

Eco Services Enterprise Baytown Plant

AUG 1 1 2011

COMPLIANCE & ENFORCEMENT

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 1441) RECEIVED

July 29, 2011

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

RE:

Rhodia Inc.

Baytown, Texas

Title 5 Semi-Annual Deviation Report

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

Dear Air Section Manager:

Please find attached the semi-annual Title V deviation report for the Rhodia Baytown, Texas facility which covers the period from January 25, 2011 to July 24, 2011.

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

RECEIVED

MAR 1 1 2013

CENTRAL FILE ROOM

Samuel E. Keen, PE **Environmental Engineer**

Attachments

Sincerciv

Executive Director, TCEQ, Austin cc:

> Chief, Air Branch **USEPA** Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Rhodia Inc. Baytown Plant 3439 Park Street P.O. Box 3331 Baytown, TX 77522-3331



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

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by 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 for the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
A. Account No.: HG-0696-Q	B. RN: 100211317	C. CN: 600125330
D. Permit No.: O-01610	E. Project No.: 1610	
F. Area Name: Baytown Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the app	propriate box[es])	
A. Responsible Official:	-	
B. x Duly Authorized Representative:		
C. Designated Representative (Title IV acid rain so	nurces only):	
D. Alternate Designated Representative (Title IV a	cid rain sources only):	
III. SUBMITTAL TYPE (Place an "X" in the appr	opriate box) (Only <u>one</u> respons	se can be accepted per form)
☐ SOP/TOP Initial Permit Application	_	ate to Permit Application
GOP Initial Permit Application		Semi-Annual Title V Deviation
☐ Permit Revision, Renewal, or Reopening	Reno	п
IV. CERTIFICATION OF TRUTH, ACCURAC	Y, AND COMPLETENESS	
This certification does not extend to information which	is designated by the TCEQ as i	information for reference only.
I, <u>William McConnell</u> , certify that I am the <u>D</u> (Name printed or typed)	AR and t	that, based on information and/or ADR)
and belief formed after reasonable inquiry, the statements specific date(s) in IV.2. below, are true, accurate, and com	and information dated during the	time period in IV.1. below, OR on a
Note: Enter EITHER a Time Period OR Specific Date(s) f	or each certification.	
1. Time Period: Fromtoto	End Date*	
OR 2. Specific Dates: 7/29/11		
Date 1* Date 2* I. * The start and end dates of the "Time Period," or "S	Date 3*Date 4* Date 5*	Date 6* Date 7* Date 8*
Permit Application" in Section III of this form, is ma	rked or a submittal package has n	nultiple dates recorded in the
documentation. A Time Period may not be used if the material being certified is an "Annual Compliance Comp	ie "Submittal Type" in Section III ertification," a "Monitoring Repo	I of this form, is "Other" and the specific ort," "Progress Report," "Deviation
Report," or "Test Report".		
Signature: William JM-9	our Sig	gnature Date: 2/29/11
Title: Plant Manager		•

Company Name	Rhodia Inc.					Account No.	HG-0696-Q	
Area Name	Baytown Plant		Operating Permit No.	O-01610				
Report Period Began on	1/25/11	And F	Inded on		7/24/11	Report Submittal Date	7/29/2011	
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	it Requirement for W Regulatory Requirement	Type of Requirement	e Being Reported SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		
Unit ID Group	ID (Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency	
1	Permit 9565, SC	SO ₂	30 TAC 116.110(a)	Standard				

						ails of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviatio	on)
Event No.		78 T 4 1 1 ± 8 1	tion Period		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	St Date	art Time	Date	nd Time	Devs		
IR-ECO- BT-2011-10	2/5/11	12:30	2/5/11	13:36	1	Unit trip caused VOC and SO2 emissions from scrubber	Restore power and operation to furnace
IR-ECO- BT-2011-12	2/7/11	10:00	2/7/11	10:45	1	Unit trip due to blower oil leak	Repair leak and restart unit
IR-ECO- BT-2011-16	2/22/11	10:50	2/22/11	14:20	1	Leak in converter shell	Repair and monitor leak
IR-ECO- BT-2011-21	3/7/11	8:50	3/7/11	16:10	1	Leak in converter shell	Repair and monitor leak
IR-ECO- BT-2011-24	4/21/11	8:20	4/21/11	10:50	1	Pinhole SO2 leak from analyzer on main gas blower	Repair analyzer and monitor
IR-ECO- BT-2011-26	4/25/11	13:00	4/25/11	13:01	1	Furnace puff due to high pressure	Restore feeds and normalize operations
	Tot	al Deviati	ions:		6		

Company Name	Rb	odia Inc.					Account No.	HG-0696-Q	
Area Name	Ba	ytown Plant					Operating Permit No.	O-01610	
Report Period Be	egan on	1/25/11	And I	Ended on		7/24/11	Report Submittal Date	7/29/2011	
ID Number (Rq'd if Applicable)		Permit Provision No.	Pollutant (Rq'd if	Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rg'd)	(See Instructions)	Citation	Frequency	
1		Permit 9565, SC	SO ₂	30 TAC 116.110(a)	Standard				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event		Devia	tion Period	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	#	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate			
No. (Optional)	Sta	rt	Eı	nd	Of Devs		Deviation Situation			
	Date	Time	Date	Time	БСАЗ					
IR-ECO- BT-2011-27	4/26/11	10:15	4/26/11	14:15	1	SO2 leak on vent line	Repair and monitor leak			
IR-ECO- BT-2011-28	6/16/11	7:00	6/16/11	15:00	1	Unit down for maintenance	Repair maintenance quickly and restore feeds			
IR-ECO- BT-2011-32	7/15/11	8:07	7/15/11	8:47	1	Loss of feeds to furnace followed by blower trip	Restore feeds and restart blower			
IR-ECO- BT-2011-33	7/19/11	11:15	7/19/11	15:20	1	Caustic scrubber used for vent system while performing tests	Complete testing and restore vents to furnace			
	Total	Deviatio	ons:		4					

Company Name	Rh	odia Inc.			Account No.	HG-0696-Q		
Area Name	Ва	ytown Plant			Operating Permit No.	O-01610		
Report Period Beg	çan on	1/25/11	And	Ended on		7/24/11	Report Submittal Date	7/29/2011
	ID Number Permit (Rq'd if Applicable) Provision No.		Pollutant (Rq'd if	nit Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq°d)	(See Instructions)	Citation	Frequency
1		Permit 9565, SC	VOC	30 TAC 115.112 (a) (1)	Standard			

						ils of Deviations from Above Referenced Requirement l elements, except Event No. are Required for Each Period of Deviati	
Event		Deviation Period		97 101, 26 221	# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
No. (Optional)	Star Date	rt Time	E) Date	nd Time	Devs		Deviation Situation
IR-ECO- BT-2011-10	2/5/11	12:30	2/5/11	13:36	1	Unit trip caused VOC and SO2 emissions from scrubber	Restore power and operation to furnace
IR-ECO- BT-2011-12	2/7/11	10:00	2/7/11	10:45	1	Unit trip due to blower oil leak	Repair leak and restart unit
IR-ECO- BT-2011-14	2/13/11	6:40	2/13/11	6:55	1	Unit upset due to low natural gas pressure	Restore gas flow and restore feeds to furnace
IR-ECO- BT-2011-17	2/17/11	17:30	2/18/11	21:00	1	Acid leak caused unit to go down for maintenance	Perform repair on pump and restore unit
IR-ECO- BT-2011-28	6/16/11	7:00	6/16/11	15:00	1	Unit down for maintenance	Repair maintenance quickly and restore feeds
IR-ECO- BT-2011-32	7/15/11	8:07	7/15/11	8:47	1	Loss of feeds to furnace followed by blower trip	Restore feeds and restart blower
Total Deviations:					6		

Company Name	Rh	iodia Inc.					Account No.	HG-0696-Q	
Area Name	Ba	ytown Plant		Operating Permit No. O-0161					
Report Period Be	gan on	1/25/11	And I	Ended on		7/24/11	Report Submittal Date	7/29/2011	
	Op ID Number Permit q'd if Applicable) Provision No.		Pollutant (Rq'd if			SOP or GOP Index Number	Monitoring Requirements		
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency	
1		Permit 9565, SC	VOC	30 TAC 115.112 (a) (1)	Standard				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)																					
Event No.	Deviation Period Start End		na registra a com en ser premo e por en el partir de la compartir de la compartir de la compartir de la compar		ka regissa a nijeling wangering king pangalang kalangan pangangan di 44 ang alam ang atau manangan ing mga pan		and the construction of th		. Barriera de la serio serio de la compansa de la compa		Deviation Period Start End		reagrand to the residence residence by the college of the college		era an terminal program program program and a construction of the		Albania (1984) and a second control of		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	Date	Time	Date	Time	Devs																
IR-ECO- BT-2011- 33	7/19/1 1	11:15	7/19/11	15:20	1	Caustic scrubber used for vent system while performing tests	Complete testing and restore vents to furnace														
	<u> </u>																				
				-																	
	Tol	al Deviati	ons:		1		사용 기업 기업으로 기업으로 기업으로 기업으로 기업으로 기업으로 기업으로 기														

Company Name	Rhodia Inc.			Account No.	HG-0696-Q		
Area Name	Baytown Plant			Operating Permit No. O-0			
Report Period Began or	1/25/11	And En	ded on		7/24/11	Report Submittal Date	7/29/2011
ID Number (Rq'd if Applicable)	Op Permit Provision No.	Pollutant (Rq'd if	Requirement for Wh Regulatory Requirement	ich Deviations at Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applica	
(Rq'd if Applicable)	Permit Provision	Pollutant		Type of	SOP or GOP		

Event		Deviat	ion Period		#	ll elements, except Event No. are Required for Each Period of Deviat Cause of Deviation	Corrective Action Taken to Remedy or Mitigate		
No.	o. Start				Of		Deviation Situation		
(Optional)	Date	Time	Date	Time	Devs				
IR-ECO- BT-2011-19	3/3/11	9:50	3/3/11	11:50	1	CEMS was out of service due to stack Cylinder Gas Audit. Alternative Monitoring Plan was initiated.	CGA was completed in a timely manner, and stack CEMS was restored to normal operation		
IR-ECO- BT-2011-20	3/4/11	9:00	3/4/11	13:15		CEMS was out of service due to replacement of filters. This activity was found to be necessary during the previous day's CGA.	Replacement was completed quickly, and stack CEMS was restored to normal operation		
Total Deviations:					2				

AIRV/HGØ6960/RN18Ø211317/0161Ø/PA



Eco Services Enterprise Baytown Plant

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 1328) RECEIVED

July 29, 2011

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

RE: Rhodia Inc.

Baytown, Texas

Title 5 Annual Certification Report

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

Dear Air Section Manager:

AUG 1 1 2011

COMPLIANCE & ENFORCEMENT



RECEIVED

MAR 1 1 2013

CENTRAL FILE ROOM

Please find attached the annual Title V certification report for the Rhodia Baytown, Texas facility which covers the period from July 25, 2010 to July 24, 2011.

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

Sincerely

Samuel E. Keen, PE Environmental Engineer

Attachments

cc: Executive Director, TCEQ, Austin

Chief, Air Branch USEPA Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Rhodia Inc. Baytown Plant 3439 Park Street P.O. Box 3331 Baytown, TX 77522-3331



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

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by 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 for the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
A. Account No.: HG-0696-Q	B. RN: 100211317	C. CN: 600125330
D. Permit No.: O-01610	E. Project No.: 1610	C. CIV. 000123330
F. Area Name: Baytown Plant	2. 110jest 110 1010	
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the app	propriete har(es)	
A. Responsible Official:	or oprime vox[es])	
B. x Duly Authorized Representative:		
C. Designated Representative (Title IV acid rain so		
D. Alternate Designated Representative (Title IV and	cid rain sources only):	
III. SUBMITTAL TYPE (Place an "X" in the appr	opriate box) (Only <u>one</u> ro	esponse can be accepted per form)
☐ SOP/TOP Initial Permit Application		Update to Permit Application
GOP Initial Permit Application	хО	ther:_ Annual Title V Certification
☐ Permit Revision, Renewal, or Reopening		
IV. CERTIFICATION OF TRUTH, ACCURACY	Y, AND COMPLETEN	NESS
This certification does not extend to information which	· · · · · · · · · · · · · · · · · · ·	2
		-
I, <u>William McConnell</u> , certify that I am the <u>D</u> (Name printed or typed)		_ and that, based on information R, DR, and/or ADR)
and belief formed after reasonable inquiry, the statements specific date(s) in IV.2. below, are true, accurate, and con		ing the time period in IV.1. below, OR on a
Note: Enter EITHER a Time Period OR Specific Date(s) f	or each certification.	
1. Time Period: Fromto		
Start Date*	End Date*	
2. Specific Dates: <u>7/29/11</u>		
Date 1* Date 2* I * The start and end dates of the "Time Period," or "S	Date 3*Date 4* Date 5	
Permit Application" in Section III of this form, is ma	rked or a submittal packag	e has multiple dates recorded in the
documentation. A Time Period may not be used if the material being certified is an "Annual Compliance Comp	ie "Submittal Type" in Sec ertification," a "Monitoring	g Report," "Progress Report," "Deviation
Report," or "Test Report".		-
Signature: Melly & in la		76.14
Signature:		Signature Date:
Title: Plant Manager		



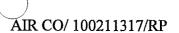
TCEQ Core Data Form

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

		neral Information		•				
		sion (If other is checked please of						
		stration or Authorization (Core Date			mitted v	vith the program applicati	ion)	
		Pata Form should be submitted with		•	1 —		nual Cer	tification Form
2. Attachme		Describe Any Attachments: (e	x. Title V A	pplication, W	aste Trai	nsporter Application, etc.)		
Yes	⊠No							
3. Customer	Referenc	e Number (if issued)		link to searc		Regulated Entity Refere	ence Numbe	er (if issued)
CN 6001				Registry**	" F	RN 100211317	·	
		ustomer Information						
		ustomer Information Updates (m		,,,,	9/2009			
	Role (Pro	posed or Actual) – as it relates to the F	Regulated E	<u>Entity</u> listed or	this for	n. Please check only <u>one</u> of	f the following:	
Owner		Operator		wner & Ope		_		
Occupation		— ·	<u> </u>	oluntary Cle	anup A	oplicant Other:		
7. General C		nformation						
☐ New Cus		· · · · · · · · · · · · · · · · · · ·		stomer Infor	mation			Entity Ownership
	-	me (Verifiable with the Texas Secre	•	•	=	No Change No Chan	<u>le**</u>	
TI NO Cria	nge and	Section I is complete, skip to Se	<u>Ction III –</u>	Regulated	<u>Entity i</u>	nformation.		·
8. Type of C	ustomer:			ndividual		☐ Sole Proprietors	hip- D.B.A	
City Gove	ernment	County Government		ederal Gove	ernment	☐ State Governme	nt	
Other Go	vernment	General Partnership		imited Partr	ership	Other:		
9. Customer	Legal Na	me (If an individual, print last name fin	st: ex: Doe		If new C below	ustomer, enter previous C	ustomer	End Date:
Rhodia In	c.							
	8 Ceda	ar Brook		—-·				
10. Mailing			· . <u>-</u>					
Address:		G 1			T		T	1
	City	Cranbury	State	NJ	ZIP	08512	ZIP + 4	7500
11. Country	Mailing In	formation (if outside USA)		12.	E-Mail	Address (if applicable)	·	
13. Telephor	no Numbe	× 44	Fretama!			45 E. N. 1		
(609) 86		14	. Extensi	on or Code		15. Fax Number		ole)
16. Federal 1		gits) 17. TX State Franchise Tax	ID (11 dia)	_{fol} 19 Γ	IINS N		9-2845	g Number (if applicable)
22353995	•	12235399545	(Truigi	· 1	95981	í	X 303 Filli	у ічинівеі (ітарріісавіе)
20. Number	of Employ	/ees		- L		21. Independ	dently Owne	ed and Operated?
0-20	21-100	☐ 101-250 ☐ 251-500	⊠ 501 a	nd higher				□ No
SECTION	<u> 1 Ш: </u>	Regulated Entity Inform	nation					
22. General	Regulated	Entity Information (If 'New Regu	lated Enti	ty" is selecte	d below	this form should be acco	ompanied by	a permit application)
	ulated Ent	ity Update to Regulated Ent	ity Name	Upda Upda	te to Re	gulated Entity Information	n 🔯 No	Change** (See below)
		**if "NO CHANGE" is checked a				ection IV, Preparer Information	on.	
		lame (name of the site where the regu	lated actio	n is taking pla	ice)			
Rhodia In	c							

24. Street Addres	ss 34	39 Park St		· · · · · ·						<u> </u>						
of the Regulated Entity:								-								
(No P.O. Boxes)	Cit	y Baytown		State	TX		ZIP	7752	0	ZIP + 4						
	P.	O Box 3331		_ 	<u></u>											
25. Mailing Address:																
	Cit	y Baytown		State	TX	;	ZIP	7752	2	ZIP ÷ 4	3331					
26. E-Mail Addres	ss:				· · · · ·		•									
27. Telephone Nu	ımber		28	B. Extensio	n or Code	-	29.	Fax Nu	mber (if applicab	ie)						
(281) 691-65	500								27-1527							
30. Primary SIC C	Code (4 dig	its) 31. Second	ary SIC Cod	de (4 digits)	32. Prim (5 or 6 digi		AICS	Code	33. Seco (5 or 6 digit	ndary NAI	CS Code					
2819					32518			*	(5 5) 5 4.8.1	<u>. </u>						
34. What is the P			ity? (Pleas	se do not rep	eat the SIC	or NAI	CS de	scription.)) 							
Manufacture of	of sulfu	ric acid				_										
	Questi	ons 34 – 37 addre	ss geograp	hic locatio	n. Please	refer	to the	instruc	tions for appl	cability.						
35. Description to Physical Location										•						
36. Nearest City			C	ounty				State		Neares	st ZIP Code					
Baytown			H	TX		7752	0									
37. Latitude (N)	In Decim	Minutes Seconds Degrees Minutes Seconds														
Degrees		Minutes Seconds Degrees Minutes Seconds 44 51 95 0 07														
29	The second seconds															
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☐ Dam Safety		☐ Districts		☐ Edwards					Hazardous Waste	∋	nicipal Solid Waste					
New Source Rev	view – Air	OSSF		Petroleur	n Storage T	ank	□P	PWS		☐ Siu	dge					
9565, 56534																
Stormwater	-	☑ Title V – Air		Tires				Jsed Oil		U	ilities					
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SECTION IV	: Prep	arer Inform	<u>ation</u>													
40. Name: Sa	muel E.	Keen, PE				41. 7	Γitle:	En	vironmenta	l Engine	er					
42. Telephone Nu	mber	43. Ext./Code	44. F	ax Numbe	r	45.	E-Ma	ail Addre	ess							
(713) 924-148	34		(71	3)835-3	261	sa	m.ke	een@u	s.rhodia.co	m						
SECTION V	: Auth	orized Signa	ture													
46. By my signate and that I have sign updates to the ID and the	nature au	thority to submit	this form o	knowledg on behalf o	e, that the of the enti	infor y spe	matic cified	on provi I in Sect	ded in this for tion II, Field 9	rm is true and/or as	and complete, required for the					
(See the Core Dat	a Form i	nstructions for n	nore inform	nation on	who shou	ld sig	n this	s form.)								
Company:	Rhodia	a Inc.	-	·	Job	Title	: P	lant M	lanager							
Name(In Print):	Willia	m J. McConne	11	P					Phone:	(713)9	24-1401					
Signature:	m	When !	V M	tro	nen				Date:	1/2						





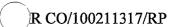
Texas Commission on Environmental Quality Federal Operating Permit Form Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Rhodia Inc.	Customer Number	CN600125330
Area Name	Baytown Plant	Account Number	HG-0696-Q
Operating Permit Number	O - 01610	Report Submittal Date	7/29/2011
Certification Period Start Date	7/25/2010	End Date	7/24/2011

I. Certification of Continuous Compliance with Permit Terms and Conditions	Resp	onse:
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found 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, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?		

II. Sui	mmary of Deviations	Resp	onse:
(Indicat	te response by placing a 'x' in the appropriate column for each of the following ons)	Yes	No
A.	Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency?		
	If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.		
	Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.		
В.	Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?		
	If the answer to this question is 'Yes', please include the relevant reports along with this page.	K-N	

TCEQ-10490 [06/08] Page 1 of 1 Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.





Texas Commission on Environmental Quality Federal Operating Permit Form PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	Rhodia Inc.	Customer Number	CN600125330
Area Name	Baytown Plant	Account Number	HG-0696-Q
Operating Permit Number	O-01610	Report Submittal Date	7/29/2011
Certification Period Start Date	7/25/2010	End Date	7/24/2011

Identification of Deviation Reports Submitted During the Certification Period (Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

(Note:	All reports must be certified to truth, accuracy, and completene	ess by the Responsi	ble Official)
Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
2/18/11	Baytown Plant Semi-Annual Deviation Report	TCEQ	Y
7/29/11	Baytown Plant Semi-Annual Deviation Report	TCEQ	Y
			
	· · · · · · · · · · · · · · · · · · ·		

TCEQ-10490 [04/09]

Page 1 of 2

Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.



Texas Commission on Environmental Quality Federal Operating Permit Form PCC – Monitoring Options Selected (Part 3)

Permit Holder Name	Rhodia Inc.	Customer Number	CN600125330
Area Name	Baytown Plant	Account Number	HG-0696-Q
Operating Permit Number	O-01610	Report Submittal Date	7/29/2011
Certification Period Start Date	7/25/2010	End Date	7/24/2011

ID Nu	umber	Regulatory Requirement (Rule or	Pollutant Monitored	SOP or GOP Index	Monitoring Option Used	Da	ites	Description/Comments
Unit ID	Group ID	Permit No. and Prov.)	Monttorea	Number	Specific Citation	Begin	End	
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Not Applicable. No Monitoring Options Allowed by Permit
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AIRV HG 069129 PN 100211317/PA 0-01610 Rhodia Eco Services Enterprise

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 2158)

February 18, 2011

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

RE:

Rhodia Inc.

Baytown, Texas

Title 5 Deviation Report
Permit No.: O-01610

Account No.: HG-0696-Q

RECEIVED

Baytown Plant

FEB 24 2011

AIR PERMITS DIVISION

Dear Air Section Manager:

Please find attached the semi-annual deviation report for the Rhodia Baytown, Texas facility which covers the period from June 25, 2010 to January 24, 2011.

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

Sincerely/

Samuel/E. Keen, P.E. Environmental Engineer

Attachments

cc: Executive Director, TCEQ, Austin

0 9 2011

Rhodia Inc. Baytown Plant 3439 Park Street P.O. Box 3331 Baytown, TX 77522-3331

RECEIVED

FEB 24 2011

Form OP-CRO1 Certification by Responsible Official

AIR PERMITS DIVISION

Federal Operating Permit Program

Chical permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by 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 for the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP. **IDENTIFYING INFORMATION**

A. Account No.: HG-0696-Q	B. RN: 100211317	C. CN: 600125330
D. Permit No.: O-01610	E. Project No.: 1610	
F. Area Name: Baytown Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the app	propriate box[es])	
A. Responsible Official:]
B. x Duly Authorized Representative:]
C. Designated Representative (Title IV acid rain so	ources only):	_
D. Alternate Designated Representative (Title IV a	cid rain sources only):	
III. SUBMITTAL TYPE (Place an "X" in the appr	opriate box) (Only <u>one</u> response can	be accepted per form)
☐ SOP/TOP Initial Permit Application		Permit Application
GOP Initial Permit Application	x Other:_ Title	V Deviation Report
☐ Permit Revision, Renewal, or Reopening		
IV. CERTIFICATION OF TRUTH, ACCURAC	Y, AND COMPLETENESS	
This certification does not extend to information which	h is designated by the TCEQ as inform	nation for reference only.
I, William McConnell , certify	that I am the <u>DAR</u>	and that, based on
information (Name printed or typed)	(RO, DAR, DR, and/	'or ADR)
	·	·
and belief formed after reasonable inquiry, the statement a specific date(s) in IV.2. below, are true, accurate, an		ume penou m 17.1. below, OK on
Note: Enter EITHER a Time Period OR Specific Do	ate(s) for each certification.	
1. Time Period: From <u>7/25/2010</u>	_ to <u>1/24/2011</u>	
Start Date*	End Date*	
OR		
2. Specific Dates:		
2. Specific Dates: Date 1* Date 2*		Date 6* Date 7* Date 8*
Date 1* Date 2* * The start and end dates of the "Time Period," o	or "Specific Dates" 2-8, should only b	e completed when the box for
Date 1* Date 2* * The start and end dates of the "Time Period," o "Update to Permit Application" in Section III of in the documentation. A Time Period may not be	or "Specific Dates" 2-8, should only be this form, is marked or a submittal pa e used if the "Submittal Type" in Sect	e completed when the box for ckage has multiple dates recorded tion III of this form, is "Other" and
* The start and end dates of the "Time Period," o "Update to Permit Application" in Section III of in the documentation. A Time Period may not be the specific material peing certified is an "Annua"	or "Specific Dates" 2-8, should only be this form, is marked or a submittal page used if the "Submittal Type" in Sectal Compliance Certification," a "Moni	e completed when the box for ckage has multiple dates recorded tion III of this form, is "Other" and
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TCEQ Core Data Form

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

I. General Information

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☐Owner		Operator		wner &	•			O.U		
Occupation		<u></u>		oluntar	y Clea	nup App	olicant	Other:		
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Other Go	vernment	☐ General Partnership		imited			Other:			<u> </u>
9. Customer	Legal Na	me (If an individual, print last name fil	st: ex: Doe,	John)	_	new Cu elow	<u>istomer, enter pre</u>	evious Cu	<u>ustomer</u>	End Date:
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13. Telephor	ne Numbe	or 14	4. Extensi	on or (Code		15. Fax	Numbe	er (if applical	ble)
(609) 86							(609) 409	-2845	
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		Regulated Entity Infor								
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		**If "NO CHANGE" is checked					ection IV, Preparer	Intormati	on.	
		Name (name of the site where the reg	ulated actio	n is tak	ang pla	:e)			-	
Rhodia In	c.									

24. Street Address	3439	9 Park Str)					<u>) </u>			
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25. Mailing											
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(281) 691-6500						T .		27-1527	,		
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2819					325188			(o or o digital	·/		
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Manufacture of s	ulfuri	c acid									
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35. Description to											
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SECTION IV: 40. Name: Floyd 42. Telephone Numb (713) 924-1408	Preparent Prepar	☐ Title V - Air O01610 ☐ Waste Water arer Inform cerson 43. Ext./Code	44	☐ Tires ☐ Waster	water Agriculture 41	Title:	Used Oil Water Ri	ghts nvironmenta ress	l Mar	Utilities Other:	
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Company Name	Rhodia	Inc.					Account No.	HG-0696-Q	
Area Name	Baytov	vn Plant					Operating Permit No.	O-01610	
Report Period Bega			And E	inded on		1/24/10	Report Submittal Date	2/18/11	
ID Numbe (Rg'd if Applic	언니는 도착하셨습니다 글로마다다	Permit	Pollutant (Rq'd if	it Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		
on assessment to the least to be	able) P Group ID	rovision No. (Rg'd If	(Rq'd if Applicable)	(Citation Rq'd if	Requirement (Rq'd)	(See Instructions)	Citation Citation	Frequency	
		Applicable)		Applicable) 30 TAC 101.201	Standards	8-14-1 (1 9-14 -1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1			
EMSSCRUBSTK	P	ermit 56534, Special							
		Condition 10							

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)											
Event		Deviat	ion Period		#	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate				
No.	Sta	rt 💮	Er	ıd	Of		Deviation Situation				
(Optional)	Date	Time	Date	Time	Devs						
IR-ECO- BT-2011-9	1/24/11	4:00	1/24/11	9:13	1	pH in scrubber was recorded as out of range	Flow to scrubber was increased in order to restore prope pH, and pH was remeasured				
					<u> </u>						
			-	<u> </u>	 -						
	Tota	ıl Deviati	ions:	<u> </u>	1						

Company Name	Rhodia Inc.					Account No.	HG-0696-Q
Area Name	Baytown Plant					Operating Permit No.	O-01610
Report Period Began	7/25/10	And	And Ended on 1/24/			Report Submittal Date	2/18/2011
		Operating Perm	it Requirement for W	hich Deviations a	re Being Reported	The Book of the Control of the Contr	The state of the first specific
ID Number	Permit	Operating Perm Pollutant	it Requirement for W	Type of ···	SOP or GOP	Monitoring Requ	
(Rq'd if Applicabl	Permit	en en en en la lace de la rece		was a fine training and detail	Market in the first and that the street of the	Monitoring Requ (Rq'd as Applic	

					Deta (Note: A	nils of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviati	on)
Event No.		140 134 (442 (414	ion Period		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	Date	art Time	En Date	a Time	Devs		
IR-ECO- BT-2010-25	7/26/10	15:05	7/26/10	15:35	1	Furnace lost feeds and released SO2	Restore feeds and return to normal operation
IR-ECO- BT-2010-27	7/29/10	5:30	7/30/10	9:31	1	Unit out of service for maintenance outage	Perform planned maintenance in a quick manner, and return unit to service
IR-ECO- BT-2010-36	9/8/10	6:03	9/8/10	9:30	1	Pinhole converter duct leak	Isolate and repair pinhole leak
IR-ECO- BT-2010-38	9/21/10	8:00	9/21/10	11:33	1	Process gas leak from burner	Isolate and repair leak from burner
IR-ECO- BT-2010-40	10/5/10	9:17	10/6/10	9:28	1	Unit down for repairs	Operate quickly to ensure minimal emissions, bring unit back to normal operation
IR-ECO- BT-2010-44	11/3/10	7:30	11/4/10	8:45	1	Unit down for repairs	Operate quickly to ensure minimal emissions, bring unit back to normal operation
	Tot	al Deviati	ions:		6		

Company Name	Rhodia Inc.			Account No.	HG-0696-Q		
Area Name	Baytown Plant					Operating Permit No.	O-01610
Report Period Began o	7/25/10	And E	nded on	Teach Teacher Cons	1/24/11	Report Submittal Date	2/18/2011
		Operating Permi	t Requirement for W	hich Deviations a	re Being Reported		
ID Number (Ra'd if Applicable)	Permit	Pollutant	Regulatory	Type of	SOP or GOP	Monitoring Requ (Rq'd as Applic	
(Rq¹d if Applicable)	Permit			 3 8 10 10 7 11 11 11 11 11 11 11 11 	 Control of the Section of the Control of the Control		

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event		Deviat	tion Period		#	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate				
No.	Sta	ırt	E,r	d	Of Devs		Deviation Situation				
(Optional)	Date	Time	Date	Time	Devs						
IR-ECO- BT-2010-45	11/16/10	16:08	11/16/10	17:20	1	Positive furnace pressure caused momentary release of SO2	Furnace pressure was restored				
IR-ECO- BT-2010-46	11/23/10	15:30	11/23/10	17:10	1	Gauge repair caused release of SO2	Repair was performed and system brought to normal				
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	e candidates na m	12 Standard Sa		gajās pieces	2						
	Tota	al Deviat	ions:								

Company Name	Rhodia Inc.			Account No.	HG-0696-Q		
Area Name	Baytown Plant			Operating Permit No.	O-01610		
Report Period Began on	7/25/10	And	Ended on	1/24/2011		Report Submittal Date	2/18/11
	(Operating Pern	nit Requirement for V	Vhich Deviations ar	re Being Reported		··
ID Number (Ra'd if Applicable)	Permit	Pollutant	Regulatory	Type of	SOP or GOP	Monitoring Requ (Rq'd as Applic	
ID Number (Rq'd if Applicable) Unit ID Group	Permit Provision No.	Administration (September 2018)	SAMPLE OF TO AN EXPRESS OF THE SE		SOP or GOP		

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)											
Event No.		and the second section of	ion Period		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation					
(Optional)	St Date	art Time	En Date	d Time	Devs							
IR-ECO- BT-2010-27	7/29/10	5:30	7/30/10	9:31	1	Unit out of service for maintenance outage	Perform planned maintenance in a quick manner, and return unit to service					
IR-ECO- BT-2010-40	10/5/10	9:17	10/6/10	9:28	1	Unit down for repairs	Operate quickly to ensure minimal emissions, bring unit back to normal operation					
IR-ECO- BT-2010-44	11/3/10	7:30	11/4/10	8:45	1	Unit down for repairs	Operate quickly to ensure minimal emissions, bring unit back to normal operation					
	Tot	al Deviati	ions:		3							