

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

July 19, 2010

MR JAMES HARTON
PRESIDENT OF RHODIA INC
RHODIA INC
8 CEDAR BROOK DR
CRANBURY NJ 08512-7500

Re: Final Revised Permit Approval
Minor Revision
Permit Number: O1610
Rhodia Inc.
Baytown Plant
Baytown, Harris County
Regulated Entity Number: RN100211317
Customer Reference Number: CN600125330
Account Number: HG-0696-Q

RECEIVED
AUG 13 2010
TCEQ
CENTRAL FILE ROOM

Dear Mr. Harton:

The revised effective federal operating permit (FOP) for Rhodia Inc., Baytown Plant, is enclosed. This letter constitutes authority to operate the changes identified in the FOP revision application.

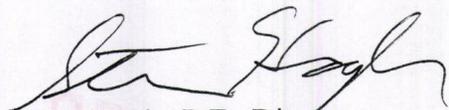
Consistent with Title 30 Texas Administrative Code Chapter 122, Subchapter C, the permit holder shall submit an application to the Air Permits Division (APD) for a revision to an FOP for those activities at a site which change, add, or remove one or more FOP terms or conditions. The permit holder shall 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.

Thank you again for your cooperation in this matter. If you have questions concerning the review or this notice, please contact **Ms. Whitney Hill** at (512) 239-1301.

Mr. James Harton
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July 19, 2010

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

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/WH/kp

cc: Mr. William F. Dickerson, Environmental Manager, Rhodia Inc., Houston
Mr. William J. McConnell, Plant Manager, Rhodia Inc., Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Air Section Manager, Region 12 - Houston

Enclosure: Revised Effective Permit

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

Project Number: 14659

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

Rhodia Inc.

AUTHORIZING THE OPERATION OF

Baytown Plant
Industrial Inorganic Chemicals

LOCATED AT

Harris County, Texas

Latitude 29° 44' 51" Longitude 095° 00' 07"

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: O1610 Issuance Date: January 25, 2008

For the Commission

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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. 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, Startup, 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. For stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed on or before January 31, 1972 that are not listed in the Applicable Requirements Summary attachment, the permit holder shall comply with the following requirements:
 - (i) Title 30 TAC § 111.111(a)(1)(A) (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)(A), 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_x, 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 do not emit visible emissions such as vents that emit only VOC or vents that provide passive ventilation, such as plumbing vents; or vents that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(A) and Compliance Assurance Monitoring, as specified in the attached Applicable Requirements Summary and "Additional 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 three 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)(A).
 - (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) 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. For stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment, the permit holder shall comply with the following requirements:
- (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_x, 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 do not emit visible emissions such as vents that emit only VOC or vents that provide passive ventilation, such as plumbing vents; or vents that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) and Compliance Assurance Monitoring, as specified in the attached "Applicable Requirements Summary" and "Additional 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 three 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) 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.

- C. 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.
- D. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- E. 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. The permit holder shall comply with the requirements of 30 TAC § 115.722(b) (relating to Site-wide Cap and Control Requirements).
- 5. 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)
- 6. 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

7. 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.
8. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. 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 "Periodic Monitoring 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 to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

New Source Review Authorization Requirements

9. 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
10. 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.
11. The permit holder shall maintain records to demonstrate continuous compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. These records may include (but are not limited to) production capacity and throughput, hours of operation, material safety data sheets (MSDS), 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.
 - A. If applicable, monitoring of control device performance or general work practice standards shall be made in accordance with the TCEQ Periodic Monitoring Guidance document.
 - B. 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).
12. The permit holder shall comply with the following requirements of Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611
 - B. General Conditions listed in 30 TAC § 116.615
 - C. Boiler Standard Permit

Compliance Requirements

13. The permit holder shall certify compliance with all permit terms and conditions 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.
14. The permit holder shall adhere to the provisions in the Compliance Schedule attachment of this permit and submit certified progress reports consistent with the schedule established under 30 TAC § 122.132(e)(4)(C) and including the information specified in 30 TAC § 122.142(e)(2). Those emission units listed in the Compliance Schedule attachment shall adhere with the requirements in the Compliance Schedule attachment until operating fully in compliance with the applicable requirements.
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

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

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

Schedules

Applicable Requirements Summary

Unit Summary15

Applicable Requirements Summary17

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 = TVP LESS THAN 0.5 PSIA (BEAUMONT/PORT ARTHUR DALLAS/FORT WORTH EL PASO HOUSTON/GALVESTON AREAS)
BARGE-DOCK	LOADING/UNLOADING OPERATIONS	N/A	R5211-0002	30 TAC Chapter 115, Loading and Unloading of VOC	TRUE VAPOR PRESSURE = TVP GREATER THAN OR EQUAL TO 0.5 PSIA (BEAUMONT/PORT ARTHUR DALLAS/FORT WORTH EL PASO HOUSTON/GALVESTON AREAS), DAILY THROUGHPUT = LOADING LESS THAN 20,000 GALLONS PER DAY
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.
1	PROCESS HEATERS/FURNACES	N/A	R7ICI-0002	30 TAC Chapter 117, Commercial	No changing attributes.
1	PROCESS HEATERS/FURNACES	N/A	PSD	Prevention of Significant Deterioration	
PREHTRSTK	PROCESS HEATERS/FURNACES	N/A	R7ICI-0001	30 TAC Chapter 117, Commercial	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRPACIDTNK	STORAGE TANKS/VESSELS	T-5, T-6, T-7, T-8	R5112-0001	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-16	STORAGE TANKS/VESSELS	N/A	R5112-0004	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
1	SULFURIC ACID PRODUCTION	N/A	REG2-002	30 TAC Chapter 112, Sulfur Compounds	No changing attributes.
1	SULFURIC ACID PRODUCTION	N/A	60H-001	40 CFR Part 60, Subpart H	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.

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		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)
ID No.	Type			Name	Citation				
BARGE-DOCK	EU	R5211-0001	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(1) § 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)	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
PKGBOILSTK	EU	R71C1-0001	NO _x	30 TAC Chapter 117, Subchapter B	§ 117.310(d)(3) § 117.310(a) § 117.310(a)(1)(C) § 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 _x 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(l)(2) § 117.340(o)(1) § 117.340(p)(1) § 117.340(p)(2)(A) § 117.340(p)(2)(B) § 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)

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		Textual Description (See Special Term and Condition I.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ID No.	Type			Name	Citation				
PKGBOILST K	EU	R71CI-0001	CO	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(d) § 117.335(e) § 117.335(g)	§ 117.345(a) § 117.345(f) § 117.345(f)(9)	§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(c)
PKGBOILST K	EU	60Dc-001	SO ₂	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	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)
i	EU	R71CI-0002	NOX	30 TAC Chapter 117, Commercial	§ 117.303	The permit holder shall comply with the applicable requirements of 30 TAC Chapter 117, Commercial	None	The permit holder shall comply with the applicable recordkeeping requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable reporting requirements of 30 TAC Chapter 117, Commercial
i	EU	PSD	**	Prevention of Significant Deterioration	PSD-TX-695M2	PSD-TX-695M2	PSD-TX-695M2	PSD-TX-695M2	PSD-TX-695M2

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		Textual Description (See Special Term and Condition I.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ID No.	Type			Name	Citation				
PREHTRSTK	EU	R71CI-0001	NOX	30 TAC Chapter 117, Commercial	§117.300 §117.310 §117.335 §117.340 §117.345 §117.350 §117.354	The permit holder shall comply with the applicable requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable monitoring and testing requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable recordkeeping requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable reporting requirements of 30 TAC Chapter 117, Commercial
GRPACIDTN K	EU	R5112-0001	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(a)(1) § 115.112(a)(3)	Tanks shall not store VOC unless the required pressure is maintained, or they are equipped with the appropriate control device specified in Table I(a) or Table II(a).	[G]§ 115.115(a) § 115.116(a)(4) § 115.116(a)(5) ** See Periodic Monitoring Summary	§ 115.116(a)(4) § 115.116(a)(5)	None
T-16	EU	R5112-0004	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(a)(1) § 115.112(a)(3)	Tanks shall not store VOC unless the required pressure is maintained, or they are equipped with the appropriate control device specified in Table I(a) or Table II(a).	[G]§ 115.115(a) § 115.116(a)(4) § 115.116(a)(5) ** See Periodic Monitoring Summary	§ 115.116(a)(4) § 115.116(a)(5)	None
1	EU	REG2-002	SO2	30 TAC Chapter 112, Sulfur Compounds	§ 112.6	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) **See CAM Summary	§ 112.2(c)	§ 112.2(b)
1	EU	REG2-002	H2SO4	30 TAC Chapter 112, Sulfur Compounds	§ 112.41(b)(2)	Sulfuric acid plants or facilities used exclusively as SO2 control systems, chamber process plants, acid concentrators, or oleum storage and transfer facilities are exempt from this section.	None	None	None

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		Textual Description (See Special Term and Condition I.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ID No.	Type			Name	Citation				
1	PRO	60H-001	SO2	40 CFR Part 60, Subpart H	§ 60.82(a)	On and after the §60.8 performance test, no owner or operator shall discharge gases containing SO2 in excess of 2 kg per metric ton (4.0 lb per ton) of acid produced into the atmosphere.	§ 60.84(a) § 60.84(b) § 60.84(c) § 60.84(e) § 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3)	None	§ 60.84(e)
1	PRO	60H-001	H2SO4	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
1	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	EU	REG2-002	SO2	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

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		Textual Description (See Special Term and Condition I.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ID No.	Type			Name	Citation				
PRO-REGEN	PRO	60H-001	SO2	40 CFR Part 60, Subpart H	§ 60.82(a)	On and after the §60.8 performance test, no owner or operator shall discharge gases containing SO2 in excess of 2 kg per metric ton (4.0 lb per ton) of acid produced into the atmosphere.	§ 60.84(a) § 60.84(b) § 60.84(c) § 60.84(e) § 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3)	None	§ 60.84(e)
PRO-REGEN	PRO	60H-001	H2SO4	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
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

Additional Monitoring Requirements

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CAM Summary

UNIT/GROUP/PROCESS INFORMATION	
ID No.: 1	Applicable Form: OP-UA43
Control Device ID No.: Ammonia Scrubber	Control Device Type: SO2 Scrubber
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: REG2-002
Pollutant: SO2	Main Standard: 112.6
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	
<p>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:</p> <ul style="list-style-type: none"> · $\pm 2\%$ of span; or · $\pm 5\%$ of design liquid flow rate. 	

*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.: 1	Applicable Form: OP-UA43
Control Device ID No.: Ammonia Scrubber	Control Device Type: SO2 Scrubber
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: REG2-002
Pollutant: SO2	Main Standard: 112.6
MONITORING INFORMATION	
Indicator: pH	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum pH is 4.5	
<p>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.</p>	

* 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		
BTCT	N/A	40 CFR Part 63, Subpart Q	Cooling tower has not operated with chromium based chemicals on or after 09/18/1994.
GRPACIDTNK	T-5, T-7, T-8	40 CFR Part 60, Subpart K	Tanks were constructed prior to 1973.
T-16	N/A	40 CFR Part 60, Subpart K	Tanks were constructed prior to 1973.

New Source Review Authorization References

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New Source Review Authorization References by Emission Unit..... 31

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.

PSD Permits	NA Permits
PSD Permit No.: PSD-TX-695M2	NA Permit No.:
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	Authorization No.: 86388
Authorization No.: 9565	Authorization No.:
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 007	Version No./Date: 09/12/1989
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: 106.472	Version No./Date: 03/14/1997
Number: 106.478	Version No./Date: 03/14/1997
Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Permit No.:
Permit No.:	Permit No.:

Periodic Monitoring Summary

UNIT/GROUP/PROCESS INFORMATION	
ID No.: GRPACIDTNK	Applicable Form: OP-UA03
Control Device ID No.: 1	Control Device Type: Thermal Incinerator
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0001
Pollutant: VOC	Main Standard: § 115.112(a)(1)
MONITORING INFORMATION	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum Temperature = 1825	
<p>Periodic Monitoring Text: Measure and record the combustion temperature in the combustion chamber or immediately downstream of the combustion chamber. The monitoring instrumentation shall be maintained, calibrated and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.</p>	

*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.

Periodic Monitoring Summary

UNIT/GROUP/PROCESS INFORMATION	
ID No.: T-16	Applicable Form: OP-UA03
Control Device ID No.: DOCKVC	Control Device Type: Vapor Combustor
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0004
Pollutant: VOC	Main Standard: § 115.112(a)(1)
MONITORING INFORMATION	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum temperature = 1400 degrees F	
<p>Periodic Monitoring Text: Measure and record the combustion temperature in the combustion chamber or immediately downstream of the combustion chamber. The monitoring instrumentation shall be maintained, calibrated and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.</p>	

*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

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
1	FURNACE	9565, PSD-TX-695M2
BARGE-DOCK	SPENT ACID LOADING	56534
BTCT	COOLING TOWER	106.371/03/14/1997
PKGBOILSTK	PACKAGE BOILER	106.183/09/04/2000
PREHTRSTK	PREHEATER	007/09/12/1989
PRO-REGEN	REGEN PROCESS UNIT	9565
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

Schedules

Compliance Schedule.....33

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
T-16	R5112-0002	VOC	115.112(a)(1))	Storage tank must be controlled by a VRS and control device
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description		NSR 56534 permit amendment application	
115.112(a)(1)	Storage tank must be controlled by a VRS and control device			
3. Non-compliance Situation Description				
Storage tank with maximum true vapor pressure greater than 1.5 psia is not equipped with a VRS and control device				
4. Corrective Action Plan Description				
Vapor combustor to be installed to control emissions from T-16 per Permit No. 56534				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
Tank T-16 was emptied, cleaned, and removed from service by March 1, 2007 and will remain out of service until the vapor combustor is installed				
6. Previously Submitted Compliance Plan(s)	Type of Action			Date Submitted
	N/A			
7. Progress Report Submission Schedule		Semi-annual beginning six months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PREHTRSTK		NOx	117.310(a)(8)(A)(ii))	NOx limit is 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			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The preheater (EPN PREHTRSTK) became subject to Chapter 117 requirements in June 2007. The preheater has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)			Type of Action	Date
			N/A	
7. Progress Report Submission			Quarterly three months after permit issuance.	

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PREHTRSTK		CO	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			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The preheater (EPN PREHTRSTK) became subject to Chapter 117 requirements in June 2007. The preheater has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Plan(s)	Compliance	Type of Action		Date
		N/A		
7. Progress Report Submission Schedule		Quarterly three months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PKGBOILSTK		NOx	117.310(a)(8)(A)(ii))	NOx limit is 0.036 lb/MMBtu (or 30ppmv NOx, at 3.0% O2, dry basis)
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The package boiler (EPN PKGBOILSTK) became subject to Chapter 117 requirements in June 2007. The package boiler has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)		Type of Action		Date
		N/A		
7. Progress Report Submission		Quarterly three months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PKGBOILSTK		CO	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			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The package boiler (EPN PKGBOILSTK) became subject to Chapter 117 requirements in June 2007. The package boiler has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)			Type of Action	Date
			N/A	
7. Progress Report Submission Schedule			Quarterly three months after permit issuance.	

APPENDIX A

Acronym List..... 39

Acronym List

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

ACFM.....	actual cubic feet per minute
AMOC.....	alternate means of control
ARP.....	Acid Rain Program
ASTM.....	American Society of Testing and Materials
B/PA.....	Beaumont/Port Arthur (nonattainment area)
CAM.....	Compliance Assurance Monitoring
CD.....	control device
COMS.....	continuous opacity monitoring system
CVS.....	closed-vent system
D/FW.....	Dallas/Fort Worth (nonattainment area)
DR.....	Designated Representative
EIP.....	El Paso (nonattainment area)
EP.....	emission point
EPA.....	U.S. Environmental Protection Agency
EU.....	emission unit
FCAA Amendments.....	Federal Clean Air Act Amendments
FOP.....	federal operating permit
GF.....	grandfathered
gr/100 scf.....	grains per 100 standard cubic feet
HAP.....	hazardous air pollutant
H/G/B.....	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S.....	hydrogen sulfide
ID No.....	identification number
lb/hr.....	pound(s) per hour
MMBtu/hr.....	Million British thermal units per hour
MRRT.....	monitoring, recordkeeping, reporting, and testing
NA.....	nonattainment
N/A.....	not applicable
NADB.....	National Allowance Data Base
NO _x	nitrogen oxides
NSPS.....	New Source Performance Standard (40 CFR Part 60)
NSR.....	New Source Review
ORIS.....	Office of Regulatory Information Systems
Pb.....	lead
PBR.....	Permit By Rule
PM.....	particulate matter
ppmv.....	parts per million by volume
PSD.....	prevention of significant deterioration
RO.....	Responsible Official
SO ₂	sulfur dioxide
TCEQ.....	Texas Commission on Environmental Quality
TSP.....	total suspended particulate
TVP.....	true vapor pressure
U.S.C.....	United States Code
VOC.....	volatile organic compound



Eco Services Enterprise - North America

Rhodia Inc.
8615 Manchester Blvd.
Houston, TX 77012

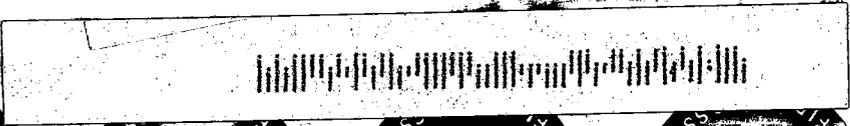
First Class Mail
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RECEIVED

JAN 08 2010

TCEQ MAIL CENTER
MM

TCEQ
Permits Administrative Review MC161
P. O. Box 13087
Austin, TX 78711-3087



FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY
SITE OPERATING PERMIT (SOP) MINOR REVISION

Permit #:	O1610	Company:	Rhodia Inc.
Project #:	14659	Site:	Rhodia-Baytown Plant
Account #:	HG-0696-Q	Application Area:	Baytown Plant
Regulated Entity #:	RN100211317	Customer #:	CN600125330
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
Nearest City: Baytown
Major Pollutants: SO₂, NO_x, CO
Additional FOPs: None

RECEIVED

AUG 13 2010

PROJECT SUMMARY

TCEQ
CENTRAL FILE ROOM

Rhodia Inc. was issued a Site Operating Permit (SOP) on January 25, 2008. Rhodia submitted a minor revision on January 8, 2010. Rhodia replaced an existing package boiler with a low-NO_x package boiler. Unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-2, and OP-UA06). Significant emission sources included loading and unloading operations, package boilers, process heaters, sulfuric acid production, storage tanks, and preheaters.

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

Summary of Revision

An existing package boiler, PKGBOILSTK, was replaced by a new low-NO_x package boiler. An OP-UA06 was submitted to update the applicable requirements. Also, the permit shield for 40 CFR Part 60, Subpart

Db was removed from the unit. The applicant also submitted an OP-REQ1 to update the terms and conditions.

Working Draft Permit (WDP) Preparation

- 1. Was Periodic Monitoring (PM) required and added during this revision?.....No
- 2. Was Compliance Assurance Monitoring (CAM) required and added during this revision?.....No
- 3. Was PM or CAM included in the permit customized for site operations?.....No
- 4. Were Special Terms and Conditions pertaining to the mass emissions cap and trade Program (for Houston/Galveston area only) included in the WDP?No
- 5. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements.....No
 - (b) Customized Special Terms and Conditions Yes
 - (c) Manual changes to the IMS-generated applicable requirements.....No

Permit reviewer notes:

Since certain terms and conditions in the current version of the permit were past the compliance date. The applicant submitted the new version of the OP-REQ1 and the updated terms and conditions were added to the permit.

Working Draft Permit Review

- 1. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
- 2. Will the draft permit be sent to public announcement with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP.

The Statement of Basis was prepared on March 17, 2010.

The Statement of Basis GroupWise Document # (OPDP Database) is 56921.

Public Announcement Information

- 1. Were comments received during the Public Announcement period?..... No

Permit reviewer notes:

On May 24, 2010, the applicant informed TCEQ that the pre-construction authorization (PCA) for the unit PREHTRSTK was incorrect. This PCA was changed and PN-11 was sent.

EPA Review

- 1. Did the EPA comment on the draft permit?..... No

Permit reviewer notes:

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
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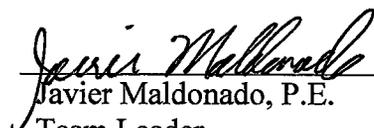
Date Application Received by TCEQ	01/08/2010	
Date Project Received by Engineer	03/05/2010	
Technical Review Period	03/05/2010	04/26/2010
Working Draft Permit Reviewed by Applicant	03/16/2010	03/29/2010
Date Rvn-5/Draft Permit Mailed	05/04/2010	
Public Announcement Period	05/11/2010	06/10/2010
EPA Review Period	05/11/2010	06/25/2010

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

REVISED PERMIT APPROVAL DATE:


 Whitney Hill
 Permit Reviewer
 Operating Permits Section
 Air Permits Division

7/7/2010
 Date


 Javier Maldonado, P.E.
 Team Leader
 Operating Permits Section
 Air Permit Division

7/7/10
 Date

ATTACHMENTS

Administrative Data
 Communication Log

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

June 2, 2010

MR JAMES HARTON
PRESIDENT OF RHODIA INC
RHODIA INC
8 CEDAR BROOK DR
CRANBURY NJ 08512-7500

Re: Errata-Draft Federal Operating Permit Approval and Notification of Public Announcement
Minor Revision
Permit Number: O1610
Rhodia Inc.
Baytown Plant
Baytown, Harris County
Regulated Entity Number: RN100211317
Customer Reference Number: CN600125330
Account Number: HG-0696-Q

Dear Mr. Harton:

A draft federal operating permit and notification of public announcement was sent to you for the above-referenced site on May 4, 2010. The New Source Authorization for the Unit PREHTRSTK was updated.

Thank you for your cooperation in this matter. If you have any questions regarding publication requirements, please contact the Texas Commission on Environmental Quality 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,

A handwritten signature in black ink that reads "Jesse E Chacon".

Jesse E. Chacon, P.E., Manager
Operating Permits Section
Air Permits Division

JEC/WH/kw

cc: Mr. William F. Dickerson, Environmental Manager, Rhodia Inc., Houston
Mr. William J. McConnell, Plant Manager, Rhodia Inc., Houston
Director, Environmental Public Health Division, Harris County Public Health and Environmental Services, Pasadena
Air Section Manager, Region 12 - Houston

Project Number: 14659

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
1	FURNACE	9565, PSD-TX-695M2
BARGE-DOCK	SPENT ACID LOADING	56534
BTCT	COOLING TOWER	106.371/03/14/1997
PKGBOILSTK	PACKAGE BOILER	106.183/09/04/2000
PREHTRSTK	PREHEATER	007/09/12/1989
PRO-REGEN	REGEN PROCESS UNIT	9565
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

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY
SITE OPERATING PERMIT (SOP) MINOR REVISION

Permit #:	O1610	Company:	Rhodia Inc.
Project #:	14659	Site:	Rhodia-Baytown Plant
Account #:	HG-0696-Q	Application Area:	Baytown Plant
Regulated Entity #:	RN100211317	Customer #:	CN600125330
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
Nearest City: Baytown
Major Pollutants: SO₂, NO_x, CO
Additional FOPs: None

PROJECT SUMMARY

Rhodia Inc. was issued a Site Operating Permit (SOP) on January 25, 2008. Rhodia submitted a minor revision on January 8, 2010. Rhodia replaced an existing package boiler with a low-NO_x package boiler. Unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-2, and OP-UA06). Significant emission sources included loading and unloading operations, package boilers, process heaters, sulfuric acid production, storage tanks, and preheaters.

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

Summary of Revision

An existing package boiler, PKGBOILSTK, was replaced by a new low-NO_x package boiler. An OP-UA06 was submitted to update the applicable requirements. Also, the permit shield for 40 CFR Part 60, Subpart

Db was removed from the unit. The applicant also submitted an OP-REQ1 to update the terms and conditions.

Working Draft Permit (WDP) Preparation

- 1. Was Periodic Monitoring (PM) required and added during this revision?.....No
- 2. Was Compliance Assurance Monitoring (CAM) required and added during this revision?.....No
- 3. Was PM or CAM included in the permit customized for site operations?No
- 4. Were Special Terms and Conditions pertaining to the mass emissions cap and trade Program (for Houston/Galveston area only) included in the WDP?No
- 5. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements.....No
 - (b) Customized Special Terms and Conditions Yes
 - (c) Manual changes to the IMS-generated applicable requirements.....No

Permit reviewer notes:

Since certain terms and conditions in the current version of the permit were past the compliance date. The applicant submitted the new version of the OP-REQ1 and the updated terms and conditions were added to the permit.

Working Draft Permit Review

- 1. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
- 2. Will the draft permit be sent to public announcement with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP.

The Statement of Basis was prepared on March 17, 2010.

The Statement of Basis GroupWise Document # (OPDP Database) is 56921.

Public Announcement Information

- 1. Were comments received during the Public Announcement period?..... Yes/No

Permit reviewer notes:

On May 24, 2010, the applicant informed TCEQ that the pre-construction authorization (PCA) for the unit PREHTRSTK was incorrect. This PCA was changed and PN-11 was sent.

EPA Review

- 1. Did the EPA comment on the draft permit?..... Yes/No

Permit reviewer notes:

IMPORTANT MILESTONES

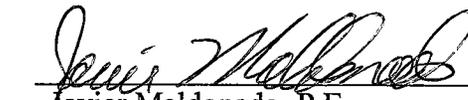
Milestone (Standard)	Start Date	End Date
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Date Application Received by TCEQ	01/08/2010	
Date Project Received by Engineer	03/05/2010	
Technical Review Period	03/05/2010	04/26/2010
Working Draft Permit Reviewed by Applicant	03/16/2010	03/29/2010
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Public Announcement Period	05/11/2010	
EPA Review Period	05/11/2010	

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

REVISED PERMIT APPROVAL DATE:

 6/2/2010
 Whitney Hill
 Permit Reviewer
 Operating Permits Section
 Air Permits Division

 6/2/10
 Javier Maldonado, P.E.
 Team Leader
 Operating Permits Section
 Air Permit Division

ATTACHMENTS

Administrative Data
 Communication Log

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

May 4, 2010

MR JAMES HARTON
PRESIDENT OF RHODIA INC
RHODIA INC
8 CEDAR BROOK DR
CRANBURY NJ 08512-7500

Re: Draft Federal Operating Permit Minor Revision Approval and
Notification of Public Announcement
Minor Revision
Permit Number: O1610
Rhodia Inc.
Baytown Plant
Baytown, Harris County
Regulated Entity Number: RN100211317
Customer Reference Number: CN600125330
Account Number: HG-0696-Q

Dear Mr. Harton:

The Texas Commission on Environmental Quality (TCEQ) has completed the technical review of your minor permit revision application and has prepared the enclosed draft federal operating permit (FOP) for your final review and approval.

In accordance with Title 30 Texas Administrative Code § 122.312, minor permit revision applications are required to undergo a public announcement. A list of draft FOPs currently in public announcement is available at the TCEQ Web site:

www.tceq.state.tx.us/assets/public/permitting/air/Title_V/announcements/table.htm

The public announcement period will begin May 11, 2010, and end June 10, 2010. In addition, if no comments are received, the U.S. Environmental Protection Agency (EPA) review period will run concurrent with the announcement and will end on June 25, 2010. If comments are received, you will be notified.

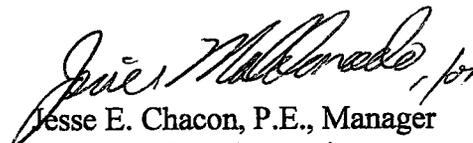
The TCEQ will make the permit application and the draft permit available to the public, local programs, affected states, and the EPA.

Mr. James Harton
Page 2
May 4, 2010

Thank you for your cooperation in this matter. If you have any questions, please contact Ms. Whitney Hill at (512) 239-1301.

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

Sincerely,


Jesse E. Chacon, P.E., Manager
Operating Permits Section
Air Permits Division
Texas Commission on Environmental Quality

JEC/WH/ssl

cc: Mr. William F. Dickerson, Environmental Manager, Rhodia Inc., Houston
Mr. William J. McConnell, Plant Manager, Rhodia Inc., Houston
Director, Environmental Public Health Division, Harris County Public Health and
Environmental Services, Pasadena
Air Section Manager, Region 12 - Houston

Enclosures: 1. Notice of Public Announcement
2. Draft Permit

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

Project Number: 14659

**ANNOUNCEMENT OF DRAFT FEDERAL OPERATING PERMIT
FOR MINOR PERMIT REVISION**

DRAFT PERMIT NO.: O1610

APPLICATION AND DRAFT PERMIT. Rhodia Inc., 8 Cedar Brook Drive, Cranbury, New Jersey 08512-7500, an Industrial Inorganic Chemicals facility, has applied to the Texas Commission on Environmental Quality (TCEQ) for a minor revision of its existing Federal Operating Permit (herein referred to as Permit) No. O1610, Application No. 14659, to authorize operation of the Baytown Plant. The area addressed by this application is located as the last industrial facility on Park Street surrounded by ExxonMobil in Baytown, Harris County, Texas 77522. This application was submitted to the TCEQ on January 8, 2010.

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. The draft permit, if approved, will codify the revised conditions under which the area must operate. The permit will not authorize new construction. The TCEQ Executive Director has completed the technical review of this application and prepared a draft permit. The TCEQ Executive Director recommends issuance of this permit. The permit application, draft permit, statement of basis, and all other relevant supporting materials, are available for viewing and copying at the Texas Commission on Environmental Quality Central Office, 12100 Park 35 Circle, Building E, First Floor, Austin, Texas and at the Texas Commission on Environmental Quality Houston Regional Office, 5425 Polk Street, Suite H, Houston, Texas 77023-1452. 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. Any person may submit written comments on the draft permit. Comments relating the accuracy, completeness, and appropriateness of the revised permit conditions may result in changes to the draft permit.

Written comments should be submitted to the Texas Commission on Environmental Quality Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087 and received within 30 days after the publication of this announcement.

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 for this application.

INFORMATION. For additional information about this permit application or the permitting process, please contact the Texas Commission on Environmental Quality Office of Public Assistance at MC-108, P.O. Box 13087, Austin, Texas 78711-3087 or toll free at 1-800-687-4040. General information regarding the TCEQ can be found at www.tceq.state.tx.us. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from Rhodia Inc. at the address in the first paragraph.

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

Rhodia Inc.

AUTHORIZING THE OPERATION OF

Baytown Plant
Industrial Inorganic Chemicals

LOCATED AT

Harris County, Texas

Latitude 29° 44' 51" Longitude 095° 00' 07"

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: _____

For the Commission

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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. 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. For stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed on or before January 31, 1972 that are not listed in the Applicable Requirements Summary attachment, the permit holder shall comply with the following requirements:
 - (i) Title 30 TAC § 111.111(a)(1)(A) (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)(A), 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_x, 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 do not emit visible emissions such as vents that emit only VOC or vents that provide passive ventilation, such as plumbing vents; or vents that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(A) and Compliance Assurance Monitoring, as specified in the attached Applicable Requirements Summary and "Additional 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 three 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)(A).
 - (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) 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. For stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment, the permit holder shall comply with the following requirements:

- (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_x, 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 do not emit visible emissions such as vents that emit only VOC or vents that provide passive ventilation, such as plumbing vents; or vents that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) and Compliance Assurance Monitoring, as specified in the attached "Applicable Requirements Summary" and "Additional 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 three 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) 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.

- C. 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.
- D. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- E. 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. The permit holder shall comply with the requirements of 30 TAC § 115.722(b) (relating to Site-wide Cap and Control Requirements).
- 5. 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)
- 6. 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

7. 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.
8. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. 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 "Periodic Monitoring 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 to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

New Source Review Authorization Requirements

9. 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
10. 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.
11. The permit holder shall maintain records to demonstrate continuous compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. These records may include (but are not limited to) production capacity and throughput, hours of operation, material safety data sheets (MSDS), 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.
 - A. If applicable, monitoring of control device performance or general work practice standards shall be made in accordance with the TCEQ Periodic Monitoring Guidance document.
 - B. 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).
12. The permit holder shall comply with the following requirements of Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611
 - B. General Conditions listed in 30 TAC § 116.615
 - C. Boiler Standard Permit

Compliance Requirements

13. The permit holder shall certify compliance with all permit terms and conditions 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.
14. The permit holder shall adhere to the provisions in the Compliance Schedule attachment of this permit and submit certified progress reports consistent with the schedule established under 30 TAC § 122.132(e)(4)(C) and including the information specified in 30 TAC § 122.142(e)(2). Those emission units listed in the Compliance Schedule attachment shall adhere with the requirements in the Compliance Schedule attachment until operating fully in compliance with the applicable requirements.
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

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

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

Schedules

Applicable Requirements Summary

Unit Summary15

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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 = TVP LESS THAN 0.5 PSIA (BEAUMONT/PORT ARTHUR DALLAS/FORT WORTH EL PASO HOUSTON/GALVESTON AREAS)
BARGE-DOCK	LOADING/UNLOADING OPERATIONS	N/A	R5211-0002	30 TAC Chapter 115, Loading and Unloading of VOC	TRUE VAPOR PRESSURE = TVP GREATER THAN OR EQUAL TO 0.5 PSIA (BEAUMONT/PORT ARTHUR DALLAS/FORT WORTH EL PASO HOUSTON/GALVESTON AREAS), DAILY THROUGHPUT = LOADING LESS THAN 20,000 GALLONS PER DAY
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.
1	PROCESS HEATERS/FURNACES	N/A	R7ICI-0002	30 TAC Chapter 117, Commercial	No changing attributes.
1	PROCESS HEATERS/FURNACES	N/A	PSD	Prevention of Significant Deterioration	
PREHTRSTK	PROCESS HEATERS/FURNACES	N/A	R7ICI-0001	30 TAC Chapter 117, Commercial	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRPACIDTNK	STORAGE TANKS/VESSELS	T-5, T-6, T-7, T-8	R5112-0001	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
T-16	STORAGE TANKS/VESSELS	N/A	R5112-0004	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
1	SULFURIC ACID PRODUCTION	N/A	REG2-002	30 TAC Chapter 112, Sulfur Compounds	No changing attributes.
1	SULFURIC ACID PRODUCTION	N/A	60H-001	40 CFR Part 60, Subpart H	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.

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		Textual Description (See Special Term and Condition I.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ID No.	Type			Name	Citation				
BARGE-DOCK	EU	R5211-0001	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(1) § 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)	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
PKGBOILST K	EU	R7ICI-0001	NO _x	30 TAC Chapter 117, Subchapter B	§ 117.310(d)(3) § 117.310(a) § 117.310(a)(1)(C) § 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 _x 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(l)(2) § 117.340(o)(1) § 117.340(p)(1) § 117.340(p)(2)(A) § 117.340(p)(2)(B) § 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)

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		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)
ID No.	Type			Name	Citation				
PKGBOILST K	EU	R71CI-0001	CO	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(d) § 117.335(e) § 117.335(g)	§ 117.345(a) § 117.345(f) § 117.345(f)(9)	§ 117.335(b) § 117.335(g) [G]§ 117.345(b) [G]§ 117.345(c)
PKGBOILST K	EU	60Dc-001	SO ₂	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	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)
1	EU	R71CI-0002	NOX	30 TAC Chapter 117, Commercial	§ 117.303	The permit holder shall comply with the applicable requirements of 30 TAC Chapter 117, Commercial	None	The permit holder shall comply with the applicable recordkeeping requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable reporting requirements of 30 TAC Chapter 117, Commercial
1	EU	PSD	**	Prevention of Significant Deterioration	PSD-TX-695M2	PSD-TX-695M2	PSD-TX-695M2	PSD-TX-695M2	PSD-TX-695M2

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		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)
ID No.	Type			Name	Citation				
PREHTRSTK	EU	R71CI-0001	NOX	30 TAC Chapter 117, Commercial	§117.300 §117.310 §117.335 §117.340 §117.345 §117.350 §117.354	The permit holder shall comply with the applicable requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable monitoring and testing requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable recordkeeping requirements of 30 TAC Chapter 117, Commercial	The permit holder shall comply with the applicable reporting requirements of 30 TAC Chapter 117, Commercial
GRPACIDTN K	EU	R5112-0001	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(a)(1) § 115.112(a)(3)	Tanks shall not store VOC unless the required pressure is maintained, or they are equipped with the appropriate control device specified in Table I(a) or Table II(a).	[G]§ 115.115(a) § 115.116(a)(4) § 115.116(a)(5) ** See Periodic Monitoring Summary	§ 115.116(a)(4) § 115.116(a)(5)	None
T-16	EU	R5112-0004	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(a)(1) § 115.112(a)(3)	Tanks shall not store VOC unless the required pressure is maintained, or they are equipped with the appropriate control device specified in Table I(a) or Table II(a).	[G]§ 115.115(a) § 115.116(a)(4) § 115.116(a)(5) ** See Periodic Monitoring Summary	§ 115.116(a)(4) § 115.116(a)(5)	None
1	EU	REG2-002	SO2	30 TAC Chapter 112, Sulfur Compounds	§ 112.6	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) **See CAM Summary	§ 112.2(c)	§ 112.2(b)
1	EU	REG2-002	H2SO4	30 TAC Chapter 112, Sulfur Compounds	§ 112.41(b)(2)	Sulfuric acid plants or facilities used exclusively as SO2 control systems, chamber process plants, acid concentrators, or oleum storage and transfer facilities are exempt from this section.	None	None	None

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		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)
ID No.	Type			Name	Citation				
1	PRO	60H-001	SO2	40 CFR Part 60, Subpart H	§ 60.82(a)	On and after the §60.8 performance test, no owner or operator shall discharge gases containing SO2 in excess of 2 kg per metric ton (4.0 lb per ton) of acid produced into the atmosphere.	§ 60.84(a) § 60.84(b) § 60.84(c) § 60.84(e) § 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3)	None	§ 60.84(e)
1	PRO	60H-001	H2SO4	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
1	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	EU	REG2-002	SO2	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

Applicable Requirements Summary

Unit/Group/Process		SOP Index No.	Pollutant	Emission Limitation/Standard or Equipment Specification		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)
ID No.	Type			Name	Citation				
PRO-REGEN	PRO	60H-001	SO2	40 CFR Part 60, Subpart H	§ 60.82(a)	On and after the §60.8 performance test, no owner or operator shall discharge gases containing SO2 in excess of 2 kg per metric ton (4.0 lb per ton) of acid produced into the atmosphere.	§ 60.84(a) § 60.84(b) § 60.84(c) § 60.84(e) § 60.85(a) § 60.85(b)(1) § 60.85(b)(2) § 60.85(b)(3)	None	§ 60.84(e)
PRO-REGEN	PRO	60H-001	H2SO4	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
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

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary23

Periodic Monitoring Summary25

CAM Summary

UNIT/GROUP/PROCESS INFORMATION	
ID No.: 1	Applicable Form: OP-UA43
Control Device ID No.: Ammonia Scrubber	Control Device Type: SO2 Scrubber
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: REG2-002
Pollutant: SO2	Main Standard: 112.6
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	
<p>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:</p> <ul style="list-style-type: none"> · ± 2% of span; or · ± 5% of design liquid flow rate. 	

*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.: 1	Applicable Form: OP-UA43
Control Device ID No.: Ammonia Scrubber	Control Device Type: SO2 Scrubber
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: REG2-002
Pollutant: SO2	Main Standard: 112.6
MONITORING INFORMATION	
Indicator: pH	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum pH is 4.5	
<p>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.</p>	

* 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.

Periodic Monitoring Summary

UNIT/GROUP/PROCESS INFORMATION	
ID No.: GRPACIDTNK	Applicable Form: OP-UA03
Control Device ID No.: 1	Control Device Type: Thermal Incinerator
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0001
Pollutant: VOC	Main Standard: § 115.112(a)(1)
MONITORING INFORMATION	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum Temperature = 1825	
<p>Periodic Monitoring Text: Measure and record the combustion temperature in the combustion chamber or immediately downstream of the combustion chamber. The monitoring instrumentation shall be maintained, calibrated and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.</p>	

*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.

Periodic Monitoring Summary

UNIT/GROUP/PROCESS INFORMATION	
ID No.: T-16	Applicable Form: OP-UA03
Control Device ID No.: DOCKVC	Control Device Type: Vapor Combustor
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0004
Pollutant: VOC	Main Standard: § 115.112(a)(1)
MONITORING INFORMATION	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum temperature = 1400 degrees F	
<p>Periodic Monitoring Text: Measure and record the combustion temperature in the combustion chamber or immediately downstream of the combustion chamber. The monitoring instrumentation shall be maintained, calibrated and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation.</p>	

*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		
BTCT	N/A	40 CFR Part 63, Subpart Q	Cooling tower has not operated with chromium based chemicals on or after 09/18/1994.
GRPACIDTNK	T-5, T-7, T-8	40 CFR Part 60, Subpart K	Tanks were constructed prior to 1973.
T-16	N/A	40 CFR Part 60, Subpart K	Tanks were constructed prior to 1973.

New Source Review Authorization References

New Source Review Authorization References 30

New Source Review Authorization References by Emission Unit..... 31

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.

PSD Permits	NA Permits
PSD Permit No.: PSD-TX-695M2	NA Permit No.:
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	Authorization No.: 86388
Authorization No.: 9565	Authorization No.:
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 007	Version No./Date: 09/12/1989
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: 106.472	Version No./Date: 03/14/1997
Number: 106.478	Version No./Date: 03/14/1997
Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Permit No.:
Permit No.:	Permit No.:

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
1	FURNACE	9565, PSD-TX-695M2
BARGE-DOCK	SPENT ACID LOADING	56534
BTCT	COOLING TOWER	106.371/03/14/1997
PKGBOILSTK	PACKAGE BOILER	106.183/09/04/2000
PREHTRSTK	PREHEATER	56534
PRO-REGEN	REGEN PROCESS UNIT	9565
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

Schedules

Compliance Schedule.....33

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
T-16	R5112-0002	VOC	115.112(a)(1))	Storage tank must be controlled by a VRS and control device
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
115.112(a)(1)	Storage tank must be controlled by a VRS and control device		NSR 56534 permit amendment application	
3. Non-compliance Situation Description				
Storage tank with maximum true vapor pressure greater than 1.5 psia is not equipped with a VRS and control device				
4. Corrective Action Plan Description				
Vapor combustor to be installed to control emissions from T-16 per Permit No. 56534				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
Tank T-16 was emptied, cleaned, and removed from service by March 1, 2007 and will remain out of service until the vapor combustor is installed				
6. Previously Submitted Compliance Plan(s)	Type of Action			Date Submitted
	N/A			
7. Progress Report Submission Schedule		Semi-annual beginning six months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PREHTRSTK		NOx	117.310(a)(8)(A)(ii))	NOx limit is 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			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The preheater (EPN PREHTRSTK) became subject to Chapter 117 requirements in June 2007. The preheater has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)		Type of Action		Date
		N/A		
7. Progress Report Submission		Quarterly three months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PREHTRSTK		CO	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			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The preheater (EPN PREHTRSTK) became subject to Chapter 117 requirements in June 2007. The preheater has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Plan(s)	Compliance	Type of Action		Date
		N/A		
7. Progress Report Submission Schedule		Quarterly three months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PKGBOILSTK		NOx	117.310(a)(8)(A)(ii))	NOx limit is 0.036 lb/MMBtu (or 30ppmv NOx, at 3.0% O2, dry basis)
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The package boiler (EPN PKGBOILSTK) became subject to Chapter 117 requirements in June 2007. The package boiler has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)		Type of Action		Date
		N/A		
7. Progress Report Submission		Quarterly three months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PKGBOILSTK		CO	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			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The package boiler (EPN PKGBOILSTK) became subject to Chapter 117 requirements in June 2007. The package boiler has not been tested to meet the new requirements of Chapter 117				
4. Corrective Action Plan Description				
Rhodia, Inc will perform the required stack test stated in 30 TAC Chapter 117.9020(2)(C)				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia, Inc will perform stack test by 08/31/2008			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)			Type of Action	Date
			N/A	
7. Progress Report Submission Schedule			Quarterly three months after permit issuance.	

APPENDIX A

Acronym List..... 39

Acronym List

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

ACFM.....	actual cubic feet per minute
AMOC.....	alternate means of control
ARP.....	Acid Rain Program
ASTM.....	American Society of Testing and Materials
B/PA.....	Beaumont/Port Arthur (nonattainment area)
CAM.....	Compliance Assurance Monitoring
CD.....	control device
COMS.....	continuous opacity monitoring system
CVS.....	closed-vent system
D/FW.....	Dallas/Fort Worth (nonattainment area)
DR.....	Designated Representative
EIP.....	El Paso (nonattainment area)
EP.....	emission point
EPA.....	U.S. Environmental Protection Agency
EU.....	emission unit
FCAA Amendments.....	Federal Clean Air Act Amendments
FOP.....	federal operating permit
GF.....	grandfathered
gr/100 scf.....	grains per 100 standard cubic feet
HAP.....	hazardous air pollutant
H/G/B.....	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S.....	hydrogen sulfide
ID No.....	identification number
lb/hr.....	pound(s) per hour
MMBtu/hr.....	Million British thermal units per hour
MRRT.....	monitoring, recordkeeping, reporting, and testing
NA.....	nonattainment
N/A.....	not applicable
NADB.....	National Allowance Data Base
NO _x	nitrogen oxides
NSPS.....	New Source Performance Standard (40 CFR Part 60)
NSR.....	New Source Review
ORIS.....	Office of Regulatory Information Systems
Pb.....	lead
PBR.....	Permit By Rule
PM.....	particulate matter
ppmv.....	parts per million by volume
PSD.....	prevention of significant deterioration
RO.....	Responsible Official
SO ₂	sulfur dioxide
TCEQ.....	Texas Commission on Environmental Quality
TSP.....	total suspended particulate
TVP.....	true vapor pressure
U.S.C.....	United States Code
VOC.....	volatile organic compound

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY
SITE OPERATING PERMIT (SOP) MINOR REVISION

Permit #:	O1610	Company:	Rhodia Inc.
Project #:	14659	Site:	Rhodia-baytown Plant
Account #:	HG-0696-Q	Application Area:	Baytown Plant
Regulated Entity #:	RN100211317	Customer #:	CN600125330
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
Nearest City: Baytown
Major Pollutants: SO₂, NO_x, CO
Additional FOPs: None

PROJECT SUMMARY

Rhodia Inc. was issued a Site Operating Permit (SOP) on January 25, 2008. Rhodia submitted a minor revision on January 8, 2010. Rhodia replaced an existing package boiler with a low-NO_x package boiler. Unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-2, and OP-UA06). Significant emission sources included loading and unloading operations, package boilers, process heaters, sulfuric acid production, storage tanks, and preheaters.

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

Summary of Revision

An existing package boiler, PKGBOILSTK, was replaced by a new low-NO_x package boiler. An OP-UA06 was submitted to update the applicable requirements. Also, the permit shield for 40 CFR Part 60, Subpart

Db was removed from the unit. The applicant also submitted an OP-REQ1 to update the

Working Draft Permit (WDP) Preparation

- 1. Was Periodic Monitoring (PM) required and added during this revision?No
- 2. Was Compliance Assurance Monitoring (CAM) required and added during this revision?No
- 3. Was PM or CAM included in the permit customized for site operations?No
- 4. Were Special Terms and Conditions pertaining to the mass emissions cap and trade Program (for Houston/Galveston area only) included in the WDP?No
- 5. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirementsNo
 - (b) Customized Special Terms and Conditions Yes
 - (c) Manual changes to the IMS-generated applicable requirementsNo

Permit reviewer notes:

Since certain terms and conditions in the current version of the permit were past the compliance date. The applicant submitted the new version of the OP-REQ1 and the updated terms and conditions were added to the permit.

Working Draft Permit Review

- 1. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
- 2. Will the draft permit be sent to public announcement with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP.

The Statement of Basis was prepared on March 17, 2010.

The Statement of Basis GroupWise Document # (OPDP Database) is 56921.

Public Announcement Information

- 1. Were comments received during the Public Announcement period? Yes/No

Permit reviewer notes:

EPA Review

- 1. Did the EPA comment on the draft permit?..... Yes/No

Permit reviewer notes:

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	01/08/2010	

Date Project Received by Engineer	03/05/2010	
Technical Review Period	03/05/2010	04/26/2010
Working Draft Permit Reviewed by Applicant	03/16/2010	03/29/2010
Date Rvn-5/Draft Permit Mailed		
Public Announcement Period		
EPA Review Period		

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

REVISED PERMIT APPROVAL DATE:



 Whitney Hill

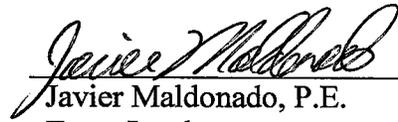
 Permit Reviewer

 Operating Permits Section

 Air Permits Division

4/30/10

 Date



 Javier Maldonado, P.E.

 Team Leader

 Operating Permits Section

 Air Permit Division

4/30/10

 Date

ATTACHMENTS

Administrative Data

 Communication Log

**AIR PERMITS DIVISION
APR 19 2010
RECEIVED**



CERTIFIED MAIL: Return Receipt Requested (7007 0220 0000 4422 0376)

April 13, 2010

Air Permits Division (MC-163)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087



Re: Rhodia Inc. (CN600125330)
Baytown Plant (RN100211317)
OP-CRO1
Account No.: HG-0696-Q

Dear Ms. Hill:

Enclosed, please find a new signed OP-CRO1 for the above-referenced facility.

If you have any questions on the amendment request, please do not hesitate to contact me at (713) 924-1484.

Sincerely,


Samuel E. Keen, PE
Environmental Engineer

Attachment



**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 INFORMATION		
A. RN: RN100211317	B. CN: CN600125330	C. Account No.: HG 0696 Q
D. Permit No.: O1610	E. Project No.: 14659	
F. Area Name: Baytown Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>		
A. <input type="checkbox"/> Responsible Official:	B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE <i>(Place an "X" in the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. CERTIFICATION OF TRUTH		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>William J. McConnell</u> certify that I am the <u>DAR</u> for this application <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>		
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:		
<i>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).</i>		
A. Time Period: From <u>03-10-2010</u> to <u>04-12-2010</u> <i>Start Date* End Date*</i>		
OR		
B. Specific Dates: _____ <i>Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*</i>		
<i>*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'</i>		
Signature: <u>William J. McConnell</u>		Signature Date: <u>4/12/2010</u>
Title: <u>Plant Manager</u>		



Whitney Hill - Response to Rhodia WDP, Permit O-1610, Project 14659

From: Wei Liu <WLiU@trinityconsultants.com>
To: WHill@tceq.state.tx.us
Date: 4/12/2010 11:25 AM
Subject: Response to Rhodia WDP, Permit O-1610, Project 14659
CC: Sam.Keen@us.rhodia.com
Attachments: Respnse-WDP-20100412.pdf; op-cro1-signed.pdf

Whitney:

On behalf of Rhodia, Trinity has prepared the response to the revised WDP. Please see the attachments. Also, Sam will mail you the original singed OP-CRO1 today. If you have any concerns, please let us know.

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

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**Rhodia Inc.
 Baytown Plant
 Title V Minor Revision
 Permit Number O-1610
 TCEQ Project 14659**

Rhodia's Comments (4/12/10)

1. Page 2, Current Special Condition 1.D

Rhodia contends that the condition should be added back, because if not, there is no reference to TAC 117 for the dock vapor combustor (DOCKVC). According to the instruction from Ms. Hill, an OP-UA35 is used to prepare the regulatory requirements for the DOCKVC. Eventually, the revised permit may contain entries similar to the ones below.

Unit Summary

Unit/Group/Process ID	Unit Type	Group/Inclusive Units	SOP Index	Regulation	Requirement Driver
DOCKVC	Vapor Combustor	N/A	R7ICI-0002	30 TAC Chapter 117	No changing attributes.

Applicable Requirement Summary

ID No.	Type	SOP Index	Pollutant	Name	Citation	Textual Description
DOCKVC	CD	R7ICI-0002	NOx	30 TAC Chapter 117	§117.303	The permit holder should comply with the applicable requirements of 30 TAC Chapter 117, Commercial

Monitoring and Testing	Recordkeeping	Reporting
None	The permit holder should comply with the applicable requirements of 30 TAC Chapter 117, Commercial	The permit holder should comply with the applicable requirements of 30 TAC Chapter 117, Commercial

2. Page 30, New Source Review Authorization References by Emissions Unit

The WDP has a typo (56534) for the Authorization. The PREHTRSTK should be authorized under 007/09/12/1989.

3. Page 8 to 12. Numbering error.

“Additional Monitoring Requirements” should start with 7 rather than 1. Last page should have an entry of 20 rather than 14.

4. Page 18. Missing a row for PKGBOILSTK for Pollutant PM

Both PM and PM(OPACITY) should be included for PKGBOILSTK, 60Dc-001. However, there is only one row for PM(OPACITY). Please add another row for PM with all other columns the same as the PM(OPACITY).



Texas Commission on Environmental Quality
Incinerator Attributes
Form OP-UA35 (Page 2)
Federal Operating Permit Program

Table 2a: Title 30 TAC Chapter 117,
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Incinerators.

Date: 04/12/2010	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		

Unit ID No.	SOP Index No.	Maximum Rated Capacity	NOx Emission Limitation	23C-Option	NOx Reduction	NOx Monitoring System
DOCKVC	R7ICI-0002	40-				

Whitney Hill - Re: which OP-UA form to use for dock vapor combustor

From: Wei Liu <WLi@trinityconsultants.com>
To: WHill@tceq.state.tx.us
Date: 4/12/2010 9:12 AM
Subject: Re: which OP-UA form to use for dock vapor combustor

It's an incinerator according to 117 definition. However, I think it is different from OP-UA35's definition of incinerators. OP-UA35 is for burning waste like solid and liquid. This is just a vapor phase VOC combustor.

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

From: "Whitney Hill" <WHill@tceq.state.tx.us>
To: "Wei Liu" <WLi@trinityconsultants.com>
Date: 04/12/2010 09:07 AM
Subject: Re: which OP-UA form to use for dock vapor combustor

I would need more information on the unit to determine the correct unit attribute form. Based on the language in Chapter 117, what would the unit be categorized as? Would this unit would be described as an incinerator or a boiler according to Ch 117? I do not think that the unit would be on an OP-UA07 unless the unit has a flare.

Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, Tx 78711-3087
whill@tceq.state.tx.us
Phone: (512) 239-1301
Fax: (512) 239-1070

 Please consider whether it is necessary to print this e-mail

>>> Wei Liu <WLiu@trinityconsultants.com> 2:43 PM Friday, April 09, 2010 >>>

Whitney:

I went through all the OP-UA forms. I don;t see a form for vapor combustors that need to comply with TAC 117. The closest are OP-UA6 for boilers, OP-UA7 for flares and OP-UA35 for incinerators.

Should I just use the generic OP-UA1?

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

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Whitney Hill - which OP-UA form to use for dock vapor combustor

From: Wei Liu <WLiou@trinityconsultants.com>
To: WHill@tceq.state.tx.us
Date: 4/9/2010 2:43 PM
Subject: which OP-UA form to use for dock vapor combustor

Whitney:

I went through all the OP-UA forms. I don;t see a form for vapor combustors that need to comply with TAC 117. The closest are OP-UA6 for boilers, OP-UA7 for flares and OP-UA35 for incinerators. Should I just use the generic OP-UA1?

Regards,

Wei Liu, Ph.D., P.E.

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Whitney Hill - Re: Comments for Rhodia permit

From: Whitney Hill
To: Keen, Sam
Date: 4/5/2010 11:14 AM
Subject: Re: Comments for Rhodia permit
Attachments: Respse-WDP.doc; SOP.doc

Attached are my responses your comments on the working draft permit. Many of the comments are will have to be revised during another revision.

Also attached is the updated working draft permit. Please submit a response by April 12.

Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, Tx 78711-3087
whill@tceq.state.tx.us
Phone: (512) 239-1301
Fax: (512) 239-1070

 Please consider whether it is necessary to print this e-mail

>>> "Keen, Sam" <Sam.Keen@us.rhodia.com> 8:32 AM Monday, March 29, 2010 >>>

Hi Ms. Hill

Here are our consolidated comments for the permit for the Rhodia Baytown plant.

Thanks!

Sam

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APIRT
APR 01 2010

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

AIR PERMITS DIVISION

APR 01 2010

RECEIVED

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 INFORMATION		
A. RN: RN100211317	B. CN: CN600125330	C. Account No.: HG 0696 Q
D. Permit No.: O1610	E. Project No.: 14659	
F. Area Name: Baytown Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the appropriate box)		
A. <input type="checkbox"/> Responsible Official:	B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE (Place an "X" in the appropriate box) (Only one response can be accepted per form)		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. CERTIFICATION OF TRUTH		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>William J. McConnell</u> certify that I am the <u>DAR</u> for this application (Certifier Name printed or typed) (RO or DAR)		
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: From <u>03-05-2010</u> to <u>03-10-2010</u> Start Date* End Date*		
OR		
B. Specific Dates: _____ Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*		
*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'		
Signature: <u>William J. McConnell</u>		Signature Date: <u>3/25/2010</u>
Title: <u>Plant Manager</u>		

Statement of Basis of the Federal Operating Permit

Rhodia Inc.

Site/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: Minor Revision

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 changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- 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
- A list of available unit attribute forms.

Prepared on: March 17, 2010

OPERATING PERMIT BASIS OF DETERMINATION

DESCRIPTION OF REVISION PROJECT

An existing package boiler, PKGBOILSTK, was replaced by a new low-NOx package boiler. An OP-UA06 was submitted to update the applicable requirements. Also, the permit shield for 40 CFR Part 60, Subpart Db was removed from the unit.

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.

The "application area" consists of the emission units and that portion of the site included in the application and this permit. When there is only one area for the site, then the application information and permit will include the site.

MAJOR SOURCE POLLUTANTS

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

Major Pollutants	SO ₂ , NO _x , CO
------------------	--

READING THE 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
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternate Work Requirements
- Appendix A
 - Acronym list

General Terms and Conditions

The General Terms and Conditions are boiler plate type paragraphs, meaning that they 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. A recently added 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. As an example, the TCEQ has

designated specific requirements of 30 TAC Chapter 111, such as the opacity limits for stationary vents, as site-wide requirements. 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.

Appendix A

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

SPECIAL TERMS AND CONDITIONS

The permit contains terms and conditions that specify the area-wide applicable requirements and a table of applicable requirements for specific emission units in the application area. The Special Terms and Conditions contain both generic and site-wide requirements. The generic requirements are general monitoring, recordkeeping, and reporting requirements that do not apply to specific sources. Site-wide requirements apply uniformly to a group of emission sources such as source-wide opacity limits. These requirements are streamlined into the Special Terms and Conditions for brevity. The streamlining of broadly applicable requirements was developed in accordance with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995. Applicable requirements that do not apply uniformly (i.e. are specific to each emission source) appear in the FOP's Applicable Requirement Summary table.

Sources subject to 30 TAC Chapter 111, Subchapter A, Division 1: Visible Emissions

Title 30 Administrative Code (30 TAC) § 111.111(a) requires that, "no person may cause, suffer, allow, or permit visible emissions from any source, except as follows" Paragraphs 30 TAC § 111.111(a)(1)-(8) specify specific opacity or visible emissions limits for certain types of sources such as stationary vents, structures, and other sources. Visible emissions are defined as particulate or gaseous matter that can be detected by the human eye. Contributions from uncombined water (i.e. steam) are not included in determining compliance with the visible emissions requirements as stated in 30 TAC § 111.111(b).

Requirements for stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) are covered in the permit's Special Terms and Conditions. Stationary vents are limited, over a six-minute average, either to 30% opacity or 20% opacity if constructed after January 31, 1972 as required by 30 TAC § 111.111(a)(1)(A) or § 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 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.

Visible emissions from other sources not classified as stationary vents are also addressed in the permit's Special Terms and Conditions as applicable, including buildings, enclosed facilities, structures, or other miscellaneous sources which are listed in 30 TAC § 111.111(a)(7) and § 111.111(a)(8). These sources must meet a 30% opacity limit for any six-minute period as specified in 30 TAC §§ 111.111(a)(7)(A) and 111.111(a)(8)(A).

Periodic monitoring is specified in the Special Terms and Conditions for sources subject to 30 TAC Chapter 111 to verify compliance with the appropriate opacity limit. The emission sources specified in the permit's Special Terms and Conditions are not capable or expected to produce visible emissions during normal operation. These sources may include, but are not limited to, passive ventilation vents, vents from natural gas-fired combustion sources, and vents that emit VOCs. 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.

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)(A)-(B), (a)(7)(A) and (a)(8)(A). 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.

Vents from emission sources that are anticipated to emit visible emissions during normal operations (such as coal fired boilers), based on the nature of the emission unit or having a flowrate of 100,000 acfm or greater subject to 30 TAC § 111.111(a)(1)(C), are required to be monitored more frequently than once every calendar quarter and are not covered under the permit's Special Terms and Conditions. These vents will be identified in the Applicable Requirements Summary and the Periodic Monitoring or CAM Summaries as appropriate.

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)	No
Nonattainment New Source Review (NNSR)	No
State 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	No
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.
14. Storage of water that 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 http://www.tceq.state.tx.us/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 http://www.tceq.state.tx.us/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, Storage of VOCs	R5112-0001	<p>ALTERNATE CONTROL REQUIREMENT [REG V] = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>30 TAC CHAPTER 115 (REG V) PRODUCT STORED = VOC other than crude oil or condensate</p> <p>30 TAC CHAPTER 115 (REG V) STORAGE CAPACITY = Capacity is greater than 40,000 gallons</p> <p>30 TAC CHAPTER (REG V) 115 TANK DESCRIPTION = Tank using a vapor recovery system (VRS)</p> <p>TRUE VAPOR PRESSURE (TVP) AT STORAGE CONDITIONS [REG V] = True vapor pressure is greater than or equal to 1.5 psia</p> <p>30 TAC CHAPTER 115 (REG V) CONTROL DEVICE TYPE = Other vapor destruction unit</p>
GRPACIDTNK	40 CFR Part 60, Subpart K	60K-0003	40 CFR 60 (NSPS) SUBPART K CONSTRUCTION/MODIFICATION DATE = On or before June 11, 1973
T-16	30 TAC Chapter 115, Storage of VOCs	R5112-0004	<p>ALTERNATE CONTROL REQUIREMENT [REG V] = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>30 TAC CHAPTER 115 (REG V) PRODUCT STORED = VOC other than crude oil or condensate</p> <p>30 TAC CHAPTER 115 (REG V) STORAGE CAPACITY = Capacity is greater than 40,000 gallons</p> <p>30 TAC CHAPTER (REG V) 115 TANK DESCRIPTION = Tank using a vapor recovery system (VRS)</p> <p>TRUE VAPOR PRESSURE (TVP) AT STORAGE CONDITIONS [REG V] = True vapor pressure is greater than or equal to 1.5 psia</p> <p>30 TAC CHAPTER 115 (REG V) CONTROL DEVICE TYPE = Other vapor destruction unit</p>
T-16	40 CFR Part 60, Subpart K	60K-0003	40 CFR 60 (NSPS) SUBPART K CONSTRUCTION/MODIFICATION DATE = On or before June 11, 1973
BARGE-DOCK	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-0001	<p>30 TAC CHAPTER 115 (REG V) FACILITY TYPE = OTHER FACILITY TYPE</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = NO ALTERNATE CONTROL REQUIREMENTS ARE BEING UTILIZED</p> <p>PRODUCT TRANSFERRED = VOLATILE ORGANIC COMPOUNDS (VOC) OTHER THAN LPG AND GASOLINE</p> <p>TRANSFER TYPE = LOADING AND UNLOADING</p> <p>TRUE VAPOR PRESSURE [REG V] = TVP LESS THAN 0.5 PSIA (BEAUMONT/PORT ARTHUR DALLAS/FORT WORTH EL PASO HOUSTON/GALVESTON AREAS)</p>
BARGE-DOCK	30 TAC Chapter 115, Loading and Unloading of VOC	R5211-0002	<p>30 TAC CHAPTER 115 (REG V) FACILITY TYPE = OTHER FACILITY TYPE</p> <p>ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = NO ALTERNATE CONTROL REQUIREMENTS ARE BEING UTILIZED</p> <p>PRODUCT TRANSFERRED = VOLATILE ORGANIC COMPOUNDS (VOC) OTHER THAN LPG AND GASOLINE</p> <p>TRANSFER TYPE = LOADING AND UNLOADING</p> <p>TRUE VAPOR PRESSURE [REG V] = TVP GREATER THAN OR EQUAL TO 0.5 PSIA (BEAUMONT/PORT ARTHUR DALLAS/FORT WORTH EL PASO HOUSTON/GALVESTON AREAS)</p> <p>DAILY THROUGHPUT [REG V] = LOADING LESS THAN 20,000 GALLONS PER DAY</p>
1	30 TAC Chapter 117, Subchapter B	R71C1-0002	<p>UNIT TYPE [REG VII] = Process heater</p> <p>MAXIMUM RATED CAPACITY [REG VII] = Maximum rated capacity is at least 100 MMBtu/hr, but less than 200 MMBtu/hr.</p> <p>RACT DATE PLACED IN SERVICE = On or before November 15, 1992</p> <p>FUEL TYPE #1 [REG VII] = Gaseous fuel other than natural gas, landfill gas, or renewable non-fossil fuel gases.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			ANNUAL HEAT INPUT [REG VII] = Annual heat input is greater than 2.2(10' 11') Btu/yr, based on a rolling 12-month average. NOX EMISSION LIMITATION = Title 30 TAC § 117.310(a)(8)
PREHTRSTK	30 TAC Chapter 117, Subchapter B	R7ICI-0001	UNIT TYPE [REG VII] = Process heater CO EMISSION LIMITATION = Title 30 TAC § 117.310(c)(1) 400 ppmv option MAXIMUM RATED CAPACITY [REG VII] = Maximum rated capacity is at least 5 MMBtu/hr, but less than 40 MMBtu/hr. NOX EMISSION LIMIT BASIS [REG VII] = Emission limit in lb/hr (or ppm by volume at 15% oxygen, dry basis) on a block one-hour average RACT DATE PLACED IN SERVICE = On or before November 15, 1992 NOX REDUCTION = No NO_x_ control method FUEL TYPE #1 [REG VII] = Natural gas NOX MONITORING SYSTEM = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] NOX EMISSION LIMITATION = Title 30 TAC § 117.310(a)(8) OPT-IN UNIT = The unit is not an opt-in unit listed in 30 TAC § 117.115(f) or the owner or operator has chosen not to include into the Plant-wide emission or Source Cap.
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. 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. INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES FUEL TYPE #1 [REG VII] = 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_x_ reduction.
PKGBOILSTK	40 CFR Part 60, Subpart Dc	60Dc-001	CONSTRUCTION/MODIFICATION DATE = After February 28, 2005. 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_2_ 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. SO2 OUTLET MONITORING TYPE = No SO_2_ 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.

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>D-SERIES FUEL TYPE = Other fuel.</p> <p>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.</p> <p>ACF OPTION - SO2 = Other ACF or no ACF.</p> <p>ACF OPTION - PM = Other ACF or no ACF.</p> <p>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.</p>
BTCT	40 CFR Part 63, Subpart Q	63Q-0001	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = INDUSTRIAL PROCESS COOLING TOWER DID NOT USE COMPOUNDS CONTAINING CHROMIUM AFTER SEPTEMBER 8, 1994.
DOCKVC	30 TAC Chapter 117, Subchapter B	R7IC1-0002	MAXIMUM RATED CAPACITY = MRC is less than 40 MMBtu/hr
	30 TAC Chapter 112, Sulfur Compounds	REG2-002	<p>30 TAC (NSPS) SUBPART V FACILITY TYPE = SULFURIC ACID PLANT BURNING ONE OF THE MATERIALS SPECIFIED IN 112.41 EXCEPT ELEMENTAL SULFUR BY CONTACT PROCESS</p> <p>EFFECTIVE STACK HEIGHT [REG II] = EFFECTIVE STACK HEIGHT IS NOT LESS THAN STANDARD EFFECTIVE STACK HEIGHT</p> <p>PRODUCTION CAPACITY [REG II] = PRODUCTION CAPACITY GREATER THAN 300 TONS PER DAY (EXPRESSED AS 100% ACID)</p> <p>FACILITY USE [REG II] = PLANT USED EXCLUSIVELY AS A SULFUR DIOXIDE CONTROL SYSTEM CHAMBER PROCESS PLANT OR OLEUM TRANSFER AND STORAGE FACILITY</p>
1	40 CFR Part 60, Subpart H	60H-001	<p>40 CFR 60 (NSPS) SUBPART H CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER AUGUST 17 1971</p> <p>PROCESS DESIGN [NSPS H] = SOURCE DOES NOT PROCESS ELEMENTAL SULFUR OR AN ORE THAT CONTAINS ELEMENTAL SULFUR AND USE AIR TO SUPPLY OXYGE</p>
PRO-REGEN	30 TAC Chapter 112, Sulfur Compounds	REG2-002	<p>30 TAC (NSPS) SUBPART V FACILITY TYPE = SULFURIC ACID PLANT BURNING ONE OF THE MATERIALS SPECIFIED IN 112.41 EXCEPT ELEMENTAL SULFUR BY CONTACT PROCESS</p> <p>EFFECTIVE STACK HEIGHT [REG II] = EFFECTIVE STACK HEIGHT IS NOT LESS THAN STANDARD EFFECTIVE STACK HEIGHT</p> <p>PRODUCTION CAPACITY [REG II] = PRODUCTION CAPACITY GREATER THAN 300 TONS PER DAY (EXPRESSED AS 100% ACID)</p> <p>FACILITY USE [REG II] = PLANT USED EXCLUSIVELY AS A SULFUR DIOXIDE CONTROL SYSTEM CHAMBER PROCESS PLANT OR OLEUM TRANSFER AND STORAGE FACILITY</p>
PRO-REGEN	40 CFR Part 60, Subpart H	60H-001	<p>40 CFR 60 (NSPS) SUBPART H CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER AUGUST 17 1971</p> <p>PROCESS DESIGN [NSPS H] = SOURCE DOES NOT PROCESS ELEMENTAL SULFUR OR AN ORE THAT CONTAINS ELEMENTAL SULFUR AND USE AIR TO SUPPLY OXYGE</p>

* - 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:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued 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 environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
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 emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.

Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated 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 Office of Public Assistance (OPA) 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.state.tx.us/permitting/air/permitbyrule/historical_rules/old106list/index106.html

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

www.tceq.state.tx.us/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

PSD Permits	NA Permits
PSD Permit No.: PSD-TX-695M2	NA Permit No.:
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	Authorization No.: 86388
Authorization No.: 9565	Authorization No.:
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 007	Version No./Date: 09/12/1989
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: 106.472	Version No./Date: 03/14/1997
Number: 106.478	Version No./Date: 03/14/1997

Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum

Permit No.:

Permit No.:

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 sandblasting 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.

RATIONALE FOR COMPLIANCE ASSURANCE MONITORING (CAM)/ PERIODIC MONITORING METHODS SELECTED

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

UNIT/GROUP/PROCESS INFORMATION	
ID No.: GRPACIDTNK	Applicable Form: OP-UA03
Control Device ID No.: 1	Control Device Type: Vapor Combustor
APPLICABLE REGULATORY REQUIREMENT	

Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0001
Pollutant: VOC	Main Standard: § 115.112(a)(1)
MONITORING INFORMATION	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum Temperature = 1825	
<p>Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

*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.

UNIT/GROUP/PROCESS INFORMATION	
ID No.: T-16	Applicable Form: OP-UA03
Control Device ID No.: DOCKVC	Control Device Type: Vapor Combustor
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112-0004
Pollutant: VOC	Main Standard: § 115.112(a)(1)
MONITORING INFORMATION	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum temperature = 1400 degrees F	

Basis of monitoring:

It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.

*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 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:

UNIT/GROUP/PROCESS INFORMATION	
ID No.: 1	Applicable Form: OP-UA43
Control Device ID No.: Ammonia Scrubber	Control Device Type: SO2 Scrubber
APPLICABLE REGULATORY REQUIREMENT	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: REG2-002
Pollutant: SO2	Main Standard: 112.6
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

Basis of CAM: A common way to control SO2 emissions from sources is by the use of a wet scrubber. Many parameters established either by the manufacturer's recommendations or a recent performance test may be monitored to ensure compliance. These parameters may include gas residence time, gas velocities, gas and liquid temperatures, gas and liquid pressure drop, pH and the liquid/gas flow rate ratio ensure that the control device is operating properly.

*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.

UNIT/GROUP/PROCESS INFORMATION

ID No.: 1

Applicable Form: OP-UA43

Control Device ID No.: Ammonia Scrubber

Control Device Type: SO2 Scrubber

APPLICABLE REGULATORY REQUIREMENT

Name: 30 TAC Chapter 112, Sulfur Compounds

SOP Index No.: REG2-002

Pollutant: SO2

Main Standard: 112.6

MONITORING INFORMATION

Indicator: pH

Minimum Frequency: once per day

Averaging Period: n/a*

Deviation Limit: Minimum pH is 4.5

Basis of CAM: A common way to control SO2 emissions from sources is by the use of a wet scrubber. Many parameters established either by the manufacturer's recommendations or a recent performance test may be monitored to ensure compliance. These parameters may include gas residence time, gas velocities, gas and liquid temperatures, gas and liquid pressure drop, pH and the liquid/gas flow rate ratio ensure that the control device is operating properly.

*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.

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-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 - Comments for Rhodia permit

From: "Keen, Sam" <Sam.Keen@us.rhodia.com>
To: WHill@tceq.state.tx.us
Date: 3/29/2010 8:33 AM
Subject: Comments for Rhodia permit
Attachments: Respnsse-WDP-20100324.doc

Hi Ms. Hill

Here are our consolidated comments for the permit for the Rhodia Baytown plant.

Thanks!

Sam

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Rhodia Inc.
Baytown Plant
Title V Minor Revision
Permit Number O-1610
TCEQ Project 14659

This document responds to the TCEQ WDP sent by Whitney Hill via email on 3/16/2010.

1. Page 2, Current Special Condition 1.D.

In current permit, S.C. 1.D. states that units 1 and DOCKVC are exempt from TAC 117 requirements based on TAC 117.303. This condition is dropped from the WDP. Rhodia have noticed that Unit 1 is mentioned on Page 17 for the similar citation. However, Unit DOCKVC is not mentioned anywhere for TAC 117.303 in the WDP. Rhodia would like to add this condition back to the WDP like the following:

The permit holder shall comply with the applicable requirements of 30 TAC Chapter 117, Subchapter B, Division 3. Title 30 TAC §117. 303 applies to the following units: 1, DOCKVC.

2. Page 2, Current Special Condition 2

Current permit has a S.C. 2 for PSD-TX-695M2. However, it is not in the WDP. Rhodia is not sure about the reason for omission. If it is missed, Rhodia would like to add it back as the following:

Permit holder shall comply with the requirements in the Prevention of Significant Deterioration (PSD) Permit Number PSD-TX-695M2 for the following pollutants: SO2 and H2SO4.

3. Page 8, Additional Monitoring Requirement

As Ms. Hill asked regarding the CAM summary, the CAM requirement was accidentally missed in the OP-REQ1. The updated page for OP-REQ1, CAM requirement is included in this response. Therefore, monitoring requirements for CAM need to be included here.

4. Page 17, PKGBOILSTK, 60Dc-001 for PM (OPACITY)

According to the TCEQ guidance flowchart, PM (OPACITY) should be included for this boiler stack. The rule citations are the same as for the 60Dc-001, PM. Please advice if this should be added.

5. Page 17, Unit GRPACIDTNK, R5112-0001, VOC

Due to the rule change, the new standards should be
§ 115.112(d)(1)
§ 115.112(d)(3)

6. Page 18, Unit T-16, R5112-0004, VOC

Due to the rule change, the new standards should be
§ 115.112(d)(1)
§ 115.112(d)(3)

7. Page 18, Unit 1, REG2-002, SO2

The standard should be §112.6(a), not §112.6.

8. Page 24, Periodic Monitoring Summary

Due to the rule change, Main Standard should be § 115.112(d)(1).
The temperature is 1825 F (F is omitted).

9. Page 25, Periodic Monitoring Summary

Due to the rule change, Main Standard should be § 115.112(d)(1).

10. Page 29, PBR Version Date for 007

The correct date should be 08/11/1989.

11. Page 30, New Source Review Authorization References by Emissions Unit

Authorization for PREHTRSTK should be 007/08/11/1989.

12. Page 32, Compliance Schedule for T-16

Due to the rule change, Citation should be § 115.112(d)(1). There are 2 places need to be changed.

13. Page 33, Compliance Schedule for PREHTRSTK

Please see attachment for proposed changes.

14. Page 35, Compliance Schedule for PKGBOILSTK

Please see attachment for proposed changes.

**Updated
OP-REQ1 CAM Requirement
and
Compliance Schedule**

Attachments





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

Date: 03/24/2010	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.*

XI. MISCELLANEOUS (continued)		
K. Compliance Assurance Monitoring		
◆	1. 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. <i>If the response to Question XI.K.1. is "NO", go to Section XII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The unit or units defined by XI.K.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.K.2. is "NO", go to Section XII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	5. The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	6. Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
◆	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).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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). <i>If the response to Question XI.K.8. is "YES", go to Section XII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	9. The CAM proposal as described by question XI.K.3.or XI.K.4. addresses particulate matter or opacity.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	10. The CAM proposal as described by question XI.K.3.or XI.K.4. addresses VOC.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	11. The control device in the CAM proposal as described by question XI.K.3.or XI.K.4. has a bypass.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PREHTRSTK		NOx	117.310(a)(8)(A)(ii)	Obtain NOx limit in lb/MMBtu
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
The preheater (EPN PREHTRSTK) became subject to Chapter 117 requirements in June 2007.				
4. Corrective Action Plan Description				
Rhodia will perform a stack test for NOx. Rhodia will use the emission factor obtained from this test to calculate NOx emissions. This rate will be used to comply with mass emission cap and trade program.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia will perform stack test by 09/31/2010			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		
7. Progress Report Submission Schedule		Quarterly three months after permit issuance.		

Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PKGBOILSTK		NOx	117.310(a)(8)(A)(ii)	Obtain NOx limit in lb/MMBtu
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
117.9020(2)(C)	Perform Stack test		Rhodia Baytown Plant	
3. Non-compliance Situation Description				
This boiler was modified with low-NOx burner in late 2009. This project has not been completed and is estimated to be completed and startup to occur in Summer 2010.				
4. Corrective Action Plan Description				
Rhodia will perform stack test for NOx. Rhodia will use the emission factor obtained from this test to calculate NOx emissions. This rate will be used to comply with mass emission cap and trade program.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	Rhodia will perform stack test by 1/1/2011			
2				
3				
4				
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		
7. Progress Report Submission Schedule		Quarterly three months after permit issuance.		

Whitney Hill - Response to Rhodia WDP, Permit O-1610, Project 14659

From: Wei Liu <WLiou@trinityconsultants.com>
To: <whill@tceq.state.tx.us>
Date: 4/12/2010 11:25 AM
Subject: Response to Rhodia WDP, Permit O-1610, Project 14659
CC: <Sam.Keen@us.rhodia.com>
Attachments: Respnse-WDP-20100412.pdf; op-cro1-signed.pdf

Whitney:

On behalf of Rhodia, Trinity has prepared the response to the revised WDP. Please see the attachments. Also, Sam will mail you the original signed OP-CRO1 today. If you have any concerns, please let us know.

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

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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 INFORMATION		
A. RN: RN100211317	B. CN: CN600125330	C. Account No.: HG 0696 Q
D. Permit No.: O1610	E. Project No.: 14659	
F. Area Name: Baytown Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the appropriate box)		
A. <input type="checkbox"/> Responsible Official:	B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE (Place an "X" in the appropriate box) (Only one response can be accepted per form)		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. CERTIFICATION OF TRUTH		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>William J. McConnell</u> certify that I am the <u>DAR</u> for this application <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>		
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:		
<i>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).</i>		
A. Time Period: From <u>03-10-2010</u> to <u>04-12-2010</u> <i>Start Date*</i> <i>End Date*</i>		
OR		
B. Specific Dates: _____ <i>Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*</i>		
<i>*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'</i>		
Signature: <u>William J. McConnell</u>	Signature Date: <u>4/12/2010</u>	
Title: <u>Plant Manager</u>		

**Rhodia Inc.
 Baytown Plant
 Title V Minor Revision
 Permit Number O-1610
 TCEQ Project 14659**

Rhodia's Comments (4/12/10)

1. Page 2, Current Special Condition 1.D

Rhodia contends that the condition should be added back, because if not, there is no reference to TAC 117 for the dock vapor combustor (DOCKVC). According to the instruction from Ms. Hill, an OP-UA35 is used to prepare the regulatory requirements for the DOCKVC. Eventually, the revised permit may contain entries similar to the ones below.

Unit Summary

Unit/Group/Process ID	Unit Type	Group/Inclusive Units	SOP Index	Regulation	Requirement Driver
DOCKVC	Vapor Combustor	N/A	R7ICI-0002	30 TAC Chapter 117	No changing attributes.

Applicable Requirement Summary

ID No.	Type	SOP Index	Pollutant	Name	Citation	Textual Description
DOCKVC	CD	R7ICI-0002	NOx	30 TAC Chapter 117	§117.303	The permit holder should comply with the applicable requirements of 30 TAC Chapter 117, Commercial

Monitoring and Testing	Recordkeeping	Reporting
None	The permit holder should comply with the applicable requirements of 30 TAC Chapter 117, Commercial	The permit holder should comply with the applicable requirements of 30 TAC Chapter 117, Commercial

2. Page 30, New Source Review Authorization References by Emissions Unit

The WDP has a typo (56534) for the Authorization. The PREHTRSTK should be authorized under 007/09/12/1989.

3. Page 8 to 12. Numbering error.

“Additional Monitoring Requirements” should start with 7 rather than 1. Last page should have an entry of 20 rather than 14.

4. Page 18. Missing a row for PKGBOILSTK for Pollutant PM

Both PM and PM(OPACITY) should be included for PKGBOILSTK, 60Dc-001. However, there is only one row for PM(OPACITY). Please add another row for PM with all other columns the same as the PM(OPACITY).



Texas Commission on Environmental Quality
Incinerator Attributes
Form OP-UA35 (Page 2)
Federal Operating Permit Program

Table 2a: Title 30 TAC Chapter 117,
Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas, Incinerators.

Date: 04/12/2010	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		

Unit ID No.	SOP Index No.	Maximum Rated Capacity	NOx Emission Limitation	23C-Option	NOx Reduction	NOx Monitoring System
DOCKVC	R7ICI-0002	40-				

Whitney Hill - Re: Comments for Rhodia permit

From: Whitney Hill
To: Keen, Sam
Date: 4/5/2010 11:14 AM
Subject: Re: Comments for Rhodia permit
Attachments: Respns-WDP.doc; SOP.doc

Attached are my responses your comments on the working draft permit. Many of the comments are will have to be revised during another revision.

Also attached is the updated working draft permit. Please submit a response by April 12.

Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, Tx 78711-3087
whill@tceq.state.tx.us
Phone: (512) 239-1301
Fax: (512) 239-1070

 Please consider whether it is necessary to print this e-mail

>>> "Keen, Sam" <Sam.Keen@us.rhodia.com> 8:32 AM Monday, March 29, 2010 >>>

Hi Ms. Hill

Here are our consolidated comments for the permit for the Rhodia Baytown plant.

Thanks!

Sam

This message and any attachments is intended for the named addressee(s) only and may contain information that is privileged and/or confidential. If you receive this message in error, please delete it and immediately notify the sender. Any copying, dissemination or disclosure, either whole or partial, by a person who is not the named addressee is prohibited. We use virus scanning software but disclaim any liability for viruses or other devices which remain in this message or any attachments.

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Whitney Hill - Re: FOP O1610/Project 14659, Updated OP-REQ1

From: Whitney Hill
To: Liu, Wei
Date: 3/17/2010 3:50 PM
Subject: Re: FOP O1610/Project 14659, Updated OP-REQ1
CC: Floyd.Dickerson@us.rhodia.com; Sam.Keen@us.rhodia.com

Thank you for submitting this. I do have a question about some of the answers provided. Specifically, page 61, XI. K. 2. No was answered for this question about any units using a control device to comply with an applicable requirement. There is CAM in the effective version of the permit and if the question is no then is CAM not required? Since CAM is in the effective version of the permit, this answer should be yes. Please resubmit Section XI. K. with any working draft permit comments you may have on or before **March 29**.

If you have any questions please feel free to contact me.

Thank you,

Whitney Hill

Air Permits Division
Texas Commission on Environmental Quality
M.C-163 P.O. Box 13087
Austin, Tx 78711-3087
whill@tceq.state.tx.us
Phone: (512) 239-1301
Fax: (512) 239-1070

 Please consider whether it is necessary to print this e-mail

>>> Wei Liu <WLiu@trinityconsultants.com> 2:24 PM Wednesday, March 10, 2010 >>>
Whitney:

We have updated the OP-REQ1 form for this project.
Please review. If you have any questions, please let us know.

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

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Whitney Hill - Working Draft Permit -- FOP O1610/Project 14659, Rhodia, Inc./Baytown Plant

From: Whitney Hill
To: sam.keen@us.rhodia.com; wliu@trinityconsultants.com
Date: 3/16/2010 8:45 AM
Subject: Working Draft Permit -- FOP O1610/Project 14659, Rhodia, Inc./Baytown Plant
Attachments: SOP.doc

I have conducted a technical review of *revision* application for *Rhodia, Inc., Baytown Plant*. I have generated a Working Draft Permit (WDP), and an electronic copy 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 March 29, 2010. You must submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

If the permit is correct, then submit an OP-CRO1 with the date range of 03/05/2010 to 03/10/2010.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at http://www.tceq.state.tx.us/permitting/air/titlev/site/sop_wdp_factsheet.html. 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. 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
whill@tceq.state.tx.us
Phone: (512) 239-1301
Fax: (512) 239-1070

 Please consider whether it is necessary to print this e-mail

Whitney Hill - FOP O1610/Project 14659, Updated OP-REQ1

From: Wei Liu <WLiu@trinityconsultants.com>
To: "Whitney Hill" <WHill@tceq.state.tx.us>
Date: 3/10/2010 2:24 PM
Subject: FOP O1610/Project 14659, Updated OP-REQ1
CC: <Sam.Keen@us.rhodia.com>, <Floyd.Dickerson@us.rhodia.com>
Attachments: OP-REQ1.pdf

Whitney:

We have updated the OP-REQ1 form for this project.
Please review. If you have any questions, please let us know.

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

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

Date: 03/10/2010	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.*

I. TITLE 30 TAC CHAPTER 111 - CONTROL OF AIR POLLUTION FROM VISIBLE EMISSIONS AND PARTICULATE MATTER		
A. Visible Emissions		
◆	1. The application area includes stationary vents constructed on or before January 31, 1972.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area includes stationary vents constructed after January 31, 1972.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	3. All stationary vents are addressed on a unit specific basis. <i>If the response to Question I.A.3. is "YES", go to Question I.A.5.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	4. Stationary vents subject to 30 TAC § 111.111(a)(1)(A) or (a)(1)(B) are subject to compliance assurance monitoring requirements.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	5. 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.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	7. 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).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	8. Emissions from units in the application area include contributions from uncombined water.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	9. 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).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
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.	
◆	a. The application area is located within the City of El Paso.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	b. The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	c. The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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

Date: 03/10/2010	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.*

I. TITLE 30 TAC CHAPTER 111 - CONTROL OF AIR POLLUTION FROM VISIBLE EMISSIONS AND PARTICULATE MATTER (continued)	
B. Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots (continued)	
◆ 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO", go to Section I.C.</i>	
2. Items a - d determine the specific applicability of these requirements.	
◆ a. The application area is subject to 30 TAC § 111.143.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ b. The application area is subject to 30 TAC § 111.145.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ c. The application area is subject to 30 TAC § 111.147.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ d. The application area is subject to 30 TAC § 111.149.	<input type="checkbox"/> YES <input type="checkbox"/> NO
C. Emissions Limits on Nonagricultural Processes	
◆ 1. The application area includes nonagricultural processes subject to 30 TAC § 111.151.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Emissions Limits on Agricultural Processes	
1. The application area includes agricultural processes subject to 30 TAC § 111.171.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Outdoor Burning	
◆ 1. Outdoor burning is conducted in the application area. <i>If the response to Question I.E.1 is "NO", go to Section II.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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

Date: 03/10/2010	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.*

I. TITLE 30 TAC CHAPTER 111 - CONTROL OF AIR POLLUTION FROM VISIBLE EMISSIONS AND PARTICULATE MATTER (continued)	
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 6. Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 7. The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	<input type="checkbox"/> YES <input type="checkbox"/> NO
II. TITLE 30 TAC CHAPTER 112 - CONTROL OF AIR POLLUTION FROM SULFUR COMPOUNDS	
A. Temporary Fuel Shortage Plan Requirements	
1. The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs)	
A. Applicability	
◆ 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. <i>See instructions for inclusive counties. If the response to Question III.A.1 is "NO", go to Section IV.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Storage of Volatile Organic Compounds	
◆ 1. The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)	
C. Industrial Wastewater	
1. The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. <i>If the response to Question III.C.1 is "NO" or "N/A", go to Section III.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. <i>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.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>If the response to Question III.C.3 is "YES", go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>If the response to Question III.C.4 is "YES", go to Section III.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Loading and Unloading of VOCs	
◆ 1. The application area includes VOC loading operations.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)

D. Loading and Unloading of VOCs (continued)

◆	2. The application area includes VOC transport vessel unloading operations. <i>For GOP applications, if the responses to Questions III.D.1 - D.2, are "NO", go to Section III.E.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	3. Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area. <i>If the response to Question III.D.3 is "YES", go to Section III.E.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	4. For application areas in the Houston/Galveston/Brazoria area, marine terminal transfer operations are conducted in the application area.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities

◆	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. <i>If the response to Question III.E.1 is "NO", go to Section III.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question III.E.2 and/or E.3 is "YES", go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area is located in a covered attainment county as defined in 30 TAC § 115.10. <i>If the response to Question III.E.4 is "NO", go to Question III.E.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	5. Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)		
E. Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities		
◆	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. <i>If the response to Question III.E.7 is "YES", go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	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. <i>If the response to Question III.E.8. is "YES", go to Section III.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	10. At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	<input type="checkbox"/> YES <input type="checkbox"/> NO
F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)		
◆	1. Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)	
F. Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)	
◆	<p>2. Tank-truck tanks are filled with non-gasoline VOCs having a TVP 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.</p>
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A	
◆	<p>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.</p>
<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
G. Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities	
◆	<p>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. <i>If the response to Question III.G.1 is "NO" or "N/A", go to Section III.H.</i></p>
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A	
◆	<p>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. <i>If the response to Question III.G.2 is "YES", go to Section III.H.</i></p>
<input type="checkbox"/> YES <input type="checkbox"/> NO	
◆	<p>3. The application area includes facilities that began construction on or after November 15, 1992.</p>
<input type="checkbox"/> YES <input type="checkbox"/> NO	
◆	<p>4. The application area includes facilities that began construction prior to November 15, 1992.</p>
<input type="checkbox"/> YES <input type="checkbox"/> NO	
◆	<p>5. The application area includes facilities that have a monthly throughput of less than 10,000 gallons of gasoline.</p>
<input type="checkbox"/> YES <input type="checkbox"/> NO	



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)	
H. Control Of Reid Vapor Pressure (RVP) of Gasoline	
◆ 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. <i>If the response to Question III.H.1 is "NO" or "N/A", go to Section III.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
◆ 2. The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes a motor vehicle fuel dispensing facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 4. The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	<input type="checkbox"/> YES <input type="checkbox"/> NO
I. Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries	
1. The application area is located at a petroleum refinery.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Surface Coating Processes (Complete this section for GOP applications only.)	
◆ 1. Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(a)(3)(A) or 115.427(b)(1) are performed in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
K. Offset Lithographic Printing	
1. The application area includes offset lithographic printing presses. <i>If the answer to Question III.K.1. is "NO", go to Section III.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area in is Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, or Tarrant Counties. <i>If the response to Question III.K.2. is "NO", go to Question III.K.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)	
K. Offset Lithographic Printing	
3. All offset lithographic printing presses on the property, when uncontrolled, emit a combined weight of VOC less than 50 tons per calendar year.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area is in Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, or Waller Counties. <i>If the responses to Questions III.K.2. and 4. are both "NO", go to Section III.L.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. All offset lithographic printing presses on the property, when uncontrolled, emit a combined weight of VOC less than 25 tons per calendar year.	<input type="checkbox"/> YES <input type="checkbox"/> NO
L. Cutback 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. <i>If the response to Question III.L.1 is "N/A", go to Section III.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
3. Asphalt emulsion is used or produced within the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area is using an alternate control requirement as specified in 30 TAC § 115.513. <i>If the response to Question III.L.4 is "NO", go to Section III.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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)	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The applicant using cutback asphalt is a state, municipal, or county agency.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)		
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. <i>If the response to Question III.M.1 is "NO" or "N/A", go to Section III.N.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆	2. Degassing or cleaning of only ocean-going, self-propelled VOC marine vessels is performed in the application area. <i>If the response to Question III.M.2 is "YES", go to Section III.N.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. Degassing or cleaning 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



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III. TITLE 30 TAC CHAPTER 115 - CONTROL OF AIR POLLUTION FROM VOLATILE ORGANIC COMPOUNDS (VOCs) (continued)	
N. Petroleum Dry Cleaning Systems	
1. The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
O. Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC))	
1. The application area includes one or more vent gas streams containing HRVOC.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more flares that emit or have the potential to emit HRVOC. <i>If the response to Question III.O.1. and III.O.2. are both "NO" or "N/A", go to Section III.P. If the response to Question III.O.1 is "YES", continue with Question III.O.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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. <i>If the response to Questions III.O.3. and III.O.4. are both "NO", go to Section III.P.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. The application area contains pressure relief valves that are not controlled by a flare.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area has at least one vent stream which has no potential to emit HRVOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	<input type="checkbox"/> YES <input type="checkbox"/> NO
P. Cooling 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A



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IV. TITLE 30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN COMPOUNDS	
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. <i>For SOP applications, if the response to Question IV.A.1 is "YES", complete Sections IV.B - IV.F and IV.H.</i> <i>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.</i> <i>For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES", complete Sections IV.C. and IV.F.</i> <i>For GOP applications, if the response to Question IV.A.1 is "NO", go to Section VI.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. <i>If the response to Question IV.A.2 is "YES", go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question IV.A.3 is "YES", go to Question IV.G.1.</i> <i>If the responses to Questions IV.A.1 - 3 are all "NO", go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. Utility Electric Generation in Ozone Nonattainment Areas	
1. The application area includes units specified in 30 TAC §§ 117.1000, 117.1100, 117.1200, or 117.1300. <i>If the response to Question IV.B.1. is "NO", go to Question IV.C.1.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is complying with a System Cap in 30 TAC §§ 117.1020, 117.1120, or 117.1220.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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IV. TITLE 30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN COMPOUNDS		
C. Commercial, Institutional, and Industrial Sources		
◆	1. The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.200, 117.300, or 117.400. <i>For SOP applications, if the response to Question IV.C.1. is "NO", go to Question IV.D.1.</i> <i>For GOP applications for GOP 517, if the response to Question IV.C.1. is "NO", go to Section IV.F.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area is located at a site that was a major source of NOx before November 15, 1992.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
◆	3. The application area is located in the Houston/Galveston/Brazoria or the Dallas/Fort Worth Eight-Hour nonattainment area and includes diesel or dual-fueled engines.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	4. The application area includes gas turbines or stationary internal combustion engines claiming an exemption as a low annual capacity factor unit, for use exclusively in emergency situations, or as stationary diesel engine meeting exemption criteria.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	5. The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Adipic Acid Manufacturing		
	1. The application area is located at, or part of, an adipic acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
E. Nitric Acid Manufacturing - Ozone Nonattainment Areas		
	1. The application area is located at, or part of, a nitric acid production unit.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A



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IV. TITLE 30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN COMPOUNDS (continued)	
F. Small Combustion Sources - Boilers, Process Heaters, Stationary Engines and Gas Turbines at Minor Sources	
◆ 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. <i>For SOP applications, if the response to Question IV.F.1 is "NO", go to Question IV.H.1.</i> <i>For GOP applications, if the response to Question IV.F.1 is "NO", go to Section VI.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 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).	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	<input type="checkbox"/> YES <input type="checkbox"/> NO
G. Utility 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. <i>If the response to Question IV.G.1 is "NO", go to Question IV.H.1.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area is complying with the System Cap in 30 TAC § 117.3020.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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

IV. TITLE 30 TAC CHAPTER 117 - CONTROL OF AIR POLLUTION FROM NITROGEN COMPOUNDS (continued)	
H. Small Combustion Sources - Water Heaters, Small Boilers, and Process 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. <i>If the response to question IV.H.1. is "NO" go to Section V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	<input type="checkbox"/> YES <input type="checkbox"/> NO
V. TITLE 40 CODE OF FEDERAL REGULATIONS PART 59 (40 CFR PART 59) - NATIONAL VOLATILE ORGANIC COMPOUND EMISSION STANDARDS FOR CONSUMER AND COMMERCIAL PRODUCTS	
A. Subpart B – National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings	
1. The application area manufactures automobile refinish coatings or coating components and sells or distributes these coatings or coating components in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports automobile refinish coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. <i>If the responses to Questions V.A.1 and V.A.2 are both "NO", go to Section V.B.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All automobile refinish coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	<input type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart C – National Volatile Organic Compound Emission Standards for Consumer Products	
1. The application area manufactures consumer products for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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V. 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. Subpart C – National Volatile Organic Compound Emission Standards for Consumer Products (continued)	
3. The application area is a distributor of consumer products whose name appears on the label of one or more of the products. <i>If the responses to Questions V.B.1 - V.B.3 are all "NO", go to Section V.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
C. Subpart D – National Volatile Organic Compound Emission Standards for Architectural Coatings	
1. The application area manufactures or imports architectural coatings for sale or distribution in the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. <i>If the responses to Questions V.C.1 and V.C.2 are both "NO", go to Section VI.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.400(c)(1) - (5).	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Subpart F – Control of Evaporative Emissions From New and In-Use Portable Fuel Containers	
1. The application area manufactures or imports portable fuel containers for sale or distribution in the United States. <i>If the response to Question V.D.1 is "NO", go to Section VI.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VI. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)	
A. Applicability	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. <i>If the response to Question VI.A.1 is "NO", go to Section VII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
B. Subpart Y - Standards of Performance for Coal Preparation Plants	
1. The application area is located at a coal preparation plant. <i>If the response to Question VI.B.1 is "NO", go to Section VI.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The coal preparation plant has a design capacity greater than 200 tons per day (tpd). <i>If the response to Question VI.B.2 is "NO", go to Section VI.C.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option.	<input type="checkbox"/> YES <input type="checkbox"/> NO
C. Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP 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. <i>If the response to Question VI.C.1 is "NO" or "N/A", go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> 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. <i>If the response to Question VI.C.2 is "NO", go to Section VI.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VI. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)	
D. Subpart XX - Standards of Performance for Bulk Gasoline Terminals	
1. The application area includes bulk gasoline terminal loading racks. <i>If the response to Question VI.D.1 is "NO", go to Section VI.E.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. One or more of the loading racks were constructed or modified after December 17, 1980.	<input type="checkbox"/> YES <input type="checkbox"/> NO
E. Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO₂) Emissions	
◆ 1. The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). <i>For SOP applications, if the response to Question VI.E.1 is "NO", go to Section VI.F.</i> <i>For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A", go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. The affected facilities that were constructed or modified after January 20, 1984.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD.	<input type="checkbox"/> YES <input type="checkbox"/> NO
F. Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants	
1. The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. <i>If the response to Question VI.F.1 is "NO", go to Section VI.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VI. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)	
G. Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems	
1. The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. <i>If the response to Question VI.G.1 is "NO", go to Section VI.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes stormwater sewer systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes non-contact cooling water systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes individual drain systems. <i>If the response to Question VI.G.5 is "NO", go to Section VI.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes completely closed drain systems.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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	
◆ 1. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. <i>Note: If the response to Question VI.H.1. is "N/A", go to Section VI.I. If the response to Question VI.H.1. is "NO", go to Question VI.H.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 3. The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VI. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (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 (continued)	
◆ 4. The application area includes at least one air curtain incinerator. <i>Note: If the response to Question VI.H.4. is "NO", go to Section VII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 5. The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. <i>Note: If the response to Question VI.H.5. is "NO", go to Question VI.H.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 6. All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 7. The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 8. All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	<input type="checkbox"/> YES <input type="checkbox"/> 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	
◆ 1. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. <i>Note: If the response to Question VII.1. is "N/A", go to Section VI.J. If the response to Question VII.1. is "NO", go to Question VI.I.4.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. 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 June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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)		
◆	3. The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one air curtain incinerator. <i>Note: If the response to Question VI.I.4. is "NO", go to Section VI.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	5. The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. <i>Note: If the response to Question VI.I.5. is "NO", go to VI.I.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	6. All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	7. The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	8. All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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. <i>Note: 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.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A



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VI. TITLE 40 CODE OF FEDERAL REGULATIONS PART 60 (40 CFR PART 60) - NEW SOURCE PERFORMANCE STANDARDS (NSPS) (continued)		
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 (continued)		
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The application area includes at least one air curtain incinerator. <i>Note: If the response to Question VI.J.4. is "NO", go to Section VII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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. <i>Note: If the response to Question VI.J.5. is "NO", go to Question VI.J.7.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	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.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 61 (40 CFR PART 61) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)	
A. Applicability	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. <i>If the response to Question VII.A.1 is "NO" or "N/A", go to Section VIII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
B. Subpart F - National Emission Standard for Vinyl Chloride	
1. The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	<input type="checkbox"/> YES <input type="checkbox"/> 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)	
◆ 1. The application area includes equipment in benzene service.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants	
1. The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). <i>If the response to Question VII.D.1 is "NO", go to Section VII.E.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
E. Subpart M - National Emission Standard for Asbestos	
Applicability	
1. The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, .144, .146, 147, .148, or .155. <i>If the response to Question VII.E.1 is "NO", go to Section VII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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	
Roadway Construction	
2. The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Manufacturing Commercial Asbestos	
3. The application area includes a manufacturing operation using commercial asbestos. <i>If the response to Question VII.E.3 is "NO", go to Question VII.E.4.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. Asbestos-containing waste material is processed into nonfriable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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)	
Asbestos Spray Application	
<p>4. The application area includes operations in which asbestos-containing materials are spray applied. <i>If the response to Question VII.E.4 is "NO", go to Question VII.E.5.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>a. Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. <i>If the response to Question VII.E.4.a is "YES", go to Question VII.E.5.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>b. Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>c. An alternative emission control and waste treatment method is being used that has received prior EPA approval.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>d. Asbestos-containing waste material is processed into nonfriable forms.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>e. Asbestos-containing waste material is adequately wetted.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>f. Alternative filtering equipment is being used that has received EPA approval.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>g. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<p>h. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.</p>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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	
5. The application area includes a fabricating operation using commercial asbestos. <i>If the response to Question VII.E.5 is "NO", go to Question VII.E.6.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
a. Visible emissions are discharged to outside air from the manufacturing operation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
b. An alternative emission control and waste treatment method is being used that has received prior EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
c. Asbestos-containing waste material is processed into nonfriable forms.	<input type="checkbox"/> YES <input type="checkbox"/> NO
d. Asbestos-containing waste material is adequately wetted.	<input type="checkbox"/> YES <input type="checkbox"/> NO
e. Alternative filtering equipment is being used that has received EPA approval.	<input type="checkbox"/> YES <input type="checkbox"/> NO
f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	<input type="checkbox"/> YES <input type="checkbox"/> NO
g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Non-sprayed Asbestos Insulation	
6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Asbestos Conversion	
7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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	
1. 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations	
1. The application area is located at a benzene production facility and/or bulk terminal. <i>If the response to Question VII.G.1 is "NO", go to Section VII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes benzene transfer operations at marine vessel loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes benzene transfer operations at railcar loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes benzene transfer operations at tank-truck loading racks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
H. Subpart FF - National Emission Standard for Benzene Waste Operations	
Applicability	
1. The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>If the responses to Questions VII.H.1 and VII.H.2 are both "NO", go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. <i>If the response to Question VII.H.3 is "YES", go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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)	
4. The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagrams per year (Mg/yr). <i>If the response to Question VII.H.4 is "YES", go to Section VIII</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question VII.H.5 is "YES", go to Section VIII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area has waste streams with flow-weighted annual average water content of 10% or greater.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Waste Stream Exemptions	
8. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw).	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. The application area transfers waste off-site for treatment by another facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area is complying with 40 CFR § 61.342(d).	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area is complying with 40 CFR § 61.342(e). <i>If the response to Question VII.H.13. is "NO", go to Question VII.H.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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)	
Waste Stream Exemptions (continued)	
14. The application area has facility waste with a flow weighted annual average water content of less than 10%.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Container Requirements	
15. The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. <i>If the response to Question VII.H.15 is "NO", go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. <i>If the response to Question VII.H.16 is "YES", go to Question VII.H.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Individual 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. <i>If the response to Question VII.H.18 is "NO", go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. <i>If the response to Question VII.H.19 is "YES", go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area has individual drain systems complying with 40 CFR § 61.346(a). <i>If the response to Question VII.H.20 is "NO", go to Question VII.H.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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)	
Individual Drain Systems (continued)	
22. The application area has individual drain systems complying with 40 CFR § 61.346(b). <i>If the response to Question VII.H.22 is "NO", go to Question VII.H.25.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
24. Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Remediation Activities	
25. Remediation activities take place at the application area subject to NESHAP FF.	<input type="checkbox"/> YES <input type="checkbox"/> NO
VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES	
A. Applicability	
◆ 1. The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. <i>See instructions for 40 CFR Part 63 subparts made applicable only by reference.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES) <i>(continued)</i>	
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry	
1. The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area is located at a site that includes chemical manufacturing process units that use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. <i>If the response to Question VIII.B.1, .B.2, or .B.3 is "NO", go to Section VIII.D.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. The application area includes chemical manufacturing process units that use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	<input type="checkbox"/> YES <input type="checkbox"/> 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	
Applicability	
1. The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. <i>If the response to Question VIII.C.1 is "NO", go to Section VIII.D.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
2. The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR 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 Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater <i>(continued)</i>	
Vapor Collection and Closed Vent Systems	
3. The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. <i>If the response to Question VIII.C.3 is "NO", go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. The application area includes vapor collection systems or closed-vent systems that contain by-pass lines that could divert a vent stream away from a control device and to the atmosphere. <i>If the response to Question VIII.C.5 is "NO", go to Question VIII.C.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. Flow indicators are installed, calibrated, maintained, and operated at the entrances to by-pass lines in the application area.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Vapor Collection and Closed Vent Systems	
7. By-pass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Transfer Racks	
8. The application area includes Group 1 transfer racks that load organic HAPs.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Process Wastewater Streams	
9. The application area includes process wastewater streams. <i>If the response to Question VIII.C.9 is "NO", go to Question VIII.C.22.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. <i>If the response to Question VIII.C.10 is "NO", go to Question VIII.C.12.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR 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 Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater <i>(continued)</i>	
Process Wastewater Streams	
11. The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. <i>If the response to Question VIII.C.12 is "NO", go to Question VIII.C.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. <i>If the response to Question VIII.C.14 is "NO", go to Question VIII.C.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes process wastewater streams, located at existing sources that are Group 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES
(continued)

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. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. <i>If the response to Question VIII.C.21. is "YES", go to Question VIII.C.31.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
22. 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. <i>If the response to Question VIII.C.22. is "NO", go to Question VIII.C.24.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
23. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
25. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the response to Question VIII.C.24 - VIII.C.25 is both "NO", go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR 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 Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater <i>(continued)</i>	
Process Wastewater Streams <i>(continued)</i>	
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. <i>If the response to Question VIII.C.24 - VIII.C.25 is both "NO", go to Question VIII.C.27.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question VIII.C.28 is "NO", go to Question VIII.C.31.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>If the response to Question VIII.C.31 is "NO", go to Question VIII.C.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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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 <i>(continued)</i>	
Drains <i>(continued)</i>	
32. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). <i>If the response to Question VIII.C.32 is "NO", go to Question VIII.C.36.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. 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 listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. 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 Review (NSR) 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR 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 Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater <i>(continued)</i>	
Gas Streams	
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.	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks	
1. The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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. <i>If the response to Question VIII.E.1 is "NO", go to Section VIII.F.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. <i>If the response to Question VIII.E.2 is "NO", go to Section VIII.F.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
F. Subpart Q - National Emission Standards for Industrial Process Cooling Towers	
1. The application area includes industrial process cooling towers. <i>If the response to Question VIII.F.1 is "NO", go to Section VIII.G.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Chromium-based water treatment chemicals have been used on or after September 8, 1994.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	
1. The application area includes a bulk gasoline terminal.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes a pipeline breakout station. <i>If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO", go to Section VIII.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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. <i>If the response to Question VIII.G.3 is "YES", go to Question VIII.G.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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. <i>If the response to Question VIII.G.4 is "YES", go to Question VIII.G.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>Note: If the response to Question VIII.G.5 is "NO", go to Question VIII.G.9.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. Emissions screening factor less than 0.5 (ET or EP < 0.5). <i>Note: If the response to Question VIII.G.6 is "YES", go to Section VIII.H.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)	
7. Emissions screening factor greater than or equal to 0.5, but less than 1.0 ($0.5 < ET \text{ or } EP < 1.0$). <i>Note: If the response to Question VIII.G.7 is "YES", go to Section VIII.H</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
8. Emissions screening factor greater than or equal to 1.0 ($ET \text{ or } EP > 1.0$). <i>Note: If the response to Question VIII.G.8 is "YES", go to Question VIII.G.10.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
9. The site at which the application area is located is a major source of HAP. <i>If the response to Question VIII.G.9 is "NO", go to Section VIII.H</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	<input type="checkbox"/> YES <input type="checkbox"/> NO
H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	
1. The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. <i>If the response to Question VIII.H.1 is "NO", go to Section VIII.I.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). <i>If the response to Question VIII.H.2 is "NO", go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. <i>If the response to Question VIII.H.3 is "NO", go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes one or more kraft pulping systems that are existing sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES
(continued)

H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry *(continued)*

5.	The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question VIII.H.6 is "NO", go to Section VIII.I.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO
8.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	<input type="checkbox"/> YES <input type="checkbox"/> NO

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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3.	The application are is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins	
1. The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. <i>If the response to Question VIII.J.1 is "NO", go to Section VIII.K.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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. <i>If the response to Question VIII.J.2 is "NO", go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flowrate of less than 1 MG/yr. <i>If the response to Question VIII.J.5. is "YES", go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flowrate of less than 1 MG/yr. <i>If the response to Question VIII.J.6. is "NO", go to Question VIII.J.8.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins <i>(continued)</i>	
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the response to Question VIII.J.8 - VIII.J.9 are both "NO", go to Question VIII.J.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Containers	
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drains	
12. 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. <i>If the response to Question VIII.J.12. is "NO", go to Question VIII.J.15.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins <i>(continued)</i>	
Drains <i>(continued)</i>	
15. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. <i>If the response to Question VIII.J.15 is "NO", go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). <i>If the response to Question VIII.J.16 is "NO", go to Section VIII.K.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. 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 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer 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 § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
K. Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production	
1. The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. <i>If the response to Question VIII.K.1 is "NO" or "N/A", go to Section VIII.L.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes a BLR and/or WSR research and development facility.	<input type="checkbox"/> YES <input type="checkbox"/> NO
L. Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting	
1. The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. <i>If the response to Question VIII.L.1 is "NO" or "N/A", go to Section VIII.M.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	<input type="checkbox"/> YES <input type="checkbox"/> NO
M. Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations	
1. The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries	
Applicability	
1. The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). <i>If the response to Question VIII.N.1 is "NO", go to Section VIII.O.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries	
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). <i>If the response to Question VIII.N.2 is "YES", go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>If the response to Question VIII.N.3 is "NO", go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question VIII.N.4 is "NO", go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> 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. <i>If the response to Question VIII.N.7 is "NO", go to Section VIII.O.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES
(continued)

N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries *(continued)*

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 YES NO

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

Containers, Drains, and other Appurtenances

11. The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii). YES NO

12. The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii). YES NO

O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations

1. The application area is located at a plant site receiving material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1).
If the response to Question VIII.O.1 is "NO" or "N/A", go to Section VIII.P. YES NO N/A

2. Materials specified in 40 CFR § 63.680(b)(2) are received at the application area. YES NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations	
3. The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> 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."	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The predominant activity in the application area is the treatment of wastewater received from off-site.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> 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).	<input type="checkbox"/> YES <input type="checkbox"/> NO
10. The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. <i>If the response to Question VIII.O.10 is "YES", go to Section VIII.P.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations	
11. The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. <i>If the response to Question VIII.O.11 is "NO", go to Question VIII.O.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. VOHAP concentration is determined by direct measurement.	<input type="checkbox"/> YES <input type="checkbox"/> NO
13. VOHAP concentration is based on knowledge of the offsite material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
14. The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. <i>If the response to Question VIII.O.14 is "NO", go to Question VIII.O.17.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
15. An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	<input type="checkbox"/> YES <input type="checkbox"/> NO
17. The application area includes containers that manage non-exempt off-site material.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes individual drain systems that manage non-exempt off-site materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
P. Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities	
1. The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. <i>If the response to Question VIII.P.1 is "NO" or "N/A", go to Section VIII.Q.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO
Q. Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.	
◆ 1. The application area is subject to 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. <i>For GOP applications, go to Section VIII.Y</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
R. Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)	
1. The application area includes shipbuilding or ship repair operations. <i>If the response to Question VIII.R.1 is "NO", go to Section VIII.S.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	<input type="checkbox"/> YES <input type="checkbox"/> NO
S. Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations	
1. The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. <i>If the response to Question VIII.S.1 is "NO" or "N/A", go to Section VIII.T.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
2. The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	<input type="checkbox"/> YES <input type="checkbox"/> NO
T. Subpart KK - National Emission Standards for the Printing and Publishing Industry	
1. The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES
(continued)

U. Subpart PP - National 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. <i>If the response to Question VIII.U.1 is "NO", go to Section VIII.V.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes containers using Container Level 1 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
3. The application area includes containers using Container Level 2 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. The application area includes containers using Container Level 3 controls.	<input type="checkbox"/> YES <input type="checkbox"/> NO

V. Subpart RR - National Emission Standards for Individual Drain Systems

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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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W. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins

1. The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. <i>If the response to Question VIII.W.1 is "NO", go to Section VIII.X.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. <i>If the response to Question VIII.W.2 is "NO", go to Section VIII.X.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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◆ *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 <i>(continued)</i>	
W. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins <i>(continued)</i>	
3. All process wastewater streams generated or managed in the application area are from sources producing polystyrene. <i>If the response to Question VIII.W.3. is "YES", go to Section VIII.X.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
4. All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. <i>If the response to Question VIII.W.4. is "YES", go to Section VIII.X.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
5. 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 § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
6. The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
7. The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	<input type="checkbox"/> YES <input type="checkbox"/> NO
8. All Group 1 wastewater streams at the site are demonstrated to have a total source mass flowrate of less than 1 MG/yr. <i>If the response to Question VIII.W.8. is "YES", go to Question VIII.W.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
9. The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flowrate of less than 1 MG/yr. <i>If the response to Question VIII.W.9. is "NO", go to Question VIII.W.11.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
W. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins <i>(continued)</i>	
10. The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	<input type="checkbox"/> YES <input type="checkbox"/> NO
11. 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
12. Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. <i>If the response to Question VIII.W.11. - VIII.W.12. are both "NO", go to Question VIII.W.14.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Containers	
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drains	
15. 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. <i>If the response to Question VIII.W.15. is "NO", go to Question VIII.W.18.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
16. 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	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
W. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins <i>(continued)</i>	
Drains <i>(continued)</i>	
17. 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
18. The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. <i>If the response to Question VIII.W.18. is "NO", go to Section VIII.X.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
19. The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). <i>If the response to Question VIII.W.19. is "NO", go to Section VIII.X.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
20. 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 § 63.1312, at any flow rate.	<input type="checkbox"/> YES <input type="checkbox"/> NO
21. 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 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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VIII. TITLE 40 CODE OF FEDERAL REGULATIONS PART 63 (40 CFR PART 63) - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <i>(continued)</i>	
X. Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Y. Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.	
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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Z. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.	
1. The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
AA. Recently Promulgated 40 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. <i>If the response to Question VIII.AA.1. is "NO", go to Section IX.</i> <i>A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Provide the Subpart designation (i.e. Subpart EEE) in the space provided below.	



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IX. TITLE 40 CODE OF FEDERAL REGULATIONS PART 68 (40 CFR PART 68) - CHEMICAL ACCIDENT PREVENTION PROVISIONS	
A. Applicability	
◆ 1. The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
X. TITLE 40 CODE OF FEDERAL REGULATIONS PART 82 (40 CFR PART 82) - PROTECTION OF STRATOSPHERIC OZONE	
A. Subpart A - Production and Consumption Controls	
◆ 1. The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product..	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
B. Subpart B - Servicing of Motor Vehicle Air Conditioners	
◆ 1. Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances	
◆ 1. The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
D. Subpart D - Federal Procurement	
◆ 1. The application area is owned/operated by a department, agency, or instrumentality of the United States.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A



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X. TITLE 40 CODE OF FEDERAL REGULATIONS PART 82 (40 CFR PART 82) - PROTECTION OF STRATOSPHERIC OZONE (continued)	
E. Subpart E - The Labeling of Products Using Ozone Depleting Substances	
◆ 1. The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 3. The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
F. Subpart F - Recycling and Emissions Reduction	
◆ 1. Servicing, maintenance, and/or repair on refrigeration and nonmotor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 2. Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 3. The application area manufactures appliances or refrigerant recycling and recovery equipment.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
G. Subpart G - Significant New Alternatives Policy Program	
◆ 1. The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. <i>If the response to Question X.G.1 is "NO", go to Section X.H.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A



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X. TITLE 40 CODE OF FEDERAL REGULATIONS PART 82 (40 CFR PART 82) - PROTECTION OF STRATOSPHERIC OZONE	
H. Subpart H -Halon Emissions Reduction	
◆ 1. Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. Disposal of halons or manufacturing of halon blends is conducted in the application area.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
XI. 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
B. Forms	
◆ 1. The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. <i>If the response to Question XI.B.1 is "NO" or "N/A", go to Section XI.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 2. Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter and Division designation for the State regulation(s) in the space provided below.	
C. Emission Limitation Certifications	
◆ 1. The application area includes units for which federally enforceable emission limitations have been established by certification.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



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XI. MISCELLANEOUS (continued)	
D. Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements	
1. The application area is located at a site that is subject to a site specific requirement of the state implementation plan (SIP).	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes units located at the site that are subject to a site specific requirement of the SIP.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
E. Title IV - Acid Rain Program	
1. The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
F. Clean Air Interstate Rule (CAIR NOx and CAIR SO2 Permit)	
1. The application area includes emission units subject to the requirements of the Clean Air Interstate Rule. <i>If the response to Question XI.F.1. is "NO", go to Section XI.G.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. The application area includes emission units qualifying for the retired unit exemptions under 40 CFR §§ 96.105 and 96.205.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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XI. MISCELLANEOUS (continued)	
G. Permit Shield (SOP Applicants only)	
1. A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
H. GOP Type (Complete this section for GOP applications only)	
◆ 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 2. The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆ 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, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Liberty, Matagorda, Montgomery, San Patricio, Tarrant, Travis, Victoria, and Waller County.	<input type="checkbox"/> YES <input type="checkbox"/> 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.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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XI. MISCELLANEOUS (continued)	
I. Title 30 TAC Chapter 101, Subchapter H	
◆ 1. The application area is located in a nonattainment area. <i>If the response to Question XI.I.1. is "NO", go to question XI.I.3.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 2. The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 3. The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
◆ 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.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆ 5. The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 6. The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
J. Periodic Monitoring	
◆ 1. The applicant or permit holder is submitting or has previously submitted at least one periodic monitoring proposal described on Form OP-MON.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



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XI. MISCELLANEOUS (continued)		
K. Compliance Assurance Monitoring		
◆	1. 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. <i>If the response to Question XI.K.1. is "NO", go to Section XII.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The unit or units defined by XI.K.1 are using a control device to comply with an applicable requirement. <i>If the response to Question XI.K.2. is "NO", go to Section XII.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	3. The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	4. The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application.	<input type="checkbox"/> YES <input type="checkbox"/> NO
	5. The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	<input type="checkbox"/> YES <input type="checkbox"/> NO
	6. Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
◆	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).	<input type="checkbox"/> YES <input type="checkbox"/> 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). <i>If the response to Question XI.K.8. is "YES", go to Section XII.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	9. The CAM proposal as described by question XI.K.3.or XI.K.4. addresses particulate matter or opacity.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	10. The CAM proposal as described by question XI.K.3.or XI.K.4. addresses VOC.	<input type="checkbox"/> YES <input type="checkbox"/> NO
◆	11. The control device in the CAM proposal as described by question XI.K.3.or XI.K.4. has a bypass.	<input type="checkbox"/> YES <input type="checkbox"/> NO



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XII. NEW SOURCE REVIEW (NSR) AUTHORIZATIONS		
A. Waste Permits with Air Addendum		
◆	1. The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. <i>Note: If the answer to XII.A.1. is "YES", include the waste permit numbers in Section XII.J.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
B. Air Quality Standard Permits		
◆	1. The application area includes at least one Air Quality Standard Permit NSR authorization. <i>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.11 as appropriate.</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
◆	2. The application area includes at least one "Pollution Control Project" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	3. The application area includes at least one "Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	4. The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	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.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	6. The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	7. The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	8. The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆	9. The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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

Date: 03/10/2010	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.*

XII. NEW SOURCE REVIEW (NSR) AUTHORIZATIONS (continued)	
B. Air Quality Standard Permits	
◆ 10. The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.10 is "NO", go to Section XII.C.</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 11. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 12. For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
◆ 13. The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. Flexible Permits	
◆ 1. The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
D. Multiple Plant Permits	
1. The application area includes at least one Multi-Plant NSR Permit NSR authorization.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO



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

Date: 03/10/2010	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.*

XII. NEW SOURCE REVIEW (NSR) AUTHORIZATIONS (Attach additional sheets if necessary)							
◆ E. PSD Permits and PSD Major Pollutants							
PSD Permit No.: PSDTX695M2	Pollutant(s)	SO2	SAM				
PSD Permit No.:	Pollutant(s)						
PSD Permit No.:	Pollutant(s)						
PSD Permit No.:	Pollutant(s)						
◆ F. Nonattainment (NA) Permits and NA Major Pollutants							
NA Permit No.:	Pollutant(s)						
NA Permit No.:	Pollutant(s)						
NA Permit No.:	Pollutant(s)						
NA Permit No.:	Pollutant(s)						
◆ G. NSR Authorizations with FCAA § 112(g) Requirements							
NSR Permit No.: 9565	NSR Permit No.:						
NSR Permit No.: 56534	NSR Permit No.:						
NSR Permit No.:	NSR Permit No.:						
◆ H Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area.							
Authorization No.: 86388	Authorization No.:						
Authorization No.:	Authorization No.:						
Authorization No.:	Authorization No.:						
Authorization No.:	Authorization No.:						
Authorization No.:	Authorization No.:						
Authorization No.:	Authorization No.:						
Authorization No.:	Authorization No.:						



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

Date: 03/10/2010	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.*

XII. NEW SOURCE REVIEW (NSR) AUTHORIZATIONS (Attach additional sheets if necessary)	
◆ I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
Note: A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.	
PBR No.: SE007	Version No./Date: 08/11/1989 <u>9/12/1989</u>
PBR No.: 106.261	Version No./Date: 11/01/2003 ✓
PBR No.: 106.262	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.:	Version No./Date:
◆ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Permit No.:

Whitney Hill - Revision Application Review -- FOP O1610/Project 14659, Rhodia, Inc./Baytown Plant

From: Whitney Hill
To: sam.keen@us.rhodia.com; wliu@trinityconsultants.com
Date: 3/9/2010 12:45 PM
Subject: Revision Application Review -- FOP O1610/Project 14659, Rhodia, Inc./Baytown Plant

I have been assigned to the Federal Operating Permit (FOP) *revision* application for *Rhodia, Inc., Baytown Plant* and have begun technical review. This application for *revision* of Permit No. O1610 has been assigned Project No. 14659. 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.

- 1) I want to give you an update on the information that I received. I am still working on updating the permit to add applicability to NSPS Dc.
- 2) Also, I would like to recommend that a new OP-REQ1 be submitted. The compliance dates in some of the terms and conditions in the current permit has pasted. This can be updated in the renewal but it does state in the permit that Rhodia will revise the permit on or before the compliance date.

In accordance with the policy memorandum dated January 6, 2006 available at <http://www.tceq.state.tx.us/assets/public/permitting/air/memos/voidguide06.pdf>, 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.state.tx.us/permitting/air/titlev/site/sop_wdp_factsheet.html. 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
whill@tceq.state.tx.us
Phone: (512) 239-1301
Fax: (512) 239-1070

 Please consider whether it is necessary to print this e-mail

Whitney Hill - Rhodia title V minor revision Permit 1610, updated OP-UA6 form

From: Wei Liu <WLiu@trinityconsultants.com>
To: <whill@tceq.state.tx.us>
Date: 3/5/2010 2:11 PM
Subject: Rhodia title V minor revision Permit 1610, updated OP-UA6 form
CC: <Sam.Keen@us.rhodia.com>
Attachments: OP-UA6.pdf

Whitney:

As you requested, we have updated the OP-UA6 form for the package boiler. Please review.

Regards,

Wei Liu, Ph.D., P.E.

Trinity Consultants
1001 West Loop South
Suite 640
Houston TX 77027

Direct line: 713-579-7145
Phone 713-552-1371 ext. 245
Fax: 713-552-1374

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you Received this in error, please contact the sender and delete the material from any computer.



Texas Commission on Environmental Quality
Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 12)
Federal Operating Permit Program

Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Date: 03/05/2010	Permit No.: O-1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		

Unit ID No.	SOP Index No.	Monitoring Type			Technology Type	43CE-Option	47C-Option
		PM	SO ₂ Inlet	SO ₂ Outlet			
PKGBOILSTK	60Dc-001	NONE	NONE	NONE	NONE		47C-G



**Eco Services Enterprise
Houston/Baytown Plants**

RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

January 4, 2010

Air Permits Initial Review Team (APIRT)
MC 161
P.O. Box 13087
Austin, Texas 78711-3087



Re: Title V Minor Revision
Permit O1610
Rhodia Inc. - Baytown Plant
Harris County
Regulated Entity Number: RN100211317
Customer Registration Number: CN600125330



To whom it may concern:

Rhodia Inc. (Rhodia) intends to replace an existing package boiler with a new model, low-NOx package boiler. As a result of this change, the title V Permit (O-1610) needs to be revised to reflect the updated regulatory requirements.

This submittal includes necessary form needed for this minor revision. They are

- OP-2 Application for Permit Revision/Renewal
- REQ-1 One page for NSR authorization reference
- REQ-2 Removal of 40 CFR Part 60, Subpart Db
- REQ-3 New citations for 40 CFR Pat 60, Subpart Dc and 30 TAC Chapter 117
- OP-SUMR Unit Summary Revision
- OP-UA6 OP-UA form for Boilers
- OP-CRO1 DAR certification

If you have any questions, please feel free to contact me at (713)-924-1484.

Sincerely yours,

Sam Keen, PE
Environmental Engineer

Project 14659
DTC 1/11/10
SOS ✓

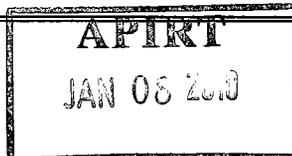
CC TCEQ Region 12
Attachments



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. IDENTIFYING INFORMATION		
A. RN: 100211317	B. CN: 600125330	C. Account No.: HG-0696-Q
D. Permit No.: O1610	E. Project No.:	
F. Area Name: Baytown Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the appropriate box)		
A. <input type="checkbox"/> Responsible Official:	B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE (Place an "X" in the appropriate box) (Only one response can be accepted per form)		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. CERTIFICATION OF TRUTH		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I <u>William J. McConnell</u> certify that I am the <u>DAR</u> for this application (Certifier Name printed or typed) (RO or DAR)		
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:		
<i>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).</i>		
A. Time Period: From _____ to _____ Start Date* End Date*		
OR		
B. Specific Dates: <u>12/16/09</u> Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*		
<i>*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'</i>		
Signature: <u>William J. McConnell</u>		Signature Date: <u>12/21/09</u>
Title: <u>Plant Manager</u>		



1/11/10 (signature)



**Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal**

Form OP-2

Table 1

Date: 12/14/2009	Permit No.: O1610	Account No.: HG-0696-Q	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Company Name: Rhodia Inc.	Customer Reference No.: CN600125330

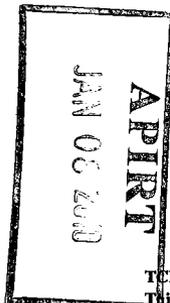
I. APPLICATION TYPE	
Indicate the type of application:	<input type="checkbox"/> Renewal <input type="checkbox"/> Significant Revision <input type="checkbox"/> Administrative Revision <input checked="" type="checkbox"/> Streamlined Revision <i>(Must include provisional terms and conditions as explained in the instructions.)</i> <input type="checkbox"/> Revision Requesting Prior Approval <input type="checkbox"/> Response to Reopening

II. QUALIFICATION STATEMENT		
For SOP Revisions Only	The referenced changes qualify for the marked revision type.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
For GOP Revisions Only	The permitted area continues to qualify for a GOP.	<input type="checkbox"/> YES <input type="checkbox"/> NO

III. MAJOR SOURCE POLLUTANTS <i>(Complete this section if the permit revision is due to a change at the site.)</i>								
Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:								
Pollutant	VOC	NO _x	SO ₂	PM ₁₀	CO	Pb	HAPs	Other
Major at the Site <i>(YES/NO)</i> :	NO	YES	YES	NO	NO	NO	NO	NO

IV. FEE INFORMATION	
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

V. DELINQUENT FEES AND PENALTIES
Notice: This form will not be processed until all delinquent fees and/or penalties owed the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.





Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
Table 2

Date: 12/14/2009	Permit No.: O1610	Account No.: HG-0696-Q	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Company Name: Rhodia Inc.	Customer Reference No.: CN600125330

I. Description of Revision						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable		
1	MS-C	NO	PKGBOILSTK	OP-UA6	106.183 version 09/04/2007	Replace the existing boiler with a package boiler. Add 40 CFR Part 60 Dc requirements. Drop permit shield for the boiler under 40 CFR Part 60 Db. Add NSR authorization reference (PBR 106.183).
				OP-		
				OP-		
				OP-		
				OP-		
				OP-		
				OP-		
				OP-		
				OP-		

JAN 03 2010
 AP/RT



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

Date: 12/14/2009	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.*

◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

Note: A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.

PBR No.: 106.183	Version No./Date: 09/04/2000
PBR No.:	Version No./Date:

◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum**

Permit No.:	Permit No.:



Texas Commission on Environmental Quality
Form OP-REQ2
Negative Applicable Requirement Determinations
Federal Operating Permit Program

Date 12/14/2009	Regulated Entity No.: RN100211317	Permit No: O1610
Company Name: Rhodia Inc.	Area Name Baytown Plant	

Unit AI	Revision No.	Unit/Group/Process		Potentially Applicable Regulatory Name	Negative Applicability Citation	Negative Applicability Reason
		ID No.	Applicable Form			
D	1 ✓	PKGBOILSTK	OP-UA6	NSPS Db	§60.40b(a)	Boiler was constructed prior to 06/19/1984

AIRT
 JAN 08 2010

TCEQ-10017 (Revised 10/07) OP-REQ2 Form
 This form for use by facilities subject to air quality permit requirements and may be revised periodically (APDG 5741 v2)



**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date 12/14/2009	Regulated Entity No.: RN100211317	Permit No: O1610
Company Name: Rhodia Inc.	Area Name Baytown Plant	

Revision No.	Unit/Group/Process		SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement		
	ID No.	Applicable Form			Name	Standard(s)	Version Code
1	PKGBOILSTK	OP-UA6	60Dc-001	SO2	NSPS Dc	§60.40c(a)	
1	PKGBOILSTK	OP-UA6	60Dc-001	PM	NSPS Dc	§60.40c(a)	
1	PKGBOILSTK	OP-UA6	60Dc-001	PM(OPACITY)	NSPS Dc	§60.40c(a)	
1	PKGBOILSTK	OP-UA6	R7ICI-0001	NOX	Chapter 117	§117.310(a), (a)(1)(C) §117.310(b) §117.310(e)(1), (e)(1)(A)(ii), (2), (4)	
1	PKGBOILSTK	OP-UA6	R7ICI-0001	CO	Chapter 117	§117.310(c), (c)(1), (c)(1)(B) §117.310(e)(1), (e)(1)(A)(ii), (2), (4)	



**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1b: Additions

Date 12/14/2009	Regulated Entity No.: RN100211317	Permit No.: 01610
Company Name: Rhodia Inc.	Area Name: Baytown Plant	

Revision No.	Unit/Group/Process	SOP/GOP Index No.	Pollutant	Version Code	Monitoring and Testing Requirement	Recordkeeping Requirements	Reporting Requirements
	ID No.						
1	PKGBOILSTK	60Dc-001	SO2			§60.48c(g)(1)-(3) §60.48c(i)	[G]§60.48c(a) §60.48c(j) §60.7(a)(1), (3) §60.7(b)
1	PKGBOILSTK	60Dc-001	PM			§60.48c(g)(1)-(3) §60.48c(i)	[G]§60.48c(a) §60.48c(j) §60.7(a)(1), (3) §60.7(b)
1	PKGBOILSTK	60Dc-001	PM(OPACITY)			§60.48c(g)(1)-(3) §60.48c(i)	[G]§60.48c(a) §60.48c(j) §60.7(a)(1), (3) §60.7(b)
1	PKGBOILSTK	R7ICI-0001	NOX		§117.335(a)(1), (4) §117.335(b) §117.335(e) §117.340(a) §117.340(l)(2) §117.340(o)(1) §117.340(p)(1), (2)(A)-(C) §117.8000(a) §117.8000(b) §117.8000(c)(1), (5)-(6)	§117.340(a)(1)(B)(i) §117.340(p)(3) §117.345(f), (f)(1), (f)(8)-(9)	§117.335(g) §117.340(p)(2)(D) §117.340(p)(3) §117.345(a) §117.345(b)(1) [G]§117.345(c) [G]§117.350(a) §117.350(c)(1), (5), (8)-(9) §117.354(a), (a)(1)(A) §117.354(a)(2)-(4) §117.354(b) [G]§117.8010(1)-(7) §117.9020(2)(A)(ii)(I) §117.9020(2)(D)

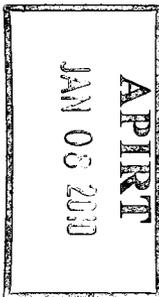


**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1b: Additions

Date 12/14/2009	Regulated Entity No.: RN100211317	Permit No.: O1610
Company Name: Rhodia Inc.	Area Name: Baytown Plant	

Revision No.	Unit/Group/Process	SOP/GOP Index No.	Pollutant	Version Code	Monitoring and Testing Requirement	Recordkeeping Requirements	Reporting Requirements
	ID No.						
1	PKGBOILSTK	R7ICI-0001	CO		§117.335(a)(1), (4) §117.335(b) §117.335(e) §117.340(a) §117.340(l)(2) §117.340(o)(1) §117.8000(a) §117.8000(b) §117.8000(c)(2), (5)-(6)	§117.340(a)(1)(B)(i) §117.345(f), (f)(1), (f)(8)-(9)	§117.335(g) §117.345(a) §117.345(b)(1) [G]§117.345(c) §117.350(c)(1), (5), (9) [G]§117.8010(1) §117.8010(2)(A)-(B) [G]§117.8010(3)-(7) §117.9020(2)(A)(ii)(I)





Form OP-SUMR
Individual Unit Summary for Revisions (Page 1)
Federal Operating Permit Program

Date: 12/14/2009	Account No.: HG-0696-Q	RN: 100211317	Permit No.: O1610
Area Name: Baytown Plant			

Unit						Preconstruction Authorizations	
Unit AI	Revision Number	ID No.	Applicable Form	Name/Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
	1	PKGBOILSTK	OP-UA6	Package Boiler		106.183/09/04/2000	



Texas Commission on Environmental Quality
Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 11)
Federal Operating Permit Program

Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Date: 12/14/2009	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN600125330

Unit ID No.	SOP/GOP Index No.	Construction/ Modification Date	Maximum Design Heat Input Capacity	Heat Input Capacity	D-Series Fuel Type	D-Series Fuel Type	D-Series Fuel Type	ACF Option	
								SO ₂	PM
PKGBOILSTK	60Dc-001	89+	10-100	30-75	OTHER			OTHER	OTHER

APERT
 JAN 08 2010

TCEQ 10026 (Revised 02/08) OP-UA6
 This form for use by facilities subject to air quality permit requirements and may
 be revised periodically. (APDG 5705 v6)



Texas Commission on Environmental Quality
Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 12)
Federal Operating Permit Program

Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Date: 12/14/2009	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN600125330

Unit ID No.	SOP Index No.	Monitoring Type			Technology Type	Fuel Heat Input
		PM	SO ₂ Inlet	SO ₂ Outlet		
PKGBOILSTK	60Dc-001	NONE	NONE	NONE	NONE	NO



Texas Commission on Environmental Quality
Boiler/Steam Generator/Steam Generating Unit Attributes
Form OP-UA6 (Page 15)
Federal Operating Permit Program

Table 5c: 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

Date: 12/14/2009	Permit No.: O1610	Regulated Entity No.: RN100211317
Area Name: Baytown Plant		Customer Reference No.: CN600125330

Unit ID No.	SOP Index No.	Subpart E Variance	Subpart E Test	Diluent Monitoring	Exhaust Flow Monitoring	NO _x Reduction	Title 30 TAC Chapter 116 Permit Limit	Permit Limits	Supplemental Fuel
PKGBOILSTK	R71CI-0001					OTHER			

APERT
 JAN 06 2010

