter
		le Emissions	
<b>♦</b>	1.	The application area includes stationary vents constructed on or before January 31, 1972.	⊠ YES □ NO
<b>♦</b>	2.	The application area includes stationary vents constructed after January 31, 1972.  If the response to both Question I.A.1. and I.A.2. is "NO," go to Question I.A.6.  If the response to Question I.A.1. is "NO" and the response to Question I.A.2. is "YES," go to Question I.A.4.	⊠ YES □ NO
<b>•</b>	3.	The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	☐ YES ☐ NO
<b>♦</b>	4.	All stationary vents are addressed on a unit specific basis.  If the response to Question I.A.4. is "YES," go to Question I.A.6.	☐ YES ⊠ NO
<b>♦</b>	5.	Stationary vents are subject to compliance assurance monitoring requirements.	☐ YES ⊠ NO
<b>•</b>	6.	Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	⊠ YES □ NO
<b>♦</b>	7.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	☐ YES ⊠ NO
<b>*</b>	8.	The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	☐ YES ⊠ NO
<b>♦</b>	9.	Emissions from units in the application area include contributions from uncombined water.	⊠ yes □ no
•	10.	The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	☐ YES ☒ NO ☐ N/A

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 2) Federal Operating Permit Program

_										
Dat	e: 08/11/2015			RN No.: RN100211			O-1610			
Are	a Name: Baytov	wn Pla	nt		Customer Reference	e No.: CN6046	583482			
<b>♦</b>				L questions unless of ILY these questions u		cted.				
I.	Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter									
	B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots									
	1. Items a - d determines applicability of any of these requirements based on geographical location.									
<b>♦</b>	a. The application area is located within the City					aso.	☐ YES ⊠ NO			
•		b.		on area is located wi except areas specifie			☐ YES ⊠ NO			
<b>*</b>		c.		on area is located in op formed by Beltway		County	☐ YES ⊠ NO			
•		d.	outlined in G	on area is located in roup II state implement atter adopted by the	entation plan (SIP) for	or inhalable	☐ YES ⊠ NO			
				oonse to Questions I. ons I.B.1.a-d are "No			a - d.			
	2.	Item	s a - d determin	ne the specific applic	ability of these requi	irements.				
<b>♦</b>		a.	The applicati	on area is subject to	30 TAC § 111.143.		☐ YES ☐ NO			
<b>♦</b>	***	b.	The applicati	on area is subject to	30 TAC § 111.145.		☐ YES ☐ NO			
<b>♦</b>		c.	The applicati	on area is subject to	30 TAC § 111.147.		☐ YES ☐ NO			
<b>♦</b>		d.	The applicati	on area is subject to	30 TAC § 111.149.		☐ YES ☐ NO			
	C. Emi	ssions	Limits on No	nagricultural Proce	sses					
<b>*</b>	1.		application are	a includes nonagricu	ıltural processes subj	ect to 30	⊠ YES □ NO			
	2.	are s	ubject addition	a includes vents from al monitoring requir Question I.C.2. is "No	ements.		⊠ YES □ NO			
	3.			agricultural processe		rea are	☐ YES ⊠ NO			

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 3) Federal Operating Permit Program

Date: 08/11/2	2015		RN No.: RN100211	1317	Permit No.: O-16	10	
Area Name:	Bayto	wn Plant		Customer Reference No.: CN604683482			
		olications, answer ALI polications, answer ON			cted.		
and the second s	30 T tinue	AC Chapter 111 - C	ontrol of Air Pollut	ion from Visible Er	nissions and Part	iculate Matter	
C.	Emi	issions Limits on No	nagricultural Proce	sses (continued)	in the		
	4.		a includes oil or gas 3(a) and 111.153(c).	fuel-fired steam gen	☐ YES ⊠ NO		
	5.	subject to additiona	a includes oil or gas il monitoring require Question I.C.5. is "No	ments.		☐ YES ⊠ NO	
	6.	All oil or gas fuel-f additional monitori	<del>-</del>	tors in the application area are subject to YES			
	7.	A A	a includes solid foss 153(a) and 111.153(l	_	enerators subject	☐ YES ⊠ NO	
	8.	subject to additiona	a includes solid foss al monitoring require Question I.C.8. is "No	ments.	☐ YES ⊠ NO		
	9.		l-fired steam generate oring requirements.	ors in the application	area are subject	☐ YES ☐ NO	
D.	Em	issions Limits on Ag	ricultural Processes	Nama saka			
	1.	The application are § 111.171.	ea includes agricultur	ral processes subject	to 30 TAC	☐ YES ⊠ NO	
E.	Out	tdoor Burning					
<b>*</b>	1.	_	conducted in the app Question I.E.1 is "NO	-		☐ YES ⊠ NO	

Fire training is conducted in the application area and subject to the exception

application area and subject to the exception provided in 30 TAC § 111.207.

Disposal fires are used in the application area and subject to the exception

Fires for recreation, ceremony, cooking, and warmth are used in the

provided in 30 TAC § 111.205.

provided in 30 TAC § 111.209.

2.

3.

4.

☐ YES ☐ NO

☐ YES ☐ NO

☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 4) Federal Operating Permit Program

Date	ate: 08/11/2015 RN No.: RN100211317 Permit No.: O-1610			)-1610		
Area	Area Name: Baytown Plant Customer Reference No.: CN604683482					583482
<b>♦</b>		ications, answer ALI lications, answer ON		herwise directed. Inless otherwise direc	cted.	
I.	Title 30 TA		ontrol of Air Pollut	ion from Visible Em	nissions and I	Particulate Matter
	E. Outd	loor Burning <i>(contin</i>	rued)			
<b>•</b>	5.		is used in the application 30 TAC § 111.21	ntion area and subject 1.	t to the	☐ YES ☐ NO
•	6.		ng is used in the appl in 30 TAC § 111.21	ication area and subj 3.	ect to the	☐ YES ☐ NO
•	7.			CEQ Executive Direct according to 30 TAC		☐ YES ☐ NO
П.	Title 30 TA	C Chapter 112 - Co	ontrol of Air Pollut	ion from Sulfur Cor	npounds	
	A. Tem	porary Fuel Shorta	ge Plan Requiremei	its		
	1.		a includes units that a tage plan requiremen	are potentially subject nts of 30 TAC	et to the	□ YES ⊠ NO
III.	Title 30 TA	C Chapter 115 - C	ontrol of Air Pollut	ion from Volatile O	rganic Comp	ounds
	A. Appl	icability		/ 郑*	PERSONAL PROPERTY OF THE PROPE	
<b>♦</b>	1.	Beaumont/Port Artle covered attainment	nur area, Dallas/Fort county as defined by inclusive counties. I	ouston/Galveston/Bra Worth area, El Paso 30 TAC § 115.10. If the response to Que	area, or a	⊠ YES □ NO
	B. Stora	ige of Volatile Orga	nic Compounds			The second distribution of the second
•	1.	containers capable of		nks, reservoirs, or othing pressure sufficienthe atmosphere.		☐ YES ⊠ NO

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 5) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610
Area Name: Baytown Plant	Customer Ref	ference No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise d

<b>▼</b> .r	or GO	г арр	lications, answer ONLY these questions unless otherwise directed.	
III.	Title	30 TA	AC Chapter 115 - Control of Air Pollution from Volatile Organic Com	pounds <i>(continued)</i>
	C.	Indu	strial Wastewater	
		1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140.  If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.	☐ YES ⊠ NO ☐ N/A
		2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area.  If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.	YES NO
		3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater).  If the response to Question III.C.3 is "YES," go to Section III.D.	☐ YES ☐ NO
		4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons).  If the response to Question III.C.4 is "YES," go to Section III.D.	☐ YES ☐ NO
		5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	☐ YES ☐ NO
		6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	☐ YES ☐ NO
		7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	☐ YES ☐ NO
	D.	Load	ling and Unloading of VOCs	
<b>•</b>		1.	The application area includes VOC loading operations.	⊠ YES □ NO
<b>•</b>		2.	The application area includes VOC transport vessel unloading operations.  For GOP applications, if the responses to Questions III.D.1 - D.2, are "NO," go to Section III.E.	⊠ YES □ NO

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 6) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

<b>♦</b>	For GOP	applications,	answer	ONLY	these	questions	unless	otherwise	directed.

<u> </u>	For GOP app	lications, answer ONLY these questions unless otherwise directed.	
III.	Title 30 TA	AC Chapter 115 - Control of Air Pollution from Volatile Organic Comp	ounds (continued)
	D. Load	ling and Unloading of VOCs (continued)	
•	3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	☐ YES ⊠ NO
	E. Fillin	ng of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispens	ing Facilities
<b>•</b>	1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container.  If the response to Question III.E.1 is "NO," go to Section III.F.	⊠ YES □ NO
•	2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	☐ YES ⊠ NO
•	3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent.  If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.	☐ YES ⊠ NO
•	4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10.  If the response to Question III.E.4 is "NO," go to Question III.E.9.	☐ YES ⊠ NO
•	5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	☐ YES ☐ NO
•	6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	☐ YES ☐ NO
<b>•</b>	7.	At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 125,000 gallons of gasoline in a calendar month after January 1, 1999. If the response to Question III.E.7 is "YES," go to Section III.F.	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 7) Federal Operating Permit Program

Date: 08/11/2	08/11/2015 RN No.: RN100211317 Permit No.: O-1610			O-1610				
Area Name: I	Baytov	vn Plant		Customer Reference No.: CN604683482				
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
III. Title	30 TA	C Chapter 115 - C	ontrol of Air Pollut	ion from Volatile O	rganic Comp	oounds (continued)		
E.	Fillin	g of Gasoline Stora	ge Vessels (Stage I)	for Motor Vehicle	Fuel Dispens	sing Facilities (continued)		
•	8.  If the	Hays, Travis, Willia stationary storage ta	amson, or Wilson Co anks greater than 100 d no more than 25,00 or December 31, 200		nade to a facility	☐ YES ☐ NO		
<b>•</b>	9.	fuel dispensing faci	lity which has dispe in any calendar mon	e tanks located at a m nsed no more than 10 th after January 1, 19 mber 15, 1992.	0,000	YES   NO		
•	10.	fuel dispensing faci gasoline in any cale	lity which has dispe	e tanks located at a m nsed more than 10,00 nuary 1, 1991 and for 15, 1992.	00 gallons of	☐ YES ⊠ NO		
<b>*</b>	11.		lity which commend	e tanks located at a m ced construction on o		☐ YES ⊠ NO		
•	12.	County, transfers ar	e made to stationary	aufman, Parker, or R v storage tanks locate 000 gallons of gasoli lendar month after	d at a	☐ YES ⊠ NO		
F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)						SOP applications for		
<b>*</b>	1.			otied of, gasoline at a or 115.224(2) withi		YES □ NO □ N/A		

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 8) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	317	Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference No.: CN604683482		
For SOP applications, answ  For GOP applications, answ	_		ected.	, , , , , , , , , , , , , , , , , , ,

Ш. Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued) Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued) 2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP ☐ YES ☒ NO ☐ N/A greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.  $\square$  YES  $\square$  NO  $\square$  N/A 3. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area. G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities ☐ YES 
☐ NO 
☐ N/A 1. The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H. 2. The application area includes facilities that began construction on or ☐ YES ☐ NO after November 15, 1992 and prior to May 16, 2012. 3. ☐ YES ☐ NO The application area includes facilities that began construction prior to November 15, 1992. If the response to Question III.G.2. and Question III.G.3. are both "NO," go to Section III.H. 4. The application area includes only facilities that have a monthly ☐ YES ☐ NO throughput of less than 10,000 gallons of gasoline. ☐ YES ☐ NO 5. The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 9) Federal Operating Permit Program

Date:	08/11/2	2015		RN No.: RN100211317		Permit No.: O-1610		
Area	Name:	Bayto	own Plant		Customer Reference No.: CN604683482			
			olications, answer AL plications, answer Ol		therwise directed. unless otherwise direc	cted.		
III.	Title	30 T	AC Chapter 115 - C	ontrol of Air Pollut	tion from Volatile O	rganic Com	pounds <i>(continued)</i>	
	н.	Con	trol Of Reid Vapor	Pressure (RVP) of	Gasoline			
<b>*</b>		1.	containers holding vehicle in El Paso	gasoline that may ul County.	tanks, reservoirs, or timately be used in a second or "N/A," go to		☐ YES ☐ NO ⊠ N/A	
•	—	2.		gasoline that will be	tanks, reservoirs, or used exclusively for		☐ YES ☐ NO	
•		3.	The application are	a includes a motor v	ehicle fuel dispensing	g facility.	☐ YES ☐ NO	
•		4.			tanks, reservoirs, or a nominal capacity of		☐ YES ☐ NO	
	I.	Pro	ocess Unit Turna	round and Vacu	um-Producing Sy	stems in	Petroleum Refineries	
		1.	The application are	a is located at a petr	oleum refinery.		☐ YES ⊠ NO	
	J.	Sur	face Coating Proces	ses (Complete this s	section for GOP appl	lications on	<b>(y.)</b>	
•		1.	located on-site and	in-place) that meet t	those performed on equition the exemption specifical (b)(1) are performed in the specifical (b)(1) are performed on equition (c)(1) are	ed in	☐ YES ☐ NO ☐ N/A	

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 10) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Referenc	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

<u> </u>	For GOP appl	lications, answer ONLY these questions unless otherwise directed.	
III.	Title 30 TA	AC Chapter 115 - Control of Air Pollution from Volatile Organic Comp	oounds <i>(continued)</i>
	K. Cutl	oack Asphalt	
	1.	Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency.  If the response to Question III.K.1 is "N/A," go to Section III.L.	☐ YES ⊠ NO ☐ N/A
	2.	The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	☐ YES ⊠ NO ☐ N/A
	3.	Asphalt emulsion is used or produced within the application area.	☐ YES ⊠ NO
	4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513.  If the response to Question III.K.4 is "NO," go to Section III.L.	☐ YES ⊠ NO
	5.	The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	☐ YES ☐ NO
	6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	☐ YES ☐ NO
	7.	The applicant using cutback asphalt is a state, municipal, or county agency.	☐ YES ☐ NO
L.	Degassing	of Storage Tanks, Transport Vessels and Marine Vessels	
<b>•</b>	1.	The application area includes degassing operations for stationary, marine, and/or transport vessels.  If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.	⊠ YES □ NO □ N/A
•	2.	Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area.  If the response to Question III.L.2 is "YES," go to Section III.M.	☐ YES ☒ NO ☐ N/A

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 11) Federal Operating Permit Program

Date:	: 08/11/2015 RN No.: RN100211317 Permit No.: O-1610			O-1610				
Area	Area Name: Baytown Plant Customer Reference No.: CN604683482					683482		
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
III.	Title 30	TAC Chapter 115 - C	ontrol of Air Pollut	ion from Volatile O	rganic Comp	oounds <i>(continued)</i>		
100	L. De	gassing of Storage Ta	nks, Transport Ves	sels and Marine Ve	ssels <i>(continu</i>	ed)		
•	3.	capacity of 1,000,00	00 gallons or more a	essels with a nominal nd a vapor space part is performed in the	tial pressure	⊠ YES □ NO □ N/A		
<b>•</b>	4.	capacity of 250,000 75,000 gallons and than 2.6 psia, and a	gallons or more, or storing materials with	essels with a nominal a nominal storage ca th a true vapor pressu pressure greater than olication area.	pacity of ire greater	⊠ YES □ NO □ N/A		
•	5.	8,000 gallons or mo	ore and a vapor space	th a nominal storage of partial pressure great named the application area	ater than or	⊠ YES □ NO		
•	6.	10,000 barrels (420	,000 gallons) or mor	a nominal storage care and a vapor space part of VOC is performed	partial	☐ YES ⊠ NO ☐ N/A		
•	7.	10,000 barrels (420	,000 gallons) and a vined damage as spec	a nominal storage ca vapor space partial pr ified in 30 TAC § 11	essure $\geq 0.5$	☐ YES ⊠ NO ☐ N/A		
	M. Pe	troleum Dry Cleaning	g Systems					
	1.		a contains one or mo etroleum based solve	ore petroleum dry cleants.	aning	☐ YES 図 NO ☐ N/A		

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 12) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610
Area Name: Baytown Plant	Cu	stomer Reference No.: CN604683482
For SOP applications, ar	iswer ALL questions unless otherv	vise directed.
♦ For GOP applications, as	nswer ONLY these questions unles	ss otherwise directed
		ss other wise an ecrea

I. Title	30 T <i>A</i>	AC Chapter 115 - Control of Air Pollution from Volatile Organic Comp	oounds (continued)					
N.	N. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC)							
	1.	The application area includes one or more vent gas streams containing HRVOC.	☐ YES ☐ NO ☐ N/A					
	2.	The application area includes one or more flares that emit or have the potential to emit HRVOC.  If the response to Question III.N.1. and III.N.2. are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.	☐ YES ⊠ NO ☐ N/A					
	3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	☐ YES ⊠ NO					
	4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times.  If the response to Questions III.N.3. and III.N.4. are both "NO," go to Section III.O.	☐ YES ⊠ NO					
	5.	The application area contains pressure relief valves that are not controlled by a flare.	☐ YES ☐ NO					
	6.	The application area has at least one vent stream which has no potential to emit HRVOC.	☐ YES ☐ NO					
	7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	☐ YES ☐ NO					
0.	Cool	ing Tower Heat Exchange Systems (HRVOC)						
energy to the second	1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	☐ YES ⊠ NO ☐ N/A					

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 13) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317	Permit No.: O-1610			
Area	a Name: Baytown Plant	Custon	ner Reference No.: CN604683482			
<b>♦</b>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					
IV.	IV. Title 30 TAC Chapter 117 - Control of Air Pollution from NITROGEN COMPOUNDS					
	A. Applicability	<b>V</b> W. T. Daniel and T.				

IV.	Title 30 T.	Title 30 TAC Chapter 117 - Control of Air Pollution from NITROGEN COMPOUNDS						
	A. App	licability						
•	1.	The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, Dallas/Fort Worth, or Dallas/Fort Worth Eight-Hour area.  For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.  For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F.  For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C. and IV.F.  For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.	⊠ YES □ NO					
	2.	The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln.  If the response to Question IV.A.2 is "YES," go to Question IV.H.1.	☐ YES ⊠ NO					
	3.	The application area includes a utility electric generator in an east or central Texas county.  See instructions for a list of counties included.  If the response to Question IV.A.3 is "YES," go to Question IV.G.1.  If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.	□ yes ⊠ no					
В.	Utility Ele	etric Generation in Ozone Nonattainment Areas						
	1.	The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300.  If the response to Question IV.B.1. is "NO," go to Question IV.C.1.	□ YES ⊠ NO					
	2.	The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	☐ YES ☐ NO					

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 14) Federal Operating Permit Program

Date: 08/11/2015				RN No.: RN100211	RN No.: RN100211317 Permit No.: C		
Area Name: Baytown Plant			own Plant	Customer Reference No.: CN604683482			683482
<b>♦</b>			olications, answer ALI olications, answer ON			cted.	
IV.	Title	30 T	AC Chapter 117 - C	ontrol of Air Pollu	tion from Nitrogen (	Compounds(c	continued)
	C.	Cor	nmercial, Institution	al, and Industrial S	Sources in Ozone No	onattainment	Areas
<b>•</b>		1.	Subchapter B and i 117.300, or 117.400 For SOP application Question IV.D.1.	ons, if the response to ons for GOP 517, if	ed in 30 TAC §§ 117  O Question IV.C.1. is	7.100, "NO," go to	⊠ YES □ NO
•		2.	The application are before November 1	a is located at a site to 5, 1992.	that was a major sou	rce of NO <sub>x</sub>	YES □ NO □ N/A
•		3.		a includes an electric estem Cap in 30 TAC		required to	☐ YES ⊠ NO
	D.	Adi	pic Acid Manufactu	ring			
		1.	The application are unit.	a is located at, or pa	rt of, an adipic acid p	production	☐ YES ⊠ NO ☐ N/A
	E.	Nit	ric Acid Manufac	turing - Ozone N	Nonattainment A	reas	
		1.	The application are	a is located at, or pa	rt of, a nitric acid pro	duction unit.	☐ YES ☒ NO ☐ N/A
	F.		nbustion Control at tionary Engines and		Dzone Nonattainmei	at Areas - Boi	lers, Process Heaters,
<b>*</b>		1.	the Houston/Galves For SOP application Question IV.H.1.	a is located at a site iston/Brazoria or Dallons, if the response to ons, if the response to	as/Fort Worth Eight- o Question IV.F.1 is	-Hour areas. "NO," go to	□ YES ⊠ NO

The application area is located in the Houston/Galveston/Brazoria area

and has units that qualify for an exemption under 30 TAC § 117.2003(a).

Section VI.

2.

☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 15) Federal Operating Permit Program

Date	: 08/11/2	015	RN No.: RN100211317 Permit No.: O-1610			O-1610	
Area	Area Name: Baytown Plant Customer Reference No.: CN604683482				683482		
<b>♦</b>			lications, answer ALI plications, answer ON				
IV.	Title	30 T.	AC Chapter 117 - Co	ontrol of Air Pollut	ion from Nitrog	gen Compounds <i>(</i>	continued)
	F.		ibustion Control at l	CALCAL CONTRACTOR OF CONTRACTO	CALLED TO THE SECOND OF THE SE	ment Areas - Bo	ilers, Process Heaters,
•	3. The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).			☐ YES ☐ NO			
•	4. The application area is located in the Dallas/Fort Worth Eight-Hour area and has units that qualify for an exemption under 30 TAC § 117.2103.			☐ YES ☐ NO			
•		5.		a has units subject to 17.2010 or 30 TAC		ecifications	☐ YES ☐ NO
	G.	Utili	ity Electric Generati	on in East and Cen	tral Texas		
		1.	stationary gas turbinducts) that were pla	a includes utility elemes (including duct baced into service before the service before the service in the service before the service before the service in the service before the servic	ourners used in to ore December 31	urbine exhaust , 1995.	☐ YES ☐ NO
		2.	The application are § 117.3020.	a is complying with	the System Cap	in 30 TAC	☐ YES ☐ NO
	Ħ.	Mul	ti-Region Combusti	on Control - Water	Heaters, Small	Boilers, and Pro	cess Heaters
		1.	installer of natural a maximum rated c	a includes a manuface gas fired water heate apacity of 2.0 MMB uestion IV.H.1. is "N	rs, boilers or pro tu/hr or less.	cess heaters with	☐ YES ⊠ NO
		2.		oilers or process hea qualify for an exem			☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 16) Federal Operating Permit Program

				The second secon		
Date: 08/11/2015 RN No.: RN10021			317	Permit No.:	O-1610	
Area	Name: Bayto	wn Plant	* · · · · · · · · · · · · · · · · · · ·	Customer Reference No.: CN604683482		
<b>♦</b>		lications, answer ALI lications, answer ON	-		ected.	
v.		ode of Federal Regu Standards for Consu			tional Volatil	e Organic Compound
		part B – National Vo tings	olatile Organic Con	pound Emission S	tandards for	Automobile Refinish
	1.	1 1	a manufactures autor s and sells or distribu Jnited States.		_	☐ YES ⊠ NO
	2.	components, manuf	a imports automobile actured on or after Jatings or coating conquestions V.A.1 and	anuary 11, 1999, an aponents in the Unit	d sells or ted States.	□ YES ⊠ NO
	3.	or imported by the	nish coatings or coat application area mee L§ 59.100(c)(1) - (6)	t one or more of the		☐ YES ☐ NO
	B. Subj	part C – National Vo	olatile Organic Con	npound Emission S	standards for	Consumer Products
	1.	The application are distribution in the U	a manufactures cons Inited States.	umer products for s	ale or	☐ YES ⊠ NO
	2.		a imports consumer 1998 and sells or disted States.			☐ YES ⊠ NO
	3.	appears on the label	a is a distributor of color of one or more of the Ouestions V.B.1 - V.I	ne products.		☐ YES ⊠ NO

All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in

Section V.C.

40 CFR § 59.201(c)(1) - (7).

4.

☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 17) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	317		Permit No.: O-1	1610
Area Name: Baytov	wn Plant	Custome	er Referenc	e No.: CN60468	3482
	lications, answer ALL questions unless ot lications, answer ONLY these questions u			cted.	
	ode of Federal Regulations Part 59 (40 o Standards for Consumer and Commerc	<b>265</b> ************************************	CONTRACTOR OF A SECURITION OF	ional Volatile O	rganic Compound
C. Subp	oart D – National Volatile Organic Con	npound I	Emission S	tandards for Ar	chitectural Coatings
1.	The application area manufactures or imor distribution in the United States.	ports arc	hitectural c	oatings for sale	☐ YES ⊠ NO
2.	The application area manufactures or in registered under the Federal Insecticide, If the responses to Questions V.C.1 and V.D.	Fungicio	le, and Rod	enticide Act.	□ YES ⊠ NO
3.	All architectural coatings manufactured meet one or more of the exemptions spe (5).				☐ YES ☐ NO
D. <u>Sub</u>	<u>oart E – National Volatile Organic Con</u>	pound I	Emission St	tandards for Ae	rosol Coatings
1.	The application area manufactures of products for sale or distribution in the			coating	☐ YES ⊠ NO
2.	The application area is a distributor distribution in the United States.	of aeros	ol coatings	for resale or	☐ YES ⊠ NO
E. Subj	oart F – Control of Evaporative Emissic	ons Fron	n New and	In-Use Portable	e Fuel Containers
1.	The application area manufactures or in sale or distribution in the United States.  If the response to Question V.E.1 is "NO			containers for	☐ YES ⊠ NO
2.	All portable fuel containers manufacture area meet one or more of the exemption (c).				☐ YES ☐ NO
VI. Title 40 Co	ode of Federal Regulations Part 60 - Ne	w Sourc	e Performa	ince Standards	
A. Appl	licability	Aug Care			
<b>♦</b> 1.	The application area includes a unit(s) the 40 CFR Part 60 subparts.  If the response to Question VI.A.1 is "N	·			⊠ YES □ NO
B. Subj	part Y - Standards of Performance for	Coal Pre	paration a	nd Processing P	Plants
· 1.	The application area is located at a coal If the response to Question VI.B.1 is "N		-		☐ YES ⊠ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 18) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN10021131	7	Permit No.: O-1610
Area Name: Baytown Plant	Cı	ustomer Reference	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed.

<b>♦</b>	For GOP app	lications, answer ONLY these questions unless otherwise directed.	
VI.	Title 40 Co	ode of Federal Regulations Part 60 - New Source Performance Standar	ds (continued)
	B. Subp	oart Y - Standards of Performance for Coal Preparation and Processin	g Plants (continued)
	2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd).  If the response to Question VI.B.2 is "NO," go to Section VI.C.	☐ YES ☐ NO
	3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option.  If the response to Question VI.B.3. is "YES," go to Section VI.C.	☐ YES ☐ NO
	4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility.  If the response to Question VI.B.4. is "NO," go to Section VI.C.	☐ YES ☐ NO
	5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	☐ YES ☐ NO
	C. Subp	oart GG - Standards of Performance for Stationary Gas Turbines (GO	P applicants only)
•	1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.	☐ YES ☐ NO ☐ N/A
•	2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. If the response to Question VI.C.2 Is "NO," go to Section VI.D.	☐ YES ☐ NO
•	3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	☐ YES ☐ NO
•	4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 19) Federal Operating Permit Program

Date: 08/11/2015 RN No.: RN			RN No.: RN100211	1317	Permit No.:	O-1610	
Are	a Name:	Bayto	wn Plant		Customer R	eference No.: CN604	1683482
<b>♦</b>			lications, answer ALI lications, answer ON	-			
VI.	Title	40 C	ode of Federal Regu	lations Part 60 - No	ew Source Po	erformance Standar	ds (continued)
	C.	XII.07.00.000.00	part GG - Standard tinued)	s of Performance fo	r Stationary	Gas Turbines (GO	P applicants only)
•		5.		nary gas turbines sub application area is in gen oxides.			☐ YES ☐ NO
	D.	Subj	part XX - Standards	s of Performance fo	r Bulk Gaso	line Terminals	
		1.		a includes bulk gaso Question VI.D.1 is "N		_	☐ YES ☒ NO ☐ N/A
		2.	One or more of the December 17, 1980	loading racks were	constructed o	r modified after	☐ YES ☐ NO
	Ē,	2004 (1000) (100 (100)	part LLL - Standard ) Emissions	ds of Performance 1	for Onshore	Natural Gas Proces	sing: Sulfur Dioxide
•		1.	§ 60.640(a) that pro For SOP application Section VI.F.	ons, if the response t	shore). o Question V	I.E.1 is "NO," go to	□ YES ⊠ NO
•		2.	January 20, 1984 at For SOP application Section VI.F.	ies commenced considered on or before Augustins, if the response to the consequence ons, if the response to the consequence ons.	ust 23, 2011. o Question V	I.E.2. is "NO," go to	☐ YES ☐ NO
•		3.	capacity greater that hydrogen sulfide by For SOP application Section VI.F.	a includes a gas swe an or equal to 2 long ut operates at less that ons, if the response to ons, if the response to	tons per day an 2 LTPD. o Question V.	(LTPD) of I.E.3. is "NO," go to	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 20) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482	

Are	a Name: Bayte	own Plant Customer Ref	Customer Reference No.: CN604683482				
<b>♦</b>		plications, answer ALL questions unless otherwise director plications, answer ONLY these questions unless otherwis					
VI.	Title 40 (	Code of Federal Regulations Part 60 - New Source Per	formance Standar	ds (continued)			
		opart LLL - Standards of Performance for Onshore N 0 <sub>2</sub> ) Emissions <i>(continued)</i>	atural Gas Proces	sing: Sulfur Dioxide			
•	4.	Federally enforceable operating limits have been estable preconstruction authorization limiting the gas sweeten than 2 LPTD.  For SOP applications, if the response to Question VI.I. Section VI.F.  For GOP applications, if the response to Question VI. to Section VI.H.	ing unit to less E.4. is "NO," go to	☐ YES ☐ NO			
<b>*</b>	5.	Please provide the Unit ID(s) for the gas sweetening usenforceable operating limits in the space provided below		blished federally			
	F. Sul	opart OOO - Standards of Performance for Nonmetal	lic Mineral Proces	sing Plants			
	1.	The application area includes affected facilities identify \$60.670(a)(1) that are located at a fixed or portable not processing plant.  If the response to Question VI.F.1 is "NO," go to Sect	onmetallic mineral	☐ YES ⊠ NO			
	2.	Affected facilities identified in 40 CFR § 60.670(a)(1) application area are subject to 40 CFR Part 60, Subpar		☐ YES ☐ NO			
		opart QQQ - Standards of Performance for VOC Emi stewater Systems	ssions from Petrol	eum Refinery			
	1.	The application area is located at a petroleum refinery or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modificati reconstruction was commenced after May 4, 1987.  If the response to Question VI.G.1 is "NO," go to Section 1.5 is "NO," go	on, or	☐ YES ⊠ NO			
	2.	The application area includes storm water sewer system	ms.	☐ YES ☐ NO			

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 21) Federal Operating Permit Program

Date: 08/11/2015			RN No.: RN100211	.: RN100211317 Permit No.: 0		O-1610			
Area Name:	Baytov	vn Plant		Customer Reference	ustomer Reference No.: CN604683482				
			L questions unless of ILY these questions u		ected.				
VI. Title	71. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)								
G.		oart QQQ - Standar tewater Systems <i>(co</i>	ds of Performance ntinued)	for VOC Emission	s from Petrol	eum Refinery			
	3. The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.					☐ YES ☐ NO			
	4.	The application are	a includes non-conta	ct cooling water sys	stems.	☐ YES ☐ NO			
	5.	П.Н.	☐ YES ☐ NO						
	6.	* *	a includes one or mo specified in 40 CFR		systems that	☐ YES ☐ NO			
	7.	The application are	a includes completel	y closed drain syste	ms.	☐ YES ☐ NO			
<b>H.</b>	Whi	ch Construction Co	ards of Performance mmenced After Au nced on or After Ju	gust 30, 1999 or fo					
<b>*</b>	1.	incineration unit, of If the response to Q	a includes at least on ther than an air curta Question VI.H.1. is "I on VI.H.1. is "NO," g	in incinerator.  N/A," go to Section	VI.I. If the	☐ YES ⊠ NO ☐ N/A			
<b>*</b>	2.	incineration unit, of	a includes at least on ther than an air curta modified or reconstr	in incinerator, const	ructed after	☐ YES ☐ NO			
<b>*</b>	3.	incineration unit, of	a includes at least on ther than an air curta ad not modified or re	in incinerator, const	ructed before	☐ YES ☐ NO			
<b>•</b>	4.		a includes at least on see to Question VI.H.			☐ YES ☒ NO			

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 22) Federal Operating Permit Program

Date	e: 08/11/2015		RN No.: RN100211	317	Permit No.:	O-1610		
Are	a Name: Bayt	town Plant		Customer Reference No.: CN604683482				
<b>♦</b>		oplications, answer ALI oplications, answer ON	cted.					
VI.	Title 40	Code of Federal Regu	lations Part 60 - Ne	w Source Performa	nce Standar	ds (continued)		
	H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004							
<b>♦</b>	5.	constructed after A after June 6, 2006.	ugust 30, 1999 or mo	ne air curtain incinera odified or reconstruct NO," go to Question	ed on or	☐ YES ☐ NO		
•	6.			nfter August 30, 1999 ne 6, 2006 combust c		☐ YES ☐ NO		
<b>*</b>	7.		August 30, 1999 and	ne air curtain incinera I not modified or reco		☐ YES ☐ NO		
•	8.			pefore August 30, 19 ne 6, 2006 combust o		☐ YES ☐ NO		
	Inc	bpart CCCC - Standa cineration Units for W odification or Reconst	hich Construction	Commenced After	November 3	20.000.02.000040094.0094.0094.0004.00940.004.0095.004.004.004.004.004.004.004.004.004.00		
•	1.		a includes at least on init, other than an air	ne commercial or indurence or indurence or indurence or industrial or incinerator.	ustrial solid	☐ YES ⊠ NO ☐ N/A		

If the response to Question VI.I.1. is "N/A," go to Section VI.J. If the

The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after

response to Question VI.I.1. is "NO," go to Question VI.I.4.

June 1, 2001.

2.

YES NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 23) Federal Operating Permit Program

Date	: 08/11/2015		RN No.: RN100211	Permit No.: 0		O-1610
Area	Name: Baytov	wn Plant		Customer Reference	e No.: CN604	683482
<b>♦</b>	~ ~	lications, answer ALI lications, answer ON	_	herwise directed. unless otherwise dire	cted.	
VI.	Title 40 Co	ode of Federal Regu	lations Part 60 - Ne	w Source Performa	nce Standar	ds (continued)
	Inch	ieration Units for <mark>V</mark>	Vhich Construction	e for Commercial a Commenced After ed on or After June	November 3	0, 1999 or for Which
•	3.	waste incineration	unit, other than an air	ne commercial or indurence or indurence or indurence or reconstructed or r	constructed	☐ YES ☐ NO
•	4.	~ ~		ne air curtain incinera O," go to Section VI.		☐ YES ⊠ NO
<b>*</b>	5.	constructed after N after June 1, 2001.		ne air curtain incinera modified or reconstr O," go to VI.I.7.		☐ YES ☐ NO
<b>*</b>	6.	modified or reconst	tructed on or after Ju	after November 30, 1 ne 1, 2001 combust of mixture of these mate	only wood	☐ YES ☐ NO
•	7.		November 30, 1999	ne air curtain incinera and not modified or	tor,	☐ YES ☐ NO
•	8.	not modified or rec	onstructed on or afte	before November 30, or June 1, 2001 combo e or a mixture of thes	ust only	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 24) Federal Operating Permit Program

Date	: 08/11/2	2015		RN No.: RN100211	1317	Permit No.:	D-1610
Area	Name:	Bayto	wn Plant		Customer	Reference No.: CN604	683482
<b>♦</b>	For GC	P apj	olications, answer AL plications, answer Ol	NLY these questions t	unless other	wise directed.	
VI.	VI. Title 40 Code of Federal Regulations Part 60 - New Source Performance Standard  J. Subpart EEEE - Standards of Performance for Other Solid Waste Incinerat  Construction Commenced After December 9, 2004 or for Which Modification  Commenced on or After June 16, 2006						tion Units for Which
•		1.	incineration unit or incinerator.  If the response to Q	ea includes at least on institutional incineral puestion VI.J.1. is "Non VI.J.1. is "NO," g	ation unit, o	other than an air curtain Section VII. If the	☐ YES ⊠ NO ☐ N/A
<b>*</b>		2.	incineration unit, o	a includes at least or ther than an air curta or modified or recon	in incinerat		YES NO
•		3.	incineration unit, o	a includes at least or ther than an air curta and not modified or	in incinerat	or, constructed before	☐ YES ☐ NO
<b>*</b>		4.		ea includes at least or Question VI.J.4. is "N			☐ YES ⊠ NO
<b>*</b>		5.	constructed after D after June 16, 2006	ea includes at least or recember 9, 2004 or recember 9, 2005.	nodified or	reconstructed on or	☐ YES ☐ NO
<b>♦</b>		6.	modified or recons	nerators constructed a tructed on or after Ju er, or yard waste or a	ne 16, 2006	combust only wood	☐ YES ☐ NO

The application area includes at least one air curtain incinerator

constructed before December 9, 2004 and not modified or reconstructed

on or after June 16, 2006.

7.

☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 25) Federal Operating Permit Program

Date:	Date: 08/11/2015			RN No.: RN10021	1317	Permit No.: C	D-1610
Area ]	Name: E	Bayto	wn Plant		Customer	Reference No.: CN6046	583482
			lications, answer ALl blications, answer ON				
VI.	Title	40 C	ode of Federal Regu	lations Part 60 - No	ew Source I	Performance Standard	ls (NSPS) (continued)
77	J.	Con		ed After December	9, 2004 or	Solid Waste Incinerat for Which Modification	
<b>*</b>		8. All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.				☐ YES ☐ NO	
<b>•</b>		9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.			☐ YES ☐ NO	
<b>•</b>		10.	The air curtain incir clean lumber, or ya			per day of wood waste, naterials.	☐ YES ☐ NO
VII.	Title	40 C	ode of Federal Regu	lations Part 61 - N	ational Em	ission Standards for H	azardous Air Pollutants
	A.	App	licability				
<b>•</b>		1.	CFR Part 61 subpar	rts.		ct to one or more 40 A," go to Section VIII.	☐ YES ⊠ NO ☐ N/A
	В.	Sub	part F - National En	nission Standard fo	r Vinyl Ch	loride	
		1.	The application are dichloride by reacti vinyl chloride by ar any fraction of poly	on of oxygen and hy ny process, and/or or	drogen chlone or more p		☐ YES ☐ NO
	. C.					Emissions for Equipm for GOP applications (	
<b>*</b>		1.	The application are	a includes equipmer	nt in benzen	e service.	☐ YES ☐ NO ☐ N/A

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 26) Federal Operating Permit Program

Date: 08/11/2015 RN No.: RN1			1317	Permit No.: O-1610		
Area Name: Bayto	wn Plant		Customer Reference No.: CN604683482			
	oplications, answer A pplications, answer C			irected.		
VII. Title 40 Co	organical administration and table 100 to	lations Part 61 - Na	ational Emission Sta	andards for H	azardous Air Pollutants	
	part L – National En its <i>(continued)</i>	nission Standard fo	or Benzen <del>e</del> Emissio	ns from Coke	By-Product Recovery	
1.	includes one or mor § 61.130(a) - (b).	e of the affected sou	e by-product recovery urces identified in 40 NO," go to Section V	CFR	☐ YES ☐ NO	
2.	2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).					
3.	The application area § 61.243-1 and 40 C		ply with the provision	ons of 40 CFR	☐ YES ☐ NO	
E. Sub	part M - National Ei	nission Standard f	or Asbestos	<b>X</b>		
Арр	licability					
1.	1. The application area includes sources, operations, or activities sin 40 CFR §§ 61.143, .144, .146, 147, .148, or .155.  If the response to Question VII.E.1 is "NO," go to Section VII.F.				☐ YES ☐ NO	
Roa	dway Construction					
2.	The application area asbestos tailings or	•	constructed or main waste material.	tained with	☐ YES ☐ NO	
Mar	ufacturing Comme	cial Asbestos				
3.	commercial asbesto	S.	cturing operation using NO, " go to Question		☐ YES ☐ NO	
	a. Visible emiss manufacturin		to outside air from the	ne	☐ YES ☐ NO	
	= 1	at has received prior	nd waste treatment n r U.S. Environmental		☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 27) Federal Operating Permit Program

	DATA DATAONALIST D		Pormit No : O 1610			
Date: 08/11/2015		KN No.: RN100211	RN No.: RN100211317 Permit		ermit No.: O-1610	
Area Name: Baytown Plant	t		Customer Reference	No.: CN6046	583482	
For SOP applications  ◆ For GOP application.				cted.		
VII. Title 40 Code of F	'ederal Regu	lations Part 61 - Na	tional Emission Sta	ndards for H	azardous Air Pollutants	
E. Subpart M	- National Er	nission Standard fo	or Asbestos (continu	ed)		
		rcial Asbestos (cont	7 (2008) 10 (2009) 17 (2009)			
	Asbestos-con forms.	taining waste materi	al is processed into n	on-friable	☐ YES ☐ NO	
d.	Asbestos-con	taining waste materi	al is adequately wette	ed.	☐ YES ☐ NO	
	Alternative fi approval.	Itering equipment is	being used that has r	received EPA	☐ YES ☐ NO	
			HEPA) filter is being icient for 0.3 micron		☐ YES ☐ NO	
			of wet collectors designergy of at least 9.95 k		☐ YES ☐ NO	
Asbestos Sp	oray Applicat	tion				
materi	als are spray	applied.	s in which asbestos-c	_	☐ YES ☐ NO	
	binder during	g spraying and are no se to Question VII.E.	with a bituminous or of friable after drying.  4.a is "YES," go to		☐ YES ☐ NO	
			gs, structures, pipes, a ore than 1% asbestos.		☐ YES ☐ NO	
		re emission control a nat has received prior	nd waste treatment m r EPA approval.	nethod is	☐ YES ☐ NO	

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 28) Federal Operating Permit Program

Date: 08/11/2015	Date: 08/11/2015 RN No.: RN1002			Permit No.: O-1610		
Area Name: Baytown Plant		Customer Reference	e No.: CN6040	683482		
	nswer ALL questions unleanswer ONLY these questi		cted.			
VII. Title 40 Code of Fed (continued)						
E. Subpart M - N	ational Emission Standa	rd for Asbestos (continu	sed)			
Asbestos Spra	y Application (continued)					
	bestos-containing waste mms.	aterial is processed into r	on-friable	YES NO		
e. As	bestos-containing waste m	aterial is adequately wett	ed.	☐ YES ☐ NO		
ľ	ernative filtering equipme proval.	nt is being used that has r	received EPA	☐ YES ☐ NO		
	HEPA filter is being used to icient for 0.3 micron particular.		ast 99.97%	☐ YES ☐ NO		
	e EPA has authorized the urrate with a unit contacting			☐ YES ☐ NO		
Fabricating Co	ommercial Asbestos					
asbestos.	cation area includes a fabroonse to Question VII.E.5			☐ YES ☐ NO		
	sible emissions are dischar nufacturing operation.	ged to outside air from th	е	☐ YES ☐ NO		
ł	alternative emission contr ng used that has received p		ethod is	☐ YES ☐ NO		
	bestos-containing waste m ms.	aterial is processed into n	on-friable	☐ YES ☐ NO		
d. Asi	bestos-containing waste m	aterial is adequately wette	ed.	☐ YES ☐ NO		
	ernative filtering equipment proval.	nt is being used that has r	eceived EPA	☐ YES ☐ NO		

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 29) Federal Operating Permit Program

Date: 08/11/20	Date: 08/11/2015 RN No.: RN1002				Permit No: O-1610		
Area Name: B	Baytow	n Plant		Customer Reference No.: CN604683482			
			L questions unless ot ILY these questions i	herwise directed. Inless otherwise dire	cted.		
	40 Co inued)		llations Part 61 - Na	tional Emission Sta	ndards for H	azardous Air Pollutants	
A Control of the Cont	Fabri	icating Commercia	l Asbestos <i>(continue</i>	ed)			
			er is being used that i 0.3 micron particles.	s certified to be at le	ast 99.97%	☐ YES ☐ NO	
		g. The EPA has operate with	authorized the use of a unit contacting ene	of wet collectors designergy of at least 9.95 k	gned to ilopascals.	☐ YES ☐ NO	
	Non-	sprayed Asbestos I	nsulation				
	6.		naterials) that are eit	materials (other than her molded and friab		☐ YES ☐ NO	
	Asbe	stos Conversion					
	7.		and asbestos-contain	s that convert regulat ning waste material i		☐ YES ☐ NO	
F.		art P - National En Metallic Arsenic Pr		r Inorganic Arsenic	Emissions fr	om Arsenic Trioxide	
	1.	an arsenic trioxide	ea is located at a meta plant that processes l ting condensation pro	allic arsenic production allic arsenic beaucess.	on plant or at aring	☐ YES ☐ NO	
G.		eart BB - National I Pations	Emission Standard	for Benzene Emissio	ons from Benz	zene Transfer	
	1.	bulk terminal.		zene production facil		☐ YES ☐ NO	
	2.	The application are loading racks.	ea includes benzene t	ransfer operations at	marine vessel	☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 30) Federal Operating Permit Program

Date: 0	08/11/2	2015		RN No.: RN100211317 Permit No		Permit No.:	: O-1610	
Area N	Jame: ]	Bayto	wn Plant		Customer Reference No.: CN604683482			
			lications, answer ALI plications, answer ON	•		cted.		
VII.			ode of Federal Regu s <i>(continued)</i>	ılations Part 61 - Na	ational Emission Sta	ındards for	Hazardous Air	
	G.		part BB - National l erations <i>(continued)</i>	enzene Transfer				
		3.	The application are loading racks.	ea includes benzene t	ransfer operations at	railcar	☐ YES ☐ NO	
		4.	The application are loading racks.	ea includes benzene t	ransfer operations at	tank-truck	☐ YES ☐ NO	
	H.	Sub	part FF - National I	Operations				
		App	olicability					
		1.			al manufacturing plan finery facility as defi		☐ YES ☐ NO	
		2.	and disposal (TSD)	) facility site as descr	ardous waste treatment ribed in 40 CFR § 61 and VII.H.2 are both '	.340(b).	☐ YES ☐ NO	
		3.	wastes, products, b	yproducts, or interme	that has no benzene of ediates. YES," go to Section		☐ YES ☐ NO	
		4.			having a total annual megagram per year (		☐ YES ☐ NO	

quantity from facility waste less than 1 megagram per year (Mg/yr). If the response to Question VII.H.4 is "YES", go to Section VIII

The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less

If the response to Question VII.H.5 is "YES," go to Section VIII.

than 10 Mg/yr.

5.

☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 31) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317		Permit No.: O-1610		
Area Name: Baytov	wn Plant		Customer Reference	No.: CN6046	583482	
	lications, answer ALI lications, answer ON			cted.		
AMMAYAHAN MAKAHAMAN ALAMAYA A	VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)					
H. Subj	part FF - National E	mission Standard f	or Benzene Waste (	Operations (co	ontinued)	
Арр	licability <i>(continued</i>					
6.		annual average benz based on documenta	zene concentration of ation.	each waste	☐ YES ☐ NO	
7. The application area has waste streams with flow-weighted annual average water content of 10% or greater.				☐ YES ☐ NO		
Waste Stream Exemptions						
8.		(c)(2) (the flow-weight	that meet the exempt ghted annual average		☐ YES ☐ NO	
9.	in 40 CFR § 61.342	2(c)(3) because proce	that meet the exempt ess wastewater has a wastewater quantity	flow rate less	☐ YES ☐ NO	
10.		2(c)(3) because the to	that meet the exempt otal annual benzene q		☐ YES ☐ NO	
11.	The application are facility.	a transfers waste off-	-site for treatment by	another	☐ YES ☐ NO	
12.	The application are	a is complying with	40 CFR § 61.342(d).		☐ YES ☐ NO	
13.			40 CFR § 61.342(e). "NO," go to Questic		☐ YES ☐ NO	
14.		a has facility waste vent of less than 10%.	with a flow weighted	annual	☐ YES ☐ NO	

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 32) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482	

			lications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.	
VII.		40 Co tinued	ode of Federal Regulations Part 61 - National Emission Standards for H )	azardous Air Pollutants
	Н.	Subp	oart FF - National Emission Standard for Benzene Waste Operations (co	ontinued)
		Cont	tainer Requirements	
		15.	The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste.  If the response to Question VII.H.15 is "NO," go to Question VII.H.18.	☐ YES ☐ NO
		16.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers.  If the response to Question VII.H.16 is "YES," go to Question VII.H.18.	☐ YES ☐ NO
		17.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐ YES ☐ NO
		Indiv	vidual Drain Systems	
		18.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste.  If the response to Question VII.H.18 is "NO," go to Question VII.H.25.	☐ YES ☐ NO
		19.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems.  If the response to Question VII.H.19 is "YES," go to Question VII.H.25.	☐ YES ☐ NO
		20.	The application area has individual drain systems complying with 40 CFR § 61.346(a).  If the response to Question VII.H.20 is "NO," go to Question VII.H.22.	☐ YES ☐ NO
		21.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 33) Federal Operating Permit Program

Date: 08/11/2015				RN No.: RN100211317 Per		Permit No.: C	Permit No.: O-1610	
Area Name: Baytown Plant				-	Customer Reference No.: CN604683482			
			lications, answer ALI blications, answer ON					
VII.	Title (cont			lations Part 61 - Na	tional Emis	ssion Standards for H	azardous Air Pollutants	
	H.	Subj	part FF - National E	mission Standard f	or Benzene	Waste Operations (co	ontinued)	
		Indi	vidual Drain System	is				
		22.	40 CFR § 61.346(b)	a has individual drain ). Puestion VII.H.22 is '	•	• •	☐ YES ☐ NO	
	23. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.				☐ YES ☐ NO			
		24.	4. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.			☐ YES ☐ NO		
		Remediation Activities						
		25.	Remediation activit CFR Part 61, Subpa	ies take place at the art FF.	application a	area subject to 40	☐ YES ☐ NO	
VIII.			ode of Federal Regu Categories	lations Part 63 - Na	rtional Emis	ssion Standards for H	azardous Air Pollutants	
	A.	App	licability		4.4			
•		1.	40 CFR Part 63 sub reference under sub	a includes a unit(s) the parts other than subpoparts in 40 CFR Part 40 CFR Part 63 sub	parts made a t 60, 61 or 6	pplicable by 3.	☐ YES ⊠ NO	
	В.		part F - National En anic Chemical Man			Hazardous Air Pollut	ants from the Synthetic	
		1.	defined in the Feder	a is located at a plant ral Clean Air Act § 1 Puestion VIII.B.1. is	12(a).		□ YES ⊠ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 34) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	317	Permit No.: C	D-1610
Area Name: Baytown Plant		Customer Reference No.: CN604683482		
For SOP applications, answer  ◆ For GOP applications, answer	_		cted.	
VIII. Title 40 Code of Federal F for Source Categories (con		tional Emission Sta	indards for H	azardous Air Pollutants
	l Emission Standards fo Manufacturing Industry		ous Air Pollut	ants from the Synthetic
manufacturing manufactures a 40 CFR § 63.10	n area is located at a site to process unit, as defined it is a primary product one could be sold by a primary product one could be sold by a primary product one could be sold by a primary product on the sold by a primary product o	n 40 CFR § 63.101, or more of the chemi	that cals listed in	☐ YES ☐ NO
manufacturing manufactures a 40 CFR § 63.10 manufactures a	n area is located at a site to process unit, as defined it is a primary product one of 100(b)(1)(i) or (b)(1)(ii). at is a product, or co-product ollutants listed in table 2	or 40 CFR § 63.101, for more of the chemical reactant of the or more of the	that cals listed in or corganic	☐ YES ☐ NO
defined in 40 C or more of the and uses as a re	n area includes a chemica EFR § 63.101, that manufachemicals listed in 40 CF eactant or manufactures a ganic hazardous air pollut t F.	actures as a primary R § 63.100(b)(1)(i) of a product, or co-product, or co-product, or co-product.	product one or (b)(1)(ii) oduct, one or	☐ YES ☐ NO
defined in 40 C or more of the and does <u>not</u> us one or more of CFR Part 63, S	n area includes a chemica CFR § 63.101, that manufachemicals listed in 40 CF are as a reactant or manufathe organic hazardous air ubpart F. to Questions VIII.B.3., B	actures as a primary R § 63.100(b)(1)(i) of acture as a product, or pollutants listed in	product one or (b)(1)(ii) or co-product, table 2 of 40	☐ YES ☐ NO

Section VIII.D.

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 35) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211	317	Permit No.: C	)-1610	
Area Name: Ba	ytown Plant		Customer Refere	ence No.: CN6046	583482	
	applications, answer ALI applications, answer ON					
LIF DO SON MANAGEMENT OF THE STATE OF THE ST	0 Code of Federal Regu urce Categories <i>(continu</i>		tional Emission	Standards for H	azardous Air Pollutants	
	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater					
aneres	Applicability		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
1	Subpart F and the a transfer racks, or wa process subject to 4	a is located at a site to a site to a site to pplication area inclustant associated CFR 63, Subpart For the control of the site of the sit	des process vents ted with a chemic F.	s, storage vessels, al manufacturing	☐ YES ☐ NO	
2		a includes fixed roof ply with 40 CFR § 6		enclosures that	☐ YES ☐ NO	
3	systems that are req	a includes vapor coll uired to comply with puestion VIII.C.3 is "	h 40 CFR § 63.14	18.	☐ YES ☐ NO	
4		a includes vapor coll		r closed-vent	☐ YES ☐ NO	
5	systems that contain from a control device	a includes vapor coll n bypass lines that co ce and to the atmosp Question VIII.C.5 is "	ould divert a vent here.	stream away	☐ YES ☐ NO	
	Vapor Collection and Cl	losed Vent Systems				
6		installed, calibrated, lines in the applicat		operated at the	☐ YES ☐ NO	
7		application area are lock-and-key type co		osed position	☐ YES ☐ NO	

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 36) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN10021	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytown Plant Customer Reference No.: CN604683482			83482			
<b>♦</b>		applications, answer applications, answer	•		rected.	
VIII.	kataŭ (2000) Synkara kindan mana kindan ki	Code of Federal Reg ce Categories <i>(contir</i>		ational Emission Sta	indards for H	azardous Air Pollutants
	Oı	bpart G - National F ganic Chemical Mar perations, and Waste	nufacturing Industry			ants from the Synthetic ls, Transfer
	Tr	ansfer Racks		AREST STORES		
	8.	The application an HAPs.	rea includes Group 1	transfer racks that loa	d organic	☐ YES ☐ NO
	Pr	ocess Wastewater St	reams			
	9.		rea includes process v Question VIII.C.9 is		ı VIII.C.31.	☐ YES ☐ NO
	10	subject to the prov	rea includes process visions of 40 CFR Par Question VIII.C.10 is	t 61, Subpart FF.		☐ YES ☐ NO
	11		rea includes process v 0 CFR §§ 63.110(e)(1		at are	☐ YES ☐ NO
	12	subject to the prov	rea includes process visions of 40 CFR Par Question VIII.C.12 is	t 61, Subpart F.		☐ YES ☐ NO
	13		rea includes process v n specified in 40 CFR		ilizing the	☐ YES ☐ NO
	14	subject to the prov	rea includes process visions of 40 CFR Par Question VIII.C.14 is	rts 260 through 272.		☐ YES ☐ NO
	15	. The application as 40 CFR § 63.110(	rea includes process v (e)(2)(i).	vastewater streams co	omplying with	☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 37) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317		Permit No.:	Permit No.: O-1610			
Area Name: Baytown Plant Customer			Customer Referen	nce No.: CN604	683482			
		L questions unless ot NLY these questions t		rected.				
Orga	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)							
Proc	ess Wastewater Str	eams	TANKS OF THE STREET		100 March 1980 March 1			
16.	The application are 40 CFR § 63.110(e)	includes process wa (2)(ii).	stewater streams c	omplying with	☐ YES ☐ NO			
17.	existing sources, th	ea includes process wat are designated as ounder 40 CFR § 63.19 compounds.	Group 1; are requir	red to be	☐ YES ☐ NO			
18.	The application are existing sources that	ea includes process wat are Group 2.	astewater streams,	located at	☐ YES ☐ NO			
19.	new sources, that a	ea includes process were designated as Gro CFR § 63.110; or are compounds.	up 1; required to be	e treated as	☐ YES ☐ NO			
20.		ea includes process we Group 2 for both T			☐ YES ☐ NO			
21.	total source mass fl	water streams at the slow rate of less than Question VIII.C.21. is	1 MG/yr.	ed to have a	☐ YES ☐ NO			
22.	streams demonstrat MG/yr.	ted and/or partially to ted to have a total so Question VIII.C.22. is	urce mass flow rate		☐ YES ☐ NO			
23.		ea includes waste ma treated Group 1 was			☐ YES ☐ NO			

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 38) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317		Permit No.: O-1610			
Area Name: Ba	aytow	n Plant		Customer Reference No.: CN604683482			
			L questions unless ot ILY these questions i	herwise directed. ınless otherwise dire	cted.		
		de of Federal Regu Categories <i>(continu</i>		itional Emission Sta	ndards for I	Iazardous Air Pollutants	
	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Syntheti Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater <i>(continued)</i>						
j	Proce	ess Wastewater Str	eams (continued)				
	24. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.				☐ YES ☐ NO		
	25. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation.  If the response to Question VIII.C.24 - VIII.C.25 is both "NO," go to Question VIII.C.27.			☐ YES ☐ NO			
	26.	manage a Group 1 v Group 1 wastewater	wastewater stream or r stream prior to ship Question VIII.C.24 - 1	nagement units that reason rates a residual removed oment or transport.  VIII.C.25 is both "NO	from a	☐ YES ☐ NO	
27. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.				☐ YES ☐ NO			
	Drains						
	28.	manage a Group 1 vastewate	wastewater stream or r stream.	I drain systems that rer a residual removed "NO," go to Question	from a	☐ YES ☐ NO	

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 39) Federal Operating Permit Program

Date: 08/11/2015			RN No.: RN100211317		Permit No.: O-1610			
Area Name: I	Baytov	vn Plant		Customer Reference	e No.: CN604	683482		
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.								
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>							
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollu- Organic Chemical Manufacturing Industry for Process Vents, Storage Vess Operations, and Wastewater (continued)								
	Drai	ns (continued)						
	29. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.			☐ YES ☐ NO				
	30. The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.			☐ YES ☐ NO				
	31. The application area includes drains, drain hubs, manholes, lift stations trenches, or pipes that are part of a chemical manufacturing process un that meets the criteria of 40 CFR § 63.100(b).  If the response to Question VIII.C.31 is "NO," go to Question VIII.C.3		process unit	☐ YES ☐ NO				
32. The application area includes drains, drain hubs, manholes, lift trenches or pipes (that are part of a chemical manufacturing protection that meet the criteria listed in 40 CFR § 63.149(d).  If the response to Question VIII.C.32 is "NO," go to Question		process unit)	☐ YES ☐ NO					
	33.	trenches, or pipes the concentration great	hat convey water wit er than or equal to 10	ain hubs, manholes, th a total annual aver 0,000 parts per millio Subpart G, Table 9,	age on by weight	☐ YES ☐ NO		

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 40) Federal Operating Permit Program

Date: 08/11/	2015	RN No.: RN100211	317	Permit No.: O-1610		
Area Name:	Baytown Plant		Customer Reference No.: CN604683482			
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.  VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)						
C.		ufacturing Industry		us Air Pollutants from the Synthetic Storage Vessels, Transfer Operation,		
Dra	ins (continued)					

for So	urce Categories (continued)	
	Subpart G-National Emission Standards for Organic Hazardous Air Pollut Organic Chemical Manufacturing Industry for Process Vents, Storage Ves and Wastewater <i>(continued)</i>	
Drain	s (continued)	STANKEN LANDERS IN PART
	34. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	☐ YES ☐ NO
	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐ YES ☐ NO
Gas S	ireams	
	36. The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	☐ YES ☐ NO
	37. The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	☐ YES ☐ NO
X X X X X X X X X X X X X X X X X X X	Subpart N - National Emission Standards for Chromium Emissions From l Chromium Electroplating and Chromium Anodizing Tanks	Hard and Decorative
	1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	☐ YES ⊠ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 41) Federal Operating Permit Program

Date: 08/11/2015	RN No.:	RN No.: RN100211317   Permit N		Permit No.: (	o.: O-1610	
Area Name: Baytowr	n Plant	(	Customer Referenc	e No.: CN604	683482	
	ations, answer ALL question cations, answer ONLY these			ected.		
	e of Federal Regulations F Categories <i>(continued)</i>	'art 63 - Nat	ional Emission Sta	andards for H	lazardous Air Pollutants	
E. Subpa	rt O - Ethylene Oxide Emi	issions Stand	lards for Steriliza	tion Facilities	<b>Ja</b>	
i	The application area include is used in the sterilization or if the response to Question I	fumigation o	of materials.	-	☐ YES ⊠ NO	
	Sterilization facilities locate CFR Part 63, Subpart O. If the response to Question 1				☐ YES ☐ NO	
	The sterilization source has exide within all consecutive			-	☐ YES ☐ NO	
	The sterilization source has oxide within all consecutive				☐ YES ☐ NO	
F. Subpa	rt Q - National Emission S	Standards fo	r Industrial Proce	ss Cooling To	owers	
	The application area include  If the response to Question 1				⊠ YES □ NO	
ř	Chromium-based water treat September 8, 1994.	ment chemic	als have been used	on or after	☐ YES ⊠ NO	
Baganghagangan bahas telahanti tuni, Yanggalan 🖚 1999	rt R - National Emission S Gasoline Terminals and P	34	3010.0.00.00.00000000000000000000000000	ution Faciliti	es a la l	
1.	The application area include	s a bulk gaso	line terminal.		☐ YES ☒ NO	
į	The application area include If the responses to Question to Section VIII.H.			"NO," go	☐ YES ⊠ NO	
1	The bulk gasoline terminal of a contiguous area and under terminal or a pipeline breakout the response to Question	common cor out station.	ntrol with another b	ulk gasoline	☐ YES ☐ NO	

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 42) Federal Operating Permit Program

Date: 08/11/2015 RN No.: RN10021		317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference	e No.: CN604683482

			lications, answer ALL questions unless otherwise directed.  olications, answer ONLY these questions unless otherwise directed.					
VIII.	Title	40 C	ode of Federal Regulations Part 63 - National Emission Standards for I e Categories <i>(continued)</i>	Hazardous Air Pollutants				
	G.	****	bpart R - National Emission Standards for Gasoline Distribution Facilities ulk Gasoline Terminals and Pipeline Breakout Stations) (continued)					
		4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs.  If the response to Question VIII.G.4 is "YES," go to Question VIII.G.9.	☐ YES ☐ NO				
		5.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep).  If the response to Question VIII.G.5 is "NO," go to Question VIII.G.9.	☐ YES ☐ NO ☐N/A				
		6.	Emissions screening factor less than 0.5 (ET or EP < 0.5).  If the response to Question VIII.G.6 is "YES," go to Section VIII.H.	☐ YES ☐ NO ☐N/A				
		7.	Emissions screening factor greater than or equal to 0.5, but less than $1.0 \ (0.5 \le \text{ET or EP} < 1.0)$ .  If the response to Question VIII.G.7 is "YES", go to Section VIII.H	☐ YES ☐ NO ☐N/A				
		8.	Emissions screening factor greater than or equal to 1.0 (ET or EP $\geq$ 1.0). If the response to Question VIII.G.8 is "YES," go to Question VIII.G.10.	☐ YES ☐ NO ☐N/A				
		9.	The site at which the application area is located is a major source of HAP.  If the response to Question VIII.G.9 is "NO", go to Section VIII.H	☐ YES ☐ NO				
		10.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	☐ YES ☐ NO				

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 43) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317		Permit No.: O-1610			
Area Name: Baytown	Plant		Customer Reference	No.: CN6046	583482		
	•	questions unless of LY these questions i	herwise directed. Inless otherwise direc	cted.			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>							
H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry							
p, a:	aperboard and are s defined in 40 CF	located at a plant site R § 63.2.	that produce pulp, page that is a major sour	ce of HAPs	□ YES ⊠ NO		
§	63.440(a)(1) - (3).		materials specified in the materials specified in the materials with the materials and the materials are materials.		☐ YES ☐ NO		
6	3, Subpart S that a	re existing sources.	re sources subject to		☐ YES ☐ NO		
	he application area xisting sources.	a includes one or mo	ore kraft pulping syste	ems that are	☐ YES ☐ NO		
	* *		ore dissolving-grade t aft or sulfite pulping	_	☐ YES ☐ NO		
a: P	nd are complying v rogram for Effluer	with the Voluntary Ant Limitation Guidel	systems that are exist dvanced Technology ines in 40 CFR § 430 (NO," go to Section 1)	Incentives 0.24.	☐ YES ☐ NO		
	he application area 0 CFR § 63.440(d)		systems that are con	plying with	☐ YES ☐ NO		
4	he application area 0 CFR § 63.440(d)	_	systems that are con	plying with	☐ YES ☐ NO		

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 44) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211317		Permit No.: O-1610
Area Name: Baytown Plant	·	Customer Reference	e No.: CN604683482

For SOP applications, answer ALL questions unless otherwise directed

			lications, answer ALL questions unless otherwise airectea.  lications, answer ONLY these questions unless otherwise directed.						
VIII.	7III. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)								
	I. Subpart T - National Emission Standards for Halogenated Solvent Cleaning								
		1.	The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	☐ YES ⊠ NO					
		2.	The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	☐ YES ⊠ NO					
		3.	The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	☐ YES ⊠ NO					
	J.		oart U - National Emission Standards for Hazardous Air Pollutant Emis mers and Resins	ssions: Group 1					
		1.	The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units.  If the response to Question VIII.J.1 is "NO," go to Section VIII.K.	☐ YES ⊠ NO					
		2.	Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U.  If the response to Question VIII.J.2 is "NO," go to Section VIII.K.	☐ YES ☐ NO					
		3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	☐ YES ☐ NO					
2	_	4.	The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	☐ YES ☐ NO					

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 45) Federal Operating Permit Program

Date: 08/11/2015	_	RN No.: RN100211317		Permit No.: O-1610	
Area Name: Baytov	vn Plant		Customer Reference	e No.: CN604	683482
4.4	ications, answer ALI lications, answer ON	•		cted.	
	ode of Federal Regu Categories <i>(continu</i>		ntional Emission Sta	ndards for I	Hazardous Air Pollutants
	oart U - National En mers and Resins <i>(co</i>		or Hazardous Air P	'ollutant Emi	issions: Group 1
5.	total source mass fl	ow rate of less than	ite are demonstrated 1 MG/yr. 'YES," go to Questio		☐ YES ☐ NO
6.	streams demonstrat 1 MG/yr.	ed to have a total so	reated Group 1 waste urce mass flow rate of "NO," go to Question	of less than	☐ YES ☐ NO
7.			nagement units that r tewater stream prior		☐ YES ☐ NO
8.	wastewater streams is not owned or ope	are transferred to an	removed from Ground on-site treatment of or operator of the sou	peration that	☐ YES ☐ NO
9.	wastewater streams	are transferred to ar	removed from Ground off-site treatment of II.J.9 are both "NO,	peration.	☐ YES ☐ NO
10.	manage a Group 1		nagement units that r r a residual removed oment or transport.		☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 46) Federal Operating Permit Program

					*****		
Date: 08/11/2015		RN No.: RN100211	317	Permit No.:	O-1610		
Area Name: Bay	town Plant		Customer Reference No.: CN604683482				
	oplications, answer AL oplications, answer ON			ected.			
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)						
	J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)						
Co	ntainers						
11.		a includes containers r stream or a residua			☐ YES ☐ NO		
Dr	ains						
12.	manage a Group 1 Group 1 wastewate	a includes individual wastewater stream or r stream. Question VIII.J.12. is	a residual removed	from a	☐ YES ☐ NO		
13.	complying with 40	a includes individual CFR § 63.136 throug systems and control	gh the use of cover a		☐ YES ☐ NO		
14.		a includes individual CFR § 63.136 throug or plugs.			☐ YES ☐ NO		
15.	trenches, or pipes th	a includes drains, dra hat are part of an elas Question VIII.J.15 is	stomer product proce	ess unit.	☐ YES ☐ NO		
16.	trenches or pipes th § 63.501(a)(12).	a includes drains, dra at meet the criteria li	isted in 40 CFR § 63	3.149(d) and	☐ YES ☐ NO		

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 47) Federal Operating Permit Program

Date: 08/11/2015 R		RN No.: RN100211317 Permit No.		Permit No.:	.: O-1610			
Area Name: Baytowi	n Plant		Customer Referenc	e No.: CN604	683482			
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)								
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins <i>(continued)</i>								
Drains	Drains (continued)							
17. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.				☐ YES ☐ NO				
1	trenches or pipes the concentration greate of compounds meet	a includes drains, dra at convey water with er than or equal to 1, ing the definition of l average flow rate g	a total annual avera 000 parts per million organic HAP in 40 0	nge n by weight CFR §	□ YES □ NO			
	trenches or pipes that new affected sour conveys water with equal to 10 parts pedefinition of organic	a includes drains, dra at are part of an elast ce or part of a new a a total annual averag r million by weight o c HAP in 40 CFR § an or equal to 0.02 li	tomer product proce ffected source and the ge concentration gree of compounds meeting 63.482, at an average	ss unit that is he equipment ater than or ng the	☐ YES ☐ NO			
		mission Standards I on Polyamides Pro		Pollutants fo	r Epoxy Resins			
	of wet strength resid	basic liquid epoxy rans (WSR) is conduct buestion VIII.K.1 is "	ed in the application	area.	☐ YES ⊠ NO ☐ N/A			
	The application are development facility	a includes a BLR and y.	d/or WSR research a	and	☐ YES ☐ NO			

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 48) Federal Operating Permit Program

Date: 08/11/2015				RN No.: RN100211317		Permit No.: O-1610		
Area N	Vame:	Bayto	wn Plant	•	Customer Reference	e No.: CN60	04683482	
		~ ~	olications, answer ALI Colications, answer ON	•		cted.		
VIII.	. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>							
let En	L.	Same and the	part X - National En lting	nission Standards f	or <b>Hazardous Ai</b> r P	ollutants fr	om Secondary Lead	
	1. The application area includes one or more of CFR § 63.541(a) that are located at a second If the response to Question VIII.L. 1 is "NO VIII.M.				condary lead smelter	•	☐ YES ☒ NO ☐ N/A	
		2. The application area is using and approved alternate to of § 63.545(c)(1)-(5) for control of fugitive dust emiss					☐ YES ☐ NO	
	М.	Sub	part Y - National Er	ssel Loadin	g Operations			
		1.		a includes marine tar CFR § 63.560 and lo § 63.561.			☐ YES ⊠ NO	
	N.	Subpart CC - National Emission Standards for Ha Refineries (continued)			for Hazardous Air	Pollutants	from Petroleum	
		App	licability	okulta (katapuni				
		1.	related emission po 40 CFR § 63.640(c)	a includes petroleum ints that are specified (1) - (c)(7). Question VIII.N.1 is "	d in		☐ YES ⊠ NO	
		2.	within the application 40 CFR § 63.640(g)	ing process units/and on area are specified )(1) - (g)(7). Puestion VIII.N.2 is "	in	-	☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 49) Federal Operating Permit Program

Date: 08/11/2015 RN No.: RN100211317 Permit No.		: O-1610						
Area Name: Bayı	town Plant		Customer Reference	No.: CN60	4683482			
♦ For GOP a	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.  VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants							
	ce Categories (continu							
	bpart CC - National I fineries <i>(continued)</i>	Emission Standards	for Hazardous Air	Pollutants	from Petroleum			
Ap	oplicability (continued	)						
3.	defined in the Feder	ral Clean Air Act § 1	t site that is a major s 12(a). NO," go to Section		☐ YES ☐ NO			
4.	equipment containitable 1 of 40 CFR F	ng/contacting one or Part 63, Subpart CC.	t site which emits or more of the HAPs li 'NO," go to Section	sted in	☐ YES ☐ NO			
5.	conveyed, stored, o that also receives st	r treated in a wastew reams subject to the	vastewater streams the vater stream manager provisions of 40 CFI vater provisions secti	nent unit R	☐ YES ☐ NO			
6.	conveyed, stored, o that also receives st	r treated in a wastew reams subject to the	wastewater streams the vater stream manager provisions of 40 CF water provisions sections	nent unit R	☐ YES ☐ NO			
7.	that are conveyed, smanagement unit the 40 CFR §§ 63.133 section.	stored, or treated in a nat also receives stre - 63.147 of Subpart (	or Group 2 wastewater wastewater stream ams subject to the programmer of wastewater provision?" go to Section	ovisions of ons	☐ YES ☐ NO			
8.		a includes Group 1 o with 40 CFR § 63.64	or Group 2 wastewate 40(o)(2)(i).	er streams	☐ YES ☐ NO			

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 50) Federal Operating Permit Program

Date: 08/11/20	ate: 08/11/2015   RN No.: RN100211317   Permit No.: O-1610		: O-1610			
Area Name: Ba	aytowr	n Plant		Customer Reference No.: CN604683482		
			L questions unless of ILY these questions u		ected.	
		le of Federal Regul Categories <i>(continu</i>		tional Emission Sta	andards for	Hazardous Air Pollutants
		ort CC - National E pries <i>(continued)</i>	Emission Standards	for Hazardous Air	Pollutants	from Petroleum
1	Applic	ability (continued)				
ç	t	that are complying	a includes Group 1 o with 40 CFR § 63.64 Juestion VIII.N.9 is "	10(o)(2)(ii).		☐ YES ☐ NO
1	10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.				☐ YES ☐ NO	
(	Contai	iners, Drains, and	other Appurtenanc	ces		
1	r		a includes containers CFR § 63.135 as a re			☐ YES ☐ NO
12. The application area includes individual dra to the requirements of 40 CFR § 63.136 as 40 CFR § 63.640(o)(2)(ii).					☐ YES ☐ NO	
0. 8	Subpa	rt DD - National F	Emission Standards	for Off-site Waste	and Recove	ry Operations
1	r § <i>J</i>	meets the criteria fo § 63.680(b)(1).	a is located at a plant or off-site material as the street on VIII.O.1 is	specified in 40 CFR	<b>.</b>	☐ YES ⊠ NO ☐ N/A
2		Materials specified application area.	in 40 CFR § 63.680(	(b)(2) are received at	the	☐ YES ☐ NO
3			a has a waste manage d is regulated under 4			☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 51) Federal Operating Permit Program

Date: 08/11/2015	ate: 08/11/2015 RN No.: RN100211317 Permit No.:		: O-1610		
Area Name: Baytov	Area Name: Baytown Plant Customer Reference No.: CN60			No.: CN60	4683482
	ications, answer ALI lications, answer ON		herwise directed. unless otherwise dire	cted.	
Fio6/00/companyed/company company of the company of	ode of Federal Regu Categories <i>(continu</i>		itional Emission Sta	ndards for	Hazardous Air Pollutants
O. Subp	oart DD - National I	Emission Standards	for Off-site Waste	and Recove	ry Operations (continued)
4. The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(6) or 265.1(c)(10).			☐ YES ☐ NO		
5.	5. The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a "state" or "municipality."			☐ YES ☐ NO	
6.	6. The predominant activity in the application area is the treatment of wastewater received from off-site.			☐ YES ☐ NO	
7.	7. The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).			☐ YES ☐ NO	
8. The application area has a reprocesses used solvent va chemical, petroleum, or to use air emission control Part 61.		lvent which is an off um, or other manufa	f-site material and is cturing process that i	not part of s required	☐ YES ☐ NO
9. The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).			☐ YES ☐ NO		
. 10.	of HAPs in the off-	site material is less t	where the total annual han 1 megagram per "YES," go to Section	year.	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 52) Federal Operating Permit Program

Date: 08/11/2015			RN No.: RN100211317 Permit No.		Permit No.:	O-1610
Area Name: Baytown Plant				Customer Reference	e No.: CN60	4683482
		lications, answer ALI lications, answer ON			cted.	
VIII.		ode of Federal Regu Categories <i>(continu</i>		itional Emission Sta	indards for	Hazardous Air Pollutants
	O. Subj	oart DD - National l	Emission Standards	for Off-site Waste	and Recove	ry Operations (continued)
	11.	concentration less t combined with mat or greater.	han 500 ppmw at the erials having a VOH Question VIII.O.11 is	terials with average to point of delivery the AP concentration of "NO," go to	at are not	☐ YES ☐ NO
	12.	VOHAP concentrate	tion is determined by	direct measurement	•	☐ YES ☐ NO
	13.	VOHAP concentrat	tion is based on know	vledge of the off-site	material.	☐ YES ☐ NO
	14.	compressor, and ag system, open-ended system.	itator, pressure relief I valve or line, valve Question VIII.O.14 is	nent component that if device, sampling co, connector or instrur	nnection	☐ YES ☐ NO
	15.			tion area contains or ion greater than or eq		☐ YES ☐ NO
	16.		ponent in the applica during a 12-month po	tion area is intended eriod.	to operate	YES NO
	17.	The application are site material.	a includes containers	s that manage non-ex	empt off-	☐ YES ☐ NO

The application area includes individual drain systems that manage

non-exempt off-site materials.

18.

☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 53) Federal Operating Permit Program

Date	Date: 08/11/2015 RN No.: RN100211317 Permit No.: C		.: O-1610						
Area Name: Baytown Plant Customer Reference No.: CN604683482						04683482			
<b>♦</b>		ications, answer ALI lications, answer ON		therwise directed. unless otherwise dire	cted.				
VIII	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)								
	P. Subp	art GG - National l	Emission Standards	s for Aerospace Ma	nufacturin	g and Rework Facilities			
	1.	commercial, civil, o	or military aerospace	that manufacture or revehicles or compone 'NO" or "N/A," go to	ents.	☐ YES ⊠ NO ☐ N/A			
	2.		a includes one or mo \$ \ \ 63.741(c)(1) - (7)	ore of the affected so.).	urces	☐ YES ☐ NO			
		oart HH - National I Production Facilitie		s for Hazardous Aiı	r Pollutant	s From Oil and Natural			
<b>♦</b>	1.	hydrocarbon liquids		that process, upgrade oil and natural gas pr ansfer.		☐ YES ⊠ NO			
<b>♦</b>	2.	natural gas prior to transmission and sto user. For SOP applicatio VIII.Q.2. is "NO," For GOP application	the point at which no orage source categorous, if the response to go to Section VIII.R.	to both Question VIII	natural gas a final end	☐ YES ⊠ NO			
•	3.	store or transfer bla For SOP application go to Section VIII.R	ck oil as defined in tons, if the response to the constant to the constant if the response to the constant if the response to the constant is the constant to the constant in	ities that exclusively § 63.761. o Question VIII.Q.3. to Question VIII.Q.3.	is "YES,"	☐ YES ☐ NO			
<b>*</b>	4.		a is located at a site question VIII.Q.4. is	that is a major source "NO," go to	e of HAP.	☐ YES ☐ NO			

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 54) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610					
Area Name: Baytown Plant	Customer	Reference No.: CN604683482					
For SOP applications, answer ALL questions uplace otherwise directed							

			lications, answer ALL questions unless otherwise directed. Dications, answer ONLY these questions unless otherwise directed.							
VIII.		Title 40 Code of Federal Regulations Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>								
	Q.		Subpart – HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities							
•		5.	The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft <sup>3</sup> ) per day and a facility-wide actual annual average hydrocarbon liquid throughput less the 39,700 liters (10,487.6 gallons) per day. For SOP applications, if the response to Question VIII.Q.5. is "YES," go to Section VIII.R.  For GOP applications, if the response to Question VIII.Q.5. is "YES," go to Section VIII.Z.  If the response to Question VIII.Q.5. is "NO," go to Question VIII.Q.7.	☐ YES ☐ NO						
•		6.	The application area includes a triethylene glycol (TEG) dehydration unit.  For SOP applications, f the answer to Question VIII.Q.6. is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6. is "NO," go to Section VIII.Z.	☐ YES ☐ NO						
•		7.	The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	☐ YES ☐ NO						
<b>♦</b>		8.	The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	☐ YES ☐ NO						
•		9.	Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput.	☐ YES ☐ NO						

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 55) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317 Permit No.: O-1610		o.: O-1610		
Area Name: Baytown Plant	Custo	Customer Reference No.: CN604683482			
	er ALL questions unless otherwisd er ONLY these questions unless d				
VIII. Title 40 Code of Federal for Source Categories (c	Regulations Part 63 - National ontinued)	Emission Standards fo	or Hazardous Air Pollutants		
R. Subpart II - Nation	nal Emission Standards for Ship	pbuilding and Ship Re	pair (Surface Coating)		
1. The application of the response of the resp	☐ YES ⊠ NO				
	or ship repair operations located i 40 CFR Part 63, Subpart II.	☐ YES ☐ NO			
S. Subpart JJ - Natio (continued)	nal Emission Standards for Wo	od Furniture Manufa	cturing Operations		
operations an operations.	on area includes wood furniture madder wood furniture component made to Question VIII.S.1 is "NO" of	nanufacturing	☐ YES ⊠ NO ☐ N/A		
	on area meets the definition of an as defined in 40 CFR § 63.801.	"incidental wood	☐ YES ☐ NO		
T. Subpart KK - Nati	onal Emission Standards for th	e Printing and Publish	ning Industry		
	on area includes publication rotog ogravure, or wide-web flexograp		☐ YES ⊠ NO ☐N/A		
U. Subpart PP - Natio	onal Emission Standards for Co	ntainers			
Part 60, 61, o Subpart PP fo	on area includes containers for what of the control of air emissions. The control of air emissions of the Control of III. U. 1 is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III. U. I is "NO," to the control of III.	40 CFR Part 63,	☐ YES ⊠ NO		
2. The application controls.	on area includes containers using	Container Level 1	☐ YES ☐ NO		
3. The application Level 2 contractions	on area includes containers using ols.	Container	☐ YES ☐ NO		

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 56) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317 Permit No.		t No.: O-1610		
Area Name: Bay	Area Name: Baytown plant			Customer Reference No.: CN604683482		
	applications, answer AL applications, answer Ol			irected.		
	Code of Federal Regu rce Categories <i>(continu</i>		tional Emission S	Standards fo	r Hazardous Air Pollutants	
U. S	ubpart PP - National F	imission Standards	for Containers (d	ontinued)		
4	. The application are controls.	a includes containers	s using Container l	Level 3	☐ YES ☐ NO	
v. s	ubpart RR - National )	Emission Standards	for Individual D	rain Systems		
1	another 40 CFR Pa	a includes individual rt 60, 61, or 63 subpa art RR for the contro	art references the u		☐ YES ⊠ NO	
	ubpart YY - National l eneric Maximum Ach	<u>                                      </u>	-GUG 3-3-444 USB \$-70 ft - 1 Julium 10 0000 00000000000000000000000000000	/TUL 570 / 006348866866666666633333	for Source Categories -	
1.	an acrylic and mod	a includes an acetal acrylic fiber product 103(b)(3)(i); or an e	ion process unit co	mplying	☐ YES ⊠ NO	
2	from an acetal resin modacrylic fiber pr § 63.1103(b)(3)(i);	a includes process was production process unit or an existing polycar puestions VIII.W.1. at V.W.20	s unit; an acrylic and it complying with a arbonate production	nd 40 CFR n process.	□ YES ⊠ NO	
3.		a includes process w p 1 or are determined CFR § 63.132(c).			☐ YES ☐ NO	
4		a includes process w roup 2 under the req			☐ YES ☐ NO	
5	-	vater streams at the s ow rate of less than		to have a	☐ YES ☐ NO	
6	streams demonstrat l MG/yr.	ted and/or partially tred to have a total sou	urce mass flow rate		☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 57) Federal Operating Permit Program

Date: 08/11/2015 RN No			RN No.: RN100211317 Permit No		No.: O-1610			
Area Name: B	a Name: Baytown Plant Customer Reference No.: CN604683482			504683482				
			L questions unless ot NLY these questions t					
		ode of Federal Regu Categories <i>(continu</i>		itional Emi	ssion Standards fo	r Hazardous Air Pollutants		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards								
	7.	The application are manage a partially during treatment.	a includes waste material treated Group 1 wast	nagement ui ewater strea	nits that receive or am prior to or	☐ YES ☐ NO		
	8. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.					☐ YES ☐ NO		
	9.	wastewater streams	er streams or residual s are transferred to ar Question VIII.W.8. an	off-site tre	atment operation.	☐ YES ☐ NO		
	10.	manage a Group 1	a includes waste ma wastewater stream or or stream prior to ship	r a residual :	removed from a	YES NO		
	11.		a includes containers ter stream or a residu			☐ YES ☐ NO		
	12.	manage, or treat a G from a Group 1 wa	Question VIII.W.12. i	stream or a	residual removed	☐ YES ☐ NO		
	13.	complying with 40	ea includes individua CFR § 63.136 throu systems and control	gh the use o		☐ YES ☐ NO		
	14.		ea includes individua CFR § 63.136 throu or plugs.	•		☐ YES ☐ NO		

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 58) Federal Operating Permit Program

Date: 08/11/2015   RN No.: RN100211317   Permit No.				.: O-1610				
Area Name: Baytown Plant Customer Reference No.: CN604683482						04683482		
		lications, answer AL. lications, answer Ol	-	therwise directed. unless otherwise dire	cted.			
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	\$1000000000000000000000000000000000000	ode of Federal Regu Categories (continu		ational Emission Sta	ındards fo	r Hazardous Air Pollutants		
130 22 T	W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards							
	15.	stations, trenches, or process unit; an acr complying with 40 polycarbonate prod	or pipes that are part ylic and modacrylic CFR § 63.1103(b)(3 action process unit.	ain hubs, manholes, lof an acetal resins profiber production proficion; or an existing s "NO," go to Questi	oduction cess unit	☐ YES ☐ NO		
	16.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3).  If the response to Question VIII.W.16. Is "NO," go to Question VIII.W.20.			☐ YES ☐ NO			
	17.	stations, trenches o average concentration by weight of compositions.	r pipes that convey vion greater than or ec	ain hubs, manholes, lavater with a total ann qual to 10,000 parts pefinition of organic Hat any flow rate.	ual er million	☐ YES ☐ NO		
	18.	stations, trenches of average concentration by weight of competer Table 9 to 40 CFR	r pipes that convey vion greater than or ecounds meeting the de	ain hubs, manholes, leater with a total ann qual to 1,000 parts perfinition of organic Hat an annual average anute.	ual er million IAP in	☐ YES ☐ NO		

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 59) Federal Operating Permit Program

Date: 08/11/2015	ate: 08/11/2015 RN No.: RN100211317 Permit No.		Permit No.	it No.: O-1610				
Area Name: Baytown	Area Name: Baytown Plant Customer Reference No.: CN604683482				04683482			
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
	VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)							
			for Hazardous Air hnology Standards		for Source Categories -			
s a a v t	stations, trenches or and modacrylic fil affected source or is water with a total ar to 10 ppmw of com Table 9 to 40 CFR I	pipes that are part of per production pro- s a new affected sound inual average concer- pounds meeting the	ain hubs, manholes, lof an acrylic resins of cess unit that is part of the equipment of the equipment of the equipment of the equipment at an average annual that the equipment of the equipment	or acrylic of a new at conveys or equal HAP in	☐ YES ☐ NO			
20.	The application area	a includes an ethyler	ne production process	s unit.	☐ YES ☒ NO ☐N/A			
e Į	ethylene production	process unit. Suestions VIII.W.20.	ams generated from and VIII.W.21. are b		☐ YES ⊠ NO ☐N/A			
<u> </u>	CFR § 63.1103(e),	Table 7(g)(1). Juestion VIII.W.22. is	e of the chemicals list "NO," go to	sted in 40	☐ YES ☐ NO			
ļ		transferred off-site duestion VIII.W.23. is			☐ YES ☐ NO			
Į Į	waste stream(s) pric	or to transfer off-site uestion VIII.W.24. is		or manage	☐ YES ☐ NO			

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 60) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610
Area Name: Baytown Plant	Customer	r Reference No.: CN604683482
	er ALL questions unless otherwise di ver ONLY these questions unless othe	
VIII. Title 40 Code of Federal for Source Categories (c		nission Standards for Hazardous Air Pollutants

VIII.	SAMANAMA SISSESSION SAMANA	itle 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants r Source Categories <i>(continued)</i>					
	w.	V. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards					
		25.	The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	☐ YES ☐ NO			
		26.	The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). If the response to Question VIII.W.26. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO			
		27.	The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control.  If the response to Question VIII.W.27. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO			
		28.	The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s).  If the response to Question VIII.W.28. is "NO," go to Question VIII.W.33	☐ YES ☐ NO			
		29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	☐ YES ☐ NO			
		30.	The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream.  If the response to Question VIII.W.30. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO			
		31.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐ YES ☐ NO			

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 61) Federal Operating Permit Program

Date: 08/11/20	15	RN No.: RN10021	RN No.: RN100211317 Permit No.		o.: O-1610	
Area Name: Baytown Plant			Customer Reference No.: CN604683482			
For SOP  For GOP	ected.					
	0 Code of Federal Repure Categories (conti		ational Emission St	andards for	Hazardous Air Pollutants	
	Subpart YY - Nationa Generic Maximum Ac	00000000000000000000000000000000000000	Control of the Contro	Control of the second control of the	for Source Categories -	
3	complying with 4 tightly fitting cap	Question VIII.W.32.	igh the use of water s		☐ YES ☐ NO	
3	that receive a con	rea has containers, as tinuous butadiene wa <i>Question VIII.W.33.</i>	ste stream.	61.341,	☐ YES ☐ NO	
3	40 CFR § 61.345	rea is an alternate mearequirements for con Question VIII.W.34.	tainers.	meet the	☐ YES ☐ NO	
3		d-vent systems used fraintained at a pressur			☐ YES ☐ NO	
3	CFR § 61.341, th stream.	rea has individual dra at receive or manage Question VIII.W.36. 43.	a continuous butadie		☐ YES ☐ NO	
	the 40 CFR § 61.	rea is using an alterna 346 requirements for <i>Question VIII.W.37</i> . 43.	individual drain syste		YES NO	

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REO1 (Page 62) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610				
Area Name: Baytown Plant	Customer	Customer Reference No.: CN604683482				
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						

For GOP applications, answer ONLY these questions unless otherwise directed VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued) Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories -W. Generic Maximum Achievable Control Technology Standards  $\square$  YES  $\square$  NO 38. The application area has individual drain systems complying with 40 CFR § 61.346(a). If the response to Question VIII.W.38. is "NO," go to Ouestion VIII.W.40. 39. Covers and closed-vent systems used for individual drain systems ☐ YES ☐ NO operate such that the individual drain system is maintained at a pressure less than atmospheric pressure. ☐ YES ☐ NO 40. The application area has individual drain systems complying with 40 CFR § 61.346(b). If the response to Question VIII.W.40. is "NO," go to Ouestion VIII.W.43. ☐ YES ☐ NO 41. Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation. 42. ☐ YES ☐ NO Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device. 43. The application area has at least one waste stream that contains ☐ YES ☐ NO benzene. If the response to Question VIII.W.43. is "NO," go to Question VIII.W.54.  $\square$  YES  $\square$  NO 44. The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. If the response to Question VIII.W.44. is "NO," go to Ouestion VIII.W.47. ☐ YES ☐ NO 45. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. If the response to Question VIII.W.45. is "YES," go to Question VIII.W.47.

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 63) Federal Operating Permit Program

Date: 08/11/2015	e: 08/11/2015 RN No.: RN100211317 Permit No.: O-1610			.: O-1610	
Area Name: Baytow	rea Name: Baytown Plant Customer Reference No.: CN604683482				
	ications, answer ALI lications, answer ON			ected	
	ode of Federal Regu Categories <i>(continu</i>		tional Emission St	andards for	Hazardous Air Pollutants
	oart YY - National F eric Maximum Achi				for Source Categories -
46.		vent systems used for intained at a pressure			☐ YES ☐ NO
47.	CFR § 61.341, that benzene.	a has individual drain receive or manage a Question VIII.W.47. is	waste stream conta		☐ YES ☐ NO
48.	the 40 CFR § 61.34	a is using an alternate for in Question VIII.W.48. is	ndividual drain syste		☐ YES ☐ NO
49.	CFR § 61.346(a).	a has individual drain			☐ YES ☐ NO
50.	operate such that th	vent systems used fo the individual drain sy ttmospheric pressure.	stem is maintained		☐ YES ☐ NO
51.	CFR § 61.346(b).	a has individual drain Question VIII.W.51. is I.		ng with 40	☐ YES ☐ NO
52.	system to prevent th	he individual drain sy he flow of organic va nosphere during norm	apors from the junct		☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 64) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211317 Permit No.		Permit No	o.: O-1610	
Area Name: Baytown Plant Customer Reference No.: CN604			04683482		
For SOP applications, answer ALL  For GOP applications, answer ON  The state of th	LY these questions i	ınless otherwise dire			
VIII. Title 40 Code of Federal Regul for Source Categories (continu	CONTRACTOR OF THE CONTRACTOR O	itional Emission Sta	ndards foi	Hazardous Air Pollutants	
W. Subpart YY - National E Generic Maximum Achi			Pollutants	for Source Categories -	
	ipes in the individua tem and control devi	l drain systems are c	onnected	☐ YES ☐ NO	
process.	•	chemicals manufactors "NO," go to Section		☐ YES ⊠ NO	
•	cals manufacturing p ing hydrogen cyanid	rocess generates mai e or acetonitrile.	ntenance	☐ YES ☐ NO	
X. Subpart JJJ - National F Polymers and Resins <i>(co</i>		for Hazardous Air	Pollutant	Emissions: Group IV	
and/or their associat § 63.1310(a)(1) - (5	ted affected sources  i), that are subject to	stic product process specified in 40 CFR 40 CFR Part 63, Sub "NO," go to Section	part JJJ.	☐ YES ⊠ NO	
and/or wastewater s associated with ther	streams and wastewarmoplastic product	stic product process ter operations that ar rocess units. NO," go to Section V	e	☐ YES ☐ NO	
application area are	from sources produc	ed or managed in the cing polystyrene. "YES," go to Section		☐ YES ☐ NO	
application area are	from sources produc	ed or managed in the cing ASA/AMSAN. "YES," go to Section		☐ YES ☐ NO	

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 65) Federal Operating Permit Program

Date: 08/11/2015		N No.: RN100211	317	Permit No.:	O-1610
Area Name: Baytown	Plant		Customer Reference	e No.: CN60	4683482
For SOP applica  ♦ For GOP applica	ected.				
	of Federal Regula tegories <i>(continue</i>		tional Emission Sta	andards for	Hazardous Air Pollutants
<b> </b>   0.5.7 <b>0</b> 00000000000000000000000000000000000	t JJJ - National En rs and Resins <i>(com</i>	2.10 MILE AND	for Hazardous Air	Pollutant E	missions: Group IV
de		l or are determined	astewater streams the to be Group 1 for o		☐ YES ☐ NO
ex			astewater streams, loganic HAPs as defin		☐ YES ☐ NO
ne			astewater streams, lo c HAPs as defined i		☐ YES ☐ NO
to <i>If</i>	ll Group 1 wastewar tal source mass flow the response to Que westion VIII.X.18.	v rate of less than 1	•	to have a	☐ YES ☐ NO
str 1	reams demonstrated MG/yr.	l to have a total sou	eated Group 1 wasted arce mass flow rate of a NO," go to Question	of less than	☐ YES ☐ NO
m			agement units that rewater stream prior		☐ YES ☐ NO
w: is	astewater streams a	re transferred to an ted by the owner o	removed from Grou on-site treatment op r operator of the sou	peration that	☐ YES ☐ NO
ws <i>If</i>	astewater streams a	re transferred to an	removed from Grou off-site treatment of VIII.X.12. are both	peration.	☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 66) Federal Operating Permit Program

Date: 08/11/2015 RN No.: RN100211317 Permit No.: O-1610			O-1610			
Area Name: Baytown Plant Customer Reference No.: CN604			4683482			
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
		ode of Federal Regu Categories <i>(continu</i>		tional Emission Sta	ndards for	Hazardous Air Pollutants
		oart JJJ - National I mers and Resins <i>(co</i>		for Hazardous Air	Pollutant F	Emissions: Group IV
	13. The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.			☐ YES ☐ NO		
	Cont	ainers				
	14. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.			-	☐ YES ☐ NO	
	Drai	ns				
	15.	manage a Group 1 v Group 1 wastewater	wastewater stream or r stream. westion VIII.X.15. is	drain systems that re a residual removed "NO," go to		☐ YES ☐ NO
	16.	complying with 40		drain systems that a gh the use of cover a devices.		☐ YES ☐ NO
	17.		CFR § 63.136 throug	drain systems that a gh the use of water se		☐ YES ☐ NO
	18.	trenches, or pipes th	nat are part of an thei	ain hubs, manholes, l rmoplastic product pr "NO," go to Section	ocess unit.	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 67) Federal Operating Permit Program

Date: 08/11/2015	te: 08/11/2015 RN No.: RN100211317 Permit No.: O-1610			O-1610	
Area Name: Bayto	rea Name: Baytown Plant			e No.: CN60	4683482
	lications, answer ALI plications, answer ON			cted.	
	ode of Federal Regu e Categories <i>(continu</i>		tional Emission Sta	andards for	Hazardous Air Pollutants
Control of the contro	part JJJ - National I mers and Resins <i>(co</i>		for Hazardous Air	· Pollutant E	Emissions: Group IV
Dra	ins (continued)				
19.	trenches or pipes th § 63.1330(b)(12).	a includes drains, dra at meet the criteria li Question VIII.X.19. is	isted in 40 CFR § 63	3.149(d) and	☐ YES ☐ NO
20.	trenches, or pipes the concentration great	a includes drains, dra nat convey water with er than or equal to 10 ds meeting the defin ow rate.	h a total annual aver 0,000 parts per millio	age on by	☐ YES ☐ NO
21.	trenches or pipes the concentration greater of compounds meet	a includes drains, dra at convey water with er than or equal to 1, ting the definition of all average flow rate	n a total annual avera 000 parts per million organic HAP in 40 (	age n by weight CFR §	☐ YES ☐ NO
22.	trenches or pipes the that is a new affects equipment conveys greater than or equameeting the definition.	a includes drains, dra at are part of an ther ed source or part of a water with a total ar al to 10 parts per mill ion of organic HAP i wrate greater than or	moplastic product product product product and affected source annual average concertion by weight of confin 40 CFR § 63.1312	rocess unit e and the ntration mpounds c, at an	☐ YES ☐ NO

# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 68) Federal Operating Permit Program

Date: 08	8/11/2	015		RN No.: RN100211	1317   Permit No.: O-1610		
Area Na	ame: I	Baytov	wn Plant		Customer Reference	ce No.: CN60	)4683482
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
TO ALC: 1 (40 TO 1) (40 TO 1) (40 TO 1)		000000000000000000000000000000000000000	ode of Federal Regu Categories <i>(continu</i>		itional Emission St	andards for	Hazardous Air Pollutants
	Y.		oart UUU - National neries: Catalytic Cr				
		1. The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.			☐ YES ⊠ NO		
Z. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal So Waste (MSW) Landfills.					nts for Municipal Solid		
•		1.	Subpart AAAA - N	a is subject to 40 CF ational Emission Sta cipal Solid Waste La	ndards for Hazardo	us Air	☐ YES ⊠ NO
18	AA.	000000000000000000000000000000000000000	oart FFFF - Nationa nic Chemical Prod			Air Pollutan	ts for Miscellaneous
		1.		a is located at a site timary product one of b)(1).			☐ YES ⊠ NO
-		2.	The application are defined in FCAA §	a is located at a plant 112(a).	t site that is a major	source as	☐ YES ☒ NO
		3.	chemical manufacture generate one or more § 112(b) of the Clea	a is located at a site turing process units (Note of the organic hazers Air Act or hydrogenestion VIII.AA.1, A	MCPU) that process ardous air pollutants en halide and halog	s, use or s listed in en HAP.	☐ YES ⊠ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 69) Federal Operating Permit Program

Date: 08/11/2015			RN No.: RN100211	317	Permit No.:	O-1610
Area Name: Baytown Plant			Customer Reference No.: CN604683482			
		lications, answer ALI plications, answer ON			ected.	
VIII.		ode of Federal Regu e Categories <i>(continu</i>		tional Emission St	andards for	Hazardous Air Pollutants
2		part FFFF - Nationa anic Chemical Prod			Air Pollutan	ts for Miscellaneous
	4.	racks, or waste stre manufacturing proc	a includes process verams associated with tess subject to 40 CF puestion VIII.AA.4 is	a miscellaneous che R 63, Subpart FFFF	mical	☐ YES ☐ NO
	5.		a includes process was included process was included process. When the second process is a second process with the second process was a second process with the second process with the second process was a second process with the second process with the second process was a second process with the second process with the second process was a second process with the second p			☐ YES ☐ NO
	6.	designated as Groulisted in Table 8 of	a includes process w p 1 or are determined 40 CFR Part 63, Sub 0 CFR Part 63, Subp	d to be Group 1 for oppart G or Table 8 ar	compounds	☐ YES ☐ NO
	7.	are Group 2 for co	rea includes proces ompounds listed in T 0 CFR Part 63, Subp	able 8 or Table 8 an		☐ YES ☐ NO
	8.	total source mass fl	vater streams at the sow rate of less than Question VIII.AA.8. is	1 MG/yr.		☐ YES ☐ NO
	9.	streams demonstrat 1 MG/yr.	ted and/or partially tred to have a total sou Question VIII.AA.9. is 1.	arce mass flow rate		☐ YES ☐ NO
	10.		a includes waste mar treated Group 1 wast			☐ YES ☐ NO

treatment.

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 70) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317 Permit No.:		O-1610	
Area Name: Bayto	wn Plant		Customer Reference No.: CN604683482		
		L questions unless ot NLY these questions i		cted.	
	ode of Federal Regu Categories <i>(continu</i>		tional Emission Sta	indards for	Hazardous Air Pollutants
		d Emission Standar uction and Processe		Air Pollutan	ts for Miscellaneous
11.	wastewater streams is not owned or ope	r streams or residual s are transferred to an erated by the owner of the stream or residual.	on-site treatment of	peration that	☐ YES ☐ NO
12.	wastewater streams	r streams or residual are transferred to an Question VIII.AA.11. of J.AA.18.	off-site treatment of	peration.	☐ YES ☐ NO
13.	facility meeting the	er streams are transfer erequirements of 40 Question VIII.AA.13. a 5.	CFR § 63.138(h).	tment	☐ YES ☐ NO
14.	that the wastewater	ment in the notification will be treated in a for CFR § 63.138(h) is 6	acility meeting the	itus report	☐ YES ☐ NO
15.	concentration of co Subpart FFFF less	or streams or residuals of mpounds in Table 8 of than 50 ppmw are traduction VIII.AA.15.	of 40 CFR Part 63, unsferred offsite.	average	☐ YES ☐ NO
16.	Table 9 of 40 CFR	emontrating that less Part 63, Subpart FFF up to the activated sh	F is emitted from wa		☐ YES ☐ NO
17.	The application are	a includes waste mar	nagement units that r	eceive or	

manage a Group 1 wastewater stream or a residual removed from a

Group 1 wastewater stream prior to shipment or transport.

☐ YES ☐ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 71) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	RN No.: RN100211317 Permit No.: O-1610		
Area Name: Baytown Plant Customer Reference No.: CN604683482		4683482		
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.				
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)				
AA. Subpart FFFF-National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)				
18.	The application area includes containers Group 1 wastewater stream or a residua wastewater stream.			☐ YES ☐ NO
19.	The application area includes individual manage a Group 1 wastewater stream of Group 1 wastewater stream.  If the response to Question VIII.AA.19.  Question VIII.AA.22.	r a residual removed		☐ YES ☐ NO
20.	The application area includes individual complying with 40 CFR § 63.136 through vented, closed vent systems and control	gh the use of cover a		☐ YES ☐ NO
21.	The application area includes individual complying with 40 CFR § 63.136 through tightly fitting caps or plugs.			☐ YES ☐ NO
22.	The application area includes drains, drawners, or pipes that are part of a chert that meets the criteria of 40 CFR § 63.1 If the response to Question VIII.AA.22.	nical manufacturing 00(b).	process unit	☐ YES ☐ NO
23.	The application area includes drains, drawing trenches or pipes (that are part of a miss manufacturing process unit) that meet the § 63.149(d).  If the response to Question VIII.AA.23.	cellaneous chemical he criteria listed in 4	0 CFR	□ YES □ NO
24.	The application area includes drains, drawtrenches or pipes that convey water with concentration of compounds in table 8 of FFFF is greater than or equal to 10,000 total annual load of compounds in table FFFF is greater than or equal to 200 lb/y	h a total annual aver of 40 CFR Part 63, S ppmw at any flow re 8 of 40 CFR Part 63	age subpart ate, and the	☐ YES ☐ NO

#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 72) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	317	Permit No.:	: O-1610
Area Name: Baytown Plant		Customer Refe	erence No.: CN60	4683482
For SOP applications, answer AI For GOP applications, answer O				
VIII. Title 40 Code of Federal Reg for Source Categories (contin		tional Emissio	n Standards for	Hazardous Air Pollutants
AA. Subpart FFFF - Nation Organic Chemical Proc				ts for Miscellaneous
trenches, or pipes concentration of conference of the concentration of t	ea includes drains, dra that convey water with ompounds in table 8 on an or equal to 1,000 pp than or equal to 1 lite	n a total annual f 40 CFR Part ( omw, and the a	average 63, Subpart	☐ YES ☐ NO
trenches or pipes to that is subject to the and the equipment concentration of consumptions of the Subpart FFFF is good combined total and the subpart state of the subpart state	ea includes drains, dra hat are part of a chemi he new source requirer conveys water with a compounds in tables 8 a reater than or equal to han or equal to 1 tpy.	ical manufactur nents of 40 CF combined total and 9 of 40 CF 30,000 ppmw,	ring process unit R § 63.2445(a); I annual average R Part 63, and the	☐ YES ☐ NO
BB. Subpart GGGG - Nation Extractions for Vegetal		rds for Hazar	dous Air Polluta	nts for: Solvent
by itself a major so	ea includes a vegetable ource of HAP emission or sources that are inditions.	ns or, is colloca	ited within a	□ yes ⊠ no
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation				
conducted.	ea includes a facility a uestion VIII.CC.1. is			☐ YES ⊠ NO
	ea is located at a site the uestion VIII.CC.2. is "	•		☐ YES ☐ NO
CFR § 63.7881(b)	n's qualify for one of (1) through (6).  uestion VIII.CC.3. is "	-		☐ YES ☐ NO

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 73) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610	
Area Name: Baytown Plant		Customer Reference No.: CN604683482	
En COD amplications groupe ALL questions enlarge athermatical dispated			

	olications, answer ONLY these questions unless otherwise directed.  ode of Federal Regulations Part 63 - National Emission Standards for	Hazardous Air Pollutants			
	for Source Categories (continued)				
CC. Sub	part GGGGG - National Emission Standards for Hazardous Air Pollu	tants: Site Remediation			
4.	Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. If the answer to Question VIII.CC.4. is "YES," go to Section VIII.DD.	☐ YES ☐ NO			
5.	The site remediation will be completed within 30 consecutive calendar days.	☐ YES ☐ NO			
6.	No site remediation will exceed 30 consecutive calendar days. If the answer to Question VIII.CC.6. is "YES," go to Section VIII.DD.	☐ YES ☐ NO			
7.	Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	☐ YES ☐ NO			
8.	All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.  If the answer to Question VIII.CC.8. is "YES," go to Section VIII.DD.	☐ YES ☐ NO			
9.	The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG.  If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.	☐ YES ☐ NO			
10.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	☐ YES ☐ NO			
11.	The application area includes containers with a capacity greater than 0.46 m <sup>3</sup> that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	☐ YES ☐ NO			
12.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	☐ YES ☐ NO			
13.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	☐ YES ☐ NO			
14.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	☐ YES ☐ NO			

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 74) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	317	Permit No.: O-1610
Area Name: Baytown Plant		Customer Reference No.: CN604683482	

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.					
VIII.	. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories <i>(continued)</i>				
	DD. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities				
	1.	The application area is located at a site that is an area source of hazardous air pollutants.  If the answer to Question DD.1. is "NO," go to Section VIII.FF.	☐ YES ⊠ NO		
	2.	The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	☐ YES ☐ NO		
	3.	The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	☐ YES ☐ NO		
	4.	The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB.  If the answer to Question VIII.DD.4. is "NO," go to Question VIII.DD.6.	☐ YES ☐ NO		
	5.	The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	☐ YES ☐ NO		
	6.	The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC.  If the answer to Question VIII.DD.6. is "NO," go to Section VIII.EE.	☐ YES ☐ NO		
	7.	The bulk gasoline terminal has a throughput of less than 250,000 gallons per day.  If the answer to Question VIII.DD.7. is "YES," go to Section VIII.EE.	☐ YES ☐ NO		
	8.	The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	☐ YES ☐ NO		
	9.	The bulk gasoline terminal loads gasoline into railcar cargo tanks.  If the answer to Question VIII.DD.9. is "NO," go to Section VIII.EE.	☐ YES ☐ NO		
	10.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	☐ YES ☐ NO		
	11.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	☐ YES ☐ NO		

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 75) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	Permit No.	Permit No.: O-1610	
Area Name: Baytown Plan	nt	Customer Reference No.: CN604683482		
	ns, answer ALL questions unless ot ns, answer ONLY these questions t			
VIII. Title 40 Code of for Source Categ	Federal Regulations Part 63 - Na ories <i>(continued)</i>	ntional Emission Standards for	Hazardous Air Pollutants	
	CCCC - National Emission Sta Gasoline Dispensing Facilities <i>(c</i>		utants for Source	
♦1.Tho haz	e application area is located at a cardous air pollutants.	site that is an area source of	☐ YES ☐ NO	
fac	the application area includes at ility as defined in 40 CFR § 63.1 : If the answer to Question VII FF.	11132.	☐ YES ☐ NO	
	he application area includes at ility with a monthly throughput		☐ YES ☐ NO	
facili	application area includes at leas ty with a monthly throughput g ess than 100,000 gallons.		☐ YES ☐ NO	
	application area includes at leas ty with a monthly throughput o		YES NO	
FF. Recently Promulgated 40 CFR Part 63 Subparts				
63 su If the of pro	application area is subject to one or obparts not addressed on this form. response to Question VIII.EE.1. is comulgated 40 CFR Part 63 subpar REQ1 is included in the instruction	s "NO," go to Section IX. A list ts not otherwise addressed on	□ YES ⊠ NO	
♦ 2. Provi	de the Subpart designation (i.e. Su	bpart EEE) in the space provided	d below.	
Services (Services Education)	onerotti her kalan soo oo			
IX. Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - CHEMICAL ACCIDENT PREVENTION PROVISIONS				
A. Applicabil	ity			
	application area contains processes nical Accident Prevention Provision 10.		⊠ YES □ NO	

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 76) Federal Operating Permit Program

Date: 08/11/2015				RN No.: RN100211317 Permit No.:		: O-1610		
Are	a Name:	Bayto	wn Plant		Customer Reference No.: CN604683482			
<b>♦</b>			lications, answer ALI plications, answer ON	-		cted.		
x.	Title OZC		ode of Federal Regu	lations Part 82 (40)	CFR Part 82) - PR(	<b>TECTION</b>	OF STRATOSPHERIC	
	Α.	Sub	part A - Production	and Consumption (	Controls			
•		1.			hat produces, transfo d substance or produ		☐ YES ⊠ NO ☐ N/A	
	В.	Sub	part B - Servicing of	Motor Vehicle Air	Conditioners			
•		1.			f fleet vehicle air con nts is conducted in the		☐ YES ⊠ NO	
	C.		part C - Ban on Non lucts Containing or				and Ban on Nonessential	
<b>*</b>		1.		ease a Class I or Clas	one or more nonessess II substance) that		☐ YES ⊠ NO ☐ N/A	
	D.	Subj	part D - Federal Pro	eurement -			19 X 2	
•		1.	The application area instrumentality of the		by a department, age	ency, or	☐ YES ⊠ NO ☐ N/A	
	E.	Subj	part E - The Labelin	g of Products Üsinį	g Ozone Depleting S	Substances		
•		1.		or transported prior t	in which a Class I on the sale of the Classer.		☐ YES ⊠ NO ☐ N/A	
•		2.			importer, wholesaler ning a Class I or Cla		☐ YES ⊠ NO ☐ N/A	
•		3.		er of products manuf	mporter, wholesaler factured with a proce		☐ YES ⊠ NO ☐ N/A	

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 77) Federal Operating Permit Program

Date: 08/11/2015				RN No.: RN100211317 Permit No.:		O-1610	
Area	Area Name: Baytown Plant Customer Reference No.: CN604683482			4683482			
<b>♦</b>			lications, answer ALI plications, answer ON				
X.			ode of Federal Regu continued)	lations Part 82 (40	CFR Part 82) - ]	PROTECTION	OF STRATOSPHERIC
	F.	Sub	part F - Recycling a	nd Emissions Redu	ction		
<b>*</b>		1.	vehicle air condition	ance, and/or repair on n appliances using o utes is conducted in	zone-depleting re	frigerants or	☐ YES ⊠ NO
<b>♦</b>		2.		ces (including motor exempt substitute rec			☐ YES ⊠ NO ☐ N/A
•		3.	The application are and recovery equip	a manufactures appl ment.	iances or refriger	ant recycling	☐ YES 図 NO ☐ N/A
	G.	Sub	part G - Significant	New Alternatives P	olicy Program		
•		1.	product substitutes, intended for use as	a manufactures, form or alternative manu a replacement for a Question X.G.1 is "N	facturing process Class I or Class I	es that are I compound.	☐ YES ☒ NO ☐ N/A
•		2.		uced by the applicat 0 CFR § 82.176(b)(		e or more of	☐ YES ☐ NO ☐ N/A
	н.	Sub	part H -Halon Emis	sions Reduction			
•		1.		maintaining, repairir s conducted in the ap		f equipment	☐ YES ☒ NO ☐ N/A
•		2.	Disposal of halons application area.	or manufacturing of	halon blends is c	onducted in the	☐ YES ☒ NO ☐ N/A
XI.	Misc	ellan	eous				
	A.	Req	uirements Referenc	e Tables (RRT) and	l Flowcharts		
		1.		a contains units that h the TCEQ has not			☐ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 78) Federal Operating Permit Program

Date: 08/11/2015			RN No.: RN100211	317	Permit No.	: O-1610
Area Name: Baytown Plant				Customer Re	eference No.: CN60	)4683482
<b>♦</b>		lications, answer ALI lications, answer ON				
XI.	Miscellane	ous (continued)				
	B. Form	as.			Taul Co. Store Superior City	
•	1.	The application area regulation for which If the response to Q Section XI.C.	the TCEQ has not	developed a u	nit attribute form.	YES NO NA
•	2.	Provide the Part and Division designation				napter, Subchapter, and low.
	C. Emi	ssion Limitation	Certifications			
•	1.	The application area emission limitations				⊠ YES □ NO
	12 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	rnative Means of Co uirements	ntrol, Alternative l	Emission Lin	iitation or Standa	rd, or Equivalent
	1.	The application area requirement of the s		_	to a site specific	☐ YES ⊠ NO
	2.	The application area a site specific require		ted at the site	that are subject to	☐ YES ⊠ NO
	3.	The application area using an alternative standard or equivale Administrator.  If the response to Q the approval docum	means of control, all ent requirements appropriate means of control, all entrollers appropriate means of control, all entrollers are means of control entrollers are means of control entrollers.	ternative emisoroved by the large in the lar	ssion limitation or EPA	□ YES ⊠ NO
	4.	The application area using an alternative standard or equivale Director.  If the response to Q the approval docum	means of control, all ent requirements appropriate the means of control, all entire means of control entire means of	ternative emisoroved by the 'ES," please in	ssion limitation or TCEQ Executive	□ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 79) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317 Permit No.:		: O-1610	
Area Name: Baytov	ne: Baytown Plant Customer Reference No.: CN604683482			)4683482	
	lications, answer ALI lications, answer ON	_		cted.	
XI. Miscellane	ous <i>(continued)</i>				
E. Title	IV - Acid Rain Pro	gram			
1.		a includes emission u cluding the Opt-In Pr	units subject to the A	cid Rain	☐ YES ⊠ NO
2.	The application are exemption under 40		units qualifying for th	ne new unit	☐ YES ⊠ NO
3.	The application are unit exemption und		units qualifying for th	ne retired	☐ YES ⊠ NO
F. Clea	n Air Interstate Rul	e (CAIR NO <sub>x</sub> and (	CAIR SO <sub>2</sub> Permit)		ing in the second of the secon
1.	requirements of the	a includes emission u Clean Air Interstate Suestion XI.F.1. is "N		<i>I.G</i> .	□ YES ⊠ NO
2.		a includes emission u der 40 CFR §§ 96.10	units qualifying for the 5 and 96.205.	ne retired	☐ YES ☐ NO
G. Pern	nit Shield (SOP App	licants Only)		AND THE STREET	
1.		le Requirement Dete	y entries on Form Olerminations) is being	_	⊠ yes □ no
H. GOF	Type (Complete th	is section for GOP	applications only)		A CONTRACT OF THE CONTRACT OF
<b>♦</b> 1.	renewal of an oil an 511 - Oil and Gas C Collin, Dallas, Den Harris, Jefferson, Jo	d gas general operat General Operating Pe ton, El Paso, Ellis, Fo	rmit for Brazoria, Ch ort Bend, Galveston, berty, Montgomery,	nambers, Hardin,	☐ YES ☐ NO
<b>♦</b> 2.	renewal of an oil an	d gas general operat	ial issuance, revision, ing permit under rmit for Gregg, Nuec		☐ YES ☐ NO

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 80) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610		
Area Name: Baytown Plant	Customer Refer	Customer Reference No.: CN604683482		
For SOP applications, answer ALL questions unless otherwise directed.				

<b>♦</b>	For GOP appl	lications, answer ONLY these questions unless otherwise directed.	
XI.	Miscellane	ous (continued)	
	H. GOP	Type (Complete this section for GOP applications only) (continued)	
<b>*</b>	3.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	☐ YES ☐ NO
<b>•</b>	4.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, and Waller County.	☐ YES ☐ NO
•	5.	The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under 517 Municipal Solid Waste Landfill general operating permit.	☐ YES ☐ NO
	I. Title	30 TAC Chapter 101, Subchapter H	
•	1.	The application area is located in a nonattainment area.  If the response to Question XI.I.1. is "NO," go to question XI.I.3.	⊠ YES □ NO
•	2.	The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	☐ YES ⊠ NO ☐ N/A
•	3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	☐ YES ⊠ NO ☐ N/A
<b>*</b>	4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO <sub>x</sub> .	⊠ yes □ no
•	5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	☐ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 81) Federal Operating Permit Program

Date: 08/11/2015			RN No.: RN100211317 Permit No.:		.: O-1610	
Area Name: Baytown Plant Customer Reference No.: CN6					e No.: CN60	4683482
			L questions unless ot LY these questions i	herwise directed. ınless otherwise dire	cted.	
XI. N	Miscellane	ous <i>(continued)</i>				
I	. Title	30 TAC Chapter 10	01, Subchapter H (	continued)	e e e e e e e e e e e e e e e e e e e	22 (1.4) Craming 1.2 (2.1)
<b>*</b>	6.	Houston/Galveston.	ore than 10 tpy of hig OC) from facilities co	in the nent area and the site ghly-reactive volatile overed under 30 TAC	organic	☐ YES ⊠ NO
<b>*</b>	7. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.		□ YES ⊠ NO			
J	I. Perio	odic Monitoring				
•	1.			tting at least one peri OP-MON in this app		☐ YES ⊠ NO
<b>*</b>	2.	requirement.		st one periodic mon		⊠ yes □ no
<b>♦</b>	3.	All periodic monitor permit with this app		re being removed from	m the	☐ YES ⊠ NO
ŀ	C. Com	pliance Assurance	Monitoring			
<b>•</b>	1.	potential to emit gre required in a site cla	eater than or equal to assified as a major s	ne unit with a pre-cond the amount in tons pource.  NO, " go to Section X	per year	⊠ yes □ no
<b>•</b>	2.	comply with an app	olicable requirement.	using a control device. NO," go to Section X		⊠ YES □ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 82) Federal Operating Permit Program

,						
Date: 08/11/2015 RN			RN No.: RN100211	1317	Permit No.:	O-1610
Area	Area Name: Baytown Plant			Customer Reference	e No.: CN60	4683482
<b>♦</b>		lications, answer ALL plications, answer ON			cted.	
XI.	Miscellan	eous <i>(continued)</i>				
	K. Con	ipliance Assurance N	Monitoring <i>(continu</i>	ued)		- 1.30 Pro-
•	3.	The permit holder ha previous application		I proposal on Form (	OP-MON in	⊠ YES □ NO
•	4.	Form OP-MON acc § 64.5 in this application	ording to the deadlination.	submitting a CAM panes for submittals in	40 CFR	⊠ yes □ no
	5.	The owner/operator implementation plan conditions in the per	and schedule to be	submitting a CAM incorporated as enfo	orceable	☐ YES ⊠ NO
	6.	Provide the unit identification plan			the applic	ant is submitting a CAM
•	7.			XI.K.2. is using a Cents of 40 CFR § 64.3		☐ YES ⊠ NO
•	8.	PEMS meeting the	requirements of 40 (	are using a CEMS, CFR § 64.3(d)(2). YES," go to Section X		☐ YES ⊠ NO
•	9.	The CAM proposal	• •	stion XI.K.3.or XI.K	.4.	☐ YES ⊠ NO

The CAM proposal as described by question XI.K.3.or XI.K.4.

The control device in the CAM proposal as described by

question XI.K.3.or XI.K.4. has a bypass.

addresses VOC.

10.

11.

☐ YES ⊠ NO

☐ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 83) Federal Operating Permit Program

Date: 08/11/2015		RN No.: RN100211317 Per		Permit No.:	O-1610	
Area	a Name: Baytow	vn Plant		Customer Reference	ce No.: CN60	4683482
<b>♦</b>		ications, answer ALL lications, answer ON			ected.	
XII.	. New Source	e Review (NSR) Au	thorizations <i>(conti</i>	nued)		
100 SM 100 SM 100 SM	A. Wast	e Permits with Air	Addendum	The state of the s		
<b>•</b>	1.	Industrial Hazardou	a includes a Municipus Waste with an Air II.A.1. is "YES," income Section XII.J.	r Addendum.		☐ YES ⊠ NO
	B. Air C	Quality Standard Pe	rmits			<b>表现</b>
<b>♦</b>	1. The application area includes at least one Air Quality Standard Permit NSR authorization.  If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H, and answer XII.B.2 - B.13 as appropriate.			he response 's	⊠ YES □ NO	
•	2.		a includes at least or d Permit NSR autho		ol Project"	☐ YES ⊠ NO
<b>♦</b>	3.		a includes at least or lity Standard Permit			☐ YES ⊠ NO
<b>♦</b>	4.		a includes at least or ty Standard Permit I			☐ YES ⊠ NO
<b>•</b>	♦ 5. The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.				☐ YES ⊠ NO	
	6. The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.			☐ YES ⊠ NO		
	7.		a includes at least or "Air Quality Standa			☐ YES ⊠ NO
	8.		a includes at least or ermit NSR authoriza		t Plant" Air	☐ YES ⊠ NO

### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 84) Federal Operating Permit Program

,							
Date	: 08/11/20	15		RN No.: RN100211	317	Permit No.	: O-1610
Area	Area Name: Baytown Plant Customer Reference No.: CN				e No.: CN60	4683482	
<b>♦</b>			ications, answer ALI lications, answer ON			cted.	
XII.	New S	oure	e Review (NSR) Au	thorizations <i>(contin</i>	nued)		
	В. Д	Air (	Quality Standard Pe	rmits (continued)			
<b>♦</b>	Ģ	<b>)</b> .	The application area Standard Permit NS		e "Rock Crusher" A	ir Quality	☐ YES ⊠ NO
<b>*</b>	]	10.	Air Quality Standar	ation area includes at least one "Electric Generating Unit" Standard Permit NSR authorization.  Onse to XII.B.10 is "NO," go to Question XII.B.13.			☐ YES ⊠ NO
•	]	11.			nit" Air Quality Stand the East Texas Regi		☐ YES ☐ NO
<b>♦</b>	1	12.			nit" Air Quality Stand the West Texas Reg		☐ YES ☐ NO
•	]	13.	The application area Permit NSR authori		e "Boiler" Air Quali	ty Standard	⊠ YES □ NO
•	]	14.		a includes at least on Control Projects NS	e non-rule Air Quali SR authorization.	ty Standard	☐ YES ☒ NO
•	1	15.			e non-rule Air Quali oduction Facilities N	•	☐ YES ⊠ NO
	C. 1	lexi	ble Permits				
•	1	l <b>.</b>	The application area authorization.	a includes at least on	e Flexible Permit NS	SR	☐ YES ⊠ NO
	D. 1	Mult	iple Plant Permits				

The application area includes at least one Multi-Plant Permit NSR

authorization.

1.

☐ YES ⊠ NO

## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 85) Federal Operating Permit Program

Date: 08/11/2015	RN No.: RN100211	IN No.: RN100211317		Permit No.: O-1610		
Area Name: Baytown Plant		Customer Reference No.: CN604683482				
	nswer ALL questions unless ot inswer ONLY these questions i					
XII. NSR Authorizations (Attach additional sh	eets if necessary for sections	E-J)				
E. PSD Permits at	nd PSD Major Pollutants					
PSD Permit No.: PSD-TX-695M3	Issuance Date:08/08/2013	Pollutant(s)	SO <sub>2</sub>			
PSD Permit No.:	Issuance Date:	Pollutant(s)				
PSD Permit No.:	Issuance Date:	Pollutant(s)				
PSD Permit No.:	Issuance Date:	Pollutant(s)				
If PSD Permits are held for th Technical Forms heading at:					l under the	Tition.
F. Nonattainment	t (NA) Permits and NA Majo	r Pollutants				
NA Permit No.:	Issuance Date:	Pollutant(s)				
NA Permit No.:	Issuance Date:	Pollutant(s)				
NA Permit No.:	Issuance Date:	Pollutant(s)				
NA Permit No.:	Issuance Date:	Pollutant(s)				
	the application area, please cat: www.tceq.texas.gov/perm.				ted under the	_
♦ G. NSR Authoriza	ations with FCAA § 112(g) R	<u>equirements</u>				3334
NSR Permit No.:	Issuance Date:	NSR Permit No.	•	Issuance Da	ate:	_
NSR Permit No.:	Issuance Date:	NSR Permit No.	.:	Issuance Da	ate:	
NSR Permit No.:	Issuance Date:	NSR Permit No.		Issuance Da	ate:	
	Chapter 116 Permits, Special Permits By Rule, PSD Permit				izations	
Authorization No.: 9565	Issuance Date: 08/08/2013	Authorization N	o.:	Issuance Da	ate:	
Authorization No.: 56534	Issuance Date: 11/24/14	Authorization N	o.:	Issuance Da	ate:	_
Authorization No.:	Issuance Date:	Authorization N	o.:	Issuance Da	ate:	_
Authorization No.:	Issuance Date:	Authorization N	o.:	Issuance Date:		

#### **Texas Commission on Environmental Quality** Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 86) **Federal Operating Permit Program**

Date: 08/11/2015	RN No.: RN100211317	Permit No.: O-1610
Area Name: Baytown Plant	Customer Referen	ce No.: CN604683482

For SOP applications, answer ALL quest For GOP applications, answer ONLY the	ions unless otherwise directed. se questions unless otherwise directed.
XII. NSR Authorizations (Attach additional sheets if necessary)	
♦ I. Permits by Rule (30 TAC Chapt	er 106) for the Application Area
A list of selected Permits by Rule (previously refe FOP application is available in the instructions.	erred to as standard exemptions) that are required to be listed in the
PBR No.: 106.183	Version No./Date: 09/04/2000
PBR No.: 106.371	Version No./Date: 03/14/1997
PBR No.: 106.4/2	Version No./Date: 03/14/1997
PBR No.: 106.478	Version No./Date: 03/14/1997
PBR No.: 106.261	Version No./Date: 11/01/2003
PBR No.: 106.262	Version No./Date: 09/04/2000
PBR No.: 106.262	Version No./Date: 11/01/2003
PBR No.: 106.412	Version No./Date: 09/04/2000
PBR No.:	Version No./Date:
♦ J. Municipal Solid Waste and Indu	strial Hazardous Waste Permits With an Air Addendum
Permit No.:	Permit No.:

### Attachment 7 OP-MON

#### Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 1) Federal Operating Permit Program

Table 1a: CAM/PM Additions

I. Identifying Information			
Account No.: HG-0696-Q	RN No.: RN	100211317	CN: CN604683482
Permit No.: O-1610		Project No.: 182	73
Area Name: Baytown Plant			
Company Name: Eco Services Ope	rations LLC		
II. Unit/Emission Point/Gro	oup/Process Infor	mation	
Revision No.:			
Unit/EPN/Group/Process ID No.:	1		
Applicable Form: OP-UA43			
III. Applicable Regulatory Ro	equirement	المرسفقية	
Name: 40 CFR Part 60, Subpart H			
SOP/GOP Index No.: 60H-001			
Pollutant: SO2			
Main Standard: 60.82(a)			
IV. Title V Monitoring Inform	mation		
Monitoring Type: CAM	-		
Unit Size: Large			
CAM/PM Option No.: CAM-SS-oo	9		
Deviation Limit: Minimum pH is 4	<b>l-</b> 5		
CAM/PM Option No.: CAM-SS-01	0		
Deviation Limit: Minimum liquid	flow rate is 650 gallo	ns per minute	
V. Control Device Informat	ion		
Control Device ID No.: Ammonia S	Scrubber		
Control Device Type: SO2SCR			

Attachment 8

OP-UA5

# Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 1) Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters

Date: 08/11/2015	Permit: O-1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN604683482

Unit ID No.	SOP/GOP Index No.	Unit Type	Maximum Rated Capacity	RACT Date Placed in Service	Functionally Identical Replacement		ıel Type(s)	Annual Heat Input	NO <sub>x</sub> Emission Limitation	Opt-In Unit	23C- Option
PREHTRSTK	R7ICI-0001	PRHTR	2-40			NG			310D		
		<u> </u>				<u> </u>		 			, , , , , , , , , , , , , , , , , , ,
		<u> </u>									

### Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 2) Federal Operating Permit Program

Table 1b: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 117)

#### Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters

Date: 08/11/2015	Permit: O-1610	Regulated Entity No.: RN100211317	
Area Name: Baytown Plant		Customer Reference No.: CN604683482	

Unit ID No.	SOP/GOP Index No.	Diluent CEMS	30 TAC Chapter 116 Limit	NO <sub>x</sub> Emission Limit Basis	NO <sub>x</sub> Reduction	Common Stack Combined	Fuel Type Heat Input	NO <sub>x</sub> Monitoring System
PREHTRSTK	R7ICI-0001	NO		30DAY	NONE			MERT

# Texas Commission on Environmental Quality Process Heater/Furnace Attributes Form OP-UA5 (Page 3) Federal Operating Permit Program

Table 1c: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)

Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Process Heaters

Date: 08/11/2015	Permit: O-1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN604683482

Unit ID No.	SOP/GOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring
PREHTRSTK	R7ICI-0001	X40A	310C	OTHER		

# Attachment 9 OP-REQ2

## Texas Commission on Environmental Quality Form OP-REQ2 Negative Applicable Requirement Determinations Federal Operating Permit Program

Date: 08/11/2015	Permit No.: O-1610		Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.	: CN604683482

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/ Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability Citation	Negative Applicability Reason
	2	PREHTRSTK	OP-UA5	MACT DDDDD	§ 63.7485	Not subject as the facility is not a major source of HAPs.
				,		

#### **Whitney Hill**

From:

Whitney Hill

Sent:

Thursday, July 09, 2015 10:57 AM

To:

'floyd.dickerson@eco-services.com'; 'david.laurie@eco-services.com'

**Subject:** 

Renewal Application Review -- FOP O1610/Project 18273, Eco Services Operations

LLC/Baytown Plant

I have been assigned to the Federal Operating Permit (FOP) renewal application for Eco Services Operations LLC, Baytown Plant and have begun technical review. This application for renewal of Permit No. O1610 has been assigned Project No. 18273. Please address all correspondence pertaining to this permit application, including updates, to me at the address below, and use the Permit and Project reference numbers above to facilitate tracking.

This renewal project and a significant revision project to incorporate PSD permit PSDTX695 into the permit were on hold until the PSD permit was issued. Since this permit was issued in November, the renewal project can be issued. Any changes from the significant revision will be incorporated into the renewal project. **Please submit the following form/information by July 28, 2015:** 

- Any forms that correspond to changes that have been made at the site since 2012
- The most recent OP-REQ1
- The OP-MON for CAM (if applicable) for PRO-REGEN and 1 for 40 CFR Part 60, Subpart H for SO2
- The OP-UA05 for emission units 1 and PREHTRSTK

In accordance with the policy memorandum dated January 6, 2006 available at <a href="http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf">http://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf</a>, please be advised that failure to submit all of the information necessary to process your application by the deadline specified will result in the voidance of this application.

Please review the "SOP Technical Review Fact Sheet" located at

http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

#### Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, TX 78711-3087
Whitney.Hill@tceq.texas.gov

**Phone:** (512) 239-1301 **Fax:** (512) 239-7130



2014 DEC -9 AM 8: 20

Eco Services Operations LLC Baytown Plant

Certified Mail: Return Receipt Requested (7011 2970 0000 3521 0510)

December 2, 2014

Texas Commission on Environmental Quality Central Registry Program Mail Code MC 224 P.O. Box 13087 Austin, TX 78711-3087

Re:

Eco Services Operations LLC Baytown Plant DIGIO CN 604686482/RN100211317

PEC 0 9 2014

TRPERAITS DIVISIO

men no soll

RECEIVED

DEC 0 9 2014

Dear Sir or Madame:

With the corporate ownership change from Solvay USA Inc. to Eco Services Operations LLC, TCEQ has changed the company's Customer Number.

Please find attached the TCEQ Core Data Form for the Baytown plant.

If you have any questions, please do not hesitate to contact me at (713) 924-1408.

Sincerely,

W. F. Dickerson

Environmental Manager

WHOckum

attachments



#### **TCEQ Core Data Form**

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For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175. SECTION I: General Information 1. Reason for Submission (If other is checked please describe in space provided) New Permit, Registration or Authorization (Core Data Form should be submitted with the program application) Renewal (Core Data Form should be submitted with the renewal form) Other **Delegation of Authortiv** 2. Attachments Describe Any Attachments: (ex. Title V Application, Waste Transporter Application, etc.) Form OP-DEL (TCEO-10011) ⊠Yes 3. Customer Reference Number (if issued) 4. Regulated Entity Reference Number (if issued) Follow this link to search for CN or RN numbers in CN 604683482 RN 100211317 Central Registry\*\* **SECTION II: Customer Information** 12/1/2014 5. Effective Date for Customer Information Updates (mm/dd/yyyy) 6. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check only one of the following: ☐ Owner ☐ Operator Owner & Operator Occupational Licensee Responsible Party □ Voluntary Cleanup Applicant Other: 7. General Customer Information Update to Customer Information ☐ Change in Regulated Entity Ownership Change in Legal Name (Verifiable with the Texas Secretary of State) No Change\*\* \*\*If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information. 8. Type of Customer: ☐ Corporation Individual ☐ Sole Proprietorship- D.B.A ☐ City Government County Government Federal Government State Government ☐ Other Government General Partnership Limited Partnership Other: If new Customer, enter previous Customer 9. Customer Legal Name (If an individual, print last name first: ex: Doe, John) End Date: below 10. Mailing Address: City State ZIP ZIP + 411. Country Mailing Information (if outside USA) 12. E-Mail Address (if applicable) 13. Telephone Number 14. Extension or Code 15. Fax Number (if applicable) 16. Federal Tax ID (9 digits) 17. TX State Franchise Tax ID (11 digits) 18. DUNS Number(if applicable) 19. TX SOS Filing Number (if applicable) 20. Number of Employees 21. Independently Owned and Operated? □ 0-20 □ 21-100 □ 101-250 □ 251-500 □ 501 and higher ☐ Yes □ No SECTION III: Regulated Entity Information

SECTION IN INC.	diated Bhile, Intol Matton		
22. General Regulated En	tity Information (If 'New Regulated Entity	y" is selected below this form should be accomp	anied by a permit application)
☐ New Regulated Entity	☐ Update to Regulated Entity Name	Update to Regulated Entity Information	No Change <sup>★★</sup> (See below)
	**If "NO CHANGE" is checked and Section I	is complete, skip to Section IV, Preparer Information.	
23. Regulated Entity Nam	e (name of the site where the regulated action	is taking place)	

			\					)			
24. Street Address	;		∌				į.	<del>_</del>			
of the Regulated										- · · · · · · · · · · · · · · · · · · ·	
`Entity: (No P.O. Boxes)						T	Τ		T		
[NO F.O. BOXES]	City			State		ZIP				ZIP + 4	
05 M-111											
25. Mailing Address:											
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30. Primary SIC Co	ode (4 digit	s) 31. Second	ary SIC Co		(5 or 6 digits)	NAICS	Code		6 digits)	lary NAICS	Code
34. What is the Pri	mary Bus	siness of this en	t <b>ity?</b> (Plea	ase do not repe	at the SIC or N	AICS d	escription	1.)			
	Questic	ons 34 – 37 addre	ess geogra	phic location.	. Please refe	er to th	e instru	ctions for	applica	bility.	
35. Description to				-							•
Physical Location:											
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Jo. Nearest City				Journey		·	State			Nealest Z	ir code
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39. TCEQ Programs updates may not be made  Dam Safety	. If your Pro	gram is not listed, che	ck other and	vrite it in. See the	Core Data Forr	n instruc	tions for a	dditional guida Hazardous	ance.		pal Solid Waste
<b></b>						<u> </u>					31221
New Source Reviews     56534, 9565, 116		⊠ OSSF		Petroleum	Storage Tank		PWS			Sludge	
12675, 86388,	00,										
PSDTX695 (M2)	, (M3)	101136				10	11077		_		_
Stormwater				Tires			Used O	il		☐ Utilitie	es
		O-1610				НС	U0007	<b>'</b> 1			
□ Voluntary Clear	nup	☐ Waste Water		☐ Wastewa	er Agriculture			Rights		Other:	ISW Registration
										30708	
SECTION IV	: Pren	arer Inform	ation								
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42. Telephone Nun		43. Ext./Code	1	Fax Number			lail Add				<u>-</u>
(713)924-140	8		(7	13)835-32	61 1	lloyd	dicke	rson@so	lvay.c	om	
SECTION V:	Auth	<u>orized Signa</u>	<u>ature</u>								
46. By my signatu and that I have sign updates to the ID n	ature au	thority to submi	t this form								
- (See the Core Data	Form i	nstructions for i	nore infoi	mation on w	ho should s	sign th	is form	ı.)			
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Signature:	//Ln/							Date:		4/4/4	

TCEQ-10400 (09/07)

#### **ECOSERVICES**



Eco Services Operations LLC Houston Plant

Certified Mail; Return Receipt Requested (7011 2000 0001 4575 1538)

December 2, 2014

Texas Commission on Environmental Quality Air Permit Division – MC 163 P.O. Box 13087 Austin, TX 78711-3087

Re:

Eco Services Operations LLC Baytown, Texas Facility Title V Permit No: O-01610 Account No.: HG-0696-Q CN604683482/RN100211317

Houston, Texas Facility
Title V Permit No: O-03049
Account No.: AG-0697-O
CN604683482/RN100220581

Dear Sir or Madame:

Please find attached Form OP-DEL, Delegation of Responsible Official Authority for the Federal Operating Permit Program for the Eco Services Baytown and Houston plants.

Please contact me at 713-924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

W. F. Dickerson

**Environmental Manager** 

attachment

cc: Air Section Manager, TCEQ, Region 12

#### Form OP-DEL Change of Responsible Official Information Federal Operating Permit Program



A Responsible Official (RO may choose to delegate signature authority to a Duly Authorized Representative (DAR). Such delegation may be made to an individual that has responsibility for the overall operation of one or more manufacturing, production, or operating facilities applying for, or subject to, a federal operating permit. Signature stamps can be accepted in place of an original signature. Faxes, photocopies, and electronic submittals can be accepted in place of an original Form OP-DEL; however, a follow-up submittal of the original Form OP-DEL is requested

I. Id	lentifying Information					
Account	t No.: HG-0697-O	RN: 100220581		Í	CN: 6	04683482
Permit l	No.: O-3049			Area Name: Hous	ton Pla	ant
Compar	ny Name: Eco Services Operations l	LLC		<u> </u>		
II. Dı	uly Authorized Representative	Information				-
Action T	lype: 🛛 Nev	w DAR Identification	on	☐ Admir Chang		ve Information
Name: (	(⊠Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) Will	liam J. McConnell				
Title: Pl	ant Manager			Delegation Effective	ve Date	======================================
Telepho	one No.: (713) 924-1401			Fax No.: (713) 835		
Mailing	Address: 8615 Manchester Street					
City: Ho	ouston		Sta	te: Texas	[:	ZIP: 77012
Delivery	Address: 8615 Manchester Street		-			
City: Ho	uston		Sta	te: Texas		ZIP: 77012
III. Ce	ertification of Truth, Accuracy,	and Completen	.ess			
I, <u>Ma</u>	ırk D. McFadden				,certif	y that, based on
		ne printed or typed) /	7			
informat accurate	tion and belief formed after reasona e, and complete.	ible inquiry, the st	aten	nents, and informat	tion sta	ated above are true,
Respons	sible Official Signature:					
Date: De	ecember, 2014 T	itle: Vice Presiden	ıt an	nd Socretary		
	thorized Representative Signature:_	Much	n	ymer	n	
Date: De	ecember <u>2</u> ,2014 Tit	tle: Plant Manager	·			
IV. Re	emoval of Duly Authorized Rep	resentative(s)				
The follo	owing should be removed as Duly Au	uthorized Represer	ntati	ive(s):		
	(RO or DAR name Printed or t	. 7)		_ Effective Date:_		
Dognong		'				
	ible Official Signature:	-				· · · · · · · · · · · · · · · · · · ·
Date:	Titl	le:				

# Form OP-DEL Change of Responsible Official Information Federal Operating Permit Program (Extension)



V. Additional Identifying	Information		
Account No.: HG-0696-Q	RN: 100211317		CN: 604683482
Permit No.: O-1610		Area Name: Bay	rtown Plant
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	•
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	
Account No.:	RN:		CN:
Permit No.:		Area Name:	-



### Texas Commission on Environmental Quality Air Permits Division Change of Name/Ownership Form

I. Application Type			
X Change in Ownership	Change in Compar	ny Name	
II. Name of the New Owner or Oper	ator of the Facilities	or Equipment (Legal )	Entity Name of the new permittee)
A. Customer Name: Eco Services Opera	tions LLC		
B. Customer Reference Number (CN) (i	f issued): 604683482		
C. Submittal Date: 12/01/2014			
D. Effective Date of Change: 12/01/2014	4		
E. Is the new owner an affiliate of the pr	revious owner?		☐ YES X NO
III. Responsible Official (RO) Contac	ct Information		
Name (Mr. Mrs. Ms. Dr.): Mark	McFadden		
Title: Vice President and Secretary			
Company Name: Eco Services Operations L			
Mailing Address: c/o CCMP Capital Adviso	ors, LLC, 245 Park Ave	enue, 16 <sup>th</sup> Floor	
City: New York	State: New York		Zip Code: 10167
Territory: N/A		Country: United States	
Foreign Postal Code: N/A		Internal Mail Code: N/	Ά
Telephone No.: (212) 600-9674		Fax No.: (212) 599-34	81
E-mail Address: Mark.McFadden@ccmpca	pital.com		
IV. Technical Contact Information			
Name (X Mr. Mrs. Mrs. Dr.): W. F	. Dickerson		.,
Title: Environmental Manager			
Company Name: Solvay			
Mailing Address: 8615 Manchester Street			
City: Houston	State: Texas		Zip Code: 77012
Territory: N/A		Country: United States	5
Foreign Postal Code: N/A		Internal Mail Code:	
Telephone No.: 713-924-1408		Fax No.: 713-835-326	1
E-mail Address: Floyd.dickerson@solvay.c	om		
V. Site Information		<u> </u>	
A. Site Name: Eco Services Operations	Baytown Plant		
B. Regulated Entity Number (RN) (if is	sued): RN100211317		
C. Account Number (if issued): HG069	6Q		

(Revised 01/09) Air Permits Division Change of Name/Ownership Form , for use by sources subject to air quality permit requirements and ised periodically. (APDG 5857 v4)

DEC 0 1 2014 APIRT



#### Texas Commission on Environmental Quality Air Permits Division Change of Name/Ownership Form

V. Site Information (c	ontinued	)					n Thomas Allina Dominion	ja – nji ili diji Kalalaka Jilla	
D. If action is transfer of	ownershi	p, is the	change fo	or the enti	ire site?				☑ YES ☐ NO ☐ N/A
E. If action is transfer of major source?	ownershi	p for a p	ortion of	the existi	ng site,	will the n	ew site be	a	☐ YES ☐ NO ☒ N/A
F. Indicate all pollutants	for which	the site	is a majo	or source 1	based or	the site	s potential	to emit.	
Pollutant:	VOC	NO <sub>X</sub>	SO <sub>2</sub>	PM <sub>10</sub>	со	PB	HAPs		Other
Major at the Site (YES/NO):	No	Yes	Yes	No	No	No	No		
VI. Air Authorizations	That Ar	e Affect	ed By Ti	his Action	1				
A. List all NSR authoriza PSDTX695, PSDTX6  B. List all FOPs (including the content of the conte	95M2, PS	SDTX69	5M3, 56	534, 1166	0, 1267	5, 86388,	9565	d NSR p	ermits), as applicable:
VII. NSR Conditions fo	473		<del></del>			The onte of the	101 - 270, - 2 7 3 3 3 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
amendments and alt  The new owner asse  The new owner asse  VIII. FOP Conditions fo	erts there erts there	will be n	o increas				mitted.		
application for a chefacilitated by a write between the old and For GOP holders: Pursuant to 30 TAC application for a ne of a site.	ten agree to stee new perror \$ 122.5 w authorizange mu	the permement comit holds  503, the ization to st be face	it identification in the interior of the inter	fication of a specification ago older (ne for a chaby a writen	f owner ic date if reement wowner to to the itten agreement in the iten agreem	ship or of for transforts is maintants r) is required the perminants	perational er of perm ined with aired to su t identification containing	control uit respo the pern bmit (be ation of c a spec	ired to submit a permit revision of a site. The change must be onsibility, coverage, and liability nit.  efore the change is operated) an ownership or operational controlistic date for transfer of permit en agreement is maintained with
A. Are any other changes (If YES, submit the inf				he instruc	rtions.)				☐ YES ☒ NO
B. Is there an Acid Rain (If YES, submit the inf						permit inc	cluded in t	he SOP?	YES NO
IX. Authorization						1. 1. 16 (	ing Alle agent k		
I, Mark McFadden , cert formed after reasonable inco	ify that I	am the reatements	esponsible and info	le official ormation o	on this f	orm are ti	on and that ue, accura Date:	te, and c	•
Title: Vice President and Sec	retary								







TCEQ Use Only

#### **TCEQ Core Data Form**

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

		derai information							
		ion (If other is checked please		the same of the sa		· · ·			
☐ New Per	rmit, Regis	tration or Authorization (Core Da	a Form sh	iould be si	ubmitted w	ith the <sub>l</sub>	orogram application	on)	
Renewa	I (Core D	ata Form should be submitted with	h the rene	wal form)		Other	Updating C	ustomer ]	nformation
2. Attachme	nts	Describe Any Attachments: (6	ex. Title V A	pplication,	Waste Tran	sporter .	Application, etc.)		
⊠Yes	□No	Form 20405							
3. Customer	Reference	e Number (if Issued)		s link to sea		Regulat	ed Entity Refere	nce Number	(if issued)
CN 6046	83482			RN number I Registry**		N 10	0211317		
SECTION	VII: C	istomer Information			· <u>L</u>				
5. Effective I	Date for C	ustomer information Updates (r	nm/dd/yy	yy) 12	2/1/2014	·			
6. Customer	Role (Prop	oosed or Actual) - as it relates to the	Regulated i	Entity listed	on this form	ı. Pleas	e check only <u>one</u> of	the following:	
Owner		☐ Operator	Ø	Owner & O	perator		· · · · · · · · · · · · · · · · · · ·	·	
Occupation	nal Licens	ee Responsible Party			Cleanup Ap	plicant	☐ Other:		
7. General C	ustomer l	nformation				- 7 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1			
New Cus	tomer	ΠUp	date to Cu	stomer Inf	formation		☐ Change in	Regulated E	ntity Ownership
☐ Change in	n Legal Nar	ne (Verifiable with the Texas Sec	retary of S	itate)			☐ No Change	_	,
**If "No Cha	nge" and	Section I is complete, skip to Se	ection III -	- Regulate	ed Entity I	nforma	tion.	_	
8. Type of C	ustomer:	□ Corporation     □ C	ا 🗆 ا	ndividual			Sole Proprietorsh	nip- D.B.A	-1
City Gove	ernment	☐ County Government		Federal Go	overnment		State Governme	nt	
Other Go	vernment	General Partnership		Limited Pa	rtnership		Other:		
9. Customer	Legal Na	me (If an individual, print last name fi	rst: ex: Doe	, John)	If new C		r, enter previous C		End Date:
Eco Servi	ces Ope	rations LLC	•		Solvay			_	11/30/2014
-	c/o CC	MP Capital Advisors, LI	.C		<u>.1 </u>				1
10. Mailing		rk Avenue, 16th Floor						<del>"</del>	
Address:			T	1277		404		I T	
t in the second	City	New York	State	NY	ZIP	101		ZIP + 4	
11. Country	Mailing In	formation (if outside USA)	ale (1) die 14. Wegenerale die 140				S (if applicable)	<u> 10 </u>	ent in the second
AO TAIREE	ne <b>T</b> obere	ক্রে বিভাগ ভারতার <del>এই বিভাগ বিভাগ করে। করি বিভাগ করি বিভাগ বিভাগ করে। করি বিভাগ বিভাগ করি বিভা</del>	Ar Division	r	ichard.ja	insen	@ccmpcapita	l.com	
-			4. Extens	on or Co	de di	Apprel Edi	1		θ) : `
16. Federal	00-9637	nis) 17. TX State Franchise Ta	× 10		DUNC N	imbari		-3481	Mirenaham ne u
47-16110		32054951721	XIU (11 ali	)rts) 10	. DUNS N	umber(	· · · · · · · · · · · · · · · · · · ·	049756	Number (if applicable)
20. Number	of Employ	/ees				<del></del>	21. Independ	dently Owne	d and Operated?
□ 0-20 □	<b>]</b> 21-100	☐ 101-250 ☐ 251-500	<b>⊠</b> 501 a	and higher		`.		Yes	⊠ No
SECTIO		Regulated Entity Infor							
22. General	Regulated	Entity Information (If New Reg	ulated Ent	ity" is sele	cted belov	this fo	rm should be acco	ompanied by	a permit application)
	julated Ent						l Entity Informatio		Change** (See below)
		**If "NO CHANGE" is checked				_	•		(
23. Regulate	ed Entity N	lame (name of the site where the reg	ulated action	on is taking	place)				
Eco Servi	ices Ope	rations LLC							

	<del></del> -									
24. Street Address	343	9 Park Street								٠
of the Regulated Entity:										
(No P.O. Boxes)	City	Baytown		State	TX	ZIP	775	520	ZIP +	+4
	P.C	). Box 3331			······································		<u> </u>	<u></u>		······································
25. Mailing Address:										
	City	Baytown		State	TX	ZIP	775	522	ZIP 1	4 3331
26. E-Mail Address:	f	oyd.dickerson	@solv	av.com						, , , , , , , , , , , , , , , , , , , ,
27. Telephone Num			<u> </u>	28. Extensio	n or Code	29.	. Fax	Number (if applica	blé)	
(713)924-140	8					1	713 )	835-3252		
30. Primary SIC Co	de (4 digil	s) 31. Seconda	ry SIC C	ode (4 digits)	32. Primary I (5 or 6 digits)	VAICS	Code	33. Sec (5 or 6 dig		IAICS Code
2819					325180			32518		
34. What is the Prin			ty? (Pl	ease do not rep	eat the SIC or N	NCS de	scriptic			
Manufacture of	sulfur	ic acid								
	Questio	ns 34 - 37 addre	ss geogr	aphic location	n. Please refe	r to th	e inst	ructions for app	licability	
35. Description to Physical Location:										
36. Nearest City				County		<del></del> -	State		Nea	rest ZIP Code
Baytown				Harris			ΤX		77.	520
37. Latitude (N) In	Decima	I: 29.7475			38. Longit	ude (V	/) In	Decimal: -9	5.0019	4444
Degrees	Minute	<u>s</u>	Seconds		Degrees			Minutes		Seconds
29	44		50.99	94	-95		· · · · ·	0		6.9978
39. TCEQ Programs :	and ID N	lumbers Check all P	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,							
	If your De	arrow in not linted, above	ionicalis all	d write in the per	mits/registration nu	nbers th	at will b	e affected by the upd	ates submi	tted on this form or the
	lf your Pro	gram is not listed, ched	k other and	write it in. See I	he Core Data Form	Instructi	ons for	additional guidance.		
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☐ Dam Safety  ☐ New Source Review  56534, 9565, 1166	v – Air	gram is not listed, ched	k other and	write it in. See i	he Core Data Form Aquifer	Instructi	ons for ndustri	additional guidance.	te 🗆	
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Austin Charlotte Dallas Fort Worth Houston New Orleans San Antonio The Woodlands Washington, D.C.

401 Congress Avenue Suite 2100 Austin, Texas 78701 512.370.2800 *OFFICE* 512.370.2850 *FAX* winstead.com

512.370.2833 *DIRECT* crupprath@winstead.com

December 1, 2014

#### **VIA HAND DELIVERY**

Mr. Johnny D. Bowers Texas Commission on Environmental Quality Air Permits Initial Review Team, Office of Air Mail Code MC 161 12100 Park 35 Circle Austin, Texas 78711-3087 DEC 0 1 2014
APIRT

Re:

**Change of Ownership** 

Eco Services Operations LLC - Baytown Plant

CN604683482; RN100211317 Account Number: HG-0696-Q

(Currently issued to Solvay USA Inc.)

Dear Mr. Bowers:

This letter serves as notification that on December 1, 2014, Eco Services Operations LLC ("Eco Services"), became the owner and operator of the above-referenced plant which was previously owned by Solvay USA Inc. ("Solvay").

Eco Services has acquired Solvay's sulfuric acid manufacturing business. The sale includes Solvay's Baytown plant, located at 3439 Park Street, Baytown, Texas 77520, which holds air permits 56534, 9565, 11660, 12675, 86388, PSDTX695M2, PSDTX695M3, and Federal Operating Permit ("FOP") O-1610. In addition, Eco Services has acquired Air Account No. HG-0696-Q.

Eco Services agrees to be bound by all permit conditions and all representation made in the permit and any amendments or alterations. Additionally, it is important to note that the ownership change will not result in changes to the type or quantity of pollutants emitted. In connection with this transfer, please find enclosed the following documents:

- 1. Core Data Form;
- 2. Change of Name/Ownership Form (TCEQ Form 20405); and
- 3. Written Agreement between Solvay and Eco Services containing the specific date of transfer of permit responsibility for FOP O-1610.

Mr. Johnny D. Bowers December 1, 2014 Page 2

Thank you for your assistance with this change of ownership notification. If you have any questions, please call me at (512) 370-2833.

Sincerely,

Carolyn Rupprath

#### **Enclosures**

cc: Mr. Andy Goodridge, Air Section Manager

TCEQ Region 12 5425 Polk St., Ste. H

Houston, Texas 77023-1452

#### AGREEMENT TRANSFERRING RESPONSIBILITY UNDER BAYTOWN PLANT TITLE V PERMIT NO. O-1610 FROM SOLVAY USA INC. TO ECO SERVICES OPERATIONS LLC

#### December 1, 2014

#### I. BACKGROUND

WHEREAS, Eco Services Operations LLC ("<u>Eco Services</u>") is in the process of acquiring the sulfuric acid manufacturing business of Solvay USA Inc. ("<u>Solvay</u>") (the "<u>Transaction</u>").

WHEREAS, as of the closing of the Transaction, which currently is targeted for on or about December 1, 2014 ("Closing Date"), Eco Services will own and operate Solvay's Baytown, Texas plant, RN100211317 ("Baytown Plant").

WHEREAS, Eco Services has submitted the Change of Name/Ownership Form (Form 20405) to the Texas Commission on Environmental Quality (the "TCEQ") Air Permits Division to request the transfer of all of the air permits currently issued to Solvay for its Baytown Plant, including its Title V Permit O-1610.

WHEREAS, in consideration of, and in exchange for, the promises and covenants herein, Eco Services and Solvay agree to the terms and provisions of this Agreement Transferring Responsibility Under Baytown Plant Title V Permit No. O-1610 from Solvay to Eco Services (this "Agreement").

#### II. AGREEMENT BETWEEN SOLVAY AND ECO SERVICES

- 1. As of the Closing Date, and in conjunction with the transfer of Title V Permit No. O-1610, Solvay hereby assigns, and Eco Services simultaneously assumes, all legal responsibilities, coverage, and liability under Title V Permit No. O-1610.
- 2. Solvay will continue to comply with all responsibilities and obligations under Title V Permit No. O-1610 until the Closing Date, and Eco Services agrees to be bound by and comply with all responsibilities and obligations under Title V Permit No. O-1610 on and after the Closing Date without regard to whether the executive director of the TCEQ has then approved the transfer of Title V Permit No. O-1610 to Eco Services.
- 3. This Agreement shall bind and inure to the benefit of the parties hereto and their respective successors and assigns.

4. The signatories for the parties each certify that he or she is authorized to enter into the terms and conditions of this Agreement and to execute and bind legally such party to this Agreement.

5. This Agreement may be executed in two or more counterparts (including electronically transmitted counterparts), each of which will be deemed an original but all of which will constitute but one instrument.

[Signature Page Follows]

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed as of the date first above written.

ECO SERVICES OPERATIONS LLC

By:

Name: Mark McFadden

Title: Vice President and Secretary

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed as of the date first above written.

SOLVAY USA INC.

By: Millen JM-Grade

Name: William McConnell

Title: Plant Manager

Bryan W. Shaw, Ph.D., P.E., Chairman Toby Baker, Commissioner Zak Covar, Commissioner Richard A. Hyde, P.E., Executive Director



#### FILE COPY

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 12, 2014

MR JAMES HARTON PRESIDENT SOLVAY USA INC 8 CEDARBROOK DR CRANBURY NJ 08512-3612

Re: Notification of Final Compliance Certification

Federal Operating Permit Permit Number: O1610 SOLVAY USA INC. Baytown Plant

Baytown, Harris County

Regulated Entity Number: RN100211317 Customer Reference Number: CN600125330

Account Number: HG-0696-Q

#### Dear Mr. Harton:

We have received from Eco Services Operations LLC a letter dated December 1, 2014, concerning an ownership change for the above-referenced site. We have been informed that SOLVAY USA INC. is no longer the owner of the above-referenced facility. Our files have been updated to document this change.

You must submit a compliance certification (Form PCC) and deviation report(s) as required by 30 Texas Administrative Code § 122.145 and 146 for the period from the day after the end date of the most recent certification to the effective date of the transfer of ownership agreement (not to exceed 12 months). The compliance certification is due within 30 days after the effective date of the transfer of ownership agreement and should be submitted to the TCEQ Houston Regional Office, 5425 Polk Street, Suite H, Houston, Texas 77023-1452 and the Environmental Protection Agency Region VI. Please contact the regional office at (713) 767-3500 if you have any questions regarding the compliance certification process.

Please maintain a copy of this letter with your records for future reference. If you have questions concerning the review or this notice, please contact Ms. Toni Oyler at (512) 239-1311.

Mr. James Harton Page 2 December 12, 2014

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

Johnny D. Bowers, Team Leader Air Permits Initial Review Team

**Air Permits Division** 

Texas Commission on Environmental Quality

JDB/to

**Enclosure** 

cc: Air Section Manager, Region 12 - Houston

Air Permit Section Chief, U.S. Environmental Protection Agency, Region 6 - Dallas

Project Number: 18273



Solvay USA Inc. Houston Plant



#### CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 0296)

October 16, 2013

Texas Commission on Environmental Quality Air Permit Division MC-163 P.O. Box 13087 Austin, Texas 78711-3087

RE:

Solvay USA Inc.

Forms OP-DEL and OP-CRO2 Houston, Texas Facility Company Name Change CN600125330/RN100220581 Baytown, Texas Facility Company Name Change CN600125330/RN100211317 AIR PERMITS DIVISION
OCT 2 1 2013
RECEIVED

Dear Sir or Madame:

Rhodia Inc. has formally changed its corporation name to Solvay USA Inc. This is a name change only; there was no change of ownership.

Please find attached the Forms OP-DEL and OP-CRO2 and TCEQ Core Data Forms for the Houston and Baytown plants for this name change.

If you have any questions, please do not hesitate to contact me at (713) 924-1408.

Sincerely,

W. F. Dickerson

**Environmental Manager** 

attachment



### Form OP-DEL Change of Responsible Official Information Federal Operating Permit Program



A Responsible Official (RO may choose to delegate signature authority to a Duly Authorized Representative (DAR). Such delegation may be made to an individual that has responsibility for the overall operation of one or more manufacturing, production, or operating facilities applying for, or subject to, a federal operating permit. Signature stamps can be accepted in place of an original signature. Faxes, photocopies, and electronic submittals can be accepted in place of an original Form OP-DEL; however, a follow-up submittal of the original Form OP-DEL is requested

Account No.: HG0697O	RN:100220581	CN:600125330				
Permit No.:3049	<del></del>	Area Name: Houston Plant				
Company Name: USA Inc.						
II. Duly Authorized Represen	tative Information					
Action Type:	New DAR Identification	x Administ	rative Information Change			
Name: ( x Mr. Mrs. Ms. Ms.	Dr.) James Harton	· · · · · · · · · · · · · · · · · · ·				
Title: President		Delegation Effective D	Pate: October 1, 2013			
Telephone No.: 609-860-4456		Fax No.: 609-860-2222	2			
Mailing Address 8 Cedar Brook						
City: Cranbury	Stat	e: New Jersey	ZIP: 08512-7500			
Delivery Address: 8 Cedar Brook						
City: Cranbury	Stat	e: New Jersey	ZIP:08512-7500			
III. Certification of Truth, Acc	curacy, and Completeness					
I, James Harton	• • •					
(RO or DAR name p formed after reasonable inquiry, th Responsible Official Signature:	• • •					
(RO or DAR name p formed after reasonable inquiry, th	e statements, and information statements, and information statements.	Led above are true, accu	rate, and complete.			
(RO or DAR name p formed after reasonable inquiry, th Responsible Official Signature:  Title: President, Eco Services  Duly Authorized Representative Signature	ignature: William J. M.	Led above are true, accu	10   15 - 20   3			
(RO or DAR name p formed after reasonable inquiry, th Responsible Official Signature:	ignature: William J. M. SA Inc. Houston and Baytown Placed Representative(s)	ted above are true, accu	10   15 - 20   3			
(RO or DAR name p formed after reasonable inquiry, th Responsible Official Signature:  Title: President, Eco Services  Duly Authorized Representative Si Title: Plant Manager of Solvay US  IV. Removal of Duly Authorized	ignature: William J. M. SA Inc. Houston and Baytown Placed Representative(s)	Led above are true, accu	10   15 - 20   3			
(RO or DAR name p formed after reasonable inquiry, th Responsible Official Signature:  Title: President, Eco Services  Duly Authorized Representative Si Title: Plant Manager of Solvay US  IV. Removal of Duly Authorized	ignature: William J. In.  SA Inc. Houston and Baytown Placed Representative(s)  as Duly Authorized Representative	Led above are true, accu	(Signature Date)  (O / 1 6 / 13  (Signature Date)			
(RO or DAR name p formed after reasonable inquiry, th Responsible Official Signature:  Title: President, Eco Services  Duly Authorized Representative Si Title: Plant Manager of Solvay US  IV. Removal of Duly Authoriz  The following should be removed:  (DAR name(s) printed or type)	ignature: William J. M. SA Inc. Houston and Baytown Placed Representative(s) as Duly Authorized Representative	ted above are true, accu	(Signature Date)  (O / 1 6 / 13  (Signature Date)			



## Form OP-DEL Change of Responsible Official Information Federal Operating Permit Program (Extension)



V. Additional Identifying I	nformation							
Account No.: HG0696Q	RN: 100211	317	CN: 600125330					
Permit No.: 1610		Area Name:	Baytown Plant					
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:	•	Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:	Area Name:					
Account No.:	RN:		CN:					
Permit No.:		Area Name:	Area Name:					
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:	·	Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:						
Account No.:	RN:		CN:					
Permit No.:		Area Name:						

#### Form OP-CRO2 Change of Responsible Official Information Federal Operating Permit Program



The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection Agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or an administrative information change for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to the TCEQ.

1. IDENTIFYING INFORMAT	TION										
A. Account No.:HG0697O	B. RN:100220581	C. CN	:600125330								
D. Permit No.: 3049	E. Area Name: Houston P	lant									
F. Company Name: Solvay USA	A Inc.										
IL CHANGE TYPES											
A. Action Type:	New Appointm	ent: 🛭 Administ	rative Information Change: x								
B. Contact Type (only one respon	B. Contact Type (only one response can be accepted per form)										
Responsible Official: x	Designated Representati	ve: Alternate Des	ignated Representative:								
III. RESPONSIBLE OFFICIAL/DESIGNATED REPRESENTATIVE/ALTERNATE DESIGNATED REPRESENTATIVE INFORMATION											
A. Name: ( <u>x</u> MrMrsM	fsDr.) James Harton										
B. Title: President	. Title: President C. Appointment Effective Date: October 1, 2013										
D. Telephone: 609-860-4456		E. Fax: 609-860-222	2								
F. Company Name: Solvay USA	A Inc.										
G. Mailing Address: 8 Cedar Bro	ook										
City: Cranbury		State: New Jersey	Zip Code: 08512-7500								
H. Delivery Address: 8 Cedar B	rook										
City: Cranbury		State: New Jersey	Zip Code: 08512-7500								
IV. CERTIFICATION OF TRI	UTH, ACCURACY, AND CO	OMPLETENESS									
This certification does not exten I,James Harton	d to information which is de	•	s information for reference only.								
reasonable inquiry, the (Name printed or	tyned)	· ,									
statements and information stated		complete.									
Signature:	The same of the sa	Sig	nature Date: 10 - 15 - 70/3								
Title: <u>President Eco Services</u>	1										

## Form OP-CRO2 Change of Responsible Official Information (Extension) Federal Operating Permit Program

V. ADDITIONAL IDENTIFYING INFORMATION	
A. Account No.:HG0696Q	B. RN: 100211317
C. CN: 600125330	D. Permit No.: 1610
E. Area Name: Baytown Plant	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	
A. Account No.:	B. RN:
C. CN:	D. Permit No.:
E. Area Name:	



Solvay USA Inc.

**TCEQ Use Only** 

#### **TCEQ Core Data Form**

SECTIO		iled instructions regarding completion neral Information	n of this form, plea	ise read the	Core Data	Form Instruc	tions or o	call 512-239-	5175.		
1. Reason for Submission (If other is checked please describe in space provided)											
11	New Permit, Registration or Authorization (Core Data Form should be submitted with the program application)										
Renewa	al (Core Da	ata Form should be submitted wit	th the renewal fo	rm)	✓ Other	Comp	any N	Name Ch	ange		
2. Attachme	ents	Describe Any Attachments: (	ex. Title V Applica	tion, Waste	Transporter						
3. Custome	r Reference	Number (if issued)	Follow this link to		4. Regula	ted Entity	Refere	nce Numbe	r (if issued)		
CN 6001	25330		Central Regis		RN 10	0211317	7				
SECTION II: Customer Information											
5. Effective Date for Customer Information Updates (mm/dd/yyyy) 10/1/2013											
6. Custome	<b>r Role</b> (Prop	osed or Actual) - as it relates to the	Regulated Entity I	isted on this	s form. Pleas	se check onl	y <u>one</u> of	the following:			
Owner		Operator		•		_					
Occupation		<u>-</u>	Volunta	ary Cleanu	p Applican	t ∐(	Other:		***************************************		
7. General C	Customer Ir	nformation									
	☐ New Customer ☐ Update to Customer Information ☐ Change in Regulated Entity Ownership										
_ •	•	ne (Verifiable with the Texas Sec	• •				Change	<u>9**</u>			
**If "No Cha	inge" and S	Section I is complete, skip to Se	ection III – Regu	ulated Ent	tity Informa	<u>ation.</u>					
8. Type of C	ustomer:	□ Corporation	☐ Individ	ual		Sole Proprietorship- D.B.A					
☐ City Gov	ernment	☐ County Government	☐ Federa	ral Government							
☐ Other Go	overnment	☐ General Partnership	Limited	d Partners	hip 🗆	Other:					
9. Custome	r Legal Nar	ne (If an individual, print last name fi	irst: ex: Doe, John	) <u>lf ne</u> <u>belo</u>	ew Custome	e <u>r, enter pre</u>	vious Cu	<u>ıstomer</u>	End Date:		
Solvay U	SA Inc.										
	8 Ceda	r Brook		'							
10. Mailing Address:		· · · · · · · · · · · · · · · · · · ·									
Address:	City	Cranbury	State NJ	Z	IP 085	12		ZIP + 4	7500		
11 Country		formation (if outside USA)		$\top$	lail Addres		nie)				
Th. Gountary	Manning III	in outdoory		12.2.		in applicati	,,,,				
13. Telepho	ne Number	1.	4. Extension or	Code		15. Fax	Numbe	r (if applicat	ole)		
(609)86	60-4000						) 409	-2845			
16. Federal		1	IX ID (11 digits)		S Number	(if applicable)	19. TX	( SOS Filing	Number (if applicable)		
22353995	54	12235399545		00295	9810						
20. Number	of Employ	ees				21. ln	depend	lently Owne	ed and Operated?		
0-20	21-100	☐ 101-250 ☐ 251-500		gher			<u> </u>	/es	☐ No		
<b>SECTIO</b>	N III: R	egulated Entity Infor	<u>mation</u>								
22. General	Regulated	Entity Information (If 'New Reg	ulated Entity" is	selected b	elow this fo	rm should	be acco	mpanied by	a permit application)		
☐ New Reg	gulated Enti	<u> </u>			o Regulate				Change** (See below)		
		**if "NO CHANGE" is checked				V, Preparer II	nformatio	л.			
23. Regulate	ed Entity N	ame (name of the site where the reg	gulated action is ta	king place)							

TCEQ-10400 (09/07) Page 1 of 2

			\					1	$\overline{}$			
24. Street Address of the Regulated	34	39 Park Str	<i></i>							·	<del></del>	,
Entity:		<del>``</del>			_		· · · · ·					Т
(No P.O. Boxes)	City	Baytown		State		ГХ	ZIP	775	520		ZIP + 4	
	P.0	D Box 3331										
25. Mailing Address:												
Address.	City	Baytown		State	,	ΓX	ZIP	775	522		ZIP + 4	3331
26. E-Mail Addres	<del>- ' - '</del>	,   20, 10						1				10001
27. Telephone Nu				28. Extens	ion (	or Code	29	). Fax I	Number (if ap	plicable)		
(281) 691-6500 (281) 427-1527												
30. Primary SIC C	30. Primary SIC Code (4 digits) 31. Secondary SIC Code (4 digits) 32. Primary NAICS Code (5 or 6 digits) 33. Secondary NAICS Code (5 or 6 digits)										S Code	
2819						325188						
34. What is the Pr			<b>ity?</b> (Ple	ease do not i	repea	t the SIC or N	AICS d	escriptio	on.)			
Manufacture of												· · · · · · · · · · · · · · · · · · ·
	Questi	ons 34 – 37 addre	ss geogra	aphic loca	tion.	Please refe	er to th	ne insti	ructions for a	applica	bility.	
35. Description to Physical Location	:											
36. Nearest City				County				State			Nearest	ZIP Code
Baytown				Harris				TX			77520	
37. Latitude (N)	In Decima	al:				38. Longit	tude (\	V) In	Decimal:			
Degrees	Minute	es	Seconds			Degrees	Minutes				Seconds	
29	44		51			95			0		07	
39. TCEQ Programs updates may not be made	s and ID I	Numbers Check all P	rograms and	d write in the p write it in. Se	permits	s/registration nu Core Data Form	ımbers ti n instruc	hat will b	e affected by the additional guidar	updates	submitted o	n this form or the
☐ Dam Safety	,	☐ Districts	<u> </u>	☐ Edwar								
<u> </u>												
New Source Rev	ew – Air	☐ OSSF		☐ Petrole	eum S	Storage Tank		PWS			Slud	ge
9565, 56534							10	11077		· · · · · · · · · · · · · · · ·		
☐ Stormwater				Tires				Used (	Oil		Util	ities
		O01610					+_			· · · · · · · · · · · · · · · · · · ·	·	
☐ Voluntary Clea	nup	☐ Waste Water			tewat	er Agriculture	<u> </u>	Water	Rights		│	<u>)r:</u>
										_		
SECTION IV	: Prep	arer Inform	<u>ation</u>									
40. Name: Flo	yd Dic	kerson				41	l. Title	: 1	Environme	ental l	Manage	er
42. Telephone Nur	nber	43. Ext./Code	44	. Fax Num	ber		45. E-N	lail Ad	dress			
(713)924-140	8		(	713 <b>)</b> 835	5-32	<b>61</b> 1	floyd	.dick	erson@so	lvay.c	om	
SECTION V:	Auth	orized Signa	ture									
46. By my signatu and that I have sigupdates to the ID r	nature au umbers	thority to submit identified in field	this form	n on behal	lf of	the entity s	pecifi	ed in S	ection II, Fi			
(See the Core Date		<del>-</del>	nore info	rmation (	in Wi	1						
Company:	<del>,                                      </del>	USA Inc.	.11			Job Tit	ie:	riant	Manager		710 \ 00	4 1 401
Name(in Print):		m J. McConne		<i>C</i> /					Phone:		713)92	4-1401
Signature:	Mi	thin J.	. M	la	m	M			Date:		0//	6/13

TCEQ-10400 (09/07) Page 2 of 2



**TCEQ Use Only** 

#### **TCEQ Core Data Form**

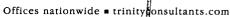
For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

<b>SECTION</b>	I: Ge	neral Information		,,,						
ľ 1		sion (If other is checked please		•	•	•				
☐ New Per	mit, Regis	stration or Authorization (Core Da	ta Form sh	ould b	e subn	nitted w	ith the	program application	on)	
Renewa	Core E	ata Form should be submitted wit					Other	Company I	Name Ch	ange
2. Attachmei	nts	Describe Any Attachments: (	ex. Title V A	pplicati	on, Wa	ste Tran	sporter	Application, etc.)		
3. Customer	Reference	e Number (if issued)	Follow this for CN or F			4. 1	Regula	ted Entity Refere	nce Numbe	r (if issued)
CN 6001	25330			Regist		R	N 10	0220581		
<b>SECTION</b>	<u> </u>	ustomer Information								
5. Effective [	Date for C	ustomer Information Updates (r	nm/dd/yyy	/y)	10/1	/2013				
6. Customer	Role (Pro	posed or Actual) – as it relates to the	Regulated E	<u>ntity</u> lis	sted on	this forn	n. Pleas	e check only <u>one</u> of	the following:	
□Owner		☐ Operator	⊠c	wner 8	& Oper	ator				
☐ Occupatio	nal Licens	ee Responsible Party	□ ∨	olunta	ry Clea	nup Ap	plicant	☐Other:		
7. General C	ustomer l	nformation								
☐ New Cust	omer	☐ Up	date to Cu	stomer	Inforn	nation		☐ Change in	Regulated E	Entity Ownership
☐ Change in Legal Name (Verifiable with the Texas Secretary of State) ☐ No Change**										
**If "No Char	nge" and	Section I is complete, skip to Se	ection III —	Regu	iated E	ntity l	nforma	tion.		
8. Type of Cu		ndividu	al			Sole Proprietorsh	nip- D.B.A			
☐ City Government ☐ County Government			☐ Federal Government				State Governmen	nt		
Other Go	vernment	☐ General Partnership		imited	Partne	rship		Other:		
9. Customer	Legal Na	me (If an individual, print last name fi	rst: ex: Doe,	John)	_	new Co	ustomei	r, enter previous Cu	<u>ustomer</u>	End Date:
Solvay US	SA Inc.									
,	8 Ceda	ar Brook								- <del></del>
10. Mailing	0 000	a Diook						,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
Address:			1							<u> </u>
	City	Cranbury	State	NJ		ZIP	085	12	ZIP + 4	7500
11. Country I	Mailing In	formation (if outside USA)			12. E	-Mail A	ddres	S (if applicable)		<u> </u>
40 - 1										
13. Telephon		r 14	4. Extensi	on or (	Code			15. Fax Numbe	• • • •	ole)
( 609 ) 86		47 TV State Franchise Te	• ID		40 DI	INIC NI.			-2845	- N
<b>16. Federal T</b> 22353995		17. TX State Franchise Ta 12235399545	XID (11 digi	- 1		ภ <b>เอ ห</b> เ 5981	· ·	f applicable) 19. T)	C SOS FIRINÇ	g Number (if applicable)
20. Number o	of Employ	/ees						21. Independ	lently Owne	ed and Operated?
□ 0-20 □	21-100	☐ 101-250 ☐ 251-500	⊠ 501 a	nd high	ner			🖂 Y	•	□ No
		Regulated Entity Inform					-			
		Entity Information (If 'New Regu		tv" is s	electer	l helow	this for	rm should be acco	mnanied hy	a nermit annlication)
☐ New Regu	_	<u> </u>		_				Entity Information	· <u> </u>	Change** (See below)
		**If "NO CHANGE" is checked			<u> </u>		<u> </u>			(000 201011)
23. Regulate	d Entity N	lame (name of the site where the reg	,							
Solvay US										

TCEQ-10400 (09/07) Page 1 of 2

		$\overline{}$					<i>-</i>	<u>~</u> }			
24. Street Address of the Regulated	86	15 Manch	r Street								
Entity: (No P.O. Boxes)	City	Houston		State	TX	ZIF	77		ZIP	+4	
	<del></del>	15 Manchester	r Street	State	IA	ZIF	-   //	012	ZIF	T 44	
25. Mailing	80	15 Ivianchester	Succi								
Address:	04			04.44	TX	715		7010	710		
00 5 51 31 4 1 1	City	Houston		State	TX	ZIF	///	7012	ZIP	+4	
26. E-Mail Address 27. Telephone Nu				28. Extensio	n or Code	•	20 Fay	Number (if applied	rahla)		
(713) 928-3411 (713) 835-3252											
30. Primary SIC Co		ts) 31. Seconda	ary SIC C	ode (4 digits)	32. Primar		`	e 33. Se	condary	NAICS	Code
2819		<u> </u>			(5 or 6 digits) 325188			(5 or 6 d	igits)		
34. What is the Pri	mary Bu	siness of this ent	ity? (Ple	ease do not rep		NAICS	descript	tion.)			
Manufacture o	f sulfu	ric acid and co	mmerci	ial hazardo	ous waste	incin	eratio	n			
	Questi	ons 34 – 37 addre	ss geogr	aphic locatio	n. Please re	efer to	the ins	tructions for ap	plicabilit	у.	
Questions 34 – 37 address geographic location. Please refer to the instructions for applicability.  35. Description to Physical Location:											
36. Nearest City				County			State		Ne	arest Z	IP Code
Houston				Harris	·		TX		77012		
	n Decima			38. Longitude (W) In Decimal:							
Degrees	Minute	es	Seconds						Minutes Seconds		ds
29	43		20		95			16		20	· · ·
39. TCEQ Programs updates may not be made	and ID I If your Pro	<b>Numbers</b> Check all P ogram is not listed, che	rograms and ck other and	d write in the perr write it in. See th	nits/registration he Core Data Fo	numbers orm instru	that will uctions fo	be affected by the up or additional guidance	odates subn ).	nitted on t	his form or the
☐ Dam Safety		☐ Districts					Indust	ndustrial Hazardous Waste		☐ Municipal Solid Waste	
		· · · · · · · · · · · · · · · · · · ·				50095					
New Source Revi	ew – Air	OSSF		Petroleun	n Storage Tan	k   [	PWS			Sludge	
4802, 19282, 565	66	N Tide V Air		Ti		<del>-   _</del>	7 11004				
Stormwater		☐ Title V – Air		Tires			Used	· OII		<u>Utilitie</u>	<del>S</del>
☐ Voluntary Clear	aur	O3049  Waste Water		☐ Wastew	vater Agricultu	re Γ	☐ Wate	r Rights		Other:	
		00542			<u> </u>						
SECTION IV	: Pren		ation	I.,				-			
	yd Dicl					41. Titl	e:	Environmen	tal Ma	nager	
42. Telephone Nun	nber	43. Ext./Code	44	. Fax Numbe	r	45. E-	Mail A				
(713)924-140	8		(7	713 <b>)</b> 835-3	261	floy	d.dick	xerson@solv	ay.com	l	
<b>SECTION V:</b>	Auth	orized Signa	ture								
<b>46.</b> By my signaturand that I have sign updates to the ID n	nature au umbers i	thority to submit identified in field	this forn	n on behalf c	of the entity	specif	fied in	Section II, Field			
(See the Core Data			nore info	rmation on							
		USA Inc.	.11		Job T	itle:	Plan	t Manager	1	100:	4.04
Name(In Print):		m J. McConne		, , ,				Phone:	(713	924	.1401
Signature:	/wx	Ulin !	Y. 1	1-60	mell	1		Date:	10,	1/6/	17

TCEQ-10400 (09/07) Page 2 of 2





yonsultants.com

JUL 2 4 2012

A DITO TO

1001 West Loop South, Suite 640, Houston, TX 77027 U.S.A. ■ (713) 552-1371 ■ Fax (713) 552-1374

July 23, 2012

Ms. Lisa Mason, Texas Commission on Environmental Quality Air Permits Initial Review Team (APIRT), MC 161 12100 Park 35 Circle Building C, Third Floor Austin, TX 78753

RE:

Federal Operating Permit Renewal

Permit Number 1610

Rhodia Inc.

Regulated Entity Number: RN100211317

Customer Number: CN600125330 Account Number: HG0696Q

Dear Ms. Mason:

Rhodia Inc. (Rhodia) is submitting the renewal application of above referenced Site Operating Permit (SOP). Permit No. O1610 has an expiration date of January 25, 2013. This application for renewal is required to be received by TCEQ before July 24, 2012.

The required supporting documentation for the federal operating permit O1610 renewal (and revision) is provided in this application.

On behalf of Rhodia, Trinity Consultants Inc. has prepared the application of permit renewal.

If you have any questions on this submittal or require additional information, please feel free to contact David Laurie at (713) 924-1484.

Sincerely,

Pranav Kulkarni Senior Consultant, Trinity Consultants

cc:

David Laurie - Rhodia Inc.

EPA Region 6

Manual Bautista – TCEQ Region 12

RECEIVED

JUL 24 2012

ATE PERMITS DIVISION

SUS, SOU, DEC

Perm. + - 1610

Project- 18273

DOCH byb30

CT

### OPERATING PERMIT O1610 RENEWAL APPLICATION RHODIA INC. • BAYTOWN PLANT

Prepared by:

TRINITY CONSULTANTS

1001 West Loop South Suite 640 Houston, Texas 77027 (713) 552-1360

**July 2012** 

Project No. 124402.0009



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i

#### 1. Introduction

Rhodia Inc. (Rhodia) owns and operates a sulfuric acid manufacturing plant in Baytown, Harris County, Texas (Baytown Plant). The facility produces sulfuric acid by regenerating spent sulfuric acid (sulfuric acid received from petroleum refining and chemical processes that has been in contact with volatile organic compounds). The Baytown Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) account number HG-0696-Q. Rhodia has a TCEQ Customer Reference Number CN600125330 and the Baytown plant is registered with a Regulated Entity Number RN100211317. The Baytown Plant is authorized by a federal operating permit O1610.

Permit O1610 has an expiration date of January 25, 2013. A renewal notice was sent by the TCEQ to Rhodia on November 29, 2011. With this application, Rhodia intends to renew this permit according to 30 TAC §122.241(b).

Additionally, Rhodia submitted a revision application for the Permit O1610 to reflect the correct regulatory requirement for several tanks in January 2012. For ease of review, updates made in January 2012 significant revision are also included with this renewal application. Rhodia has also identified one gasoline tank and three diesel tanks at Baytown Plant. These tanks are included as part of the revision together with the renewal. Table 1-1 summarizes all the revisions.

Section 2 contains all the required forms for this submittal. A process description is located in Section 3. An area map indicating the site location, a plot plan identifying the location of sources, and process flow diagrams are included in Section 4.

TABLE 1-1. SUMMARY OF CHANGES

Item	Description	Change						
GRPACIDTNK	Spent acid tanks T-5, T-6, T-7 and T-8	The tanks are not subject to 40 CFR, Part 60, Subpart Kb due to vapor pressure < 0.5 psia. Additionally, except 30 TAC 115.118 (relating to Recordkeeping Requirements), these tanks are not subject to any other requirements in 30 TAC 115.						
T-16	Production Tank	This tank has been changed to 96% to 98% sulfuric acid production tank. Since it does not store VOC, it is no longer subject to 30 TAC 115 requirements. Also, since it is no longer stores any VOC, this tank is not subject to 40 CFR Part 60 Subpart Kb.						
T-GAS	Gasoline Tank	New Tank. Authorized by PBR 106.412. The tank is not subject to 40 CFR, Part 60, Subpart Kb due to capacity < 75 cubic meter. Additionally, tank is not subject to any requirements in 30 TAC 115 since capacity < 25000 gallons (storage tank at the motor vehicle dispensing facility).						
GRPDIESELT	Diesel Tanks: T-Diesel1, T- Diesel2, T-Diesel3	New Tanks. Authorized by PBR 106.412. New Tank. Authorized by PBR 106.412. These tanks are not subject to 40 CFR, Part 60, Subpart Kb due to capacity < 75 cubic meter. Additionally, except 30 TAC 115.118 (relating to Recordkeeping Requirements), these tanks are not subject to any other requirements in 30 TAC 115.						
Permit Shield	T-5, T-6, T-7 and T-8	Remove 40 CFR Part 60 Subpart K from permit shield.						
Permit Shield	T-16	Remove 40 CFR Part 60 Subpart K from permit shield.						
Permit Shield	T-16	Not subject to 40 CFR Part 60 Subpart Kb or 30 TAC 115.						
Periodic Monitoring	VOC control for Tank T-5, T-6, T-7 and T-8	Deleted. These tanks are not subject to periodic monitoring requirement per 30 TAC 115 as their vapor pressures are less than 0.5 psia.						
Periodic Monitoring	VOC control for T- 16	Deleted. This tank is no longer a VOC storage tank.						
	T-16,	Deleted for tank T-16. Since tank T-16 no longer stores VOC, no vapor controls (vapor combustor) is needed.						
Compliance Schedule	PREHTRSTK,	The stack test for preheater was performed in time. However, stack test results indicated that Rhodia did not meet the Chapter 117 requirement. Rhodia proposes to schedule another stack test for the preheater based on the compliance plan and schedule as provided in TCEQ OP-ACPS form.						
	PKGBOILSTK	The stack tests for package boiler have been completed in time.						

#### 2. TCEQ FORMS

OP-CRO1
OP-1
OP-2
OP-SUMR
OP-UA3
OP-REQ1
OP-REQ2
OP-MON
OP-ACPS

OP-CRO1



#### Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

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JUL 24 2012

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public horizon materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

				<u> </u>						
I. IDENTIFYING INFORMATION				<u> </u>						
A. RN: 100211317 B. CN: 6	00125330	C	. Account No.: HG-0	696-Q						
D. Permit No.: O-1610	E. Pro	ect No.: TBA								
F. Area Name: Baytown Plant										
G. Company Name: Rhodia Inc.										
II. CERTIFICATION TYPE (Please mark the appropriate box)										
A. Responsible Official:	В. 🛚	Ouly Authorized	Representative: Willia	am McConnell						
III. SUBMITTAL TYPE (Place an "X" in the a	ppropriate box,	(Only one resp	onse can be accepted p	er form)						
SOP/TOP Initial Permit Application	Update t	Permit Applica	ation							
GOP Initial Permit Application	Permit R	evision, Renewa	ıl, or Reopening							
Other:										
IV. CERTIFICATION OF TRUTH				*						
This certification does not extend to information	n which is desig	nated by the T	CEQ as information 1	for reference only.						
I, <u>William McConnell</u>	certify	that I am the	DAR	for this application						
(Certifier Name printed or typed)	, corniy		(RO or DAR)	ior and approacion						
I, William McConnell, certify that I am the DAR for this application (Certifier Name printed or typed)  and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:  Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).										
' '										
A. Time Period: Fromt  Start Date*	0									
Start Date*	End Da	e*								
OK										
B. Specific Dates: <u>07/24/2012</u>										
		4* Date 5*		Date 7* Date 8*						
*The Time Period option may only be used whe uncertified submittals; or a submittal package has										
if the "Submittal Type" is 'Other.'	munipic daics	ceoraca in inc	accumentation. Bone	t also the Time I citou option						
Signature: Wella June	m	S	ignature Date:	120/2012						
Title: Plant Manager				•						

OP-1



#### Texas Commission on Environmental Quality Federal Operating Permit Program Site Information Summary Form OP-1 (Page 1)

RECEIVED

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250. Address written inquiries to the Texas Commission on Environmental Quality Office of Permits and Registration, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I.	I. COMPANY IDENTIFYING INFORMATION													
	A.	Company N	Vame:	Rhodia	Inc.									
	B.	Customer F	Referen	ce Numl	er (CN):	CN60	CN600125330							
	C.	Submittal I	Date (m	m/dd/yy	yy):	07/24	07/24/2012							
II.	SITE	INFORMA	ATION	Į										
	A. Site Name: Baytown Plant													
	B.	Regulated l	Entity 1	Referenc	e Numbe	(RN):	RN1002	11317						
	C.	Primary Ac	Primary Account Number for Site: HG-0696-Q											
	D. Indicate affected state(s) required to review permit application: (Place an "X" in the appropriate box[es].)													
AR		СО		KS		LA		NM		OK		N/A	X	
	E.	Indicate all	pollut	ants for v	which the	site is a	major soı	irce based	d on the s	ite's pote	ntial to e	emit:		
Pollutant VOC NO <sub>X</sub>						SO <sub>2</sub>	PM <sub>10</sub>	M <sub>10</sub> CO Pb HAPS Other						
Major	at the	Site (YES/N	<i>IO)</i> :	No	Yes	Yes	No	No	No	No	No			
	F.	Is the source	e a no	n-major :	source sul	oject to t	he Federa	l Operati	ng Permi	t Progran	1?	☐ YES 🖾 NO		
	G.	Is the site v	vithin a	local pr	ogram ar	ea jurisd	iction?					✓ YES	□ NO	
	H.	Will emissi	ions av	eraging l	be used to	comply	with any	Subpart	of 40 CF	R Part 63	?	☐ YES	⊠ NO	
	I.	Indicate the averaging:	e 40 Cl	FR Part 6	3 Subpar	t(s) that	will use e	missions		N/A				
m.	PER	MIT TYPE	n San Sagai								. :			
	A.	Type of Pe	rmit R	equested	: (Select	only <u>one</u>	response	and plac	e an "X"	in the bo	x.)			
Site O <sub>1</sub>	peratin	g Permit (SC	OP)	X Ten	рогагу О	perating	Permit (	ГОР)	Gene	ral Opera	ting Perr	nit (GOP)		
IV.	INI	IAL APPL	ICATI	ON INF	ORMAT	ION (C	omplete f	or Initial	Issuance	Applicat	ions <u>onl</u> y	<b>.)</b>		
	A.	Is this su	bmittal	an abbr	eviated or	a full a	pplication	?			Abbrev	riated 🔲 1	Full	
	B.	If this is	a full a	pplicatio	n, is the s	ubmitta	a follow	up to an	abbreviat	ed applic	ation?	☐ YES	NO	
	C.	If this is Acid Rai	an abb n/CAI	reviated R permit	applicatio	n, is this	s an early	submittal	for a cor	mbined S	OP and	☐ YES	□NO	
	D.	Has a cop to the for	py of the	nis applic	cation bee	n submi onal info	tted (or is ormation.)	being su	bmitted)	to EPA?	(Refer	☐ YES	□ио	



#### Texas Commission on Environmental Quality Federal Operating Permit Program Site Information Summary Form OP-1 (Page 2)

V.	CON	FIDENTIAL INFORMATION							
	A.	Is confidential information s	submitted in conjun	ction with this applic	ation?	☐ YES 🖾 NO			
VI.	RES	PONSIBLE OFFICIAL (RO	0)						
	A.	RO Name: ( Mr. Mrs.	. Ms. Dr.) Ja	mes Harton					
	B.	RO Title: President							
	C.	Employer Name: Rhodia In	ıc.						
	D.	Mailing Address: 8 Cedarb	rook Dr.						
City: (	Cranbu	ry S	State: NJ		ZIP Code: 08:	512-3612			
Territo	гу:		Country:		Foreign Postal	Code:			
	E.	Internal Mail Code:		F. Telepi	hone:				
	G.	Fax:							
VII.	TECHNICAL CONTACT IDENTIFYING INFORMATION (Complete if different from RO.)								
	A.	Technical Contact Name: (	Mr. Mrs. 🔲	Ms. Dr.) David L	aurie				
	B.	Technical Contact Title: En	vironmental Engine	еет					
	C. Employer Name: Rhodia Inc.								
	D.	Mailing Address: 8615 Mai	nchester Street						
City: 1	Housto	n S	State: Texas		ZIP Code: 770	012			
Territo	ry:		Country: Foreign Post			Code:			
	E.	Internal Mail Code:							
	F.	Delivery Address: Same as	above						
City:		S	State:		ZIP Code:				
Territo	гу:		Country:		Foreign Postal				
	G.	Internal Mail Code:		H. Telep	hone: 713-924	-1484			
	I.	Fax: 713-835-3261		J. E-mai	il: David.Laurie	@us.rhodia.com			
VIII.	REF	ERENCE ONLY REQUIR	EMENTS (For refe	erence only.)					
	Α.	State Senator: John Whitmi	іге						
	B.	State Representative: Wayn	ne Smith						
	C.	Has the applicant paid emiss (Sept. 1 - August 31)?	sions fees for the m	ost recent agency fisc	cal year	YES □ NO □N/A			
	D.	Is the site subject to bilingua	al notice requiremen	notice requirements pursuant to 30 TAC § 122.322?					
	E.	Indicate the alternate langua	age(s) in which publ	lic notice is required:		Spanish			



#### Texas Commission on Environmental Quality Federal Operating Permit Program Site Information Summary Form OP-1 (Page 3)

IX.		SITE PERMIT REQUES on all for applicants requestions.		and records	at an off-	site location.)	
	<b>A.</b>	Office/Facility Name:					
	В.	Physical Address:					
City:			State:			ZIP Code:	
Territo	ry:		Country:			Foreign Postal	Code:
	C.	Physical Location:					
	D.	Contact Name: ( Mr.	Mrs. Ms. D	)r.)			
 	E.	Telephone:					
X,	APP	LICATION AREA INFOR	RMATION				
	A.	Area Name: Baytown Plan	t				
	B.	Physical Address: 3439 Pa					
City: 1	Baytow		State: TX			ZIP Code: 77:	520
	C.	Physical Location:					
	D.	Nearest City:					
	E.	State:		F. ZIP Code:			
	G.	Latitude (nearest second):	29°44'53.48"N	Н.	Longitu	de (nearest seco	ond): 95° 0'9.16"W
	I.	Are there any emission uni requirements identified in	its that were not in	compliance w	vith the ap	plicable	☐ YES 🖾 NO
<b>—</b>	J.	Indicate the estimated num					15
	K.	Are there any emission uni Program and/or CAIR?					☐ YES ⊠ NO
XI.		LIC NOTICE uplete this section for SOP A					
	A.	Name of public place to vi					cipal Library
	B.	Physical Address: Mary E					
City: I	Baytow	/n		ZIP Code:			
	C.	Contact Person (Someone	who will answer qu	uestions from	the publi	ic, during the p	ublic notice period):
		(⊠ Mr. ☐ Mrs. ☐ Ms. [					
	D.	Contact Mailing Address:					
City: 1	Housto		State: Texas			ZIP Code: 770	)12
Territo			Country:			Foreign Postal	Code:
	E.	Internal Mail Code:		F.	Telep	hone: 713-924	-1484
XII.	DEL	INQUENT FEES AND PI				1 833 1	
Notice	e: Thi	is form will not be processed torney General on behalf of	d until all delinques the TCEO are paid	nt fees and/or in accordanc	penalties e with the	owed to the To "Delinquent F	CEQ or the Office of ee and Penalty Protocol."



#### Texas Commission on Environmental Quality Federal Operating Permit Program Site Information Summary Form OP-1 (Page 4)

		ections XIII and XIV for A ate of Representation sub		i CAIR Peri	nit app	olications <u>only</u> . Please include a copy of			
XIII.	DES	SIGNATED REPRESENT	ATIVE (DR) IDEN	TIFYING IN	FORM	IATION			
	A.	DR Name: ( Mr. M							
	B.	DR Title:							
	C.	Employer Name:							
	D.	Mailing Address:							
City:			State:			ZIP Code:			
Territo	ry:		Country:	Foreign Postal Code:					
	E.	Internal Mail Code:		F.	Telep	ohone:			
	G.	Fax:		H. E-mail:					
XIV.	AL	TERNATE DESIGNATE	D REPRESENTATIV	/E (ADR) II	DENTI	FYING INFORMATION			
	A,	ADR Name: ( Mr.	Mrs. Ms. Dr.)						
	B.	ADR Title:							
	C.	Employer Name:							
	D.	Mailing Address:							
City:			State:			ZIP Code:			
Territo	ory:		Country:			Foreign Postal Code:			
	E.	Internal Mail Code:		F.	Telep	phone:			
	G.	Fax:		H.	E-ma	il:			

OP-2



# Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2

Table 1

Date:	7/24/2012	Permit No.:	O-1610	Account No.:	HG-0696-Q		Regulated Entity No.: RN1002113		
Area Name:	Baytown Plant			Company Name	: Rhodia Inc.		Customer Refer	ence No.:	CN600125330
For Submiss	ions to EPA (SOP	renewal, minor revi	ision, and significant	revision application	ons <u>only</u> )				
Has a copy of	f this application be	en submitted (or is l	being submitted) to E	EPA? (Refer to the	form instructions for	additional informa	ation.)	☑ YES	□ NO
<u> </u>									
I. APPLICA	TION TYPE								
	Renewal Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)								
Indicate the application:	type of	Significant Revis	sion $\square$	Revison Requesti	Revison Requesting Prior Approval				
application.		Administrative R	Revision	Response to Reop	pening		<del> </del>		
II. QUALIFI	ICATION STATE	MENT							
For SOP Rev	isions Only	The referenced of	changes qualify for th	e marked revision	type.			✓ YES	□ NO
For GOP Rev	visions Only	The permitted ar	ea continues to quali	fy for a GOP.				☐ YES	□ NO
III. MAJOR	SOURCE POLLI	JTANTS (Complete	e this section if the pe	ermit revision is du	e to a change at the	site.)			
Indicate all pe	ollutants for which	the site is a major se	ource based on the si	te's potential to en	nit after the change is	operated:			
Pollutant		voc	NOx	SO <sub>2</sub>	PM <sub>10</sub>	CO	Pb	HAPs	Other
Major at the	Site (YES/NO):	No	Yes	Yes	No	No	No	No	No
IV. FEE INF	FORMATION								
Has the appli	cant paid emissions	fees for the most re	ecent agency fiscal ye	ear (September 1 -	August 31)?		✓ YES	□ №	□ NA
V. DELINQ	UENT FEES AND	PENALTIES							
		ocessed until all deli Fee and penalty pro	inquent fees and/or potocol.	enalties owed the	TCEQ or the Office of	of the Attorney Ger	neral on behalf of t	he TCEQ are paid	in



# Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2

Table 2

Date:	7/24/2012	Permit No.: O-1610	Account No.:	HG-0696-Q	Regulated Entity No.:	RN100211317
Area Name: B	Baytown Plant		Company Name:	: Rhodia Inc.	Customer Reference No.:	CN600125330

I. DESCRIPT	ION OF R	EVISION				
Revision No.	Revision	New	Unit/Group/Proce	ss Applicable	NSR	Description of Changes and
ICC VISION TVO	Code	Unit	ID No.	Form	Authorization	Provisional Terms and Conditions
i	SIG-A	NO	GRPACIDTNK	OP-UA3	56534	Rule applicability change and remove periodic monitoring.
2	SIG-A	NO	T-16	OP-REQ2	56534	Rule applicability change.
3	SIG-E	YES	T-GAS	OP-UA3	106.412	Adding a new 850 gal gasoline tank.
4	SIG-E	YES	GRPDIESELT	OP-UA3	106.412	Adding two 500 gal diesel tanks and one 475 gal diesel tank.
5	MS-C	NO	PREHTRSTK	OP-ACPS	56534	Documentation of compliance plan and schedule.
-	-					
				1		



## Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2

Table 3

Date:	7/24/2012	Permit No.:	O-1610	Account No.:	HG-0696-Q	Regulated Entity No.:	RN100211317			
Area Name:	Baytown Plant	Company Name:	Rhodia Inc.			Customer Reference No.:	CN600125330			
I. SIGNIFICAN	F REVISION (Complete this	section if you are subm	nitting a significal	nt revision application or a	renewal application	that includes a significant revision	n.)			
A. Is the site su	A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?									
B. Indicate the	alternate language(s) in whi	ich public notice is rec	quired:	Spanish						
C. Will there be	e a change in air pollutant e	missions as a result of	the significant r	revision?		☑ YES	□ NO			
D. Indicate the	e air pollutant(s) that will be	changing and include	e a brief descrip	tion of the change in pollu	tant emissions for ea	ch pollutant:				
	Pollutant			Description of the	e Change in Pollutant	Emissions				
Benzene, Toluene, Xylene	Ethylbenzene, and m,p-	tanks. A significant r	revision application bmitted to TCEQ	on for Rhodia Baytown faci in January 2012. For ease	ility operating permit (	scovered due to the testing of vapo (O-1610) to reflect the correct regulate in January 2012 significant rev	ulatory requirement for			
	, Iso-Butane, n-Butane, and sumed to be iso-pentane)	Emission increases-fi submitted to TCEQ			ication to incorporate t	the PBR No. 91097 into NSR Pen	mit No. 9565 was			
Gasoline, Diesel		Emission increases f	Emission increases from PBR 106.412 to authorize 850 gal gasoline tank, two 500 gal diesel tanks and one 475 gal diesel tank.							

**OP-SUMR** 



# Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 1

Date:	7/24/2012		Regulated Entity No.: RN100211317	Permit No.: O-1610
Company Na	me:	Rhodia Inc.	Area Name: Baytown Plant	

				Preconstruction Author	izations		
		Applicable Form			30 TAC Chapter 116/ 30 TAC Chapter 106	Title I	
	2	T-16	OP-REQ2	Production Acid Tank		56534	
A	3	T-GAS	OP-UA3	Gasoline Tank		106.412/09/04/2000	
		· · · · · · · · · · · · · · · · · · ·			***		
		<b></b>					1
-	-						
							<del>-</del>



# Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 2

Date:	07/24/2012	Regulated Entity No.: RN100211317	Permit No.: O-1610
Company Name:	Rhodia Inc.	Area Name: Baytown Plant	

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.	Plant AI	Plant ID No.
1	T-5	OP-UA3		GRPACIDTNK		
1	T-6	OP-UA3		GRPACIDTNK		
1	T-7	OP-UA3		GRPACIDTNK		
1	T-8	OP-UA3		GRPACIDTNK		
4	T-Diesel 1	OP-UA3	A	GRPDIESELT		
4	T-Diesel2	OP-UA3	A	GRPDIESELT		
4	T-Diesel3	OP-UA3	Α	GRPDIESELT		

OP-UA3



## Storage Tank/ Vessel Attributes Form OP-UA3 (Page 3) Federal Operating Permits Program

#### Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR 60)

Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

Date:	7/24/2012	Permit No.: O-1610	Regulated Entity No.:	RN100211317
Area Name:	Baytown Plant		Customer Reference No.:	CN600125330

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	Maximum TVP	Storage Vessel Description	AMEL ID	Reid Vapor Pressure	Control Device ID No.
GRPACIDTNK	60Kb-0001	VOL	40K+	0.5-				
T-GAS	60Kb-0002	PTLQ-3	10K-					
GRPDIESELT	60Kb-0003	PTLQ-3	10K-					
	<del></del>							
							<del> </del>	
							<del></del>	

TCEQ - 10008 (Revised 02/12) OP-UA3 Storage Tank/Vessel Attributes This form is for use by sources subject to air quality permit requirements and may be revised periodically. (APDG 5737v6)



#### Storage Tank/ Vessel Attributes Form OP-UA3 (Page 4) Federal Operating Permit Program

Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Storage of Volatile Organic Compounds (VOCs)

Date:	07/24/2012	Permit No.:	O-1610	Regulated Entity No.:	RN100211317
Area Name:	Baytown Plant			Customer Reference No.:	CN600125330

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
GRPACIDTNK	R5112-0001	NO		VOCI	A40K+			
T-GAS	R5112-0002	NO		GASMV	A25K-			
GRPDIESELT	R5112-0003	NO		VOC1	A1K-			
			<u> </u>		<del></del>			
				\				



## Storage Tank/ Vessel Attributes Form OP-UA3 (Page 5) Federal Operating Permit Program

Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)
Subchapter B: Storage of Volatile Organic Compounds (VOCs)

Date:	07/24/2012	Permit No.:	O-1610	Regulated Entity No.: RN100211317
Area Name:	Baytown Plant			Customer Reference No.: CN600125330

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
GRPACIDTNK	R5112-0001		NONEI	1-				
							: :	
			<u> </u>					
					<u> </u>			

OP-REQ1



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 1) Federal Operating Permit Program

Date	Date: 07/24/2012 RN No.: RN100211317 Permit No.: O-1610			)-1610				
Агеа	rea Name: Baytown Plant							
<b>)</b>					, questions unless otherwise directed. LY these questions unless otherwise d	irected.		
I.				CHAPTER 11 LATE MATT	1 - CONTROL OF AIR POLLUTI ER	ON FROM VIS	IBLE EMISSIONS	
	A. Visible Emissions							
<b>*</b>		1.		pplication areary 31, 1972.	a includes stationary vents constructed	l on or before	☑ YES ☐ NO ☐ N/A	
<b>♦</b>		2.		pplication areary 31, 1972.	a includes stationary vents constructed	l after	☑ YES ☐ NO	
		3.	All st	ationary vents response to Q	are addressed on a unit specific basis uestion I.A.3. is "YES", go to Question	n I.A.5.	☐ YES ☑ NO	
		4.			nstructed after January 31, 1972 are su ce monitoring requirements.	bject to	☐ YES ☒ NO	
<b>*</b>		5.	Deter	mination of th	CFR Part 60, Appendix A, Method 9 - e Opacity of Emissions from Stationa pacity of emissions in the application	ry Sources) is	⊠ YES □ NO	
<b>*</b>		6.		pplication are .111(a)(7)(A).	a includes structures subject to 30 TA	С	☐ YES 🖾 NO	
<b>*</b>		7.	30 TA		a includes sources, other than those sp a)(1), (4), or (7), subject to 30 TAC	ecified in	☐ YES 🖾 NO	
<b>*</b>		8.		sions from uni mbined water.	ts in the application area include cont	ributions from	☑ YES ☐ NO	
<b>♦</b>		9.	Milit	application are ary Reservatio AC § 111.111(	a is located in the City of El Paso, inc n, and includes solid fuel heating devi c).	luding Fort Bliss ces subject to	☐ YES ☑ NO ☐ N/A	
	В.	Mat	erials l	Handling, Co	nstruction, Roads, Streets, Alleys, a	nd Parking Lots		
		1.	Items	a - d determin	nes applicability of any of these requir	ements based on	geographical location.	
<b>♦</b>			a.	The applicati	on area is located within the City of E	l Paso.	☐ YES 🖾 NO	
<b>♦</b>			b.		on area is located within the Fort Blis except areas specified in 30 TAC § 11		☐ YES ☒ NO	
<b>♦</b>			c.		on area is located in the portion of Happ formed by Beltway 8.	rris County	☐ YES 🖾 NO	



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 2) Federal Operating Permit Program

Date	Pate: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			RN No.: RN100211317	Permit No.: O161	0	
Area	a Name: E	Baytown	Plant				
<b>♦</b>				L questions unless otherwise directed. ILY these questions unless otherwise dire	cted.		
I.	. TITLE 30 TAC CHAPTER 111 - CONTROL OF AIR POLLUTION FROM VISIBLE EMISSIONS AND PARTICULATE MATTER (continued)						
	В.	Materi	als Handling, Co	nstruction, Roads, Streets, Alleys, and	Parking Lots (con	ntinued)	
•		d	Group II state	on area is located in the area of Nueces C e implementation plan (SIP) for inhalable ed by the TCEQ on May 13, 1988.	County outlined in particulate	☐ YES 🖾 NO	
		If there If all re	is any "YES" responses to Question	ponse to Questions I.B.1.a - d, answers Q ons I.B.1.a-d are "NO", go to Section I.C	uestions I.B.2.a - a	<i>1</i> .	
		2. I	tems a - d determin	ne the specific applicability of these requ	irements.		
<b>*</b>		а	. The applicati	on area is subject to 30 TAC § 111.143.		☐ YES ☐ NO	
<b>♦</b>		b	. The applicati	on area is subject to 30 TAC § 111.145.		☐ YES ☐ NO	
<b>♦</b>		c	. The applicati	on area is subject to 30 TAC § 111.147.		☐ YES ☐ NO	
<b>♦</b>		d	l. The applicati	on area is subject to 30 TAC § 111.149.		☐ YES ☐ NO	
	C.	Emissi	ons Limits on No	nagricultural Processes			
<b>*</b>			The application are 111.151.	a includes nonagricultural processes subj	ect to 30 TAC	☑ YES ☐ NO	
				ea includes oil or gas fuel-fired steam gen 3(a) and 111.153(c).	erators subject to	☐ YES ☒ NO	
				ea includes solid fossil fuel-fired steam ge 153(a) and 111.153(b).	enerators subject	☐ YES ☒ NO	
	D.	Emissi	ons Limits on Ag	ricultural Processes			
			The application are	ea includes agricultural processes subject	to 30 TAC	☐ YES 🖾 NO	
	E.	Outdo	or Burning				
<b>*</b>				conducted in the application area.  Question I.E.1 is "NO", go to Section II.		☐ YES 🖾 NO	
•			Fire training is con provided in 30 TA	ducted in the application area and subject C § 111.205.	t to the exception	☐ YES ☐ NO	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 3) Federal Operating Permit Program

Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			0					
Area	Area Name: Baytown Plant							
				L questions unless otherwise directed. ILY these questions unless otherwise dire	ected.			
I.	TITL	E 30		11 - CONTROL OF AIR POLLUTION		E EMISSIONS		
	E. Outdoor Burning (continued)							
•	3. Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.							
<b>*</b>		4.	Disposal fires are uprovided in 30 TAC	sed in the application area and subject to $\mathbb{C}$ § 111.209.	the exception	☐ YES ☐ NO		
<b>*</b>	5. Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.				YES NO			
•	6. Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.				YES NO			
<b>*</b>	· · · · · · · · · · · · · · · · · · ·	7.	The application are otherwise prohibite	a has received the TCEQ Executive Dire od outdoor burning according to 30 TAC	ector approval of § 111.215.	☐ YES ☐ NO		
II.	TITL	E 30	TAC CHAPTER 1	12 - CONTROL OF AIR POLLUTION	N FROM SULFU	R COMPOUNDS		
	A.	Tem	porary Fuel Shorta	ge Plan Requirements				
		1.	The application are temporary fuel show	ea includes units that are potentially subjectage plan requirements of 30 TAC §§ 11	ect to the 2.15 - 112.18.	☐ YES ⊠ NO		
III.			TAC CHAPTER 1: INDS (VOCs)	15 - CONTROL OF AIR POLLUTION	N FROM VOLAT	TILE ORGANIC		
	A.	Appl	licability					
•		1.	Beaumont/Port Art covered attainment	that is located in the Houston/Galveston/Brahur area, Dallas/Fort Worth area, El Pasos county as defined by 30 TAC § 115.10. In inclusive counties. If the response to Quantity.	o area, or a	☑ YES ☐ NO		
	В.	Stora	age of Volatile Orga	anic Compounds				
•		1.	capable of maintair	ea includes storage tanks, reservoirs, or on ning working pressure sufficient at all tin loss to the atmosphere.	ther containers nes to prevent any	☐ YES ☒ NO		



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 4) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610	
Area Name: Baytown Plant			

<b>*</b>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
III.								
	C. Industrial Wastewater							
		1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140.  If the response to Question III.C.1 is "NO" or "N/A", go to Section III.D.	☐ YES ☑ NO ☐ N/A				
		2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area.  If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.	YES NO				
		3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater).  If the response to Question III.C.3 is "YES", go to Section III.D.	☐ YES ☐ NO				
		4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons).  If the response to Question III.C.4 is "YES", go to Section III.D.	☐ YES ☐ NO				
		5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	☐ YES ☐ NO				
		6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	☐ YES ☐ NO				
		7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	☐ YES ☐ NO				
	D.	Load	ling and Unloading of VOCs					
+		1.	The application area includes VOC loading operations.	☑ YES ☐ NO				
<b>*</b>		2.	The application area includes VOC transport vessel unloading operations.  For GOP applications, if the responses to Questions III.D.1 - D.2, are "NO", go to Section III.E.	☑ YES ☐ NO				



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 5) **Federal Operating Permit Program**

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610				
Area Name: Baytown Plant						

For SOP applications, answer ALL questions unless otherwise directed.

•		~	questions unless otherwise directed.
•	Law (-/ III ammliantiana	man man ( ) N/I V th an a	accontinue contana athematica divanted
	roring and and an experience of the contract o	TINGWER LIVE I INDEE	miesimas iiniess maerwise miremen

♦	For GC	)P app	plications, answer ONLY these questions unless otherwise directed.		
III.	TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)				
	D.	Load	ling and Unloading of VOCs (continued)		
•		3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area. If the response to Question III.D.3 is "YES", go to Section III.E.	☐ YES 🖾 NO	
<b>♦</b>		4.	For application areas in the Houston/Galveston/Brazoria area, marine terminal transfer operations are conducted in the application area.	YES □ NO □ N/A	
	E.	Fillir	ng of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispens	ing Facilities	
<b>*</b>		1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container.  If the response to Question III.E.1 is "NO", go to Section III.F.	☐ YES 🖾 NO	
<b>*</b>		2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	☐ YES ☐ NO	
•		3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent.  If the response to Question III.E.2 and/or E.3 is "YES", go to Section III.F.	YES NO	
•		4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10.  If the response to Question III.E.4 is "NO", go to Question III.E.9.	☐ YES ☐ NO	
<b>♦</b>		5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	☐ YES ☐ NO	
•		6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	☐ YES ☐ NO	
<b>•</b>		7.	At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 125,000 gallons of gasoline in a calendar month after January 1, 1999. If the response to Question III.E.7 is "YES", go to Section III.F.	☐ YES ☐ NO	



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 6) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317 Permit No.: O1610				
Area Name: Baytown Plant					
	L questions unless otherwise directed. NLY these questions unless otherwise dire	cted.			
III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)					
E. Filling of Gasoline Stor	age Vessels (Stage I) for Motor Vehicle	Fuel Dispensing Facilities			
♦ 8. At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004.  If the response to Question III.E.8. is "YES", go to Section III.F.					
fuel dispensing fac gallons of gasoline	9. Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.				
County, transfers a facility which has	d in Ellis, Johnson, Kaufman, Parker, or Rure made to stationary storage tanks locate dispensed at least 10,000 gallons of gasolins of gasoline in a calendar month after	d at a			
F. Control of VOC Leaks GOPs 511, 512, 513 and	from Transport Vessels (Complete this l 514 only)	section for GOP applications for			
	re filled with, or emptied of, gasoline at a .C § 115.214(a)(1)(C) or 115.224(2) withi				
greater than or equ	re filled with non-gasoline VOCs having all to 0.5 psia under actual storage condition TAC § 115.214(a)(1)(C) within the approximation of the state	ons at a			
	are filled with, or emptied of, gasoline at a a C § 115.214(b)(1)(C) or 115.224(2) with				



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 7) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

			lications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.			
ın.			TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VO	LATILE ORGANIC		
	G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities					
<b>*</b>		1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks.  If the response to Question III.G.1 is "NO" or "N/A", go to Section III.H.	☐ YES ☑ NO ☐ N/A		
•		2.	Transfer operations used exclusively for the fueling of aircraft, watercraft, or agricultural implements are the only transfer operations conducted at facilities in the application area.  If the response to Question III.G.2 is "YES", go to Section III.H.	☐ YES ☐ NO		
<b>*</b>		3.	The application area includes facilities that began construction on or after November 15, 1992.	☐ YES ☐ NO		
<b>*</b>		4.	The application area includes facilities that began construction prior to November 15, 1992.	☐ YES ☐ NO		
•		5.	The application area includes facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	☐ YES ☐ NO		
	H.	Con	trol Of Reid Vapor Pressure (RVP) of Gasoline			
<b>*</b>		1.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County.  If the response to Question III.H.1 is "NO" or "N/A", go to Section III.I.	☐ YES ☐ NO 🖾 N/A		
<b>*</b>		2.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	☐ YES ☐ NO		
<b>*</b>		3.	The application area includes a motor vehicle fuel dispensing facility.	☐ YES ☐ NO		
•		4.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	☐ YES ☐ NO		
	I.	Proc	ess Unit Turnaround and Vacuum-Producing Systems in Petroleum R	efineries		
		1.	The application area is located at a petroleum refinery.	☐ YES ☒ NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 8) Federal Operating Permit Program

Date: 0	re: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			O1610		
Area Name: Baytown Plant						
				, questions unless otherwise directed. LY these questions unless otherwise dire	cted.	
III.	I. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)					
	J.	Surfa	ace Coating Process	es (Complete this section for GOP app	lications onl	y.)
<b>*</b>		1.	located on-site and	rations (other than those performed on e- in-place) that meet the exemption specifi a)(3)(A) or 115.427(b)(1) are performed	ed in	YES NO NA
	K.	Offse	et Lithographic Prin	iting		
		1.		a includes offset lithographic printing prestion III.K.1. is "NO", go to Section III.		☐ YES ☒ NO
	•	2.	Kaufman, Parker, R	a in is Collin, Dallas, Denton, Ellis, John ockwall, or Tarrant Counties.  uestion III.K.2. is "NO", go to Question		☐ YES ☐ NO
		3.		nic printing presses on the property, when combined weight of VOC less than 50 t		☐ YES ☐ NO
		4.	Harris, Liberty, Mo	a is in Brazoria, Chambers, Fort Bend, G ntgomery, or Waller Counties. Questions III.K.2. and 4. are both "NO",		☐ YES ☐ NO
		5.		nic printing presses on the property, when combined weight of VOC less than 25 t		☐ YES ☐ NO
	L.	Cutb	ack Asphalt			
		1.	roadways, driveway application area by	ck asphalt containing VOC solvents for the solvents for t	r use in the	☐ YES ☒ NO ☐ N/A
		2.	asphalt containing	n, sale, or offering for sale of conventionate of solvents for the paving of roadways are in the application area.		☐ YES ☒ NO ☐ N/A
		3.	Asphalt emulsion is	used or produced within the application	area.	☐ YES ☒ NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 9) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

<b>♦</b>			ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.			
III.	III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANI COMPOUNDS (VOCs) (continued)					
	L.	Cutb				
		4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513.  If the response to Question III.L.4 is "NO", go to Section III.M.	☐ YES 🖾 NO		
		5.	The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	☐ YES ☐ NO		
		6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	☐ YES ☐ NO		
		7.	The applicant using cutback asphalt is a state, municipal, or county agency.	☐ YES ☐ NO		
	M. Degassing or Cleaning of Stationary, Marine, and Transport Vessels					
•		1.	The application area includes degassing or cleaning operations for stationary, marine, and/or transport vessels.  If the response to Question III.M.1 is "NO" or "N/A", go to Section III.N.	☐ YES ☒ NO ☐ N/A		
<b>*</b>		2.	Degassing or cleaning of only ocean-going, self-propelled VOC marine vessels is performed in the application area.  If the response to Question III.M.2 is "YES", go to Section III.N.	☐ YES ☐ NO ☐ N/A		
<b>*</b>		3.	Degassing or cleaning of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐ YES ☐ NO ☐ N/A		
•		4.	Degassing or cleaning of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	YES NO NA		
•		5.	Degassing or cleaning of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐ YES ☐ NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 10) Federal Operating Permit Program

Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			O1610				
Area	Name:	Baytov	wn Plant				
<b>♦</b>				, questions unless otherwise dire LY these questions unless other		ted.	
III.			TAC CHAPTER 11 NDS (VOCs) (conti	5 - CONTROL OF AIR POL	LUTION	FROM VO	LATILE ORGANIC
	M.	Dega	ssing or Cleaning o	f Stationary, Marine, and Tra	insport Ve	essels <i>(conti</i>	nued)
•		6.	capacity of 10,000 l	ng of VOC marine vessels with parrels (420,000 gallons) or monater than or equal to 0.5 psia of 3.	re and a va	por space	YES NO N/A
<b>*</b>	7. Degassing or cleaning of VOC marine vessels that do not meet one or more of the exemptions specified in 30 TAC § 115.547(1), (2), or (5), but have sustained damage as specified in 30 TAC § 115.547(4) is performed in the application area.				YES NO N/A		
	N. Petroleum Dry Cleaning Systems						
		1.		a contains one or more petroleur troleum based solvents.	m dry clea	ning	☐ YES ☐ NO ☐ N/A
	О.	O. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC)					
		1.	The application are HRVOC.	a includes one or more vent gas	streams c	ontaining	YES □ NO □ N/A
		2.	potential to emit HI  If the response to Q	nuestion III.O.1. and III.O.2. are in III.P.  If the response to Ques	e both "NC	)" or	☐ YES ☑ NO ☐ N/A
		3.		the application area that are rou /OC by weight at all times.	ited to a fla	re contain	☐ YES 🖾 NO
		4.	contain less than 10	the application area that are not 00 ppmv HRVOC at all times. Duestions III.O.3. and III.O.4. ar			☐ YES 🖾 NO
		5.	The application are controlled by a flar	a contains pressure relief valves e.	s that are n	ot	☐ YES ☐ NO
		6.	The application are to emit HRVOC.	a has at least one vent stream w	hich has n	o potential	YES NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 11) Federal Operating Permit Program

Date	ate: 07/24/2012 RN No.: RN100211317 Permit No.: O1610				O1610	
Are	a Name:	Bayto	wn Plant			
<b>♦</b>				L questions unless otherwise directed. ILY these questions unless otherwise dire	cted.	
III.	II. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)					
	0.	Vent	Gas Control (Highl	y-reactive volatile organic compounds	(HRVOC) (	continued)
		7.	The application area § 115.727(c)(3)(A) -	has vent streams from a source describe (H).	d in 30 TAC	☐ YES ☐ NO
	P.	Cool	ing Tower Heat Exc	hange Systems (HRVOC)		
		1.		includes one or more cooling tower head have the potential to emit HRVOC.	exchange	☐ YES ☐ NO ☐ N/A
IV.		LE 30 1POU		7 - CONTROL OF AIR POLLUTION	FROM NIT	ROGEN
	A.	A. Applicability				
<b>*</b>		1.	Beaumont/Port Arth Eight-Hour area. For SOP application complete Sections IV For GOP applicatio Question IV.A.1 is " For GOP applicatio "YES", complete Se	is located in the Houston/Galveston/Braur, Dallas/Fort Worth, or Dallas/Fort Worth, or Dallas/Fort Worth, is "V.B IV.F and IV.H.  Ins for GOPs 511, 512, 513, or 514, if the YES", go to Section IV.F.  Ins for GOP 517, if the response to Quest octions IV.C. and IV.F.  Ins, if the response to Question IV.A.1 is	orth 'YES", response to ion IV.A.1 is	⊠ YES □ NO
		2.	McLennan County a	is located in Bexar, Comal, Ellis, Hays, and includes a cement kiln.  uestion IV.A.2 is "YES", go to Question I		☐ YES 🖾 NO
		3.	central Texas county See instructions for If the response to Qu	n includes a utility electric generator in any.  a list of counties included.  suestion IV.A.3 is "YES", go to Question In any  Questions IV.A.1 - 3 are all "NO", go to Question In any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III any  suestions IV.A.1 - 3 are all "NO", go to Question III	IV.G.1.	☐ YES 🖾 NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 12) Federal Operating Permit Program

Date	e: <b>07</b> /24/	2012		RN No.: RN100211317	Permit No.: O1610		
Area	Area Name: Baytown Plant						
<b>♦</b>				, questions unless otherwise directed. LY these questions unless otherwise dire	ected.		
IV.			30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN DUNDS (continued)				
	В.	Utilit	y Electric Generation	on in Ozone Nonattainment Areas			
		1.	117.1200, or 117.13	includes units specified in 30 TAC §§ 1 00.  uestion IV.B.1. is "NO", go to Question is a second control of the second control of th		☐ YES 🖾 NO	
		2.	The application area §§ 117.1020 or 117.	☐ YES ☐ NO			
	C.	Com	mercial, Institutions	l, and Industrial Sources in Ozone No	nattainment	Areas	
•		1.	Subchapter B and in 117.300, or 117.400 For SOP application Question IV.D.1.	ns, if the response to Question IV.C.1. is ns for GOP 517, if the response to Quest	.100, "NO", go to	⊠ YES □ NO	
<b>♦</b>		2.	The application area before November 15	is located at a site that was a major sour i, 1992.	ce of NOx	YES □ NO □ N/A	
<b>*</b>		3.		includes an electric generating facility retem Cap in 30 TAC § 117.320.	equired to	☐ YES 🖾 NO	
	D.	Adip	ic Acid Manufactur	ing			
	·	1.	The application area is located at, or part of, an adipic acid production unit.			☐ YES 🖾 NO 🗌 N/A	
	E.	Nitri	c Acid Manufacturi	ng - Ozone Nonattainment Areas			
		1.	The application area	is located at, or part of, a nitric acid pro	duction unit.	☐ YES ☒ NO ☐ N/A	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 13) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610				
Area Name: Baytown Plant						

<b>♦</b>			ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.				
IV.	7. TITLE 30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN COMPOUNDS (continued)						
	F. Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines						
•		1.	The application area is located at a site that is a minor source of NOx in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas. For SOP applications, if the response to Question IV.F.1 is "NO", go to Question IV.H.1.  For GOP applications, if the response to Question IV.F.1 is "NO", go to Section VI.	☐ YES ⊠ NO			
<b>*</b>		2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	☐ YES ☐ NO			
<b>♦</b>		3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	☐ YES ☐ NO			
<b>*</b>		4.	The application area is located in the Dallas/Fort Worth Eight-Hour area and has units that qualify for an exemption under 30 TAC § 117.2103.	☐ YES ☐ NO			
*		5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	☐ YES ☐ NO			
	G.	Utili	ty Electric Generation in East and Central Texas				
		1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995.  If the response to Question IV.G.1 is "NO", go to Question IV.H.1.	☐ YES ☐ NO			
	·	2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	YES NO			
	H.	Mul	ti-Region Combustion Control - Water Heaters, Small Boilers, and Pro	ocess Heaters			
		1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less.  If the response to question IV.H.1. is "NO" go to Section V.	☐ YES ⊠ NO			



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 14) Federal Operating Permit Program

Date	Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610					01610		
Area	Area Name: Baytown Plant							
<b>♦</b>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
IV.	TITLE 30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN COMPOUNDS (continued)							
	Н.	Mult	i-Region Combustio	n Control - Water Heaters, Small Bo	ilers, and Pro	cess Heaters (continued)		
		2.	All water heaters, bo retailed or installed o	pilers or process heaters manufactured, qualify for an exemption under 30 TAC	distributed, § 117.3203.	YES NO		
V.	VOL	ATIL	CODE OF FEDERA E ORGANIC COM CIAL PRODUCTS	AL REGULATIONS PART 59 (40 CI POUND EMISSION STANDARDS I	FR PART 59) FOR CONSUM	- NATIONAL MER AND		
	A. Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings							
		1.	The application area coating components components in the U	manufactures automobile refinish coat and sells or distributes these coatings of Inited States.	ings or r coating	☐ YES 🖾 NO		
		2.	components, manufadistributes these coa	imports automobile refinish coatings of actured on or after January 11, 1999, and tings or coating components in the Unit Questions V.A.1 and V.A.2 are both "NO	d sells or ted States.	☐ YES 🖾 NO		
		3.	imported by the app	ish coatings or coating components ma lication area meet one or more of the ex § 59.100(c)(1) - (6).		☐ YES ☐ NO		
	В.	Subp	oart C – National Vo	latile Organic Compound Emission S	Standards for	Consumer Products		
		1.	The application area distribution in the U	manufactures consumer products for s nited States.	ale or	☐ YES 🖾 NO		
		2.	The application area December 10, 1998 the United States.	imports consumer products manufactu and sells or distributes these consumer	red on or after products in	☐ YES 🖾 NO		
		3.	appears on the label	is a distributor of consumer products of one or more of the products.  Questions V.B.1 - V.B.3 are all "NO", g		☐ YES 🖾 NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 15) Federal Operating Permit Program

Date	e: <b>07/24</b> /2	07/24/2012 RN No.: RN100211317 Permit No.: O1610			01610		
Аге	Area Name: Baytown Plant						
<b>*</b>				, questions unless otherwise directed. LY these questions unless otherwise dir	ected.		
V.	7. TITLE 40 CODE OF FEDERAL REGULATIONS PART 59 (40 CFR PART 59) - NATIONAL VOLATILE ORGANIC COMPOUND EMISSION STANDARDS FOR CONSUMER AND COMMERCIAL PRODUCTS (continued)						
_ <b></b>	В.		oart C – National Vo inued)	olatile Organic Compound Emission S	Standards for	Consumer Products	
	4. All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).				☐ YES ☐ NO		
	C. Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatin						
		1.		a manufactures or imports architectural in the United States.	coatings for	☐ YES ☒ NO	
		2.	are registered under Act.	a manufactures or imports architectural the Federal Insecticide, Fungicide, and Questions V.C.1 and V.C.2 are both "No	Rodenticide	☐ YES ☑ NO	
		3.		atings manufactured or imported by the ore of the exemptions specified in 40 Cl		☐ YES ☐ NO	
	D.	Subp	eart F – Control of I	Evaporative Emissions From New and	d In-Use Porta	able Fuel Containers	
		1.	for sale or distributi	a manufactures or imports portable fuel on in the United States. Suestion V.D.1 is "NO", go to Section V		☐ YES ☑ NO	
		2.	All portable fuel coarea meet one or mo § 59.605(a) - (c).	ntainers manufactured or imported by to ore of the exemptions specified in 40 C	he application FR	☐ YES ☐ NO	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 16) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610					
Area Name: Baytown Plant							
For COD amplications and	III susstians unless ethernise dina	atad					

<u> </u>			lications, answer ALL questions unless otherwise directed. Dications, answer ONLY these questions unless otherwise directed.				
VI.	TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)						
	A.	A. Applicability					
•		1.	☑ YES ☐ NO				
	В.	Subj	part Y - Standards of Performance for Coal Preparation and Processin	g Plants			
		1.	The application area is located at a coal preparation and processing plant.  If the response to Question VI.B.1 is "NO", go to Section VI.C.	☐ YES 🖾 NO			
		2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd).  If the response to Question VI.B.2 is "NO", go to Section VI.C.	☐ YES ☐ NO			
		3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option.  If the response to Question VI.B.3. is "YES", go to Section VI.C.	☐ YES ☐ NO			
		4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility.  If the response to Question VI.B.4. is "NO", go to Section VI.C.	☐ YES ☐ NO			
		5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	☐ YES ☐ NO			
	C.	Subj	part GG - Standards of Performance for Stationary Gas Turbines (GO	P applicants only)			
•		1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. If the response to Question VI.C.1 is "NO" or "N/A", go to Section VI.D.	☐ YES ☐ NO ☐ N/A			
<b>*</b>		2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. If the response to Question VI.C.2 Is "NO", go to Section VI.D.	☐ YES ☐ NO			
		3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	☐ YES ☐ NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 17) Federal Operating Permit Program

Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			O1610			
Area	Name: I	Baytov	vn Plant			
				L questions unless otherwise directed. ILY these questions unless otherwise dire	ected.	
VI.				AL REGULATIONS PART 60 (40 CF LDS (NSPS) <i>(continued)</i>	R PART 60)	- NEW SOURCE
	C.		oart GG - Standard: tinued)	s of Performance for Stationary Gas T	urbines (GO	P applicants only)
		4.		cified in 40 CFR § 60.332(e) is being utigas turbines in the application area.	lized for one	☐ YES ☐ NO
		5.	One or more station GG in the application of nitrogen oxides.	nary gas turbines subject to 40 CFR Part on area is injected with water or steam fo	60, Subpart or the control	☐ YES ☐ NO
	D.	Subp	oart XX - Standards	s of Performance for Bulk Gasoline Te	rminals	
		1.		a includes bulk gasoline terminal loading puestion VI.D.1 is "NO", go to Section V		☐ YES ☑ NO ☐ N/A
		2.	One or more of the December 17, 1980	loading racks were constructed or modif	ied after	☐ YES ☐ NO
	E.		part LLL - Standard Emissions	ds of Performance for Onshore Natura	al Gas Proces	sing: Sulfur Dioxide
<b>♦</b>		1.	§ 60.640(a) that pro For SOP application Section VI.F.	a includes affected facilities identified in ocess natural gas (onshore). ons, if the response to Question VI.E.1 is ons, if the response to Question VI.E.1 is on VI.H.	"NO", go to	☐ YES 🖾 NO
•		2.	The affected facilit January 20, 1984.	ies that were constructed or modified after	er	☐ YES ☐ NO
•		3.	capacity greater tha	a includes a gas sweetening unit with a can or equal to 2 long tons per day (LTPD ut operates at less than 2 LTPD.		YES NO
	F.	Subj	part OOO - Standai	rds of Performance for Nonmetallic M	ineral Proces	sing Plants
		1.	§ 60.670(a)(1) that processing plant.	ea includes affected facilities identified in are located at a fixed or portable nonmerous of the control of th	tallic mineral	☐ YES 🖾 NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 18) Federal Operating Permit Program

Date	: 07/24/2	012		RN No.: RN100211317		Permit No.:	71010
Area	Area Name: Baytown Plant						
<b>♦</b>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
VI.	I. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)						
	F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants (continued)						
		2.	Affected facilities i application area are	dentified in 40 CFR § 60 subject to 40 CFR Part (	.670(a)(1) and lo 50, Subpart OOC	ocated in the	☐ YES ☐ NO
	G.		art QQQ - Standaı tewater Systems	rds of Performance for	VOC Emissions	from Petrol	eum Refinery
		1.	or more of the affect 40 CFR § 60.690(a reconstruction was	a is located at a petroleur eted facilities identified in (2) - (4) for which const commenced after May 4 Question VI.G.1 is "NO",	n ruction, modifica , 1987.	ation, or	☐ YES 🖾 NO
		2.	The application are	a includes stormwater se	wer systems.		☐ YES ☐ NO
		3.		a includes ancillary equipostemand do vastewater system and do vater.			☐ YES ☐ NO
		4.	The application are	a includes non-contact co	ooling water syst	ems.	☐ YES ☐ NO
		5.		a includes individual dra Question VI.G.5 is "NO",		I.H.	YES NO
		6.	The application are meet the exemption	a includes one or more in specified in 40 CFR § 6	ndividual drain s 0.692-2(d).	ystems that	☐ YES ☐ NO
		7.	The application are	a includes completely cl	osed drain syster	ns.	☐ YES ☐ NO
	Н.	Whic	ch Construction Co	ards of Performance for mmenced After August nced on or After June 6	: <b>30, 1999 or for</b>	oal Waste Ind Which Mod	ineration Units for ification or
<b>♦</b>		1.	incineration unit, o  If the response to Q	ea includes at least one so ther than an air curtain in Question VI.H.1. is "N/A" on VI.H.1. is "NO", go to	cinerator. ", go to Section V	I.I. If the	☐ YES ⊠ NO ☐ N/A
<b>♦</b>		2.	incineration unit, o	ea includes at least one sn ther than an air curtain in modified or reconstructe	cinerator, constr	ucted after	☐ YES ☐ NO



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 19) Federal Operating Permit Program

Date:	te: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			O1610			
Area	Area Name: Baytown Plant						
<b>*</b>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
VI.							
	H. Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)						
<b>*</b>		3.	incineration unit, of	a includes at least one small municip ther than an air curtain incinerator, co d not modified or reconstructed on o	onstructed before	☐ YES ☐ NO	
*		4.		a includes at least one air curtain incise to Question VI.H.4. is "NO", go to		YES NO	
<b>*</b>		5.	constructed after A after June 6, 2006.	a includes at least one air curtain includes at least one air curtain includes 30, 1999 or modified or recons	structed on or	☐ YES ☐ NO	
•		6.		nerators constructed after August 30, tructed on or after June 6, 2006 comb		☐ YES ☐ NO	
•		7.		a includes at least one air curtain incl August 30, 1999 and not modified or 2006.		☐ YES ☐ NO	
•		8.		nerators constructed before August 30 tructed on or after June 6, 2006 comb		☐ YES ☐ NO	
	I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001					al Solid Waste 10, 1999 or for Which	
<b>♦</b>		1.	waste incineration  If the response to Q	a includes at least one commercial or unit, other than an air curtain inciners cuestion VI.I.1. is "N/A", go to Section on VII.1 is "NO" go to Question VI	ator. on VI.J. If the	☐ YES ⊠ NO ☐ N/A	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 20) Federal Operating Permit Program

KN No.: KN100211	ate: 07/24/2012 RN No.: RN100211317 Permit No.: O1610						
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VI. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)							
I. Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)							
ncineration unit, other than an air ovember 30, 1999 or modified or	r curtain incinerator, constru	solid YES NO NO NO					
ncineration unit, other than an air November 30, 1999 and not mod	r curtain incinerator, constru	ucted					
		☐ YES ☑ NO					
cted after November 30, 1999 or ne 1, 2001.	modified or reconstructed	on or					
ed or reconstructed on or after Ju	ne 1, 2001 combust only we	YES NO					
cted before November 30, 1999	ne air curtain incinerator, and not modified or reconst	tructed YES NO					
dified or reconstructed on or afte	er June 1, 2001 combust only	у					
	answer ALL questions unless of answer ONLY these questions unless of STANDARDS (NSPS) (continued) (CC - Standards of Performance Units for Which Construction or Reconstruction Commence of Dication area includes at least on accineration unit, other than an air ovember 30, 1999 or modified or 2001.  Dication area includes at least on accineration unit, other than an air November 30, 1999 and not mod 2001.  Dication area includes at least on exponse to Question VI.I.4. is "Not Dication area includes at least on the context of th	answer ALL questions unless otherwise directed.  answer ONLY these questions unless otherwise directed.  DF FEDERAL REGULATIONS PART 60 (40 CFR PAR STANDARDS (NSPS) (continued)  CC - Standards of Performance for Commercial and Ind Units for Which Construction Commenced After Novem or Reconstruction Commenced on or After June 1, 2001  Dication area includes at least one commercial or industrial statementation unit, other than an air curtain incinerator, constructed on or after 2001.  Dication area includes at least one commercial or industrial statementation unit, other than an air curtain incinerator, constructed on unit, other than an air curtain incinerator, constructed on or 2001.  Dication area includes at least one air curtain incinerator. Exponse to Question VI.1.4. is "NO", go to Section VI.J.  Dication area includes at least one air curtain incinerator, cited after November 30, 1999 or modified or reconstructed one 1, 2001.  Exponse to Question VI.1.5. is "NO", go to VI.1.7.  Curtain incinerators constructed after November 30, 1999 or ed or reconstructed on or after June 1, 2001 combust only we clean lumber, or yard waste or a mixture of these materials.  Dicitation area includes at least one air curtain incinerator, cited before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and not modified or reconstructed before November 30, 1999 and					



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 21) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

<b>♦</b>		ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.				
VI.		CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - MANCE STANDARDS (NSPS) (continued)	NEW SOURCE			
	J. Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006					
•	1.	The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator.  If the response to Question VI.J.1. is "N/A", go to Section VII. If the response to Question VI.J.1. is "NO", go to Question VI.J.4.	☐ YES ☑ NO ☐ N/A			
<b>*</b>	2.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	☐ YES ☐ NO			
•	3.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐ YES ☐ NO			
<b>*</b>	4.	The application area includes at least one air curtain incinerator.  If the response to Question VI.J.4. is "NO", go to Section VII.	☐ YES ☒ NO			
•	5.	The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.  If the response to Question VI.J.5. is "NO", go to Question VI.J.7.	YES NO			
*	6.	All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ YES ☐ NO			
<b>*</b>	7.	The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐ YES ☐ NO			
<b>*</b>	8.	All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐ YES ☐ NO			
*	9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	☐ YES ☐ NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 22) Federal Operating Permit Program

Date:	Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			)1610				
Area l	Area Name: Baytown Plant							
<b>♦</b>			LL questions unless otherwise directed. DNLY these questions unless otherwise di	rected.				
VI.	TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)							
	J.	<b>Construction Commenc</b>	rds of Performance for Other Solid Wa ed After December 9, 2004 or for Whic June 16, 2006 <i>(continued)</i>	aste Incinerat h Modificatio	tion Units for Which on or Reconstruction			
<b>*</b>	10. The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.							
VII.			AL REGULATIONS PART 61 (40 CF OR HAZARDOUS AIR POLLUTANTS		- NATIONAL			
	A.	Applicability						
+		CFR Part 61 subpar	a includes a unit(s) that is subject to one orts.  Question VII.A.1 is "NO" or "N/A", go to		☐ YES ☑ NO ☐ N/A			
	B. Subpart F - National Emission Standard for Vinyl Chloride							
		dichloride by reacti vinyl chloride by a	a is located at a plant which produces eth ion of oxygen and hydrogen chloride with ny process, and/or one or more polymers ymerized vinyl chloride.	ethylene,	☐ YES ☐ NO			
	C.	Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive Emission Sources) of Benzene (Complete this section for GOP applications only)						
<b>*</b>		1. The application are	a includes equipment in benzene service.		YES NO NA			
	D.	Subpart L – National E Plants	mission Standard for Benzene Emission	ns from Coke	By-Product Recovery			
		includes one or mo § 61.130(a) - (b).	a is located at a coke by-product recovery re of the affected sources identified in 40 Question VII.D.1 is "NO", go to Section V	CFR	☐ YES ☐ NO			
		2. The application are determined by 40 C	ea includes equipment in benzene service CFR § 61.137(b).	as	☐ YES ☐ NO			
		3. The application are § 61.243-1 and 40	ea has elected to comply with the provisio CFR § 61.243-2.	ns of 40 CFR	☐ YES ☐ NO			



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 23) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: (	)1610
Area Name: Baytown Plant			
For SOP applications, answer ALL For GOP applications, answer ON			
	AL REGULATIONS PART 61 OR HAZARDOUS AIR POLLU		- NATIONAL
E. Subpart M - National E	mission Standard for Asbestos		
	Applicability		
in 40 CFR §§ 61.14	a includes sources, operations, or 3, .144, .146, 147, .148, or .155. <i>tuestion VII.E.1 is "NO", go to Sources of the control </i>	_	YES NO
	Roadway Construction		
2. The application are asbestos tailings or	a includes roadways constructed asbestos-containing waste materi	or maintained with ial.	☐ YES ☐ NO
	Manufacturing Commercial A	sbestos	
commercial asbesto	a includes a manufacturing opera s. Suestion VII.E.3 is "NO", go to Q	_	YES NO
a. Visible emiss manufacturin	ions are discharged to outside air	r from the	YES NO
	e emission control and waste trea at has received prior U.S. Enviro a) approval.		YES NO
c. Asbestos-con forms.	taining waste material is process	ed into nonfriable	☐ YES ☐ NO
d. Asbestos-con	taining waste material is adequat	ely wetted.	☐ YES ☐ NO
e. Alternative fi approval.	ltering equipment is being used t	hat has received EPA	YES NO
	ency particulate air (HEPA) filter e at least 99.97% efficient for 0.3		☐ YES ☐ NO
	authorized the use of wet collect a unit contacting energy of at least		☐ YES ☐ NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 24) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O16	510			
Area Name: Baytown Plant	Area Name: Baytown Plant					
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.					
	/II. TITLE 40 CODE OF FEDERAL REGULATIONS PART 61 (40 CFR PART 61) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (continued)					
E. Subpart M - National E	mission Standard for Asbestos (continu	ed)				
	Asbestos Spray Application					
materials are spray	a includes operations in which asbestos-capplied.  Question VII.E.4 is "NO", go to Question		YES NO			
binder during	ers are encapsulated with a bituminous or g spraying and are not friable after drying se to Question VII.E.4.a is "YES", go to Q		YES NO			
	olications on buildings, structures, pipes, a aterial containing more than 1% asbestos.		YES NO			
	e emission control and waste treatment mat has received prior EPA approval.	ethod is	YES NO			
d. Asbestos-cor forms.	ntaining waste material is processed into r	onfriable	YES NO			
e. Asbestos-cor	ntaining waste material is adequately wett	ed.	YES NO			
f. Alternative f approval.	iltering equipment is being used that has i	eceived EPA	YES NO			
	er is being used that is certified to be at le 0.3 micron particles.	ast 99.97%	YES NO			
	a authorized the use of wet collectors designated a unit contacting energy of at least 9.95 k		YES NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 25) Federal Operating Permit Program

Date: 07/24/2012		RN No.: RN100211317	Permit No.: C	)1610		
Area Name: Baytown Plant						
		L questions unless otherwise directed. TLY these questions unless otherwise dire	ected.			
VII. TITLE 40 CO EMISSION S	VII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 61 (40 CFR PART 61) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (continued)					
E. Subpart M - National Emission Standard for Asbestos (continued)						
		Fabricating Commercial Asbestos				
as	sbestos.	a includes a fabricating operation using of the authorised of the contraction vii.E.5 is "NO", go to Question		☐ YES ☐ NO		
a.	Visible emiss manufacturin	sions are discharged to outside air from the government of the second se	he	☐ YES ☐ NO		
b.		e emission control and waste treatment nat has received prior EPA approval.	nethod is	☐ YES ☐ NO		
c.	Asbestos-con forms.	taining waste material is processed into	nonfriable	☐ YES ☐ NO		
d.	. Asbestos-con	taining waste material is adequately wet	ted.	☐ YES ☐ NO		
e.	Alternative fi	iltering equipment is being used that has	received EPA	☐ YES ☐ NO		
f.		er is being used that is certified to be at le 0.3 micron particles.	east 99.97%	☐ YES ☐ NO		
g.	. The EPA has operate with	authorized the use of wet collectors desi a unit contacting energy of at least 9.95 l	igned to kilopascals.	☐ YES ☐ NO		
		Non-sprayed Asbestos Insulation				
ar	The application are pplied insulating notes the property of th	a includes insulating materials (other tha naterials) that are either molded and friat able after drying.	n spray ble or	☐ YES ☐ NO		
		Asbestos Conversion				
C		a includes operations that convert regula and asbestos-containing waste material tos-free) material.		☐ YES ☐ NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 26) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: C	01610				
Area Name: Baytown Plant							
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 61 (40 CFR PART 61) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (continued)							
	F. Subpart P - National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities						
<ol> <li>The application area is located at a metallic arsenic production plant or at an arsenic trioxide plant that processes low-grade arsenic bearing materials by a roasting condensation process.</li> </ol>							
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations							
bulk terminal.	area is located at a benzene product o Question VII.G.1 is "NO", go to		☐ YES ☐ NO				
The application vessel loading range.	area includes benzene transfer ope ocks.	rations at marine	☐ YES ☐ NO				
3. The application loading racks.	area includes benzene transfer ope	rations at railcar	☐ YES ☐ NO				
4. The application loading racks.	area includes benzene transfer ope	rations at tank-truck	☐ YES ☐ NO				
H. Subpart FF - Nations	l Emission Standard for Benzen	e Waste Operations					
	Applicability						
	area includes a chemical manufact very plant, or petroleum refinery fa		☐ YES ☐ NO				
and disposal (TS	area is located at a hazardous wast (ED) facility site as described in 40 to Questions VII.H.1 and VII.H.2	CFR § 61.340(b).	☐ YES ☐ NO				
wastes, products	area is located at a site that has no byproducts, or intermediates. Or Question VII.H.3 is "YES", go to		☐ YES ☐ NO				



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 27) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610				
Area Name: Baytown Plant						
	L questions unless otherwise directed. VLY these questions unless otherwise dire	cted.				
VII. TITLE 40 CODE OF FEDER EMISSION STANDARDS FO	VII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 61 (40 CFR PART 61) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (continued)					
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)						
	Applicability (continued)					
quantity from facil	ea is located at a site having a total annuality waste less than 1 megagrams per year Question VII.H.4 is "YES", go to Section	(Mg/yr).	☐ YES ☐ NO			
quantity from facil 10 Mg/yr.	ea is located at a site having a total annuality waste greater than or equal to 1 Mg/yr Question VII.H.5 is "YES", go to Section	but less than	☐ YES ☐ NO			
	l annual average benzene concentration o s based on documentation.	f each waste	☐ YES ☐ NO			
	ea has waste streams with flow-weighted tent of 10% or greater.	annual	YES NO NA			
	Waste Stream Exemptions					
8. The application are in 40 CFR § 61.34 concentration is less	ea has waste streams that meet the exemp 2(c)(2) (the flow-weighted annual averages than 10 ppmw).	tion specified e benzene	☐ YES ☐ NO			
in 40 CFR § 61.34	ea has waste streams that meet the exemp 2(c)(3) because process wastewater has a s per minute or an annual wastewater qua	flow rate	☐ YES ☐ NO			
10. The application are in 40 CFR § 61.34 less than or equal (	ea has waste streams that meet the exemp 2(c)(3) because the total annual benzene to 2 Mg/yr.	tion specified quantity is	☐ YES ☐ NO			
11. The application are facility.	ea transfers waste off-site for treatment by	y another	☐ YES ☐ NO			
12. The application are	ea is complying with 40 CFR § 61.342(d)		☐ YES ☐ NO			
	ea is complying with 40 CFR § 61.342(e) Question VII.H.13. is "NO", go to Questi		☐ YES ☐ NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 28) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No.: O	)1610	
Area 1	Area Name: Baytown Plant						
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
VII.	VII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 61 (40 CFR PART 61) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (continued)						
	н.	Subp	art FF - National E	mission Standard for Benzene Was	ite Operations (co	ontinued)	
			1	Waste Stream Exemptions (continu	ted)		
		14.		a has facility waste with a flow weighent of less than 10%.	nted annual	☐ YES ☐ NO	
				Container Requirements			
		15.	receive non-exempt	a has containers, as defined in 40 CFF t benzene waste. Duestion VII.H.15 is "NO", go to Ques		☐ YES ☐ NO	
		16.	40 CFR § 61.345 re	a is an alternate means of compliance equirements for containers.  Question VII.H.16 is "YES", go to Que		☐ YES ☐ NO	
	17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.			☐ YES ☐ NO			
				Individual Drain Systems			
		18.	§ 61.341, that receive	a has individual drain systems, as defive or manage non-exempt benzene was suestion VII.H.18 is "NO", go to Question VIII.H.18 is "NO", go to Que	aste.	☐ YES ☐ NO	
		19.	the 40 CFR § 61.34	a is using an alternate means of complete requirements for individual drain sy Question VII.H.19 is "YES", go to Que	ystems.	☐ YES ☐ NO	
		20.	CFR § 61.346(a).	a has individual drain systems comply Question VII.H.20 is "NO", go to Ques		☐ YES ☐ NO	
		21.	Covers and closed- such that the individ atmospheric pressur	vent systems used for individual drain dual drain system is maintained at a pa re.	n systems operate ressure less than	☐ YES ☐ NO	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 29) Federal Operating Permit Program

Date: 0	7/24/2	2012		RN No.: RN100211317	Permit No.: C	1610	
Area N	lame:	Baytov	vn Plant				
				L questions unless otherwise directed. ILY these questions unless otherwise dire	ected.		
VII.	TITI EMI	LE 40 ISSION	CODE OF FEDER N STANDARDS FO	AL REGULATIONS PART 61 (40 CI OR HAZARDOUS AIR POLLUTANT	FR PART 61) · S (continued)	NATIONAL	
	Н.	Subp	art FF - National E	mission Standard for Benzene Waste	Operations (co	ontinued)	
				Individual Drain Systems (continued)			
		22.	40 CFR § 61.346(b	a has individual drain systems complyin ). Question VII.H.22 is "NO", go to Question		☐ YES ☐ NO	
		23.	system to prevent the	he individual drain systems are equipped the flow of organic vapors from the junct here during normal operation.		YES NO	
		24.		oipes in the individual drain systems are and control device.	connected to a	☐ YES ☐ NO	
	Remediation Activities						
		25.	Remediation activi NESHAP FF.	ties take place at the application area sub	ject to	☐ YES ☐ NO	
VIII.	III. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES					NATIONAL CE CATEGORIES	
	A.	Appl	icability				
•		1.	40 CFR Part 63 sub reference under sub	pa includes a unit(s) that is subject to one operts other than subparts made applicable operts in 40 CFR Part 60, 61 or 63.  The 40 CFR Part 63 subparts made applications are subparts of the control of	le by	☐ YES ⊠ NO	
	B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry					ants from the Synthetic	
		1.	manufacture as a p	ea is located at a site that includes proces rimary product one or more of the chemic (1)(i) or (b)(1)(ii).		☐ YES ☑ NO	
		2.		ea is located at a plant site that is a major eral Clean Air Act § 112(a).	source as	☐ YES 🖾 NO	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 30) Federal Operating Permit Program

Date: U	11/24/2	012		KN NO.: KN1002113	1/	Permit No.: C	71010
Area N	lame: l	Baytov	vn Plant				
				L questions unless othe LY these questions un		cted.	
VIII.							
	В.			nission Standards for ufacturing Industry (		ous Air Pollut	ants from the Synthetic
		3.	manufacturing product, or co-prod pollutants listed in	a is located at a site thess units that use as a uct, one or more of the table 2 of 40 CFR Part puestion VIII.B.1, .B.2,	reactant or manufa e organic hazardous 63, Subpart F.	cture as a s air	☐ YES ⊠ NO
		4.	use as a reactant or	a includes chemical m manufacture as a prod rdous air pollutants lis	luct, or co-product,	one or more	☐ YES ☐ NO
	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater						
				Applica	bility		
		1.	Subpart F and the a vessels, transfer rac manufacturing proc	a is located at a site the application area included by the control of the contro	es process vents, stassociated with a character.  63, Subpart F.	orage emical	☐ YES ☐ NO
		2.		a includes fixed roofs, ply with 40 CFR § 63		losures that	☐ YES ☐ NO
		3.	systems that are rec	a includes vapor collequired to comply with Question VIII.C.3 is "N	40 CFR § 63.148.		☐ YES ☐ NO
		4.		a includes vapor colle nstructed of hard-pipii		osed-vent	☐ YES ☐ NO
		5.	systems that contain from a control devi	a includes vapor colle n by-pass lines that co ce and to the atmosph Question VIII.C.5 is "N	uld divert a vent st ere.	ream away	☐ YES ☐ NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 31) Federal Operating Permit Program

Date: 07/24/2012		RN No.: RN100211317	Permit No.: C	)1610			
Area Name: Bayto	Area Name: Baytown Plant						
		L questions unless otherwise directed. ILY these questions unless otherwise dire	ected.				
EMISSIO	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES) (continued)						
Org	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)						
	Va	apor Collection and Closed Vent System	ms				
6.		installed, calibrated, maintained, and opes in the application area.	erated at the	☐ YES ☐ NO			
7.		application area are secured in the close lock-and-key type configuration.	d position	☐ YES ☐ NO			
Transfer Racks							
8.	The application are HAPs.	a includes Group 1 transfer racks that loa	nd organic	☐ YES ☐ NO			
		Process Wastewater Streams					
9.	The application are If the response to Q	a includes process wastewater streams. Question VIII.C.9 is "NO", go to Question	n VIII.C.31.	☐ YES ☐ NO			
10.	subject to the provi	a includes process wastewater streams th sions of 40 CFR Part 61, Subpart FF. Question VIII.C.10 is "NO", go to Question VIII.C.10 is "NO", go		YES NO			
11.		a includes process wastewater streams th CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	at are	☐ YES ☐ NO			
12.	subject to the provi	a includes process wastewater streams th sions of 40 CFR Part 61, Subpart F. Question VIII.C.12 is "NO", go to Question		☐ YES ☐ NO			
13.		a includes process wastewater streams ut specified in 40 CFR § 63.110(f)(4)(ii).	tilizing the	☐ YES ☐ NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 32) Federal Operating Permit Program

Date:	Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610				)1610	
Area l	Area Name: Baytown Plant					
<b>♦</b>	For S For C	OP ap GOP a	pplications, answer A pplications, answer (	LL questions unless otherwise directed. ONLY these questions unless otherwise d	irected.	
VIII.	<b>EMI</b>	LE 40 SSIOI inued,	N STANDARDS FO	AL REGULATIONS PART 63 (40 CF OR HAZARDOUS AIR POLLUTANT	R PART 63) - S FOR SOUR	NATIONAL CE CATEGORIES
	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)					
				Process Wastewater Streams		
		14.	subject to the provis	a includes process wastewater streams the sions of 40 CFR Parts 260 through 272. Suestion VIII.C.14 is "NO", go to Question		☐ YES ☐ NO
		15.	The application are 40 CFR § 63.110(e)	a includes process wastewater streams co (2)(i).	omplying with	☐ YES ☐ NO
		16.	The application are 40 CFR § 63.110(e)	includes process wastewater streams con (2)(ii).	mplying with	☐ YES ☐ NO
		17.	existing sources, the	a includes process wastewater streams, leat are designated as Group 1; are require 0 CFR § 63.110; or are determined to be	d to be treated	YES NO
		18.	The application are existing sources that	a includes process wastewater streams, let are Group 2.	ocated at	☐ YES ☐ NO
		19.	sources, that are de-	a includes process wastewater streams, l signated as Group 1; required to be treate .110; or are determined to be Group 1 fo	ed as Group 1	☐ YES ☐ NO
		20.	The application are sources that are Gro	a includes process wastewater streams, loup 2 for both Table 8 and Table 9 comp	ocated at new ounds.	☐ YES ☐ NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 33) Federal Operating Permit Program

Date: 07/24/2012 RN No				RN No.: RN100211317	Permit No.: (	01610
Area N	lame: E	Baytow	vn Plant			
				L questions unless otherwise directed. VLY these questions unless otherwise dire	cted.	
VIII.	EMIS	LE 40 ( SSION inued)	N STANDARDS FO	AL REGULATIONS PART 63 (40 CF OR HAZARDOUS AIR POLLUTANTS	R PART 63) S FOR SOUI	- NATIONAL RCE CATEGORIES
	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)					
				Process Wastewater Streams		
		21.	total source mass fl	water streams at the site are demonstrated low rate of less than 1 MG/yr. Question VIII.C.21. is "YES", go to Question VIII.C.21.		☐ YES ☐ NO
		22.	streams demonstrate 1 MG/yr.	ted and/or partially treated Group 1 waste ted to have a total source mass flow rate of Question VIII.C.22. is "NO", go to Question VIII.C.22.	of less than	☐ YES ☐ NO
	·····	23.		ea includes waste management units that r treated Group 1 wastewater stream prior		☐ YES ☐ NO
		24.	wastewater streams is not owned or ope	er streams or residual removed from Grous are transferred to an on-site treatment or erated by the owner or operator of the soute stream or residual.	peration that	☐ YES ☐ NO
		25.	wastewater streams	er streams or residual removed from Grous are transferred to an off-site treatment of Question VIII.C.24 - VIII.C.25 is both "No.".	peration.	☐ YES ☐ NO



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 34) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610				
Area Name: Baytown Plant						

			ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.				
VIII.	II. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)						
	C.	Orga	Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
			Process Wastewater Streams (continued)				
		26.	The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.  If the response to Question VIII.C.24 - VIII.C.25 is both "NO", go to Question VIII.C.27.	☐ YES ☐ NO			
		27.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐ YES ☐ NO			
			Drains				
		28.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.  If the response to Question VIII.C.28 is "NO", go to Question VIII.C.31.	☐ YES ☐ NO			
		29.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices	☐ YES ☐ NO			
		30.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐ YES ☐ NO			
		31.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b).  If the response to Question VIII.C.31 is "NO", go to Question VIII.C.36.	☐ YES ☐ NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 35) Federal Operating Permit Program

Date: 07/24/20	12	RN No.: RN100211317	Permit No.: (	D1610	
Area Name: Ba	aytown Plant				
		L questions unless otherwise directed. ILY these questions unless otherwise direc	cted.		
VIII. TITLE EMISS (contin	SION STANDARDS FO	AL REGULATIONS PART 63 (40 CF OR HAZARDOUS AIR POLLUTANTS	R PART 63) S FOR SOUR	- NATIONAL RCE CATEGORIES	
(	C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)				
		Drains (continued)			
3	trenches or pipes (the unit) that meet the o	a includes drains, drain hubs, manholes, leat are part of a chemical manufacturing periteria listed in 40 CFR § 63.149(d). Suestion VIII.C.32 is "NO", go to Question view of the properties of	process	☐ YES ☐ NO	
3	trenches, or pipes the concentration great	a includes drains, drain hubs, manholes, leat convey water with a total annual average than or equal to 10,000 parts per million in 40 CFR Part 63 Subpart G, Table 9, a	age on by weight	☐ YES ☐ NO	
3	trenches or pipes th concentration great of compounds listed	a includes drains, drain hubs, manholes, lat convey water with a total annual avera er than or equal to 1,000 parts per million d in 40 CFR Part 63 Subpart G, Table 9, a reater than or equal to 10 liters per minute	ge by weight at an annual	☐ YES ☐ NO	
3	trenches or pipes the that is subject to the or (1)(2); and the eq concentration great compounds listed in	a includes drains, drain hubs, manholes, last are part of a chemical manufacturing penew source requirements of 40 CFR § 6 quipment conveys water with a total annual er than or equal to 10 parts per million by a 40 CFR Part 63 Subpart G, Table 8, at a geater than or equal to 0.02 liter per minute	orocess unit 3.100(1)(1) al average weight of an average	☐ YES ☐ NO	



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 36) Federal Operating Permit Program

Date: 0	Date: 07/24/2012			RN No.: RN10021131	.7	Permit No.:	J1610
Area N	ame: I	Baytov	vn Plant				
				L questions unless other VLY these questions unl		cted.	
VIII.	EMI	E 40 SSIOI inued	N STANDARDS FO	AL REGULATIONS OR HAZARDOUS AII	PART 63 (40 CF R POLLUTANTS	R PART 63) S FOR SOUF	- NATIONAL RCE CATEGORIES
	C.	Orga		ufacturing Industry fo			tants from the Synthetic els, Transfer
				Gas Stre	ams		
		36.	40 CFR § 63.107(b	a includes gas streams a ) - (h) or the criteria of atrol device not owned o	40 CFR § 63.113(	i) and are	☐ YES ☐ NO
		37.		able to comply with 40 s described in 40 CFR			YES NO
	D.			mission Standards for ng and Chromium An		sions From I	lard and Decorative
		1.	anodizing tanks loc	ea includes chromium el cated at hard chromium lating, and/or chromiun	electroplating, dec	corative	☐ YES 🖾 NO
	E.	E. Subpart O - Ethylene Oxide Emissions Standards for Sterilization Fac					3
		1.	oxide is used in the	ea includes sterilization e sterilization or fumiga Question VIII.E.1 is "NO	tion of materials.		☐ YES ⊠ NO
		2.	CFR Part 63, Subp	ies located in the applic art O. Question VIII.E.2 is "NO	-		☐ YES ☐ NO
		3.		ource has used less than nsecutive 12-month per			YES NO
		4.	The sterilization so oxide within all co	ource has used less than nsecutive 12-month per	10 tons (9070 kg) iods after Decemb	of ethylene er 6, 1996	☐ YES ☐ NO



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 37) Federal Operating Permit Program

Date: 07/2	Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610		01610				
Area Nam	Area Name: Baytown Plant						
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
E	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)						
F.	. Subp	art Q - National Eı	mission Standards for Industrial Proces	ss Cooling To	owers		
	1.		a includes industrial process cooling towo Question VIII.F.1 is "NO", go to Section 1		☑ YES ☐ NO		
	2.	Chromium-based w September 8, 1994.	vater treatment chemicals have been used	on or after	☐ YES 🖾 NO		
G			mission Standards for Gasoline Distrib Breakout Stations)	ution Faciliti	es (Bulk Gasoline		
	The application area includes a bulk gasoline terminal.				☐ YES 🖾 NO		
	2. The application area includes a pipeline breakout station.  If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO", go to Section VIII.H.		"NO", go	☐ YES 🖾 NO			
	3.	a contiguous area a terminal or a pipeli	terminal or pipeline breakout station is located under common control with another beine breakout station.  Question VIII.G.3 is "YES", go to Question	ulk gasoline	☐ YES ☐ NO		
	4.	a contiguous area a bulk gasoline termi the potential to em	terminal or pipeline breakout station is locand under common control with sources, controls or pipeline breakout stations that emit HAPs.  Question VIII.G.4 is "YES", go to Question	other than nit or have	☐ YES ☐ NO		
	5.	terminal emissions emissions screenin	i) is less than 5% of the value of the bulk screening factor (ET) or the pipeline bread factor (Ep).  Question VIII.G.5 is "NO", go to Question	akout station	☐ YES ☐ NO		
	6.	Emissions screening If the response to Q	ng factor less than 0.5 (ET or EP < 0.5).  Question VIII.G.6 is "YES", go to Section	VIII.H.	YES NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 38) Federal Operating Permit Program

Date: 0	e: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			)1610		
Area Na	ame: E	Baytow	vn Plant			
				, questions unless otherwise directed. LY these questions unless otherwise d	irected.	
VIII.	/III. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)					
	G.			nission Standards for Gasoline Distr Breakout Stations) <i>(continued)</i>	ibution Facilitie	es (Bulk Gasoline
	<del> </del>	7.	$1.0 (0.5 \le ET \text{ or } EP$	g factor greater than or equal to 0.5, but < 1.0).  Luestion VIII.G.7 is "YES", go to Section.		YES NO NA
	8. Emissions screening factor greater than or equal to 1.0 (ET or EP $\geq$ 1.0).  If the response to Question VIII.G.8 is "YES", go to Question VIII.G.10.				☐ YES ☐ NO ☐N/A	
		9.	HAP.	ne application area is located is a major Duestion VIII.G.9 is "NO", go to Section		☐ YES ☐ NO
	10. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).			ng program as	☐ YES ☐ NO	
	H.	Subp Indus		nission Standards for Hazardous Air	r Pollutants fron	n the Pulp and Paper
		1.	paperboard and are as defined in 40 CF	a includes processes that produce pulp located at a plant site that is a major so R § 63.2.  Suestion VIII.H.1 is "NO", go to Section	ource of HAPs	☐ YES 🖾 NO
		2.	§ 63.440(a)(1) - (3)	a uses processes and materials specifie Duestion VIII.H.2 is "NO", go to Section		☐ YES ☐ NO
		3.	63, Subpart S that a	a includes one or more sources subject are existing sources. Question VIII.H.3 is "NO", go to Section		☐ YES ☐ NO
		4.	The application are existing sources.	a includes one or more kraft pulping s	ystems that are	☐ YES ☐ NO



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 39) Federal Operating Permit Program

Date: 0	7/24/2	012	2 RN No.: RN100211317 Permit No.: O1610			01610
Area N	Area Name: Baytown Plant					
				l questions unless otherwise directed. LY these questions unless otherwise direc	cted.	
VIII.	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)					NATIONAL CE CATEGORIES
	Н.		oart S - National Em stry <i>(continued)</i>	nission Standards for Hazardous Air Po	ollutants fron	1 the Pulp and Paper
		5.		a includes one or more dissolving-grade t sting sources at a kraft or sulfite pulping		☐ YES ☐ NO
	6. The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24.  If the response to Question VIII.H.6 is "NO", go to Section VIII.I.			☐ YES ☐ NO		
		7.	The application area 40 CFR § 63.440(d)	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).		
		8.	The application area 40 CFR § 63.440(d)	a includes bleaching systems that are com )(3)(ii).	nplying with	☐ YES ☐ NO
I.	Subp	art T	- National Emission	n Standards for Halogenated Solvent C	leaning	
		1.	line cold, and/or bat hazardous air pollut halogenated HAP se	a includes an individual batch vapor, in-litch cold solvent cleaning machine that us tant (HAP) solvent, or any combination o olvents, in a total concentration greater that and/or drying agent.	ses a of	☐ YES 🖾 NO
		2.	cleaning machines,	a is located at a major source and include qualifying as affected facilities, that use trichloroethylene or methylene chloride.	es solvent	☐ YES 🖾 NO
		3.	cleaning machines,	a is located at an area source and includes other than cold batch cleaning machines, trichloroethylene or methylene chloride.		☐ YES 🖾 NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 40) Federal Operating Permit Program

Date: 07/24/2012	7/24/2012 RN No.: RN100211317 Permit No.: O1610			01610			
Area Name: Baytov	Area Name: Baytown Plant						
		L questions unless otherwise directe ILY these questions unless otherwis					
	N STANDARDS FO	AL REGULATIONS PART 63 (4 OR HAZARDOUS AIR POLLUT					
	eart U - National Er mers and Resins	nission Standards for Hazardous	Air Pollutant Emi	ssions: Group 1			
1.	wastewater streams elastomer product p	a includes elastomer product process and wastewater operations that are process units.  Puestion VIII.J.1 is "NO", go to Sec	associated with	☐ YES 🖾 NO			
2.	wastewater operation 40 CFR Part 63, Su	process units and/or wastewater streets located in the application area a bpart U.  Suestion VIII.J.2 is "NO", go to Section 2.	re subject to	☐ YES ☐ NO			
3.	3. The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.			☐ YES ☐ NO			
4.		a includes process wastewater streater HAPs as defined in 40 CFR § 63.4		☐ YES ☐ NO			
5.	total source mass fl	vater streams at the site are demons owrate of less than 1 MG/yr. Question VIII.J.5. is "YES", go to Q		☐ YES ☐ NO			
6.	streams demonstrat 1 MG/yr.	ted and/or partially treated Group 1 ed to have a total source mass flow Puestion VIII.J.6. is "NO", go to Question VIII.J.6.	rate of less than	☐ YES ☐ NO			
7.	The application are manage a partially treatment.	a includes waste management units treated Group 1 wastewater stream	that receive or prior to or during	☐ YES ☐ NO			



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 41) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610				
Area Name: Baytov	vn Plant					
	ications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise direc	ted.				
EMISSION	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)					
	oart U - National Emission Standards for Hazardous Air Pomers and Resins <i>(continued)</i>	ollutant Emissions: Group 1				
8.	Group 1 wastewater streams or residual removed from Group wastewater streams are transferred to an on-site treatment ope is not owned or operated by the owner or operator of the sour generating the waste stream or residual.	eration that				
9.	Group 1 wastewater streams or residual removed from Group wastewater streams are transferred to an off-site treatment op If the response to Question VIII.J.8 - VIII.J.9 are both "NO", Question VIII.J.11.	eration.				
10.	The application area includes waste management units that remanage a Group 1 wastewater stream or a residual removed for Group 1 wastewater stream prior to shipment or transport.					
	Containers					
11.	The application area includes containers that receive, manage Group 1 wastewater stream or a residual removed from a Growastewater stream.					
	Drains					
12.	The application area includes individual drain systems that remanage a Group 1 wastewater stream or a residual removed in Group 1 wastewater stream.  If the response to Question VIII.J.12. is "NO", go to Question of the response to Question VIII.J.12. is "NO", go to Question VIII.J.12.	from a				
13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover are vented, closed vent systems and control devices.					
14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water setightly fitting caps or plugs.					



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 42) Federal Operating Permit Program

Date: 0	Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			O1610		
Агеа N	Area Name: Baytown Plant					
<i>F</i> <sub>0</sub> <b>♦</b> <i>F</i> <sub>0</sub>	or SOP a	ipplic applic	ations, answer ALL cations, answer ON	L questions unless otherwise directed. ILY these questions unless otherwise dire	ected.	
VIII.						
	J. Si	ubpa 'olym	rt U - National En ers and Resins <i>(co</i>	nission Standards for Hazardous Air l ontinued)	Pollutant Emi	issions: Group 1
				Drains (continued)		
	1:	1	trenches, or pipes th	a includes drains, drain hubs, manholes, hat are part of an elastomer product proc Question VIII.J.15 is "NO", go to Section	cess unit.	☐ YES ☐ NO
	10	1	trenches or pipes th § 63.501(a)(12).	a includes drains, drain hubs, manholes, at meet the criteria listed in 40 CFR § 6.2 Question VIII.J.16 is "NO", go to Section	3.149(d) and	☐ YES ☐ NO
	1'	1	trenches, or pipes the concentration great	a includes drains, drain hubs, manholes, hat convey water with a total annual ave er than or equal to 10,000 parts per milliting the definition of organic HAP in 40 ow rate.	erage ion by weight	☐ YES ☐ NO
	1	1	trenches or pipes the concentration greated of compounds meet	ea includes drains, drain hubs, manholes, nat convey water with a total annual average than or equal to 1,000 parts per million ting the definition of organic HAP in 40 ual average flow rate greater than or equal to 1,000 parts per million ting the definition of organic HAP in 40 ual average flow rate greater than or equal transfer than or equal transfer than or equal transfer t	rage on by weight ) CFR	☐ YES ☐ NO
	1		trenches or pipes the is a new affected so equipment conveys greater than or equipmenting the definition.	ea includes drains, drain hubs, manholes, nat are part of an elastomer product procource or part of a new affected source and swater with a total annual average concal to 10 parts per million by weight of colon of organic HAP in 40 CFR § 63.482 we rate greater than or equal to 0.02 liter	cess unit that and the entration compounds 2, at an	☐ YES ☐ NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 43) Federal Operating Permit Program

Date: 07/24/2	:: 07/24/2012 RN No.: RN100211317 Permit No.: O1610					
Area Name:	Area Name: Baytown Plant					
			L questions unless otherwis LY these questions unless (			
EMI	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)					ES
К.			mission Standards for Ha on Polyamides Productio		tants for Epoxy Resins	
	1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area.  If the response to Question VIII.K.1 is "NO" or "N/A", go to Section VIII.L.  □ YES □ NO □ N/A					] N/A
	2.	The application are development facilit	a includes a BLR and/or W y.	SR research and	☐ YES ☐ NO	
L.		Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting				
	1.	CFR § 63.541(a) th	a includes one or more of that are located at a secondar suestion VIII.L.1 is "NO" of	y lead smelter.	ŀ	] N/A
	2.	The application are of § 63.545(c)(1)-(2	a is using and approved alt 5) for control of fugitive du	ernate to the require st emission sources	ements YES NO	
M.	Subp	oart Y - National Ei	nission Standards for Ma	rine Tank Vessel I	Loading Operations	
	1.	The application are are specified in 40 defined in 40 CFR	a includes marine tank vess CFR § 63.560 and located a § 63.561.	sel loading operation at an affected source	ons that YES NO	
N.		Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries				
		Applicability				
	1.	related emission po	ea includes petroleum refinitions that are specified in (1) - (c)(7). Question VIII.N.1 is "NO",			



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 44) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

F ♦ F	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
VIII.							
	N.		part CC - National Emission Standards for Hazardous Air Pollutants incries	from Petroleum			
			Applicability				
		2.	All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7).  If the response to Question VIII.N.2 is "YES", go to Section VIII.O.	☐ YES ☐ NO			
		3.	The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a).  If the response to Question VIII.N.3 is "NO", go to Section VIII.O.	☐ YES ☐ NO			
		4.	The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC.  If the response to Question VIII.N.4 is "NO", go to Section VIII.O.	☐ YES ☐ NO			
		5.	The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	☐ YES ☐ NO			
		6.	The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	☐ YES ☐ NO			
		7.	The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.  If the response to Question VIII.N.7 is "NO", go to Section VIII.O.	☐ YES ☐ NO			
		8.	The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	☐ YES ☐ NO			



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 45) Federal Operating Permit Program

Date: 07/24/2012	te: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			01610			
Area Name: Bay	Area Name: Baytown Plant						
For SOP ap For GOP a	pplications, answer ALI pplications, answer ON	, questions unless otherwise direc LY these questions unless otherw	eted. ise directed.				
EMISSI							
	ibpart CC - National I efineries <i>(continued)</i>	Emission Standards for Hazard	ous Air Pollutants	from Petroleum			
9.	9. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii).  If the response to Question VIII.N.9 is "NO", go to Section VIII.O						
10	10. The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.			☐ YES ☐ NO			
	Cor	ntainers, Drains, and other App	urtenances				
11	The application are requirements of 40 § 63.640(o)(2)(ii).	a includes containers that are sub CFR § 63.135 as a result of comp	ject to the olying with 40 CFR	☐ YES ☐ NO			
12		a includes individual drain system of 40 CFR § 63.136 as a result of (2)(ii).		☐ YES ☐ NO			
O. St	ubpart DD - National l	Emission Standards for Off-site	Waste and Recove	ery Operations			
1.	meets the criteria for § 63.680(b)(1).	a is located at a plant site receiving or off-site material as specified in Question VIII.O.1 is "NO" or "N/.	40 CFR	☐ YES ⊠ NO ☐ N/A			
2.	Materials specified application area.	in 40 CFR § 63.680(b)(2) are rec	ceived at the	☐ YES ☐ NO			



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 46) Federal Operating Permit Program

Date: 07/24	ate: 07/24/2012 RN No.: RN100211317 Permit No.: O1610		: O1610			
	Area Name: Baytown Plant					
For S  For G	OP appl 7OP appl	lications, answer ALL lications, answer ON	L questions unless otherwise ILY these questions unless of	directed. therwise directed.		
VIII. TI'						
0.	Subp	oart DD - National E	Emission Standards for Off	f-site Waste and Recove	ery Operations	
	3.	The application are off-site material and	a has a waste management o d is regulated under 40 CFR	peration receiving Part 264 or Part 265.	YES NO	
	4. The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(6) or 265.1(c)(10).			☐ YES ☐ NO		
	5.		a has an operation subject to ut is not owned by a "state"		☐ YES ☐ NO	
	6.	The predominant ac wastewater received	ctivity in the application area d from off-site.	a is the treatment of	☐ YES ☐ NO	
	7.	reprocesses hazardo	a has a recovery operation thous waste which is an off-sit CFR §§ 264.1(g)(2) or 265.	te material and is	☐ YES ☐ NO	
	8.	reprocesses used so a chemical, petroleu	a has a recovery operation to olvent which is an off-site ma um, or other manufacturing controls by another subpart	aterial and is not part of process that is required	☐ YES ☐ NO	
	9.	reprocesses used oi	ea has a recovery operation to it which is an off-site materia Subpart F (Standards for Use	al and is regulated under	☐ YES ☐ NO	
	10.	of HAPs in the off-	ea is located at a site where the site material is less than 1 m Question VIII.O.10 is "YES"	negagram per year.	☐ YES ☐ NO	



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 47) Federal Operating Permit Program

Date: 07/24/2012 RN No.: RN100211317 Permit No.: O1610			.: O1610			
Area Name: Baytov	Area Name: Baytown Plant					
		L questions unless otherwise directed. TLY these questions unless otherwise dire	ected.			
EMISSIO!						
O. Subp	oart DD - National l	Emission Standards for Off-site Waste	and Recov	ery Operations		
11.	concentration less t combined with mat 500 ppmw or greate	a receives offsite materials with average han 500 ppmw at the point of delivery the erials having a VOHAP concentration of er.  Suestion VIII.O.11 is "NO", go to Question of the extra transfer.	at are not	☐ YES ☐ NO		
12.	VOHAP concentrate	tion is determined by direct measurement	<b>t.</b>	☐ YES ☐ NO		
13.	VOHAP concentrate	tion is based on knowledge of the offsite	material.	☐ YES ☐ NO		
14.	compressor, and ag system, open-ender system.	a includes an equipment component that itator, pressure relief device, sampling collivative or line, valve, connector or instructuration VIII.O.14 is "NO", go to Question VIII.	onnection mentation	☐ YES ☐ NO		
15.		ponent in the application area contains of the a HAP concentration greater than or e		☐ YES ☐ NO		
16.		ponent in the application area is intended during a 12-month period.	to operate	☐ YES ☐ NO		
17.	The application are site material.	a includes containers that manage non-ex	kempt off-	☐ YES ☐ NO		
18.	The application are non-exempt off-site	ea includes individual drain systems that it materials.	manage	☐ YES ☐ NO		



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 48) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.: 01610			
Area N	Area Name: Baytown Plant						
Fo ♦ Fo	or SOI or GO	P appli P appli	cations, answer ALL questions unless otherwise directed. ications, answer ONLY these questions unless otherwise direc	ted.			
VIII.	TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)						
	P.	Subp	art GG - National Emission Standards for Aerospace Man				
		1.	The application area includes facilities that manufacture or recommercial, civil, or military aerospace vehicles or component of the response to Question VIII.P.1 is "NO" or "N/A", go to VIII.Q.	nts.	☐ YES 🖾 NO 🗌 N/A		
		2.	The application area includes one or more of the affected sou specified in 40 CFR § 63.741(c)(1) - (7).	rces	☐ YES ☐ NO		
	Q.	Subp Gas I	art HH - National Emission Standards for Hazardous Air Production Facilities.	Pollutants			
<b>*</b>	···	1.	The application area is subject to 40 CFR Part 63, Subpart HI National Emission Standards for Hazardous Air Pollutants from the Natural Gas Production Facilities.  For GOP applications, go to Section VIII.Y	om Oil	☐ YES ⊠ NO		
	R.	Subp	oart II - National Emission Standards for Shipbuilding and	Ship Rep			
		1.	The application area includes shipbuilding or ship repair oper If the response to Question VIII.R.1 is "NO", go to Section V	rations.	☐ YES ☒ NO		
		2.	Shipbuilding or ship repair operations located in the application are subject to 40 CFR Part 63, Subpart II.	ion area	YES NO		
<u> </u>	S.	Subp	part JJ - National Emission Standards for Wood Furniture	Manufact	uring Operations		
		1.	The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations.  If the response to Question VIII.S.1 is "NO" or "N/A", go to Section VIII.T.		☐ YES ☑ NO ☐ N/A		
		2.	The application area meets the definition of an "incidental w manufacturer" as defined in 40 CFR § 63.801.	rood	☐ YES ☐ NO		
	T.	Subj	part KK - National Emission Standards for the Printing an	ıd Publish	ing Industry		
		1.	The application area includes publication rotogravure, produpackaging rotogravure, or wide-web flexographic printing p	ict and	☐ YES ☑ NO ☐N/A		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 49) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.	.: O1610	
Area Name: B	laytow	n Plant				
			L questions unless otherwise directed. ILY these questions unless otherwise direc	cted.		
VIII. TITL EMIS						
U.	Subpa	art PP - National E	Emission Standards for Containers			
1. The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions.  If the response to Question VIII.U.1 is "NO", go to Section VIII.V.				63,	☐ YES 🖾 NO	
	The application area includes containers using Container Level 1 controls.				☐ YES ☐ NO	
	3.	The application are controls.	a includes containers using Container Le	vel 2	☐ YES ☐ NO	
	4. The application area includes containers using Container Level 3 controls.		vel 3	☐ YES ☐ NO		
V.	Subp	art RR - National I	Emission Standards for Individual Dra	in Systems		
	1.	another 40 CFR Par	ea includes individual drain systems for wart 60, 61, or 63 subpart references the use art RR for the control of air emissions.		☐ YES 🖾 NO	
w.	Subp Gene	art YY - National l ric Maximum Achi	Emission Standards for Hazardous Air ievable Control Technology Standards	r Pollutants	s for Source Categories -	
	1. The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process		nplying	☐ YES ☑ NO		
	2.	from an acetal resir modacrylic fiber pr & 63.1103(b)(3)(i);	ea includes process wastewater streams gents production process unit; an acrylic and roduction process unit complying with 40 or an existing polycarbonate production Questions VIII.W.1. and VIII.W.2. are both 11.W.20	d O CFR process.	☐ YES 🖾 NO	



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 50) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No	: O1610
Area N	lame: E	Baytov	vn Plant			
F ♦ F	or SOI or GO	P appli P appl	ications, answer ALl lications, answer Ολ	L questions unless otherwise dir ILY these questions unless other	rected. rwise directed.	
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)						
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Generic Maximum Achievable Control Technology Standards						for Source Categories -
		3.		a includes process wastewater s p 1 or are determined to be Gro CFR § 63.132(c).		☐ YES ☐ NO
		4.	The application are determined to be G § 63.132(c).	a includes process wastewater s roup 2 under the requirements of	streams that are of 40 CFR	☐ YES ☐ NO
		5.		water streams at the site are determined on the low rate of less than 1 MG/yr.	ermined to have a	☐ YES ☐ NO
		6.	streams demonstrat 1 MG/yr.	ted and/or partially treated Grouted to have a total source mass fuestion VIII.W.6. is "NO", go	flowrate of less than	☐ YES ☐ NO
		7.	The application are manage a partially during treatment.	ea includes waste management u treated Group 1 wastewater stre	units that receive or eam prior to or	☐ YES ☐ NO
		8.	wastewater streams that is not owned o	er streams or residual removed to s are transferred to an on-site tro or operated by the owner or oper te stream or residual.	eatment operation	☐ YES ☐ NO
		9.	wastewater streams	er streams or residual removed is are transferred to an off-site tr Question VIII.W.8. and W.9. are	eatment operation.	☐ YES ☐ NO
		10.	The application are manage a Group 1	ea includes waste management wastewater stream or a residua	units that receive or I removed from a	☐ YES ☐ NO

Group 1 wastewater stream prior to shipment or transport.



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 51) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.	.: O1610	
Area Name: Baytown Plant						
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)						
W.	Subp Gene	art YY - National I ric Maximum Achi	Emission Standards for Hazardous Air evable Control Technology Standards	r Pollutants	for Source Categories -	
11. The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.				☐ YES ☐ NO		
manage, or treat a from a Group 1 w			ea includes individual drain systems that receive, Group 1 wastewater stream or a residual removed astewater stream.  Question VIII.W.12. is "NO", go to Question		☐ YES ☐ NO	
	13.	complying with 40	a includes individual drain systems that CFR § 63.136 through the use of covers systems and control devices.	are and, if	☐ YES ☐ NO	
	14.	The application are complying with 40 tightly fitting caps of	a includes individual drain systems that CFR § 63.136 through the use of water sor plugs.	are seals or	☐ YES ☐ NO	
	15.	stations, trenches, or process unit; an acr complying with 40 polycarbonate prod	ra includes drains, drain hubs, manholes, or pipes that are part of an acetal resins prylic and modacrylic fiber production pro CFR § 63.1103(b)(3)(i); or an existing fluction process unit.  Question VIII.W.15. is "NO", go to Ques	oroduction ocess unit	☐ YES ☐ NO	
	16.	stations, trenches o § 63.1106(c)(1) - (3	ea includes drains, drain hubs, manholes, or pipes that meet the criteria listed in 40 3).  Question VIII.W.16. is "NO", go to Ques	CFR	☐ YES ☐ NO	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 52) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

For SOP applications, answer ALL questions unless otherwise directed. For GOP applications, answer ONLY these questions unless otherwise directed. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued) Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories -Generic Maximum Achievable Control Technology Standards ☐ YES ☐ NO The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute. ☐ YES ☐ NO The application area includes drains, drain hubs, manholes, lift 19. stations, trenches or pipes that are part of an acetyl resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute. ☐ YES ☒ NO ☐N/A The application area includes an ethylene production process unit. 20. ☐ YES ☒ NO ☐N/A The application area includes waste streams generated from an 21. ethylene production process unit. If the response to Questions VIII.W.20. and VIII.W.21. are both "NO" or "N/A," go to Question VIII.W.53. ☐ YES ☐ NO The waste stream(s) contains at least one of the chemicals listed in 40 22. CFR § 63.1103(e), Table 7(g)(1). If the response to Question VIII.W.22. is "NO," go to Question VIII.W.53. ☐ YES ☐ NO Waste stream(s) are transferred off-site for treatment. If the response to Question VIII.W.23. is "NO," go to Question VIII.W.25.



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 53) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

<i>F F F</i>	or SO. or GO	P appli P appl	ications, answer ALL questions unless otherwise directed. ications, answer ONLY these questions unless otherwise directed.			
VIII.	III. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)					
	W.		art YY - National Emission Standards for Hazardous Air Pollutants ric Maximum Achievable Control Technology Standards	for Source Categories -		
		24.	The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment.  If the response to Question VIII.W.24. is "YES," go to Question VIII.W.54	☐ YES ☐ NO		
		25.	The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	☐ YES ☐ NO		
		26.	The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b).  If the response to Question VIII.W.26. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO		
		27.	The waste stream(s) contains at least 10 ppmw 1,3-butadiene at a flow rate of 0.02 liters per minute or is designated for control.  If the response to Question VIII.W.27. is "NO," go to Question VIII.W.43.	☐ YES ☐ NO		
		28.	The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s).  If the response to Question VIII.W.28. is "NO," go to Question VIII.W.33	☐ YES ☐ NO		
		29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	☐ YES ☐ NO		
		30.	The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream.  If the response to Question VIII.W.30. is "NO", go to Question VIII.W.43.	☐ YES ☐ NO		
		31.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	☐ YES ☐ NO		



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 54) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

Area Name: Baytown Plant

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.

VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

VIII.	EMI	TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)					
	w.	Sub <sub>I</sub> Gene	part YY - National Emission Standards for Hazardous Air Pollutants eric Maximum Achievable Control Technology Standards	s for Source Categories -			
		32.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.  If a response to Question VIII.W.32. is required, go to Question VIII.W.43.	☐ YES ☐ NO			
		33.	The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream.  If the response to Question VIII.W.33. is "NO", go to Question VIII.W.36.	☐ YES ☐ NO			
		34.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers.  If the response to Question VIII.W.34 is "YES", go to Question VIII.W.36.	☐ YES ☐ NO			
		35.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐ YES ☐ NO			
		36.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream.  If the response to Question VIII.W.36. is "NO", go to Question VIII.W.43.	☐ YES ☐ NO			
		37.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. If the response to Question VIII.W.37 is "YES", go to Question VIII.W.43.	☐ YES ☐ NO			
		38.	The application area has individual drain systems complying with 40 CFR § 61.346(a).  If the response to Question VIII.W.38 is "NO", go to Question VIII.W.40.	☐ YES ☐ NO			



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 55) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.	: O1610				
Area Name: Baytown Plant							
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
W. Subpart YY - Generic Max	W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards						
39. Covers operate pressure	☐ YES ☐ NO						
CFR § 6	lication area has individual drain system 1.346(b).  sponse to Question VIII.W.40. is "NO" 13.		☐ YES ☐ NO				
system	n boxes in the individual drain systems a to prevent the flow of organic vapors from the to the atmosphere during normal open	om the junction box	☐ YES ☐ NO				
	n box vent pipes in the individual drain sed-vent system and control device.	systems are connected	☐ YES ☐ NO				
benzene	sponse to Question VIII.W.43 is "NO",		☐ YES ☐ NO				
that rec	olication area has containers, as defined eive a waste stream containing benzene esponse to Question VIII.W.44. is "NO" 47.	•	☐ YES ☐ NO				
40 CFR	olication area is an alternate means of co. § 61.345 requirements for containers. esponse to Question VIII.W.45 is "YES" 47.		☐ YES ☐ NO				
46. Covers the con pressur	and closed-vent systems used for conta tainer is maintained at a pressure less the.	iners operate such that an atmospheric	☐ YES ☐ NO				



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 56) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317		Permit No	.: O1610	
Area N	Area Name: Baytown Plant							
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed							
VIII.	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
	W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards						for Source Categories -	
47. The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene.  If the response to Question VIII.W.47. is "NO", go to Question VIII.W.54.				ning	☐ YES ☐ NO			
	48. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems.  If the response to Question VIII.W.48 is "YES", go to Question VIII.W.54.				systems.	☐ YES ☐ NO		
		49.	CFR § 61.346(a).	a has individual drain sy Question VIII.W.49 is "No			☐ YES ☐ NO	
		50.	operate such that th	vent systems used for inc e individual drain systen tmospheric pressure.			☐ YES ☐ NO	
		51.	CFR § 61.346(b).	a has individual drain sy Question VIII.W.51. is "N			☐ YES ☐ NO	
		52.	system to prevent the	he individual drain system he flow of organic vapor nosphere during normal o	rs from the junction		☐ YES ☐ NO	
		53.		pipes in the individual drastem and control device.		onnected	☐ YES ☑ NO	
		54.	process.	a contains a cyanide che			☐ YES ⊠ NO	



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 57) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No.: O1610			
Area N	Area Name: Baytown Plant							
				L questions unless otherwise directed. LY these questions unless otherwise dire	cted.			
VIII.								
	W.	V. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards						
		55.		cals manufacturing process generates maining hydrogen cyanide or acetonitrile.	ntenance	☐ YES ☐ NO		
	х.		part JJJ - National l mers and Resins (co	Emission Standards for Hazardous Air ontinued)	Pollutant	Emissions: Group IV		
		1.	and/or their associa § 63.1310(a)(1) - (5	a includes thermoplastic product process ted affected sources specified in 40 CFR b), that are subject to 40 CFR Part 63, Subjection VIII.X.1. is "NO", go to Section	part JJJ.	☐ YES 🖾 NO		
		2.	and/or wastewater sassociated with the	a includes thermoplastic product process streams and wastewater operations that armoplastic product process units.  Question VIII.X.2 is "NO", go to Section	re	☐ YES ☐ NO		
		3.	application area are	ater streams generated or managed in the from sources producing polystyrene. Question VIII.X.3. is "YES", go to Section	,	☐ YES ☐ NO		
		4.	application area are	rater streams generated or managed in the from sources producing ASA/AMSAN. Question VIII.X.4. is "YES", go to Section		☐ YES ☐ NO		
		5.	designated as Grou	a includes process wastewater streams the p 1 or are determined to be Group 1 for of 40 CFR § 63.1312.		☐ YES ☐ NO		
		6.	The application are existing sources, th 40 CFR § 63.1312.	a includes process wastewater streams, loat are Group 2 for organic HAPs as defin	ocated at led in	☐ YES ☐ NO		
		7.		a includes process wastewater streams, le re Group 2 for organic HAPs as defined i		☐ YES ☐ NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 58) Federal Operating Permit Program

Date: 07/24/201	12	RN No.: RN100211317	Permit No.:	O1610			
Area Name: Baytown Plant							
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
	ubpart JJJ - National I olymers and Resins <i>(co</i>	Emission Standards for Hazardous Air	Pollutant E	missions: Group IV			
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flowrate of less than 1 MG/yr.  If the response to Question VIII.X.8. is "YES", go to Question VIII.X.18.				☐ YES ☐ NO			
9	streams demonstrate 1 MG/yr.	ed and/or partially treated Group 1 waste ed to have a total source mass flowrate of the view of the v	f less than	☐ YES ☐ NO			
1		a includes waste management units that a treated Group 1 wastewater stream prior		☐ YES ☐ NO			
1	wastewater streams that is not owned or	r streams or residual removed from Grou are transferred to an on-site treatment of r operated by the owner or operator of the e stream or residual.	peration	☐ YES ☐ NO			
1	wastewater streams	r streams or residual removed from Grou are transferred to an off-site treatment of suestion VIII.X.11 VIII.X.12. are both	peration.	☐ YES ☐ NO			
1	manage a Group 1	a includes waste management units that a wastewater stream or a residual removed r stream prior to shipment or transport.	1	☐ YES ☐ NO			
		Containers					
1		a includes containers that receive, manager stream or a residual removed from a Gr		☐ YES ☐ NO			



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 59) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No.:	O1610		
Area Name: Baytown Plant								
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.								
VIII.	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
	Х.		art JJJ - National I ners and Resins <i>(co</i>	Emission Standards for Hazardous <i>Antinued)</i>	Air Pollutant F	Emissions: Group IV		
				Drains (continued)				
		15.	manage a Group 1 v Group 1 wastewater	a includes individual drain systems the wastewater stream or a residual remover stream.  Suestion VIII.X.15. is "NO", go to Que	red from a	☐ YES ☐ NO		
		16.	complying with 40	a includes individual drain systems the CFR § 63.136 through the use of covery systems and control devices.		☐ YES ☐ NO		
		17.		a includes individual drain systems the CFR § 63.136 through the use of water plugs.		☐ YES ☐ NO		
		18.	trenches, or pipes th	a includes drains, drain hubs, manhole nat are part of an thermoplastic production VIII.X.18. is "NO", go to Sec.	et process unit.	☐ YES ☐ NO		
		19.	trenches or pipes th § 63.1330(b)(12).	a includes drains, drain hubs, manhole at meet the criteria listed in 40 CFR § Question VIII.X.19. is "NO", go to Sec	63.149(d) and	☐ YES ☐ NO		
		20.	trenches, or pipes the concentration great	a includes drains, drain hubs, manhole hat convey water with a total annual arer than or equal to 10,000 parts per mids meeting the definition of organic Hat any flow rate.	verage illion by	☐ YES ☐ NO		
		21.	trenches or pipes the concentration great of compounds mee	a includes drains, drain hubs, manhole at convey water with a total annual aver than or equal to 1,000 parts per mil ting the definition of organic HAP in a nual average flow rate greater than or e.	verage lion by weight 40 CFR	☐ YES ☐ NO		



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 60) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.:	O1610			
Area Nam	Area Name: Baytown Plant							
	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
E	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
X		ubpart JJJ - National l	Emission Standards for Hazardous Air ontinued)	Pollutant E	missions: Group IV			
			Drains (continued)					
	2	22. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute						
Y.	. S	Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.						
	1	Subpart UUU - Nat Pollutants for Petro	a is subject to 40 CFR Part 63, tional Emission Standards for Hazardous leum Refineries: Catalytic Cracking Units Units, and Sulfur Recovery Units.		☐ YES 🖾 NO			
Z	Z. S	Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal So Waste (MSW) Landfills.						
<b>+</b>	1	Subpart AAAA - N	a is subject to 40 CFR Part 63, lational Emission Standards for Hazardou icipal Solid Waste Landfills.	ıs Air	☐ YES 🖾 NO			
A	AA. S	Subpart FFFF - Nations Organic Chemical Prod	al Emission Standards for Hazardous A uction and Processes (MON)	Air Pollutan	ts for Miscellaneous			
	1	. The application are manufacture as a p in 40 CFR § 63.242	ea is located at a site that includes process rimary product one or more of the chemic 35(b)(1).	units that cals listed	☐ YES 🖾 NO			
	2	The application are defined in FCAA §	ea is located at a plant site that is a major 112(a).	source as	☐ YES 🖾 NO			



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 61) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610					
Area Name: Baytown Plant							
For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
AA. Subpart FFFF - National Organic Chemical Prod	al Emission Standards for Hazardous A uction and Processes (MON)	Air Pollutants for Miscellaneou	IS				
chemical manufact generate one or mo § 112(b) of the Cle	a is located at a site that includes miscell uring process units (MCPU) that process re of the organic hazardous air pollutants an Air Act or hydrogen halide and halogouestion VIII.AA.1, AA.2 or AA.3 is "NO	use or slisted in en HAP.					
racks, or waste stre manufacturing pro-	a includes process vents, storage vessels, ams associated with a miscellaneous che cess subject to 40 CFR 63, Subpart FFFF Question VIII.AA.4 is "NO", go to Section	mical YES NO					
5. The application are  If the response to Q  VIII.AA.17.	a includes process wastewater streams. Question VIII.AA.5 is "NO", go to Questi	on YES NO					
designated as Grou	ea includes process wastewater streams the p 1 or are determined to be Group 1 for a Table 8 and Table 9, as appropriate, of 4	compounds DVES DNO					
total source mass f	water streams at the site are demonstrated lowrate of less than 1 MG/yr. Question VIII.AA.7. is "YES", go to Section 1.	☐ YES ☐ NO					
streams demonstra 1 MG/yr.	ted and/or partially treated Group 1 wasted to have a total source mass flowrate of Question VIII.AA.8. is "NO", go to Question VIII.AA.8.	of less than YES NO					
9. The application are manage a partially during treatment.	ea includes waste management units that treated Group 1 wastewater stream prior	receive or to or YES NO					



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 62) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610			
Area Name: Baytown Plant					

			lications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.			
VIII.						
	AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)					
		10.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐ YES ☐ NO		
		11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. If the response to Question VIII.AA.10. and VIII.AA.11. are both "NO", go to Question VIII.AA.13.	□ YES □ NO		
		12.	The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	□ YES □ NO		
		13.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐ YES ☐ NO		
		14.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.  If the response to Question VIII.AA.14. is "NO", go to Question VIII.AA.17.	☐ YES ☐ NO		
		15.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	☐ YES ☐ NO		
		16.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐ YES ☐ NO		
		17.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b).  If the response to Question VIII.AA.17. is "NO", go to Section VIII.BB.	☐ YES ☐ NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 63) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.:	O1610			
Area Name: Baytown Plant								
♦ For G	GOP appl	lications, answer ON	L questions unless otherwise directed. ILY these questions unless otherwise direc					
VIII. TI	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)							
AA	1. Subp Orga	oart FFFF - Nationa nic Chemical Produ	al Emission Standards for Hazardous A uction and Processes (MON)	\ir Pollutan	ts for Miscellaneous			
	18.	trenches or pipes (the manufacturing processing \$63.149(d).	ta includes drains, drain hubs, manholes, I hat are part of a miscellaneous chemical cess unit) that meet the criteria listed in 40 Question VIII.AA.18 is "NO", go to Section	0 CFR	☐ YES ☐ NO			
	19.	The application area trenches or pipes the concentration of conference of the concentration of the concentration of the conference of the concentration of t	ea includes drains, drain hubs, manholes, leat convey water with a total annual avera empounds in table 8 of 40 CFR Part 63, Sum or equal to 10,000 ppmw at any flowrate from the compounds in table 8 of 40 CFR Part 63 in or equal to 200 lb/yr.	lift stations, age ubpart te, and the	☐ YES ☐ NO			
	20.	trenches or pipes the concentration of con FFFF is greater than	ea includes drains, drain hubs, manholes, leat convey water with a total annual avera ompounds in table 8 of 40 CFR Part 63, Sum or equal to 1,000 ppmw, and the annual than or equal to 1 liter per minute.	age Subpart	☐ YES ☐ NO			
	21.	trenches or pipes the that is subject to the and the equipment concentration of co Subpart FFFF is green combined total annual contents.	ea includes drains, drain hubs, manholes, hat are part of a chemical manufacturing per new source requirements of 40 CFR § 6 conveys water with a combined total announcements in tables 8 and 9 of 40 CFR Pareater than or equal to 30,000 ppmw, and the total load of compounds in tables 8 and 9 than or equal to 1 tpy.	process unit 63.2445(a); mual average art 63, the	☐ YES ☐ NO			
Bl	BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.			nnts for: Solvent				
	1.	by itself a major so	ea includes a vegetable oil production pro ource of HAP emissions or, is collocated ver er sources that are individually or collective AP emissions.	within a	☐ YES ⊠ NO			



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 64) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	1	Permit No.: O1610	
Area Name: I						
For SO	P appl. P appl	ications, answer ALI lications, answer ON	L questions unless otherwise di VLY these questions unless othe	rected. rwise direct	led.	
VIII. TITI EMI	.E. 40	CODE OF FEDER N STANDARDS FO	AL REGULATIONS PART ( OR HAZARDOUS AIR POLI	63 (40 CFR	R PART 63	) - NATIONAL RCE CATEGORIES
CC.	Subp	art GGGGG - Nati	ional Emission Standards for	Hazardous	s Air Pollu	tants: Site Remediation
	1.	conducted.	a includes a facility at which a testion .CC.1. is "NO", go to Se		i	☐ YES 🖾 NO
	2.	CFR § 63.7881(b)(1	ns qualify for one of the exempt 1) through (6). sestion .CC.2. is "YES", go to S			☐ YES ☐ NO
	3.	total quantity of HA	site remediation activities it wa AP listed in Table 1 of Subpart site remediations will be less t	GGGGG th	at will be	☐ YES ☐ NO
	4.	The site remediation days.	on will be completed within 30	consecutive	calendar	☐ YES ☐ NO
	5.	materials subject to	ea includes containers that many 40 CFR Part 63, Subpart GGO Question VIII.CC.5 is "NO", go	GGG.		☐ YES ☐ NO
	6.		ea includes containers using Co ed in 40 CFR § 63.922(b).	ontainer Lev	el I	☐ YES ☐ NO
	7.	The application are 0.46 m³ that meet the (ii).	ea includes containers with a ca he requirements of 40 CFR § 6	pacity great i3.7900(b)(3	ter than (i) and	☐ YES ☐ NO
	8.	The application are controls as specifie	ea includes containers using Co ed in 40 CFR § 63.923(b).	ontainer Lev	rel 2	☐ YES ☐ NO
	9.		ea includes containers using Co ed in 40 CFR § 63.924(b).	ontainer Lev	'el 3	☐ YES ☐ NO
DD.	Sub <sub>l</sub> Cate	part BBBBBB - Nat gories: Gasoline D	tional Emission Standards for Distribution Bulk Terminals, I	r Hazardou Bulk Plants	s Air Pollu and Pipeli	itants for Source ine Facilities
	1.	hazardous air pollu	ea is located at a site that is an a stants. suestion DD.1. is "NO", go to S			☐ YES 🖾 NO



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 65) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.: O1610			
Area Name: Baytown Plant							
For SO For GO	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
EM	VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)						
DD.	Subp Cate	art BBBBBB - Nati gories: Gasoline Di	ional Emission Standards for Hazardo istribution Bulk Terminals, Bulk Plant	us Air Pollu s and Pipeli	tants for Source ne Facilities		
	2.	The application are 40 CFR Part 63, Su Subpart R.	a includes a pipeline breakout station, as bpart BBBBBB, not subject to 40 CFR P	defined in Part 63,	☐ YES ☐ NO		
	3.	The application are 40 CFR Part 63, Su	a includes a pipeline pumping station as abpart BBBBBB.	defined in	☐ YES ☐ NO		
	4.	CFR Part 63, Subpa	a includes a bulk gasoline plant as define art BBBBBB.  Lestion VIII.DD.4. is "NO", go to Question		☐ YES ☐ NO		
	5.	compliance with an	plant was operating, prior to January 10, 2 n enforceable State, local or tribal rule or 1 fill as specified in 40 CFR § 63.11086(a	permit that	☐ YES ☐ NO		
	6.	40 CFR Part 63, Su Subpart R or Subpa	a includes a bulk gasoline terminal, as dealbpart BBBBBB, not subject to 40 CFR Fort CC.  sestion VIII.DD.6. is "NO", go to Section	Part 63,	☐ YES ☐ NO		
	7.	gallons per day.	terminal has a throughput of less than 250 testion VIII.DD.7. is "YES", go to Section		☐ YES ☐ NO		
	8.	The bulk gasoline to other than railcar co	terminal loads gasoline into gasoline carg argo tanks.	o tanks	☐ YES ☐ NO		
	9.	The bulk gasoline of the answer to Qu	terminal loads gasoline into railcar cargo uestion VIII.DD.9. is "NO", go to Section	tanks. VIII.EE.	☐ YES ☐ NO		
	10.		terminal loads gasoline into railcar cargo ct vapors from a vapor balance system.	tanks	☐ YES ☐ NO		
	11.	which collect vapo	terminal loads gasoline into railcar cargo rs from a vapor balance system and that s deral, State, local, or tribal rule or permi	system	☐ YES ☐ NO		



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 66) Federal Operating Permit Program

						01/10		
Date: 07/24/2012 RN				RN No.: RN100211317	Permit No.:	U1610		
Area Name: Baytown Plant								
<i>F</i> ♦ <i>F</i>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.							
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (continued)								
	EE.			0 CFR Part 63 Subparts				
•	↑ 1. The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form.  If the response to Question VIII.EE.1. is "NO", go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions					☐ YES ⊠ NO		
<b>*</b>	- <del> </del>	2.	Provide the Subpar	t designation (i.e. Subpart EEE) in the sp	pace provided	below.		
IX. TITLE 40 CODE OF FEDERAL REGULATIONS PART 68 (40 CFR PART 68) - CHEMICAL ACCIDENT PREVENTION PROVISIONS								
	A.	A. Applicability						
*	<u> </u>	1.	Chemical Acciden § 68.10.	ea contains processes subject to 40 CFR to Prevention Provisions, and specified in	40 CFR	⊠ yes □ no		
x.	TIT	LE 40 ATOS	CODE OF FEDER PHERIC OZONE	RAL REGULATIONS PART 82 (40 C	FR PART 82	) - PROTECTION OF		
	Α.	Subp	art A - Production	and Consumption Controls				
<b>*</b>		1.	The application ar destroys, imports,	ea is located at a site that produces, trans or exports a controlled substance or prod	forms, luct.	☐ YES ☑ NO ☐ N/A		
	В.	Subp		of Motor Vehicle Air Conditioners				
•	·	1.	Servicing, mainter systems using ozo application area.	nance, and/or repair of fleet vehicle air conne-depleting refrigerants is conducted in	i tne	☐ YES 🖾 NO		
	C.	Subj Prod	part C - Ban on No lucts Containing o	nessential Products Containing Class r Manufactured with Class II Substan	I Substances ces	and Ban on Nonessential		
•		1.	The application a	rea sells or distributes one or more nones elease a Class I or Class II substance) that	sential	☐ YES ☒ NO ☐ N/A		



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 67) Federal Operating Permit Program

Date	Date: 07/24/2012 RN			RN No.: RN100211317	Permit No.:	: O1610		
Аге	Area Name: Baytown Plant							
<u> </u>	For SOP applications, answer ALL questions unless otherwise directed. For GOP applications, answer ONLY these questions unless otherwise directed.							
X.	TITI	LE 40		AL REGULATIONS PART 82 (		) - PROTECTION OF		
	D.	Subp	oart D - Federal Pro	curement				
•		1.	The application are instrumentality of the	a is owned/operated by a department the United States.	ent, agency, or	☐ YES ☒ NO ☐ N/A		
	E.	Subp	part E - The Labelin	ng of Products Using Ozone Dep	leting Substances			
*		1.	substance is stored	a includes containers in which a C or transported prior to the sale of to the ultimate consumer.	Class I or Class II the Class I or	☐ YES 🖾 NO 🗆 N/A		
<b>*</b>		2.	The application are distributor, or retail substance.	ea is a manufacturer, importer, who ler of products containing a Class l	olesaler, I or Class II	☐ YES ☑ NO ☐ N/A		
•		3.	The application are distributor, or retail uses a Class I or Cl	ea is a manufacturer, importer, who ler of products manufactured with lass II substance.	olesaler, a process that	☐ YES ☑ NO ☐ N/A		
	F.	Subj	part F - Recycling a	nd Emissions Reduction				
•		1.	vehicle air conditio	ance, and/or repair on refrigeration on appliances using ozone-depletin tutes is conducted in the application	ng refrigerants or	☐ YES 🖾 NO		
•		2.	Disposal of applian refrigerant or non-e application area.	nces (including motor vehicle air c exempt substitute reclamation occu	onditioners) or urs in the	☐ YES ☒ NO ☐ N/A		
•		3.	The application are and recovery equip	ea manufactures appliances or refri	igerant recycling	☐ YES ☑ NO ☐ N/A		
	G.	Subj	part G - Significant	New Alternatives Policy Progra	ım			
*		1.	product substitutes intended for use as	ea manufactures, formulates, or cress, or alternative manufacturing process a replacement for a Class I or Cla Question X.G.1 is "NO", go to Sec	cesses that are ass II compound.	☐ YES ⊠ NO ☐ N/A		
*		2.		duced by the application area meet 40 CFR § 82.176(b)(1) - (7).	t one or more of	☐ YES ☐ NO ☐ N/A		



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 68) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610					
Area Name: Baytown Plant							
E COD II II	ATT disease and an other wine disease	ad					

Area	a Name: 1	Bayto	wn Plant			
<b>*</b>	For SO. For GO	P appi P app	lications, answer ALL questions unless otherwise directed. lications, answer ONLY these questions unless otherwise directed.			
X.	TIT	LE 40	CODE OF FEDERAL REGULATIONS PART 82 (40 CFR PART 82 SPHERIC OZONE	2) - PROTECTION OF		
	H. Subpart H -Halon Emissions Reduction					
<b>*</b>		1.	Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	☐ YES ☑ NO ☐ N/A		
<b>*</b>		2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	YES NO N/A		
XI.	KI. MISCELLANEOUS					
	A. Requirements Reference Tables (RRT) and Flowcharts					
		1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	☐ YES 🖾 NO		
B. Forms						
<b>*</b>		1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. If the response to Question XI.B.1 is "NO" or "N/A", go to Section XI.C.	☐ YES ☒ NO ☐ N/A		
•		2.	Provide the Part and Subpart designation for the federal rule(s) or the C Division designation for the State regulation(s) in the space provided be	hapter, Subchapter and slow.		
	C.	C. Emission Limitation Certifications				
•		1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	⊠ YES □ NO		



#### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 69) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.: 01610		
Area Name: l	Area Name: Baytown Plant					
For SO	P appli P appl	ications, answer ALI lications, answer ON	L questions unless otherwise directed. ILY these questions unless otherwise dire	cted.		
	MISCELLANEOUS (continued)					
D.	Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements					
	<ol> <li>The application area is located at a site that is subject to a site specific requirement of the state implementation plan (SIP).</li> <li>The application area includes units located at the site that are subject to a site specific requirement of the SIP.</li> <li>The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator.</li> </ol>				☐ YES ☑ NO	
					☐ YES 🖾 NO	
					☐ YES 🖾 NO	
E.	F. Title IV - Acid Rain Program					
			a includes emission units subject to the A cluding the Opt-In Program.	Acid Rain	☐ YES 🖾 NO	
	2. The application area includes emission units qualifying for the new uniexemption under 40 CFR § 72.7		the new unit	☐ YES 🖾 NO		
	3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.				☐ YES ☒ NO	
F.	F. Clean Air Interstate Rule (CAIR NO, and CAIR SO, Permit)					
	1. The application area includes emission units subject to the requirements of the Clean Air Interstate Rule.  If the response to Question XI.F.1. is "NO", go to Section XI.G.			Л.G.	☐ YES 🖾 NO	
	2. The application area includes emission units qualifying for the retired unit exemptions under 40 CFR §§ 96.105 and 96.205.				☐ YES ☐ NO	



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 70) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No.:	O1610
Area	a Name: I					
<u> </u>	For SO	P appli P appl	ications, answer ALI lications, answer ON	L questions unless otherwise directed. VLY these questions unless otherwise dire	cted.	
XI.	MIS	CELL	ANEOUS (continue	?d)		
	G.	Perm	nit Shield (SOP App	olicants Only)		
		1.	A permit shield for (Negative Applicab or already exists in	negative applicability entries on Form Olele Requirement Determinations) is being the permit.	P-REQ2 requested	⊠ YES □ NO
	H.	GOP	Type (Complete th	nis section for GOP applications only)		
<b>*</b>		1.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Fort Bend, Galveston, Hardin, Harris, Jefferson, Liberty, Montgomery, Orange, Tarrant, and Waller Counties.			☐ YES ☐ NO
•		2.	renewal of an oil ar	ea is applying for initial issuance, revision nd gas general operating permit under 512 sting Permit for Gregg, Nueces, and Victo	2 - Oil and	☐ YES ☐ NO
<b>*</b>		3.	renewal of an oil ar Gas General Opera	ea is applying for initial issuance, revision nd gas general operating permit under 51: ating Permit for Aransas, Bexar, Calhoun, tricio, and Travis Counties.	3 - Oil and	☐ YES ☐ NO
•		4.	renewal of an oil ar Gas General Opera Bexar, Brazoria, Ca Fort Bend, Galvest	ea is applying for initial issuance, revision nd gas general operating permit under 514 ating Permit for All Texas Counties Excep alhoun, Chambers, Collin, Dallas, Dentor ton, Gregg, Hardin, Harris, Jefferson, Libo comery, San Patricio, Tarrant, Travis, Vict	4 - Oil and pt Aransas, n, El Paso, perty,	☐ YES ☐ NO
<b>*</b>		5.	renewal of a solid v	ea is applying for initial issuance, revision waste landfill general operating permit un id Waste Landfill general operating perm	nder	☐ YES ☐ NO



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 71) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.:	O1610		
Area	Area Name: Baytown Plant						
<u> </u>	For SOP applications, answer ALL questions unless otherwise directed.  For GOP applications, answer ONLY these questions unless otherwise directed.						
XI.	No.	ANEOUS (continue					
	I. Title	30 TAC Chapter 10	01, Subchapter H				
<b>*</b>	1.	The application area is located in a nonattainment area.  If the response to Question XI.I.1. is "NO", go to question XI.I.3.			<ul><li>YES □ NO</li><li>YES □ NO □ N/A</li></ul>		
<b>♦</b>	2.	2. The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.					
<b>♦</b>	3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.			☐ YES ☑ NO ☐ N/A		
<b>*</b>	4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NOx.			☑ YES ☐ NO		
<b>*</b>	5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.		☐ YES 🖾 NO			
•	6.	Houston/Galveston potential to emit me	ea is located at a site in the h/Brazoria nonattainment area and the site ore than 10 tpy of highly-reactive volatile OC) from facilities covered under 30 TAC, Divisions 1 and 2.	le organic	☐ YES ⊠ NO		
*	7.	Houston/Galveston to emit 10 tpy or le applicant is opting	ea is located at a site in the n/Brazoria nonattainment area, the site hates of HRVOC from covered facilities and to comply with the requirements of 30 T., Division 6, Highly Reactive VOC Emis n.	nd the FAC Chapter			
	J. Perio	odic Monitoring			-		
*	1.	The applicant or pe submitted at least of OP-MON.	ermit holder is submitting or has previous one periodic monitoring proposal describ	sly ed on Form	⊠ YES □ NO		



# Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 72) Federal Operating Permit Program

Date: 07/24/2012			RN No.: RN100211317	Permit No.	: O1610	
Are	a Name: Bayto	own Plant				
<b>♦</b>			L questions unless otherwise dir ILY these questions unless other			
XI.	MISCEL	LANEOUS (continue	?d)			
	K. Co	mpliance Assurance	Monitoring			
<b>*</b>	1.	potential to emit greenired in a site cl	The application area includes at least one unit with a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source.  If the response to Question XI.K.1. is "NO", go to Section XII.			
*	2.	The unit or units de comply with an app	☑ YES ☐ NO			
•	3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.			☑ YES ☐ NO	
•	4.		or permit holder is submitting cording to the deadlines for substation.		☐ YES ☒ NO	
	5.		r or permit holder is submitting in and schedule to be incorporate ermit.		☐ YES 🖾 NO	
	6.		entification numbers for the unit in and schedule in the space belonger		cant is submitting a CAM	
<b>*</b>	7.	7. At least one unit defined by XI.K.1. and XI.K.2. is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).		☐ YES ☒ NO		
<b>*</b>	8.	8. All units defined by XI.K.1. and XI.K.2. are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).  If the response to Question XI.K.8. is "YES", go to Section XII.			☐ YES 🖾 NO	
*	9.		as described by question XI.K te matter or opacity.	☐ YES 🖾 NO		
*	10.	The CAM proposal addresses VOC.	as described by question XI.K	☐ YES ☒ NO		
•	11.	The control device XI.K.3.or XI.K.4.1	in the CAM proposal as describas a bypass.	bed by question	☐ YES ⊠ NO	



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 73) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No.:	O1610	
Агеа	Name: E	Baytov	vn Plant				
				questions unless otherwise directe LY these questions unless otherwise			
XII.	NEW	SOU	RCE REVIEW (NS	SR) AUTHORIZATIONS			
	A.	Wast	e Permits with Air	Addendum			
<b>♦</b>	1. The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum.  If the answer to XII.A.1. is "YES", include the waste permit numbers and issuance date in Section XII.J.						
	В.	Air (	Quality Standard Pe	rmits			
•		1.	NSR authorization. If the response to X to XII.B.1 is "YES"	a includes at least one Air Quality S II.B.1 is "NO", go to Section XII.C. , be sure to include the standard pers in Section XII.H, and answer XII.	. If the response	⊠ YES □ NO	
<b>♦</b>		2.		a includes at least one "Pollution Co d Permit NSR authorization.	ontrol Project"	☐ YES ☑ NO	
•		3.		a includes at least one "Modification ity Standard Permit NSR authorization		☐ YES ☒ NO	
•		4.		a includes at least one "Municipal S ty Standard Permit NSR authorization		☐ YES 🖾 NO	
+		5.	Landfill Facilities a	a includes at least one "Municipal S nd Transfer Stations" Standard Peri pter 330, Subchapter U.		☐ YES ☑ NO	
		6.		a includes at least one "Concrete Ba ermit NSR authorization.	atch Plant" Air	☐ YES ☒ NO	
		7.	The application are Enhanced Controls	a includes at least one "Concrete Ba" Air Quality Standard Permit NSR	atch Plant with authorization.	☐ YES 🖾 NO	
		8.		a includes at least one "Hot Mix As ermit NSR authorization.	phalt Plant" Air	☐ YES ☒ NO	
<b>*</b>		9.	The application are Standard Permit NS	a includes at least one "Rock Crush SR authorization.	er" Air Quality	☐ YES 🖾 NO	



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 74) Federal Operating Permit Program

Date: 07/24/2012				RN No.: RN100211317	Permit No.:	O1610
Area N	ame: I	Baytov	vn Plant			
				L questions unless otherwise directed. ILY these questions unless otherwise dire	cted.	
XII.				SR) AUTHORIZATIONS (continued)		
	B.	Air (	Quality Standard Po	ermits		
Air Quality Standard Permit NSR at				a includes at least one "Electric Generation Permit NSR authorization." II.B.10 is "NO", go to Question XII.B.13		☐ YES 🖾 NO
<b>♦</b>		11.		lectric Generating Unit" Air Quality Stan tion area is located in the East Texas Reg		☐ YES 🖾 NO
•		12.		lectric Generating Unit" Air Quality Stan tion area is located in the West Texas Re		☐ YES ☑ NO
<b>*</b>		13.	The application are Standard Permit NS	a includes at least one "Boiler" Air Qual SR authorization.	ity	☑ YES ☐ NO
	C.	Flexi	ble Permits			
<b>*</b>		1.	The application are authorization.	a includes at least one Flexible Permit N	SR	☐ YES 🖾 NO
	D.	Mult	iple Plant Permits			
		1.	The application are authorization.	a includes at least one Multi-Plant Permi	t NSR	☐ YES ☒ NO



## Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 75) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	1317 Permit No.: O1610						
Area Name: Baytown Plant								
For SOP applications, answer ALI For GOP applications, answer ON			lirected	!				
XII. NEW SOURCE REVIEW (N	SR) AUTHORIZATION	S (Attach a	dditior	al she	ets if no	cessar	y)	
♦ E. PSD Permits and PSD N	Iajor Pollutants							
PSD Permit No.: PSDTX695	Poll	utant(s)	SO <sub>2</sub>					
PSD Permit No.:	Poll	utant(s)						
PSD Permit No.:	Poll	utant(s)					!	
PSD Permit No.:	Poll	utant(s)						
F. Nonattainment (NA) Permits and NA Major Pollutants								
NA Permit No.:	Poll	utant(s)						
NA Permit No.:	Poll	utant(s)						
NA Permit No.:	Poll	utant(s)						
NA Permit No.:	Poll	utant(s)						
♦ G. NSR Authorizations wit	h FCAA § 112(g) Requi	rements						
NSR Permit No.:	NSI	NSR Permit No.:						
NSR Permit No.:	NSI	NSR Permit No.:						
NSR Permit No.:	NSI	NSR Permit No.:						
H Title 30 TAC Chapter 1 (Other Than Permits By	16 Permits, Special Perry Rule, PSD Permits, NA	nits, Standa Permits) fo	rd Per or the A	mits, C Applica	Other A	uthoriz rea.	zations	
Authorization No.: 9565	Aut	horization N	o.:					
Authorization No.: 56534	Aut	Authorization No.:						
Authorization No.: 86388	Aut	Authorization No.:						
Authorization No.:	Aut	Authorization No.:						
Authorization No.:	Aut	Authorization No.:						
Authorization No.:	Aut	horization N	o.:					
Authorization No.:	Aut	Authorization No.:						



### Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 (Page 76) Federal Operating Permit Program

Date: 07/24/2012	RN No.: RN100211317	Permit No.: O1610
Area Name: Baytown Plant		

For SOP applications, answer ALL questions  For GOP applications, answer ONLY these questions							
II. NEW SOURCE REVIEW (NSR) AUTHORIZATIONS (Attach additional sheets if necessary)							
♦ I. Permits by Rule (30 TAC Chapter 1	I. Permits by Rule (30 TAC Chapter 106) for the Application Area						
A list of selected Permits by Rule (previously referre FOP application is available in the instructions.	ed to as standard exemptions) that are required to be listed in the						
PBR No.: 106.183	Version No./Date: 09/04/2007						
PBR No.: 106.371	Version No./Date: 03/14/1997						
PBR No.: 106.472	Version No./Date: 03/14/1997						
PBR No.: 106.478	Version No./Date: 03/14/1997						
PBR No.: SE007	Version No./Date: 08/11/1989						
PBR No.: 106.261	Version No./Date: 11/01/2003						
PBR No.: 106.262	Version No./Date: 09/04/2000						
PBR No.: 106.262	Version No./Date: 11/01/2003						
PBR No.:106.412	Version No./Date: 09/04/2000						
PBR No.:	Version No./Date:						
PBR No.:	Version No./Date:						
PBR No.:	Version No./Date:						
♦ J. Municipal Solid Waste and Industr	ial Hazardous Waste Permits With an Air Addendum						
Permit No.:	Permit No.:						
Permit No.:	Permit No.:						
Permit No.:	Permit No.:						
Permit No.:	Permit No.:						

OP-REQ2



#### Texas Commission on Environmental Quality Form OP-REQ2

#### Negative Applicable Requirement Determinations Federal Operating Permit Program

Date 07/24/2012		Regulated Entity No.:	RN100211317	Permit No:	O-1610
Company Name:	Rhodia Inc.	Area Name	Baytown Plant		

		Unit/Grou	p/Process	Potentially Applicable	Negative Applicability	Negative Applicability Reason
Unit AI	Revision No.	ID No.	Applicable Form	Regulatory Name	Citation	Regative Applicatinity Reason
	1	GRPACIDTNK	OP-UA3	NSPS Kb	§60.110b(b)	Tank capacity is greater than or equal to 151 cubic meters and vapor pressure of material stored is less than 3.5 kPa (0.5 psia).
	2	T-16	OP-REQ2	NSPS Kb	§60.110b(a)	Tank does not store VOC.
	2	T-16	OP-REQ2	Chapter 115, Storage of VOCs	§115.110(a)	Tank does not store VOC.
A	3	T-GAS	OP-UA3	Chapter 115, Storage of VOCs	§115.111(a)(3)	Storage capacity less than 25,000 gallons located at a motor vehicle fuel dispensing facility.
A	4	GRPDIESELT	OP-UA3	Chapter 115, Storage of VOCs	§115.111(a)(8)	tank with storage capacity less than 1,000 gallons.
A	3	T-GAS	OP-UA3	NSPS Kb	§60.110b(a)	Tank capacity is less than 75 cubic meters.
Α	4	GRPDIESELT	OP-UA3	NSPS Kb	§60.110b(a)	Tank capacity is less than 75 cubic meters.
					<u> </u>	

**OP-MON** 



## Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program

Table 2a: CAM/PM Deletions

I IDENTIFYING I	EODMAT	ION				
I. IDENTIFYING IN	NFORMAT	ION			······	
A. Account No.:	HG0696Q	B. RN No.:	RN100211317	C. CN No.:	CN6001253	30
D. Permit No.:	O1610	E. Project No.:	TBA	F. Area Name:	Baytown Pla	nnt
G. Company Name:	Rhodia Inc					
II. UNIT/EMISSION	POINT/G	ROUP/PROCESS I	NFORMATIO!	N		
A. Revision No.:	1	B. Unit/EPN/Group	/Process ID No.:	GRPACIDTNK	C. Applicat	le Form: OP-UA3
III. APPLICABLE I	REGULAT	ORY REQUIREME	ENT			
A. Name:	30 TAC C	hapter 115		B. SOP/GOP Inde	x No.:	R5112-0001
C. Pollutant:	voc		D. Main Stand	ard:	§115.112(a)	(1)
IV. TITLE V MONI	TORING I	NFORMATION				
A. Monitoring Type:		PM		B. CAM/PM Opti	on No.:	PM-V-007
V. CONTROL DEV	ICE INFOI	RMATION				
A. Device ID No.:		1		B. Device Type:	DIRFLM	
VI. TYPE OF DELF	TION	****				
A. Monitoring Requir	rement:	х		B. Control Device	e:	

Table 2b: CAM/PM Control Device Deletions

EN	IISSION UNIT	CONTROL DEVICE			
1 A. Unit ID No.:		B. Device ID No.:	C. Device Type:		
2	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
3	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
4	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
5	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
6	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		



## Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program

Table 2a: CAM/PM Deletions

F						
I. IDENTIFYING IN	FORMAT	ION				
A. Account No.:	HG0696Q	B. RN No.:	RN100211317	C. CN No.:	CN6001253	30
D. Permit No.:	O1610	E. Project No.:	TBA	F. Area Name:	Baytown Pla	nt
G. Company Name:	Rhodia Inc	•				
II. UNIT/EMISSION	POINT/G	ROUP/PROCESS I	NFORMATIO	N		
A. Revision No.:	2	B. Unit/EPN/Group	/Process ID No.:	T-16	C. Applicab	le Form: OP-UA3
III. APPLICABLE F	REGULATO	ORY REQUIREME	ENT			
A. Name:	30 TAC CI	hapter 115		B. SOP/GOP Index No.: R51		R5112-0004
C. Pollutant:	voc		D. Main Standard:		§115.112(a)(1)	
IV. TITLE V MONI	TORING II	NFORMATION				1
A. Monitoring Type:		PM		C. CAM/PM Opti	on No.:	PM-V-008
V. CONTROL DEV	ICE INFOR	RMATION				
A. Device ID No.:		DOCKVC		B. Device Type:	сомв	
VI. TYPE OF DELE	TION					
A. Monitoring Requir	ement:	X	· · · · · · · · · · · · · · · · · · ·	B. Control Device	:	

#### Table 2b: CAM/PM Control Device Deletions

EN	AISSION UNIT		CONTROL DEVICE			
1	A. Unit ID No.:	B. Device ID No.:	C. Device Type:			
2	A. Unit ID No.:	B. Device ID No.:	C. Device Type:			
3	A. Unit ID No.:	B. Device ID No.:	C. Device Type:			
4	A. Unit ID No.:	B. Device ID No.:	C. Device Type:			
5	A. Unit ID No.:	B. Device ID No.:	C. Device Type:	_		
6	A. Unit ID No.:	B. Device ID No.:	C. Device Type:			

**OP-ACPS** 



### Texas Commission on Environmental Quality Form OP-ACPS Application Compliance Plan and Schedule

Date: 07/24/2012	Regulated Entity No.: RN100211317		Permit No.: O1610
Company Name: Rhodia Inc		Area Nan	ne: Baytown Plant

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(e)(9).

#### Part 1

4	Compliance	Plan	Future	Activity	Committel	Statement
<b>4.</b>	Сошриансе	LixII —	Lutaie	Activity	Сошиния	Statement

requirements that become effective during the permit term.

The Responsible Official commits, utilizing reasonable effort, to the following:

As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable

B.	Compliance Certification — Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	☑ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☑ YES ☐ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. (For reference only)	1
*	For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirement corresponding emission units when assessing compliance status.  For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122. Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, a requirements, as appropriate, associated with the applicable requirement in question.	d be consulted as



Date: 07/24/2012

§117.9020(2)(C)(i)

### Texas Commission on Environmental Quality Form OP-ACPS Application Compliance Plan and Schedule

Permit No.: O1610

Rhodia Baytown Plant

	, ,	•							
Company Name: Rhod	mpany Name: Rhodia Inc.  Area Name: Baytown Plant								
Part 2									
A. Compliance Scho	edule			· .					
If there are non-compliangly instructions for details.)	nce situations ongoing at tin If there are no non-compli	me of application, the ance situations ongoi	en complete a <u>separate</u> Oling at time of application	P-ACPS Part 2 for sthen this section is	each separate non-compliance situation. (See form some sont required to be completed.				
1. Specific Non-Co	mpliance Situation								
Unit/Group/Process				A	pplicable Requirement				
ID. No(s).	SOP Index No.	Pollutant	Citation		Text Description				
PREHTRSTK		NOx	§117.310(a)(8)(A)(ii)	NOx limit 0.036 lb/MMBtu (or 30 ppmv NOx, at 3.0% O2 dry basis).					
2. Compliance Stat	us Assessment Method an	d Records Location	1						
	Compliance S	Status Assessment M	lethod		Location of Records/Documentation				
Citation Text Description					Location of Records/Documentation				

The stack test for preheater was performed in time. However, stack test results indicated that Rhodia did not meet the Chapter 117 requirement.

Regulated Entity No.: RN100211317

Perform stack test

Non-compliance Situation Description



### Texas Commission on Environmental Quality Form OP-ACPS Application Compliance Plan and Schedule

Date: 07/24/2012 Regulated Entity No.: RN100211317			b.: RN100211317	Permit No.: O1610			
Compa	ny Name: Rhodia Inc.		Area Name: Baytown Plant	Name: Baytown Plant			
Part 2 (	continued)						
4. C	Corrective Action Plan Descript	ion					
Rhodia	will again perform the required st	ack test stated in 30 T	FAC Chapter 117, §117.9020(2	(C)(i).			
5. I	List of Activities/Milestones to I	mplement the Corre	ctive Action Plan				
1	Rhodia proposes to replace the burner in order to meet the regulatory requirement and comply with the stack test standards. Rhodia will perform the stack test for preheater by the end of second quarter of 2013.						
2							
3							
4							
5							
				Type of Action	Date Submitted		
6. I	Previously Submitted Complian	ce Plan(s)	N/A				
7. Progress Report Submission Schedule Every six months until the non-compliance issue is resolved.							

#### 3.1 REGENERATION UNIT (PRO-REGEN)

The unit is designed to produce fresh sulfuric acid from a blend of refinery or chemical plant spent sulfuric acids or "sludges". Hydrogen sulfide gas and natural gas are burned to maintain proper operating parameters and sulfur dioxide (SO<sub>2</sub>) strengths. The sludge and sulfur are sprayed into a combustion furnace where the hydrocarbons and sulfur are burned and the spent sulfuric acid is decomposed. The combustion gases exit the furnace and pass through a boiler for heat recovery and then passed through gas cleaning, cooling, and mist removal equipment. This equipment consists of a scrubbing tower, a direct contact gas cooler, two electrostatic precipitators, and a drying tower.

The gases are next sent through a catalytic converter. In the converter the gas passes over multiple beds of catalyst, where the SO<sub>2</sub> gas is converted to sulfur trioxide (SO<sub>3</sub>) gas. From the converter the gas passes through an economizer where more heat is recovered and finally sent to an absorbing tower.

In the absorbing tower, the SO<sub>3</sub> reacts with water to form sulfuric acid. Sulfur trioxide is absorbed from the gas by concentrated sulfuric acid that circulates in the tower. This increases the strength of the acid. Water is added to the acid in a pump tank to return the acid to the desired strength.

The gas that exits from the absorbing tower is passed through a mist removal element where any entrained acid (or acid mist) from the absorbing tower is removed. The final gas stream enters an ammonia scrubber that reduces the concentration of unconverted sulfur dioxide gas. The tail gas is then exhausted to the stack.

#### 3.2 BARGE LOADING/UNLOADING

Barges carry spent acid and transport the acid into spent acid tanks T-5, T-6, T-7 and T-8. Emissions from barges are controlled by a dockside caustic scrubber followed by a vapor combustor. Emissions from spent acid tanks (T-5, T-6, T-7, and T-8) are usually controlled by the furnace. In case the furnace is out of service, the emissions are routed to a caustic scrubber.

#### 3.3 RAILCAR LOADING/UNLOADING

Railcars carry spent acid and transport the acid into spent acid tanks T-5, T-6, T-7 and T-8. Emissions from spent acid tanks are usually controlled by the furnace. Railcars are also loaded with product acid from product storage.

#### 3.4 MSS ACTIVITIES

Catalyst beds in converters are cleaned periodically. The emissions from the catalyst screening are controlled by a bag filter. When maintenances are performed for spent acid tanks T-5, T-6, T-7 and T-8, the purged gas is combusted in a combustion furnace or a portable flare.

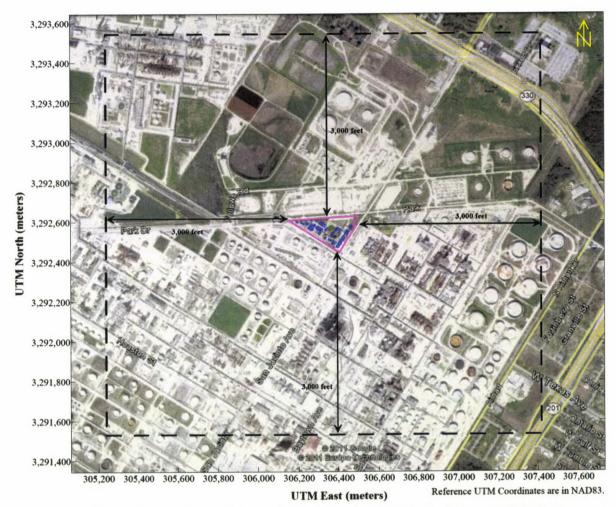
#### 3.5 UTILITIES

A number of miscellaneous emission sources are in place to maintain the facility's normal operations. Rhodia operates a cooling tower at the Baytown Plant. During periods of plant startup and shutdown, plant steam is generated by a package boiler. A small gas tank and 3 diesel tanks are maintained to supply fuel to on-site motor vehicles. The plant also maintains a used oil tank.

4. MAPS

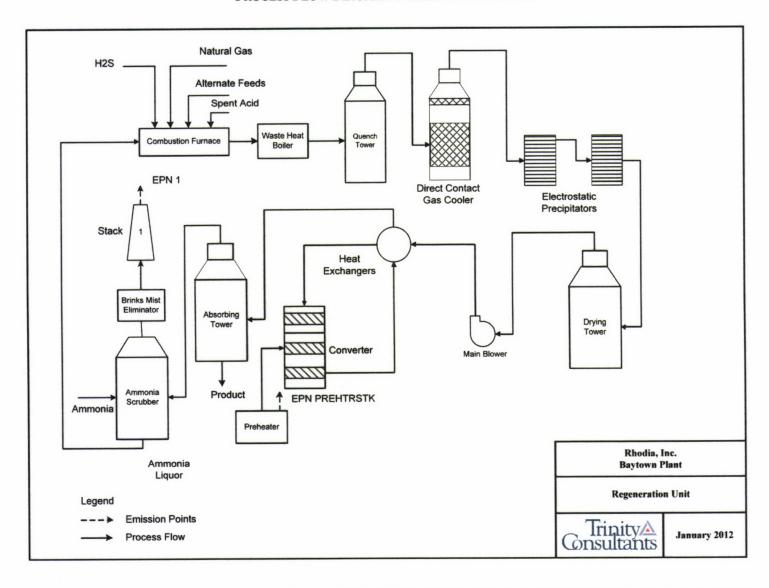
PLOT PLAN
AREA MAP
PROCESS FLOW DIAGRAMS

#### Aerial Map for Rhodia Inc., Baytown Plant

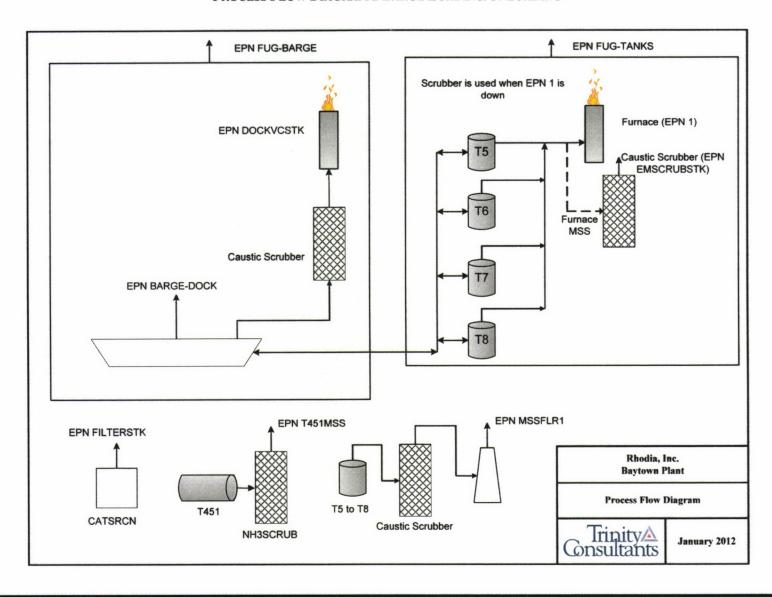


Referenced Universal Transverse Mercator (UTM) coordinates are in North American Datum 83 (NAD 83) datum.

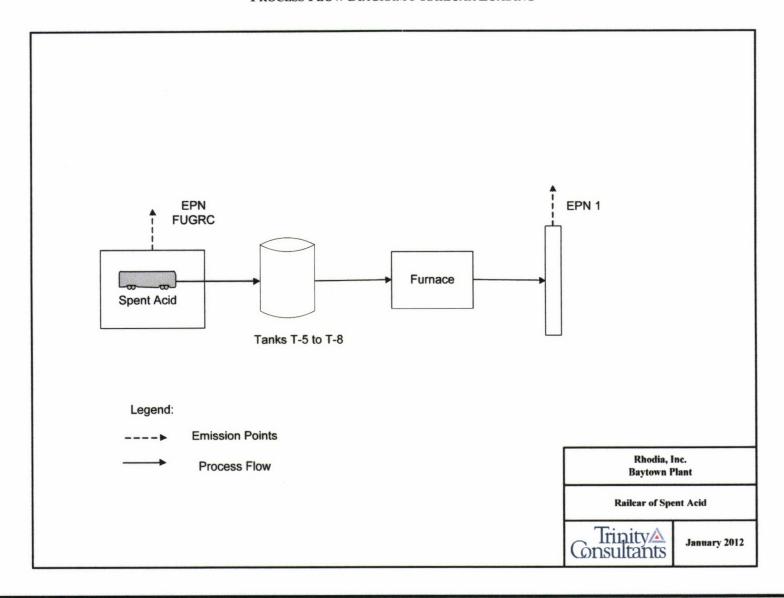
#### **PROCESS FLOW DIAGRAM 1 REGENERATION UNIT**



#### PROCESS FLOW DIAGRAM 2 BARGE LOADING/UNLOADING



#### PROCESS FLOW DIAGRAM 3 RAILCAR LOADING





Member of the Solvay Group Baytown Plant

#### CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 4522)

January 17, 2012

Texas Commission on Environmental Quality Air Permits Initial Review Team (APIRT), MC 161 P.O. Box 13087 Austin, Texas 78711-3087

Re Title V State Operating Permit Revision
Permit O1610
Rhodia Inc., Baytown Plant
Baytown, Harris County
CN600125330, RN100211317, Account HG0696Q

AIR PERMITS DIVISION

JAN 20 2012

RECEIVED



To whom it may concern:

Rhodia Inc. (Rhodia) owns and operates a sulfuric acid manufacturing plant in Baytown, Harris County, Texas (Baytown Plant). The Baytown Plant is authorized by the Federal Operating Permit O1610. With this application, Rhodia proposes to revise the Permit O1610 to reflect the correct regulatory requirement for several tanks. Required forms, process description, plot plan and flow charts can be found in this application.

If you have any questions, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson

**Environmental Manager** 

Attachment

CC Mr. Manuel Bautista, TCEQ Region 12 – Houston
Mr. Bob Allen, Harris County Pollution Control Department
EPA Region 6, Air Permit Division (6PD-R) –Electronic files submittal on CD

Rhodia Inc. Baytown Plant 3439 Park Street P.O. Box 3331 Baytown, TX 77522-3331 18/4 de #130° 17428 JH dfc 1/23/12

### OPERATING PERMIT O1610 REVISION APPLICATION RHODIA INC. • BAYTOWN PLANT

Prepared by:

#### **TRINITY CONSULTANTS**

1001 West Loop South Suite 640 Houston, Texas 77027 (713) 552-1360

January 2012

Project No. 104402.0098



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1.	Introduction1-1					
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#### 1. Introduction

Rhodia Inc. (Rhodia) owns and operates a sulfuric acid manufacturing plant in Baytown, Harris County, Texas (Baytown Plant). The facility produces sulfuric acid by regenerating spent sulfuric acid (sulfuric acid received from petroleum refining and chemical processes that has been in contact with volatile organic compounds). The Baytown Plant currently operates under the Texas Commission on Environmental Quality (TCEQ) account number HG-0696-Q. Rhodia has a TCEQ Customer Reference Number CN600125330 and the Baytown plant is registered with a Regulated Entity Number RN100211317. The Baytown Plant is authorized by a federal operating permit O1610.

With this application, Rhodia proposes to revise the Permit O1610 to reflect the correct regulatory requirement for several tanks. Recent vapor analysis from the spent acid tanks indicates that the maximum vapor pressure is less than 0.5 psia for VOC. Therefore, these tanks are NOT subject to 40 CFR Kb requirements. However, construction Permit 56534 authorizes these tanks at VOC vapor pressure of 1 psia. Additionally, Rhodia also proposes to submit an amendment of Permit 56534 by January 31, 2012 to incorporate the updated vapor pressure and corresponding speciation profile for VOC based on the recent vapor analysis from the spent acid tanks. Table 1-1 summarizes all the revisions related to this application.

Section 2 contains all the required forms for this submittal. A process description is located in Section 3. An area map indicating the site location, a plot plan identifying the location of sources, and process flow diagrams are included in Section 4.

TABLE 1-1. SUMMARY OF CHANGES

Item	Description	Change
GRPACIDTNK	Spent acid tanks T-5 to T-8	The tanks are not subject to 40 CFR, Part 60, Subpart Kb due to vapor pressure < 0.5 psia. Additionally, except 30 TAC 115.118 (relating to Recordkeeping Requirements), these tanks are not subject to any other requirements in 30 TAC 115.
T-16	Production Tank	This tank has been changed from 96% to 98% sulfuric acid production tank. Since it does not store VOC, it is no longer subject to 30 TAC 115 requirements. Also, since it is no longer stores any VOC, this tank is not subject to 40 CFR, Part 60, Subpart Kb.
Permit Shield	T-5 to T-8	Remove 40 CFR, Part 60, Subpart K from permit shield
Permit Shield	T-16	Remove 40 CFR, Part 60, Subpart K from permit shield
Permit Shield	T-16	Not subject to 40 CFR, Part 60, Subpart Kb or 30 TAC 115
Periodic Monitoring	VOC control for Tank T-5 to T-8	Deleted. These tanks are not subject to periodic monitoring requirement per 30 TAC 115 as their vapor pressures are less than 0.5 psia
Periodic Monitoring	VOC control for T-16	Deleted. This tank is no longer a VOC storage tank.
Compliance Schedule	T-16,	Deleted for T-16. For T-16 tank, since it no longer stores VOC; therefore, no vapor combustor is needed.
	PREHTRSTK,	The stack test for preheater was performed in time. However, stack test results indicated that Rhodia did not meet the Chapter 117 requirement. Rhodia proposes to schedule another stack test for the preheater based on the compliance plan and schedule as provided in TCEQ OP-ACPS form.
	PKGBOILSTK	The stack tests for package boiler have been completed in time.

#### 2. TCEQ FORMS

OP-CRO1 OP-2 OP-SUMR OP-UA3 OP-REQ2 OP-MON OP-ACPS

OP-CRO1



### Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

APIRT
JAN 20 2012

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMA	ATION		
A. RN: 100211317	B. CN: 60012	25330	C. Account No.: HG0696Q
D. Permit No.: O1610		E. Project No.:	
F. Area Name: Baytown Plant			
G. Company Name: Rhodia Inc.			
II. CERTIFICATION TYPE	Please mark the app	propriate box)	
A. Responsible Official:		B. Duly Author	ized Representative: William McConnell
III. SUBMITTAL TYPE (Place	an "X" in the appro	opriate box) (Only one r	esponse can be accepted per form)
SOP/TOP Initial Permit Appli	cation	Update to Permit App	olication
GOP Initial Permit Application	n 🗵	Permit Revision, Ren	ewal, or Reopening
Other:			
IV. CERTIFICATION OF TR	UTH		
This certification does not extend	d to information wh	ich is designated by th	e TCEQ as information for reference only.
I, William McConnell (Certifier Name printed o	r typed)	, certify that I am the	DARfor this application (RO or DAR)
and that, based on information a period in Section IV.A below, or o	nd belief formed aft on the specific date(s)	ter reasonable inquiry, to in Section IV.B below,	the statements and information dated during the time are true, accurate, and complete:
Note: Enter EITHER a Time Peri not valid without documentation d		(s) for each certification	n. This section must be completed. The certification is
A. Time Period: From	to Date*	End Date*	
*The Time Period option may on	ly be used when the ttal package has mul	Date 4* Date "Submittal Type" is 'itiple dates recorded in t	5* Date 6* Date 7* Date 8* Update to Permit Application' and there are multiple the documentation. Do not use the Time Period option
Signature: Welle (	y Mic	onu	Signature Date:
Title: Plant Manager	<b>'</b>		

gnor 1/23/12



## Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2



Table 1

Date: 01/12/2012	Permit No.: O1610 Account			G0696Q		Regulated Ent	Regulated Entity No.: RN100211317			
Area Name: Baytown Plant			Company Name: Rhodia Inc. Customer Reference No.: CN60012				25330			
				41.879884NJ 1 1 1 1 2 2	· · · · · · · · · · · · · · · · · · ·					
For Submissions to EPA (SOP r	enewal, minor revision, and signific	cant revision applicat	tions <u>only</u> )	Markey Extra 1			The control of the Control	digiply in the second		
Has a copy of this application bee	en submitted (or is being submitted)	to EPA? (Refer to th	e form instructions	for additional infor	mation.)		✓ YES	□ NO		
I. APPLICATION TYPE										
Indicate the type of application:	Renewal		Streamlined F	evision (Must inclu	de provisional to	erms and condition	s as explained in the	instructions.)		
	✓ Significant Revision			esting Prior Appro			•	,		
	☐ Administrative Revision		Response to I	leopening						
II. QUALIFICATION STAT	EMENT		TES SAMPANIA : 1	imitalisis.				N. Andrews		
For SOP Revisions Only	The referenced chang	ges qualify for the ma	e marked revision type.					)		
For GOP Revisions Only	The permitted area co	ontinues to qualify for	for a GOP.					)		
III. MAJOR SOURCE POLI	LUTANTS (Complete this section i	f the permit revision i	is due to a change o	it the site.)	ng jiha	AMBOTE TO				
Indicate all pollutants for which th	ne site is a major source based on th	e site's potential to er	nit after the change	is operated:	<u></u>	Activities and the second seco	<u> </u>	*		
Pollutant	voc	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>10</sub>	co	Pb	HAPs	Other		
Major at the Site (YES/NO):	NO	YES	YES	NO	NO	NO	NO	NO		
IV. FEE INFORMATION	- Marketin			and the second s	to a second part Mark The second part Mark The second part of the second of			46,H90		
Has the applicant paid emissions t	ees for the most recent agency fisca	l year (September 1 -	August 31)?			a comment	✓ YES □ NO	D N/A		
V. DELINQUENT FEES AN	D PENALTIES	7754 Marie				a sa a sa Na Na an				
Notice: This form will not be proc Fee and penalty protocol.	essed until all delinquent fees and/o	or penalties owed the	TCEQ or the Office	of the Attorney Ger	neral on behalf o	f the TCEQ are pai	id in accordance with	the Delinquent		



## Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2

#### Table 2

Date: 01/12/2012 Permit No.: O1610		Account No.: HG0696Q	Regulated Entity No.: RN100211317	
Area Name: Baytown Plant Co		Company Na	me: Rhodia Inc.	Customer Reference No.: CN600125330

. Description of REVISION						7 <del>1 7 1 7 1 7 1 7 1 7 1 7 1 7 1 7 1 7 1</del>	
Revision No.	Revision Code	Unit/Group Process				Description of Changes	
		New Unit	ID No.	Applicable Form	NSR Authorization	and Provisional Terms and Conditions	
1	SIG-A	NO	GRPACIDTNK	OP-UA3	56534	Rule applicability change and remove periodic monitoring	
2	SIG-A	NO	T-16	OP-REQ2	56534	Rule applicability change	
				OP-			
				OP-			
				OP-			
-			-	OP-			
			<del>''' -</del>	OP-			
· · · ·				OP-			
				OP-			
				OP-			
				OP-			
				OP-			



## Texas Commission on Environmental Quality Federal Operating Permit Program Application for Permit Revision/Renewal Form OP-2

#### Table 3

Date: 01/12/2012	Permit No.: O1610	Account No.: HG0696Q	Regulated Entity No.: RN100211317  Customer Reference No.: CN600125330				
Area Name: Bayto	wn Plant	Company Name: Rhodia Inc.					
I. SIGNIFICAN	T REVISION (Complete	this section if you are submitting a significant revisio	n application or a <b>renewal application</b> that includes a				
significant revision.							
A. Is the site sub	ject to bilingual requireme	nts pursuant to 30 TAC § 122.322?	✓ YES □ NO				
B. Indicate the al	ternate language(s) in whi	ch public notice is required: Spanish					
C. Will there be	a change in air pollutant ei	missions as a result of the significant revision?	✓ YES □ NO				
D. Indicate the a	ir pollutant(s) that will be	changing and include a brief description of the change	in pollutant emissions for each pollutant:				
Pollutant		Description of the Cha	nge in Pollutant Emissions				
Benzene, Toluene, Ethylbenzene, and m,p-Xylene		C emissions from spent acid tanks. However, new pole nendment to Permit 56534 by January 31, 2012.	lutants discovered due to the testing of vapor space from spent acid tanks. Rhodia				

**OP-SUMR** 



# Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 1

Date:	01/12/2012	Regulated Entity No.: RN100211317			Permit No.:	O1610
Company Name	: Rhodia Inc.		Area Name:	Baytown P	lant	

Unit					Preconstruction Authorizations		
AI	Revision No.	ID No.	**Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	2	T-16	OP-UA3	Production Acid Tank		56534	
				-			
						_	



# Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary for Revisions Form OP-SUMR Table 2

Date: 01/12/2012		Regulated Entity No	Regulated Entity No.: RN100211317			O1610
Company Name: Rhodia Inc.			Area Name:	Baytown Plant	,	

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.	Plant AI	Plant ID No.
1	T-5	OP-UA3		GRPACIDTNK		
1	T-6	OP-UA3		GRPACIDTNK		
1	T-7	OP-UA3		GRPACIDTNK		
1	T-8	OP-UA3		GRPACIDTNK	, ,,,==	

OP-UA3



# Storage Tank/Vessel Attributes Form OP-UA3 (Page 3) Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

Date: 01/12/2012	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN600125330

	Stored	Storage Capacity	Maximum TVP	Storage Vessel Description	AMEL ID No.	Reid Vapor Pressure	Control Device ID No.
0Kb-0001	VOL	40K+	0.5-				
	-						
						-	
	JKb-0001	JKb-0001 VOL	VOL 40K+	VOL 40K+ 0.5-	JKB-0001 VOL 40K+ 0.5-	JKB-0001 VOL 40K+ 0.5-	JKB-0001 VOL 40K+ 0.5-



# Storage Tank/Vessel Attributes Form OP-UA3 (Page 4) Federal Operating Permit Program

Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Storage of Volatile Organic Compounds (VOCs)

Date: 01/12/2012	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN600125330

SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
R5112-0001	NO		VOC1	A40K+			
	648. u	SOP/GOP Index No. Control Requirement	SOP/GOP Index No. Control Requirement ACR ID No.	SOP/GOP Index No. Control Requirement ACR ID No. Product Stored	SOP/GOP Index No. Control Requirement ACR ID No. Product Stored Capacity	SOP/GOP Index No. Control Requirement ACR ID No. Product Stored Capacity Throughput	SOP/GOP Index No. Control Requirement ACR ID No. Product Stored Capacity Throughput Emit



# Storage Tank/Vessel Attributes Form OP-UA3 (Page 5) Federal Operating Permit Program

Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Subchapter B: Storage of Volatile Organic Compounds (VOCs)

Date: 01/12/2012	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN600125330

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description		True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
GRPACIDTNK	R5112-0001	73-	NONE1	1-					
		<u>.</u>			<del></del>				1-12/
	<u> </u>								
					-				
						-			
									- -

OP-REQ2



# Texas Commission on Environmental Quality Form OP-REQ2 Negative Applicable Requirement Determinations Federal Operating Permit Program



Date 01/12/2012	Regulated Entity No.:	RN100211317	Permit No: O1610
Company Name: Rhodia Inc.	Area Name	Baytown Plant	
Unit/Group/Proc			86 Turk 30 30 31 3 3 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
Unit AI Revision No. Appli	Potentially Applicable	Negative Applicabilit	Negative Applicability Reason

	\$160min   177	Unit/Gr	oup/Process	Potentially Applicable	Negative Applicability	
Unit AI	Revision No.	ID No.	Applicable Form	Regulatory Name	Citation (15)	Negative Applicability Reason
	2	T-16	OP-REQ2	NSPS Kb	§60.110b(a)	Tank does not store VOC
	2	T-16	OP-REQ2	Chapter 115, Storage of VOCs	§115.110(a)	Tank does not store VOC
		,				
					****	
					**************************************	
L						

**OP-MON** 



# Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program

Table 2a: CAM/PM Deletions

I. IDENTIFYING IN	FORMAT	ION				
A. Account No.:	HG0696Q	B. RN No.:	RN100211317	C. CN No.:	CN6001253	30
D. Permit No.:	O1610	E. Project No.:	TBA	F. Area Name:	Baytown Pl	ant
G. Company Name:	Rhodia Inc	•				
II. UNIT/EMISSION	N POINT/G	ROUP/PROCESS	INFORMATIO	N		
A. Revision No.:	1	B. Unit/EPN/Grou	p/Process ID No.:	GRPACIDTNK	C. Applical	ole Form: OP-UA3
III. APPLICABLE I	REGULATO	ORY REQUIREM	ENT			
A. Name:	30 TAC CI	napter 115		B. SOP/GOP Inde	ex No.:	R5112-0001
C. Pollutant:	VOC		D. Main Stand	ndard: §115.112(a)(1)		
IV. TITLE V MONI	TORING II	NFORMATION				
A. Monitoring Type:		PM		B. CAM/PM Option No.: PM-V-007		
V. CONTROL DEV	ICE INFOR	RMATION				
A. Device ID No.:			1	B. Device Type:	DIRFLM	
VI. TYPE OF DELE	TION			1999 - 1997 - 1997 - 1998 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999		
A. Monitoring Requir	ement:	X		B. Control Device	<b>:</b>	

# **Table 2b: CAM/PM Control Device Deletions**

EN	IISSION UNIT		CONTROL DEVICE		
1:	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
2	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
3	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
4	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
5	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		
6	A. Unit ID No.:	B. Device ID No.:	C. Device Type:		



# Monitoring Requirements Form OP-MON (Page 3) Federal Operating Permit Program

Table 2a: CAM/PM Deletions

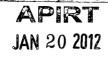
I. IDENTIFYING IN	NFORMAT	ION					
A. Account No.:	HG0696Q	B. RN No.:	RN100211317	C. CN No.:	CN6001253	30	
D. Permit No.:	O1610	E. Project No.:	TBA	F. Area Name:	Baytown Plant		
G. Company Name:	Rhodia Inc						
II. UNIT/EMISSION	N POINT/G	ROUP/PROCESS	INFORMATIO	7			
A. Revision No.:	2	B. Unit/EPN/Group	p/Process ID No.:	T-16	C. Applicab	ole Form: OP-UA3	
III. APPLICABLE I	REGULATO	ORY REQUIREM	ENT				
A. Name:	30 TAC CI	hapter 115		B. SOP/GOP Inde	ex No.:	R5112-0004	
C. Pollutant:	voc		D. Main Stand	lard: §115.112(a)(1)			
IV. TITLE V MONI	TORING I	NFORMATION					
A. Monitoring Type:		PM		C. CAM/PM Option No.: PM-V-0		PM-V-008	
V. CONTROL DEV	ICE INFOR	RMATION					
A. Device ID No.:		DOCKVC	B. Device Type:	СОМВ			
VI. TYPE OF DELE	TION				) (1) (1) (1)		
A. Monitoring Requir	ement:	X		B. Control Device	<del>:</del> :		

### Table 2b: CAM/PM Control Device Deletions

EN	IISSION UNIT		CONTROL DEVICE
1	A. Unit ID No.:	B. Device ID No.:	C. Device Type:
2	A. Unit ID No.:	B. Device ID No.:	C. Device Type:
3	A. Unit ID No.:	B. Device ID No.:	C. Device Type:
4	A. Unit ID No.:	B. Device ID No.:	C. Device Type:
5	A. Unit ID No.:	B. Device ID No.:	C. Device Type:
6	A. Unit ID No.:	B. Device ID No.:	C. Device Type:

**OP-ACPS** 





Date: 01/12/2012	Regulated Entity No.: RN100211317		Permit No.: O1610	
Company Name: Rhodia Inc	•	Area Nam	ne: Baytown Plant	

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(e)(9).

### Part 1

Α.	Compliance Plan — Future Activity Committal Statement
As the	Responsible Official commits, utilizing reasonable effort, to the following: e responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable rements that become effective during the permit term.

В.	Compliance Certification — Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	⊠ YES □ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	⊠ YES □ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. (For reference only)	1
*	For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirement corresponding emission units when assessing compliance status.  For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122. Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and requirements, as appropriate, associated with the applicable requirement in question.	ld be consulted as



Date: 01/12/2012	Regulated Entity No.: RN100211317	Permit No.: O1610	
Company Name: Rhodia Inc.		Area Name: Baytown Plant	

#### Part 2

# . Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a <u>separate</u> OP-ACPS Part 2 for <u>each</u> separate non-compliance situation. (See form instructions for details.) If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

### 1. Specific Non-Compliance Situation

Unit/Group/Process	t/Group/Process			Applicable Requirement	
ID. No(s).	SOP Index No.	Pollutant Citation	Citation	Text Description	
PREHTRSTK		со	§117.310(C)(1)	CO limit 400 ppmv at 3.0% O2, dry basis.	

# 2. Compliance Status Assessment Method and Records Location

Compliance Status Assessment Method				
Citation		Text Description	Location of Records/Documentation	
§117.9020(2)(C)	Perform stack test		Rhodia Baytown Plant	

# 3. Non-compliance Situation Description

The stack test for preheater was performed in time. However, stack test results indicated that Rhodia did not meet the Chapter 117 requirement.



Date: 01/12/2012 Regulated Entity No.: RN100211317		Permit No.: O1610		
Company Name: Rhodia Inc.		Area Name: Baytown Plant		
Part 2 (continued				
4. Corrective	Action Plan Description		<u></u>	
Rhodia will again	perform the required stack test stated in 30	TAC Chapter 117.9020(2)(C).		
5. List of Act	vities/Milestones to Implement the Corn	rective Action Plan	V 10444	
1 Rhodia	proposes to perform the stack test for preh	eater by January 17, 2012.		
2				
3				
4				
5				
6. Previously	Submitted Compliance Plan(s)	N/A	Type of Action	Date Submitted
7. Progress R	eport Submission Schedule	Every six months until the no	-compliance issue is resolved	

# 3.1 REGENERATION UNIT (PRO-REGEN)

The unit is designed to produce fresh sulfuric acid from a blend of refinery or chemical plant spent sulfuric acids or "sludges". Hydrogen sulfide gas and natural gas are burned to maintain proper operating parameters and sulfur dioxide (SO<sub>2</sub>) strengths. The sludge and sulfur are sprayed into a combustion furnace where the hydrocarbons and sulfur are burned and the spent sulfuric acid is decomposed. The combustion gases exit the furnace and pass through a boiler for heat recovery and then passed through gas cleaning, cooling, and mist removal equipment. This equipment consists of a scrubbing tower, a direct contact gas cooler, two electrostatic precipitators, and a drying tower.

The gases are next sent through a catalytic converter. In the converter the gas passes over multiple beds of catalyst, where the SO<sub>2</sub> gas is converted to sulfur trioxide (SO<sub>3</sub>) gas. From the converter the gas passes through an economizer where more heat is recovered and finally sent to an absorbing tower.

In the absorbing tower, the SO<sub>3</sub> reacts with water to form sulfuric acid. Sulfur trioxide is absorbed from the gas by concentrated sulfuric acid that circulates in the tower. This increases the strength of the acid. Water is added to the acid in a pump tank to return the acid to the desired strength.

The gas that exits from the absorbing tower is passed through a mist removal element where any entrained acid (or acid mist) from the absorbing tower is removed. The final gas stream enters an ammonia scrubber that reduces the concentration of unconverted sulfur dioxide gas. The tail gas is then exhausted to the stack.

# 3.2 BARGE LOADING

Barges carry spent acid and transport the acid into spent acid tanks T-5 to T-8. Emissions from barges are controlled by a dockside caustic scrubber followed by a vapor combustor. Emissions from spent acid tanks (T-5 to T-8) are usually controlled by the furnace.

### 3.3 RAILCAR LOADING

Railcars carry spent acid and transport the acid into spent acid tanks T-5 to T-8. Emissions from spent acid tanks (T-5 to T-8) are usually controlled by the furnace. In case the furnace is out of service, the emissions are routed to a caustic scrubber.

### 3.4 MSS ACTIVITIES

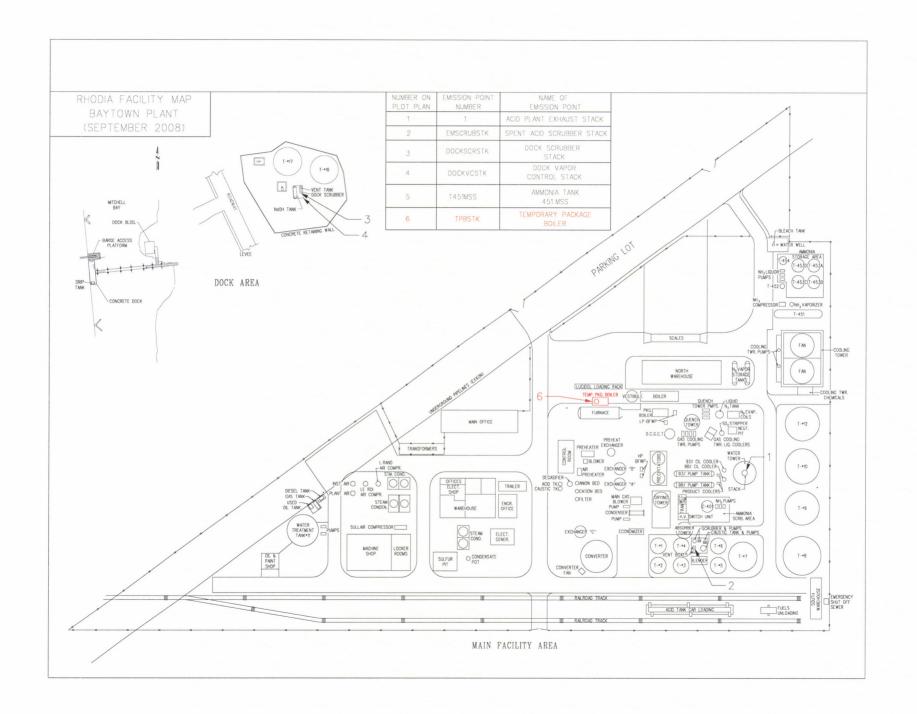
Catalyst beds in converters are cleaned periodically. The emissions from the catalyst screening are controlled by a bag filter. When maintenances are performed for spent acid tanks T-5 to T-8, the purged gas is combusted in a portable flare.

# 3.5 UTILITIES

A number of miscellaneous emission sources are in place to maintain the facility's normal operations. Rhodia operates a cooling tower at the Baytown Plant. During periods of plant startup and shutdown, plant steam is generated by a package boiler. A small gas tank is maintained to supply fuel to on-site motor vehicles. The plant also maintains a used oil tank.

4. MAPS

PLOT PLAN
AREA MAP
PROCESS FLOW DIAGRAMS

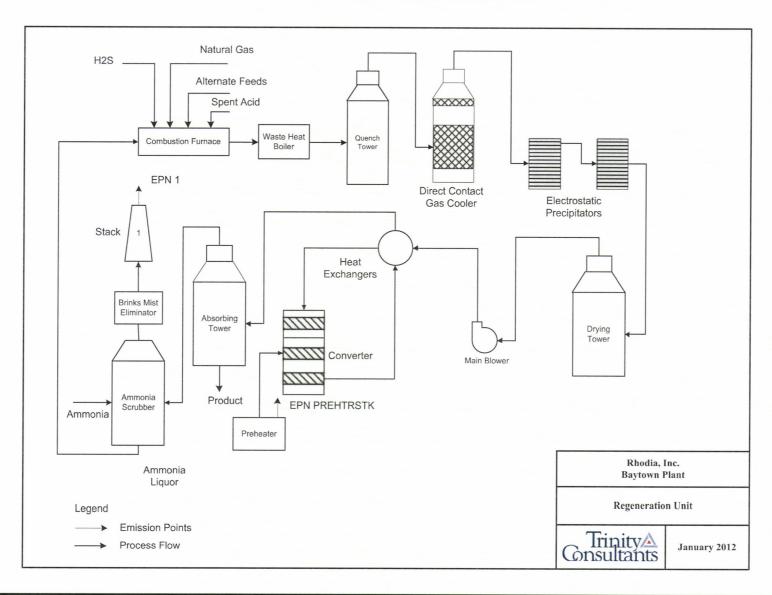


# Aerial Map for Rhodia Inc., Baytown Plant

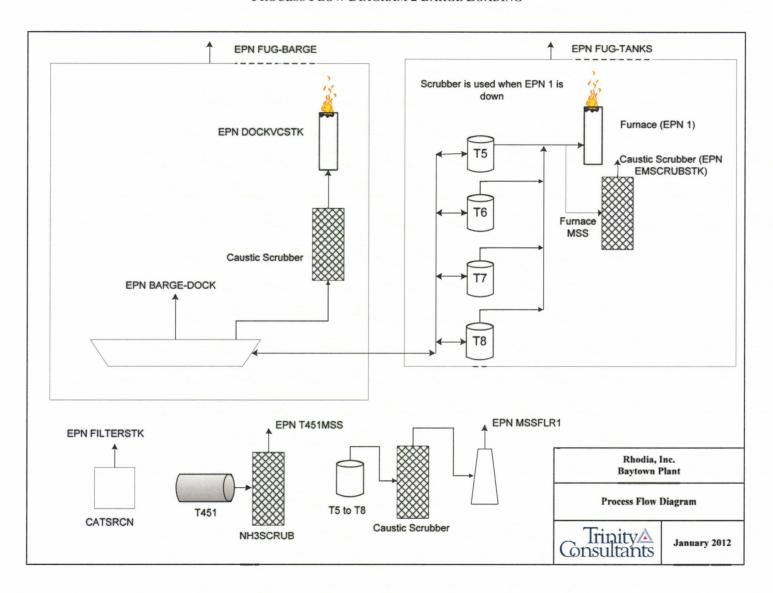


Referenced Universal Transverse Mercator (UTM) coordinates are in North American Datum 83 (NAD 83) datum.

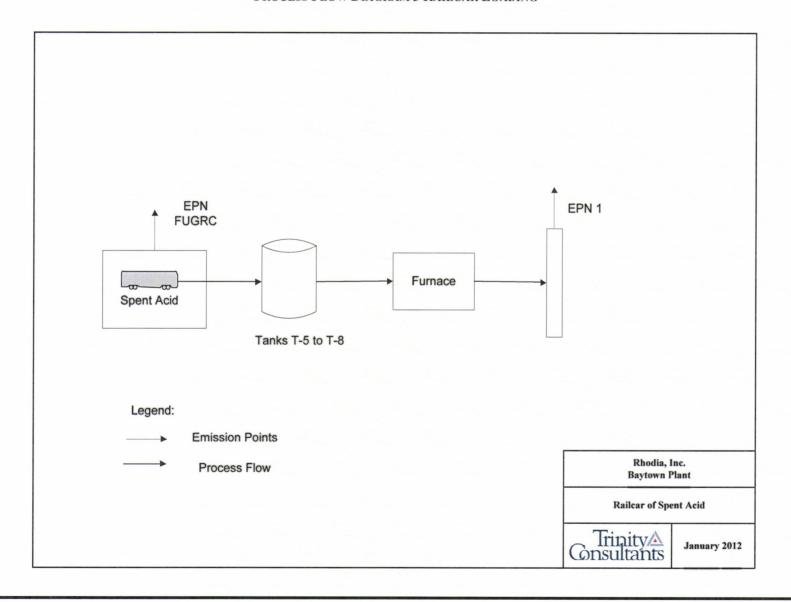
# PROCESS FLOW DIAGRAM 1 REGENERATION UNIT



# PROCESS FLOW DIAGRAM 2 BARGE LOADING



# PROCESS FLOW DIAGRAM 3 RAILCAR LOADING





Date: 01/12/2012	Regulated Entity No.: RN100211317		Permit No.: O1610	
Company Name: Rhodia Inc.		Area Nam	e: Baytown Plant	

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(e)(9).

### Part 1

A. Compliance Plan — Future Activity Committal Statement
The Responsible Official commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.

В.	Compliance Certification — Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	⊠ YES □ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	⊠ YES □ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. (For reference only)	1
*	For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirement corresponding emission units when assessing compliance status.  For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122. Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, as requirements, as appropriate, associated with the applicable requirement in question.	d be consulted as



Date: 01/12/2012 Regulated Entity No.: RN100211317			Permit No.: O1610
Company Name: Rhodia Inc.		Area Name: 1	Baytown Plant

#### Part 2

# A. Compliance Schedule

If there are non-compliance situations ongoing at time of application, then complete a <u>separate</u> OP-ACPS Part 2 for <u>each</u> separate non-compliance situation. (See form instructions for details.) If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.

### 1. Specific Non-Compliance Situation

Unit/Group/Process ID. No(s). SOP Index No.			Applicable Requirement	
	SOP Index No.	Pollutant	Citation	Text Description
PREHTRSTK		NOx	§117.310(a)(8)(A)(ii)	NOx limit 0.036 lb/MMBtu (or 30 ppmv NOx, at 3.0% O2 dry basis).

# 2. Compliance Status Assessment Method and Records Location

	Compliance Status Assessment Method		
Citation	Text Description	Location of Records/Documentation	
§117.9020(2)(C)	Perform stack test	Rhodia Baytown Plant	

# 3. Non-compliance Situation Description

The stack test for preheater was performed in time. However, stack test results indicated that Rhodia did not meet the Chapter 117 requirement.



Date: 01/12/2012 Regulated Entity No		o.: RN100211317	Permit No.: O1	Permit No.: O1610				
Company Name: Rhodia Inc.			Area Name: Baytown Plant					
Part 2 (	(continued)							
4.	Corrective Action Plan	Description						
Rhodia	will again perform the re	equired stack test stated in 30 T	TAC Chapter 117.9020(2)(C).					
5.	List of Activities/Mileste	ones to Implement the Corre	ective Action Plan					
1	Rhodia to design burner system for high nitrogen bearing refinery gas by May 1, 2012							
2	Rhodia to purchase and install burner system by September 30, 2012							
3	Rhodia proposes to perform the stack test for preheater by November 1, 2012.							
4								
5								
<b>6.</b> ]	Previously Submitted C	ompliance Plan(s)	N/A	Type of Action	Date S	Submitted		
7. 1	Progress Report Submis	ssion Schedule	Every six months until the nor	-compliance issue is resolved.				

**Progress Report Submission Schedule** 

From: (713) 552-1371 Trinity Consultants

1001 West Loop South Suite 640 HOUSTON, TX 77027 Origin ID: HOUA



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Dept#

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