

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) MINOR REVISION

Permit #:	04169	Company:	Gulf Coast Growth Ventures LLC
Project #:	31659	Site:	Gulf Coast Growth Ventures
Regulated Entity #:	RN109753731	Application Area:	Olefins, Derivative and Utilities
Region:	14	Customer #:	CN605632439
NAICS Code:	325199	County:	San Patricio
Permit Reviewer:	Vasant V. Chaphekar, P.E.	NAICS Name:	All Other Basic Organic Chemical Manufacturing

SITE INFORMATION

Physical Location: 6414 County Road 1612
Nearest City: Gregory
Major Pollutants: CO, HAPS, NOX, PM, VOC
Additional FOPs: None

PROJECT SUMMARY

Gulf Coast Growth Ventures LLC's Gulf Coast Growth Ventures site is an Organic Chemical Manufacturing facility and a major source of emissions. It is subject to 30 TAC Chapter 122 which requires it to apply and obtain a Federal Operating Permit (FOP). FOP 04169 was initially issued on 12/30/2020. An application for a minor revision to the FOP was received by TCEQ on 01/06/2021.

The emission sources at the site are subject to State and/or Federal regulations. Some of the significant emission sources at the site are boilers, engines, storage tanks, transfer operations, water separators, fugitive equipment, process vents, and flares. Periodic monitoring and compliance assurance monitoring requirements for the applicable units are identified in the permit. The minor revision project includes adding applicable requirements for a new temporary boiler unit and revising an emergency engine unit, which were identified using various forms [OP-1, OP-2, OP-CRO1, OP-SUMR, OP-REQ1 (for revising NSR authorizations), OP-REQ3 (for providing applicable low-level citations for the temporary boiler and emergency engine units) and several OP-UAXX forms]. Major NSR Summary Table was revised to include new issuance date for NSR Permit Nos. 146425 and PSDTX1518.

A petition was filed by Environmental Integrity Project (EIP) with EPA on 02/24/2021 objecting to the issuance of FOP 04169 on 12/30/2020.

PROCESS DESCRIPTION

Gulf Coast Growth Ventures LLC (GCGV) is a grassroots olefin and derivatives manufacturing complex located near Gregory in San Patricio County, which includes a process unit that will convert market pipeline ethane to olefins ("the Olefins unit") and multiple derivative units which will receive the ethylene, produced in the Olefins unit, as feed. The derivative units include two polyethylene units and a Mono-Ethylene Glycol (MEG) Unit. The utilities and infrastructure on-site support facilities include steam, rail, cooling water, liquid transport, and wastewater treatment.

TECHNICAL REVIEW

Summary of Revision

Minor revision project includes adding applicable requirements for a new temporary boiler unit subject to NSPS Db and MACT DDDDD and revising an emergency engine unit subject to NSPS IIII and MACT ZZZZ. At applicant's request, high-level requirements for new temporary boiler unit (01POBLR001) subject to MACT DDDDD were replaced with low-level detailed citations based on OP-REQ3 form submittal. Major NSR Summary Table was revised to include new issuance date for NSR Permit Nos. 146425 and PSDTX1518.

Permit Content Summary

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 case-by-case PM or CAM added during this revision?..... No
4. Identify if the following are applicable for this project:

- (a) Manually-built applicable requirements..... Yes
- (b) Customized Special Terms and Conditions..... No
- (c) Manual changes to the IMS-generated applicable requirements..... Yes
5. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
6. Will the draft permit be sent to public announcement with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

The project was assigned to this permit reviewer on 01/21/2021. An introductory email was sent to the applicant on 01/21/2021. Minor revision project includes adding applicable requirements for a new temporary boiler unit subject to NSPS Db and MACT DDDDD (using OP-UA1 and OP-UA5 forms) and revising an emergency engine unit GRPEMRGGEN (using OP-UA2 form) subject to NSPS IIII and MACT ZZZZ. Revisions to the unit include changing index number from 60IIII-2 to 60IIII-3 and updating OP-UA2 form unit attributes from E368-560 to E560-2237.

At applicant's request, high-level requirements for new temporary boiler unit (01POBLR001) subject to MACT DDDDD were replaced with low-level detailed citations based on OP-REQ3 form submittal. Major NSR Summary Table was revised to include new issuance date for NSR Permit Nos. 146425 and PSDTX1518.

Manually built applicable requirements for unit 01POBLR001 subject to MACT DDDDD were submitted by the applicant using an OP-REQ3 form. An initial WDP was generated which included high-level MACT DDDDD for the boiler unit since errors were noted in the OP-REQ3 submittal during a technical review by the permit reviewer. Applicant was advised on the errors and they submitted a revised OP-REQ3 to correct errors identified by the permit reviewer. High-level citations for MACT 5D were manually deleted and replaced with manually entered low-level citations on the permit side of the IMS.

Manual edits to the Word SOP document were performed in the CAM section of the permit for certain GRP units to remove row entry "Control Device ID No.: N/A Control Device Type: N/A" (e.g., GRPCPECPV). Tan Nguyen, P.E. was contacted regarding the error. Resolution of this is under discussion with the OPS Team Leaders. The error is noticed when one or more of the units in the group don't have a control device, in which case the macro/SQL puts in N/A.

Manual edits to the Word document also include replacing textual descriptors for UFFLARE01 & UFFLARE02 flare units to "Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b)." This change was made to the initial issuance of the SOP in response to a public comment and the change is carried over in this SOP.

Finally, manual edits to the Word document include deleting Ã,Â text improperly inserted by a macro error in the reading of textual description in IMS for O_FUG and U_FUG units subject to MACT YY.

Customized special terms were carried over from the current permit. No new customized special terms were added for this project.

In the SOB, Determination of Applicable Requirements Table, column titled "Changes and Exceptions to DSS", for units subject to MACT FFFF, YY, DDDDD and EEEE and having manually entered low-level citations, previously entered description is carried over from previous SOB to this SOB. New description for unit 01POBLR001 subject to MACT DDDDD is added to the SOB.

No PBR Supplemental Table is included with this or any previous project since the site does not include any units that are authorized under any PBR (including claimed PBRs).

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Delinquent Fee Check

1. The delinquent fee check was performed on 03/26/2021.
2. Were there any delinquent fees owed?..... No

Public Announcement Information

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

Permit reviewer notes:

No public comments were received.

EPA Review

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


Permit reviewer notes:

No EPA comments were received.

IMPORTANT MILESTONES

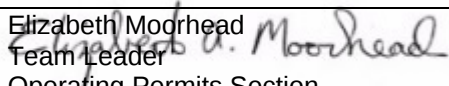
Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	01/06/2021	
Date Project Received by Engineer	01/21/2021	
Technical Review Period	01/21/2021	03/26/2021
Working Draft Permit Reviewed by Applicant	02/24/2021	03/24/2021
Date Rvn-5/Draft Permit Mailed	04/13/2021	
Public Announcement Period	04/20/2021	05/20/2021
EPA Review Period	04/20/2021	06/04/2021

REVISED PERMIT APPROVAL DATE: 06/17/2021


Vasant V. Chaphekar, P.E.
Permit Reviewer
Operating Permits Section
Air Permits Division

06/09/2021

Date


Elizabeth Moorhead
Team Leader
Operating Permits Section
Air Permit Division

06/10/2021

Date

CONTACT INFORMATION

Responsible Official:

Terry Boles
President
Gulf Coast Growth Ventures LLC
1735 Hughes Landing Blvd HLE 07 S185
The Woodlands, Texas 77380-1688
Email: terry@exxonmobil.com

Technical Contact:

Hanh Tran
Environmental Advisor
Gulf Coast Growth Ventures LLC
4589 FM 2986
Gregory, TX 78359-2005
Phone: (281) 425-2652
Email: hanh.m.tran@exxonmobil.com